

Managing Escalation Dynamics with Iran in Syria -- and Beyond

[Michael Eisenstadt](#)

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Given recent frictions, the United States should take a number of steps to reduce the potential for escalation with Tehran and to avoid a broader conflict.

In recent weeks, U.S. forces have clashed in Syria with regime or Iran-supported pro-regime forces on at least a half-dozen occasions. This has raised concerns that with the impending military defeat of the Islamic State in Syria and the scramble to fill the resulting void, the United States may be on a collision course with Syria and its allies -- Iran, Hezbollah, and perhaps Russia. Escalating tensions elsewhere in the region between the United States, its allies, and Iran have compounded these concerns. So while the United States pursues informal "deconfliction" efforts with Russia, it needs to pursue parallel efforts to avoid a broader conflict with pro-regime forces and Iran.

Proliferating Friction Points

Recent U.S. military actions in Syria include a cruise missile strike on the al-Shayrat Air Base following a regime chemical attack on civilians (April 7); the aerial interdiction of Iran-supported pro-regime militias (May 18, June 6 and 8) and armed drones (June 8 and 20) that threatened Syrian rebels and coalition advisors near the border town of al-Tanf; and the downing of a Syrian Su-22 fighter that had attacked Syrian Democratic Forces units near al-Tabqa (June 18).

U.S. officials worry, moreover, that the liberation of Mosul might cause Tehran to conclude that it no longer benefits from the American presence in Iraq, and to encourage its Iraqi proxies to attack U.S. forces there.

Other potential flashpoints include the Persian Gulf, where Iranian warships frequently harass U.S. naval forces; the Golan Heights, where Iran and Hezbollah are creating an infrastructure to attack Israel (an Israeli drone strike there in January 2015 killed an Iranian general and several senior Hezbollah officials); Saudi Arabia and Bahrain, where Iranian claims of Saudi Arabian responsibility for the June 7 Islamic State (IS) attack in Tehran have raised concerns about possible Iranian subversion; and the Bab al-Mandab Strait, where Houthi rebels have attacked foreign warships using Iranian antiship cruise missiles and remotely controlled boat bombs.

The existence of so many friction points has raised fears that a clash (intentional, or accidental -- as when U.S. aircraft bombed Syrian troops in September 2016) might lead to a broader conflict with Iran. What does the past say about avoiding and managing escalation with Iran and its proxies?

Tehran's Risk Calculus

While pursuing anti-status quo policies that cause tension with other states, Iran is generally sensitive to risks and costs, and careful during crises and in dealings with more powerful adversaries such as the United States. It has generally emphasized *reciprocity* (responding in kind, at the level of the perceived transgression) as well as *indirection*, *ambiguity*, and *patience* (relying on proxies to provide standoff and a degree of deniability) in order to manage risk and limit the potential for escalation.

Thus, Tehran has repeatedly sought to avoid costly foreign adventures, even if it meant, in practice, abandoning beleaguered Shia communities -- as it did during the 1991 Shia uprising in Iraq, the 1998 slaughter of thousands of Shia Hazaras and eight Iranian officials by the Afghan Taliban, the 2006 war between Israel and Hezbollah, and the 2011 crackdown on Shia protestors in Bahrain. In each case, Iran responded indirectly via proxies, or after the fact -- sending the Iraqi Badr Brigades to aid the 1991 uprising in Iraq, arming the Afghan Northern Alliance against the Taliban, rebuilding Hezbollah after the 2006 war, and plotting to assassinate the Saudi ambassador in Washington DC in revenge for his country's role in quashing unrest in Bahrain.

In confronting foreign adversaries, Iran has done so directly when it could, and indirectly (through proxies) or by other means (such as terrorism or cyber) when it could not, or when logic dictated that it do otherwise. It has often tested adversary limits, backing off when faced with a firm response and reengaging under more favorable conditions later on. Thus, during the Iran-Iraq War (1980-88), Tehran countered U.S. naval convoys in the Gulf by indirect means (mines) and by attacking unescorted vessels, and when engaged decisively, fought as best it could. Iran was not deterred by U.S. intervention, but was forced to alter its approach and to eventually curtail its activities after a bruising series of encounters with the U.S. Navy.

During the U.S. occupation of Iraq, Iran armed Shiite special groups -- and assisted Sunni insurgents -- that targeted U.S. forces. It responded to a series of sticky bomb attacks on its nuclear scientists by attempting sticky bomb attacks on Israeli diplomats in Georgia, India, and Thailand in February 2012. Between 2011 and 2013, it countered cyberattacks on its nuclear program and economic sanctions with cyberattacks on the U.S. financial sector and Saudi Aramco. More recently, it responded to Saudi support for anti-regime rebels in Syria and other perceived provocations by intensifying its support for the Houthis in Yemen.

Tehran is also tactically flexible; when risks outweigh benefits, it will renege on threats -- though it may renew a challenge at a different place or time. Thus, when the United States returned an aircraft carrier to the Gulf in January 2012 after Tehran warned it against doing so, Iran failed to act, though it subsequently tried to shoot down an American UAV in the Persian Gulf that November and again in March 2013. And more recently, Iraqi proxies of Iran have not acted on past threats to attack U.S. combat forces if they returned to Iraq, as they needed American help to defeat IS.

Despite its general caution, Tehran is occasionally prone to high-risk behavior -- including the Marine barracks bombing in Beirut in 1983 (which it facilitated), the Khobar Towers bombing in Saudi Arabia in 1996, and the bungled plot to assassinate the Saudi ambassador in Washington in 2011. For this reason, interactions with Iran always entail a degree of unpredictability. And when it believes it has the upper hand (as currently seems to be the case, thanks to its successes in Syria), it is prone to press its advantage -- and perhaps to overreach.

The Syrian Cauldron

Iran's intervention in Syria is unprecedented; never before has it sent such large numbers of troops to support combat operations abroad. Yet its performance has been consistent with certain enduring principles: namely, it has avoided major risks, even when developments seemed to jeopardize its core interests. Thus, Iran never committed more than the minimum force needed to keep Syrian president Bashar al-Assad in power. It had some 700 men in Syria prior to its brief surge in late 2015 -- which raised force levels to about 3,000 -- most of whom it withdrew shortly thereafter, having experienced a spike in losses. The number is now believed to be about 1,500, a fraction of 1 percent of its ground forces. (By contrast, the United States deployed about one-third of its ground forces during its 2007-09 surge in Iraq.)

Iran has tried to cut its own losses in Syria by fighting to the last non-Iranian Shia proxy, even when its own forces would have been more effective. And when the tide of war turned against Assad in 2015, Tehran convinced Moscow to intervene, effectively enlisting Russia as a "Great Power proxy." Yet, if decisionmakers in Tehran have been strategically risk averse, Iranian personnel on the ground have been tactically risk acceptant. Iran has lost nearly 500 military personnel in more than five years of fighting in Syria -- though these losses pale in comparison to those of its proxy militias, which include, according to expert Ali Alfoneh, more than 1,900 Iraqis, nearly 1,100 Lebanese Hezbollah (1,700, according to Israeli estimates), nearly 700 Afghans, and nearly 150 Pakistanis.

Although pursuing an increasingly assertive regional policy, Tehran's handling of recent clashes in Syria reflects traditional Iranian caution. Thus, Iran relied on its Shia militia proxies to challenge rebel and coalition forces at al-Tanf. Once these forces were bloodied by U.S. airpower, Iran pulled them back and used armed drones to maintain pressure. They eventually opted to bypass the rebel- and coalition-held enclave. In pushing up against U.S. interests in Syria, Iran has gambled with expendable assets only. And the American tendency to respond proportionally, and somewhat predictably, has enabled Iran to test U.S. limits without incurring significant risk.

Conclusions

As long as Iranian forces operate in Syria and encourage their proxies to target rebel forces and their coalition advisors, a degree of friction and conflict will be inevitable. Yet for decades, the United States and Iran have avoided an open conflict, demonstrating that the potential for escalation may be overstated -- even as complacency is never warranted. To further reduce the potential for escalation, the United States should take a number of steps to influence Tehran -- as well as Damascus -- and avoid a broader conflict with either:

First, the United States should halt mixed messaging that could cause Syria or Iran to miscalculate. The Trump administration has intimated that it is not seeking Assad's departure and is not averse to military operations that enable the regime to regain control over much of Syria. Yet Washington has threatened military action should Damascus resume chemical attacks that enable such operations, and it has countered Iranian activities that, from Tehran's perspective, advance these twin goals. Such ambiguity encourages the type of testing that could lead to further clashes with the Assad regime and its Iranian backers.

Second, the United States should seek broad international support for its redlines in Syria. Iran, for its part, may be less likely to challenge U.S. interests if doing so might alienate key actors in Europe and Asia that Iranian president Hassan Rouhani has been courting. And Washington should continue to engage Moscow as part of its efforts to "deconflict" operations and influence Syria and Iran in order to avoid a broader conflict with Russia and its partners.

Third, redlines must be continually tended to, so that U.S. focus and commitment are not questioned. When tested by Tehran and Damascus, Washington must respond firmly, lest inaction lead to further challenges and possible miscalculation.

Fourth, predictable U.S. responses make it easier for Tehran and Damascus to calibrate risk and reduce the costs of testing American limits. U.S. responses should therefore be unpredictable and should target assets that Tehran and Damascus truly value to introduce uncertainty into their cost-benefit calculus and to exact an unacceptable price for their policy choices.

Fifth, the best way to counter Iran's proxy strategy in Syria is through a U.S. proxy strategy involving a revitalized train-and-equip program for non-Islamist Syrian rebels. This would enable the United States to pressure Tehran and Damascus by indirect means. The goal would be to mire pro-regime forces in a low-level insurgency in areas they currently control; hinder new offensives against rebel-held areas in the east, the south, or Idlib province while reducing the potential for Iranian troublemaking elsewhere in the region; and disrupt Iranian efforts to build a land bridge to the Mediterranean Sea.

Sixth, Washington should consider cost-imposing measures vis-à-vis Iran elsewhere in the region, such as Yemen, to make its intervention there more costly and further stress its overstretched forces. This might reduce Tehran's willingness to challenge U.S. interests in Syria.

Finally, the United States should strengthen policy coordination with its Gulf Arab allies to prevent unilateral steps vis-à-vis Iran and its allies that could adversely affect U.S.-Iran escalation dynamics in Yemen, Syria, or elsewhere. Indeed, Houthi attempts in October 2016 to target U.S. warships using shore-based antiship missiles indicate that this may have already occurred. It is in America's interest to prevent a recurrence.

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**United States Mission to
the United Nations**

Explanation of Vote at the Adoption of UN Security Council Resolution 2370 on Preventing Terrorists from Acquiring Weapons

Ambassador Nikki Haley

U.S. Permanent Representative to the United Nations

U.S. Mission to the United Nations

New York City

August 2, 2017

AS DELIVERED

Thank you, Mr. President, and I want to congratulate you on the Presidency for August and also for starting it off in a very good way, especially for negotiations on something that brings attention to an important issue like this. So we thank you.

We know that terrorists have many ways to get their hands on dangerous weapons. They divert legal weapons transfers. They take advantage of poorly secured stockpiles. They seize weapons on the battlefield. They get them through criminal networks.

This resolution is meant to address the many ways that terrorists acquire weapons. It calls on Member States to do more to strengthen export controls and provide assistance to other countries in destroying excess weapons. It highlights the need for enhancing the physical security of weapons stockpiles and the creation of tracing programs for weapons. It sheds a spotlight on the killing potential of improvised explosive devices. It encourages public-private cooperation to prevent the transfer of IEDs, drones, and light weapons to terrorist organizations. Most importantly, it calls attention to the obligation of all nations – particularly those who profess a concern about weapons falling into the hands of terrorists – to enforce UN arms embargos.

This Council has been clear in prohibiting arms transfers to Yemen, Somalia, and other places. And yet we know weapons continue to flow across borders in open violation of Security Council resolutions. For some Member States, this is an issue of extreme hypocrisy. For all of us, it is an unacceptable stain on this Council's authority that must be removed. It's true that we have made great progress against ISIS and al-

Qa'ida in recent months. We're pleased that regional partners have taken steps to improve their ability to cut off ISIS from financial support and material. But weapons aren't finding their way to terrorists only through some Member States' failure to take action.

One country stands out for its deliberate, systematic contributions of weapons, training, and funding for terrorist groups. One country uses its support for terrorist proxies to conduct its foreign policy and to compensate for its own weakness. That country is Iran. Iran was first designated by the United States as a State Sponsor of Terrorism in 1984. Its training, funding, and arming of terrorists has continued unabated to this day. Terrorist proxies are doing the Iranian regime's will in Iraq and in Syria. Iran also supports Hamas and Bahraini terrorist groups. Through its partner Hizballah, Iran is engaged in preparing for war in Lebanon. It is building an arsenal of weapons and battle-hardened troops.

We applaud the message at the heart of this resolution: that the international community must work together – and do more – to prevent weapons from falling into the hands of terrorists. But I encourage this Council to be aware that weapons don't always just “fall” into the hands of terrorists. Too often they are pushed.

This is the threat we face today in Iran, and it is one that no amount of technical cooperation or security upgrades will diminish. As long as we allow the Iranian regime to violate this Council's prohibitions with impunity, it will be a source of weapons to terrorist groups that will only grow in volume and destructive capability. The United States will continue to raise this issue of Iranian non-compliance with international obligations at every opportunity.

Thank you.

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**United States Mission to
the United Nations**

Remarks at a UN Security Council Briefing on Non-Proliferation in Iran

Ambassador Nikki Haley

U.S. Permanent Representative to the United Nations

U.S. Mission to the United Nations

New York City

June 29, 2017

AS DELIVERED

Thank you Mr. President. Thank you Under-Secretary Feltman, for your briefing today, and Ambassador Almeida, for your comments.

The topic of Iranian regime's compliance with its international obligations reminds me of the fable of the scorpion and the frog. The scorpion asks the frog for a ride across the river. The frog quite rationally asks, "How do I know you won't sting me?" And the scorpion replies, "Because it would kill both of us. We'd both drown." So the frog is convinced. He lets the scorpion get on his back and starts across the river. But sure enough, midway through, the scorpion stings him. With his last breath the frog asks, "Why?" And the scorpion replies, "Because it's in my nature."

The Secretary-General's report is filled with devastating evidence of the nature of the Iranian regime. In paragraph after paragraph, it documents the Iranian government's actions in defiance of Resolution 2231: repeated ballistic missile launches, proven arms smuggling, illicit procurement of ballistic missile-related technology. Iran's destructive and destabilizing role in the Middle East goes far beyond its illicit missile launches. From Syria to Yemen and Iraq to Lebanon, Iran's support for terrorist groups continues unabated. Iran's weapons, military advisors and arms smugglers stoke regional conflicts and make them harder to solve.

Iran's leaders abuse their own people. The Iranian people deserve better. The Iranian people know the horror of chemical weapons attacks. And so it is sad and horrifying, the irony that the Iranian regime now supports a dictator in Syria who uses these same evil weapons against his own people.

But just as alarming as the actions of the scorpion is the gullibility of the frog. It's been almost two years since this Council unanimously adopted Resolution 2231 – a resolution that this report confirms has been repeatedly and deliberately violated by the Iranian regime. And yet the Security Council has failed to take even minimal steps to respond to these violations.

What's more, these violations are not occurring in secret. They are being covered in the media, and yet this Council has done nothing. Let me give an example. Resolution 2231 banned Iranian Major General Soleimani from traveling outside of Iran. It gave all UN Member States a clear and unambiguous obligation to deny him entry. Nonetheless, the Secretary-General's report cites multiple press photos and reports of the general traveling to Syria and Iraq. And this is not the first time he's openly traveled to other countries. This is a violation of the Security Council's authority, plain and simple. And it's one that is occurring out in the open for the entire world to see.

The Secretary General's report makes clear that Iran is in violation of the Security Council Resolution 2231. And so the question becomes: what is the Security Council going to do about it? What will we do to make Iran understand that Resolution 2231 means something? We as the Security Council must stand behind the provisions of 2231. We must strictly enforce them and show Iran that we will not tolerate their egregious flaunting of UN resolutions. These measures are here for a reason. This Council should be here to enforce them.

For our part, the United States will not continue to turn a blind eye to Iranian regime's behavior. In our national capacity, the United States will do our part to enforce Resolution 2231. We will work with our global partners to interdict cargo prohibited under the resolution. And we will continue to impose our own sanctions on those who help violate Resolution 2231. Regarding the portions of the resolution that address the nuclear deal, as we have said previously, the United States is now undertaking a comprehensive review of this policy. Until that review is completed, we will comply with our JCPOA commitments, and we expect Iran to do the same.

The continuance of Iran's destructive, destabilizing behavior will prevent it from ever having a normal relationship with the United States and the rest of the world. And the regime's continued oppression of its own people speaks volumes about its true nature.

At a military parade last September, the Iranian government first displayed the missile it fired into Syria last week. The new missiles were accompanied by a banner that read: "If the leaders of the Zionist regime make a mistake, then the Islamic Republic will turn Tel Aviv and Haifa to dust."

These are not the words of a peace-loving regime. These are not the words of a responsible member of the international community. These are the words of a scorpion. The Security Council must recognize this fact and act accordingly.

Thank you.

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**United States Mission to
the United Nations**

Remarks at a UN Security Council Briefing on UN-EU Cooperation

Ambassador Nikki Haley

U.S. Permanent Representative to the United Nations

U.S. Mission to the United Nations

New York City

May 9, 2017

AS DELIVERED

Thank you, Mr. President, and let me take this opportunity to congratulate you on the presidency. You wear it well, and we look forward to your leadership.

Thank you, Madam High Representative, for your comprehensive briefing.

One of the great honors and pleasures of being the U.S. permanent representative to the UN is working with nations and organizations that share our commitment to freedom, prosperity, and human dignity. We deeply appreciate the European Union and its member states' leadership and cooperation in promoting peace, security, and human rights in Europe and around the world.

Today as we take stock of our global priorities, I am struck by how often the United States and the European Union partner to amplify each other's important efforts.

In Syria, the European Union is a close, reliable partner as we work together to end the conflict there and address the human rights and international humanitarian law violations of the Assad regime.

The humanitarian assistance provided by the European Union and its member states in this crisis and others across the globe has been vital to relieve suffering. This support has complemented U.S. humanitarian assistance to Syria of more than \$6.5 billion since the start of the crisis.

In the longer term, the European Union's commitment to support Syria's reconstruction once a political resolution is reached will be invaluable, not only to the Syrian people but to the region and to the world.

But to get to this point, imposing sanctions on individuals and entities connected to Syria's chemical weapons program is necessary. The United States has sought to expand UN sanctions on known suppliers and facilitators of the Syrian chemical weapons program. We appreciate the European Union's cooperation in levying Syria-related sanctions, but we need to do more. We call on the European Union and the UN to apply more rigorous sanctions to deny Assad and his regime the means to commit further war crimes.

Ukraine is another area in which we have worked effectively together. The European Union has played a critical role in holding Russia accountable for its actions in Ukraine. The United States and the European Union should remain united in our resolve to keep sanctions in place until Moscow fully honors its Minsk commitments.

One of our most fruitful areas of cooperation has been in our effort to bring greater focus on the relationship between human rights and international peace and security.

We commend and share the European Union's emphasis on accountability and its efforts to fight impunity for human rights abuses and violations. Together, we're fighting not only to hold violators accountable but also to ensure that victims receive the proper treatment, care, and justice.

I am hopeful we will begin to see greater support from European Union member states at the Human Rights Council as we work to prevent the ongoing anti-Israel bias in that forum.

We remain deeply concerned about the migrant situation in Libya and the Central Mediterranean region. We recognize the challenges the European Union and its member states – especially Italy – are facing with the continuous flow of refugees. We commend them for their sustained efforts to counter migrant smuggling and human trafficking.

Other bright spots in our partnership are in conflict prevention, security assistance, counterterrorism, and peacebuilding.

In Africa, we commend the European Union's missions on the ground. We also greatly appreciate its partnership with the UN and the U.S. in the nine United Nations missions in Africa, especially in Mali, Somalia, and the Central African region. The European Union's financial contribution to the African Union forces in Somalia in particular has been central to the significant security and political progress there.

Elsewhere in the world, we look forward to additional support from European partners.

In Asia, the European Union has played a key role in support of UN efforts to create the necessary incentives for North Korea to address urgent nonproliferation and humanitarian crises and human rights violations. The only path to a secure and prosperous future for North Korea is to comply fully with all of its obligations under international law. North Korea must abandon its reckless pursuit of weapons of mass destruction, including nuclear weapons. We call on the European Union and all countries to exert maximal pressure on North Korea to change course.

We urge European Union member states to rigorously implement UN Security Council resolutions, impose tough, autonomous measures that go beyond the resolutions, and downgrade diplomatic and economic ties with North Korea. Stronger action on North Korea from the European Union and its member states will assist in securing peace in the region.

With respect to Iran, as well, we look forward to deepened cooperation with the European Union to counter Iran's destabilizing activities and to hold the Iranian government accountable for its actions. UN Security Council Resolution 2231 must be fully implemented, including provisions regarding the transfer of arms and launching of ballistic missiles.

The European Union can and should do more to underscore to Iran that its destabilizing actions in the region, including support for extremist and terrorist groups, must cease.

In closing, the United States shares deep bonds of history and principle with the European Union and its member countries. We reiterate our firm commitment to working closely with you, Madam High Representative, in support of UN priorities. We look forward to continuing our valuable partnership in support of our shared values.

Thank you.

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U.S. Department of State

Diplomacy in Action

After the Deal: A New Iran Strategy

Remarks

Mike Pompeo

Secretary of State

The Heritage Foundation

Washington, DC

May 21, 2018

MS JAMES: Good morning. (Applause.) Welcome to the Heritage Foundation. My name is Kay James and I have the honor of being the president here. It is a pleasure and honor to welcome our distinguished guest, Secretary of State Mike Pompeo, back to Heritage. Yes, I said back. Some of you may remember that then-Congressman Pompeo spoke here on September 9th, 2015. His presence was appreciated, as his topic was timely. It was entitled “A Pathway Forward: An Alternative to the Flawed Iran Nuclear Deal.” And now we have the great pleasure of being with our friend in his new role as Secretary of State for the United States of America. It’s not just a pleasure having him here; it’s truly an honor that he chose Heritage as the site for his first public address as Secretary.

Our scholars here are dedicated to advancing individual freedom and national security, and his presence here is a wonderful affirmation of the positive impact that their work is having. And so to Secretary Pompeo, I’d like to say thank you.

Now, I imagine all who are in this room and watching online know a great deal about Secretary Pompeo, but please allow me to provide just a few highlights from his extraordinary career. Secretary Pompeo graduated first in his class at the United States military academy at West Point, and then served as a cavalry officer patrolling the Iron Curtain before the fall of the Berlin Wall. He also served with the 2nd Squadron, 7th Cavalry in the U.S. Army’s 4th Infantry Division. After leaving active duty, he attended and graduated from Harvard Law School where he served as an editor of the Harvard Law Review. He then had a successful private sector career, founding and serving as CEO of Thayer Aerospace and then becoming president of Sentry International.

Secretary Pompeo’s public service began when he was elected representative of Kansas’s 4th Congressional District, and his distinguished tenure on the Hill included service on the House Intelligence Committee, the Energy and Commerce Committee, and the House Select Benghazi Committee. Recognizing the Secretary’s many talents, President Trump tapped him as director of the CIA, where he served from January 2017 to April 2018. And now, of course, he is our Secretary of State, having been sworn in just three and a half weeks ago.

Last but, of course, never least, Secretary Pompeo is married to Susan Pompeo and has one son, Nick.

Secretary Pompeo, on behalf of the board of trustees, the staff, and all of the friends of the Heritage Foundation, welcome back to home. (Applause.)

SECRETARY POMPEO: Well, good morning, everyone. I first want to thank the Heritage Foundation and its president, Kay Coles James. Thank you for hosting me today. First as a private citizen and then as a member of Congress, and even today, the Heritage Foundation has shaped my thinking on matters of the world and public policy issues. I’m grateful for that excellent work.

And thanks for reminding me I can't talk about anything else but what we're talking about today. (Laughter.) Three years on. But it's an honor to be here.

Two weeks ago, President Trump terminated the United States participation in the Joint Comprehensive Plan of Action, more commonly known as the Iran nuclear deal.

President Trump withdrew from the deal for a simple reason: it failed to guarantee the safety of the American people from the risk created by the leaders of the Islamic Republic of Iran.

No more. No more wealth creation for Iranian kleptocrats. No more acceptance of missiles landing in Riyadh and in the Golan Heights. No more cost-free expansions of Iranian power. No more.

The JCPOA put the world at risk because of its fatal flaws.

And they're worth recounting at some length today, if only for the purpose of ensuring that subsequent arrangements do not repeat them.

For example, the weak sunset provisions of the JCPOA merely delayed the inevitable nuclear weapons capability of the Iranian regime.

After the countdown clock ran out on the deal's sunset provisions, Iran would be free for a quick sprint to the bomb, setting off a potentially catastrophic arms race in the region. Indeed, the very brevity of the delay in the Iranian nuclear program itself incentivized Middle Eastern proliferation.

Moreover, as we have seen from Israel's recent remarkable intelligence operation, Iran has lied for years about having had a nuclear weapons program. Iran entered into the JCPOA in bad faith. It is worth noting that even today, the regime continues to lie.

Just last month, Iranian Foreign Minister Zarif told a Sunday morning news show, "We never wanted to produce a bomb."

This claim – this claim would be laughable if not for the willful deception behind it. Not only did the AMAD Program exist; the Iranians took great care – though, as we can see now, not enough care – to protect, hide, and preserve the work of Mohsen Fakhrizadeh Mahabadi and his gang of nuclear scientists.

The JCPOA had additional shortcomings as well.

The mechanisms for inspecting and verifying Iran's compliance with the deal were simply not strong enough.

The deal did nothing to address Iran's continuing development of ballistic and cruise missiles, which could deliver nuclear warheads.

The JCPOA permitted the Iranian regime to use the money from the JCPOA to boost the economic fortunes of a struggling people, but the regime's leaders refused to do so.

Instead, the government spent its newfound treasure fueling proxy wars across the Middle East and lining the pockets of the Islamic Revolutionary Guard Corps, Hizballah, Hamas, and the Houthis.

Remember: Iran advanced its march across the Middle East during the JCPOA. Qasem Soleimani has been playing with house money that has become blood money. Wealth created by the West has fueled his campaigns.

Strategically, the Obama administration made a bet that the deal would spur Iran to stop its rogue state actions and conform to international norms.

That bet was a loser with massive repercussions for all of the people living in the Middle East.

The idea of the JCPOA as a strategic pillar of stability in the Middle East was captured perfectly by John Kerry when he said, quote, "I know the Middle East that is on fire ... is going to be more manageable with this deal," end of quote.

Query whether the Middle East is more manageable today than it was when they embarked on the JCPOA.

Lebanon is an even more comfortable home for Hizballah today than it was when we embarked on the JCPOA. Hizballah is now armed to the teeth by Iran and has its sights set on Israel.

Thanks to Iran, Hizballah provides the ground forces for the military expedition in Syria. The IRGC, too, has continued to pump thousands of fighters into Syria to prop up the murderous Assad regime and help make that country 71,000 square miles of kill zone.

Iran perpetuates a conflict that has displaced more than 6 million Syrians inside the – 6 million Syrians and caused over 5 million to seek refuge outside of its borders.

These refugees include foreign fighters who have crossed into Europe and threatened terrorist attacks in those countries.

In Iraq, Iran sponsored Shia militia groups and terrorists to infiltrate and undermine the Iraqi Security Forces and jeopardize Iraq's sovereignty – all of this during the JCPOA.

In Yemen, Iran's support for the Houthi militia fuels a conflict that continues to starve the Yemeni people and hold them under the threat of terror.

The IRGC has also given Houthi missiles to attack civilian targets in Saudi Arabia and the Emirates and to threaten international shipping in the Red Sea.

And in Afghanistan, Iran's support to the Taliban in the form of weapons and funding leads to further violence and hinders peace and stability for the Afghan people.

Today, the Iranian Qods Force conducts covert assassination operations in the heart of Europe.

We should remember, too, that during the JCPOA Iran continues to hold Americans hostage: Baquer Namazi, Siamak Namazi, Xiyue Wang, and Bob Levinson, who has been missing for over 11 years.

I will note for the American people, you should know we are working diligently to bring each American missing wrongfully detained in Iran home.

The list continues. Iran continues to be, during the JCPOA, the world's largest sponsor of terror. It continues to serve as sanctuary for al-Qaida, as it has done since 9/11, and remains unwilling to bring to justice senior al-Qaida members residing in Tehran.

Today we ask the Iranian people: Is this what you want your country to be known for, for being a co-conspirator with Hizballah, Hamas, the Taliban, and al-Qaida? The United States believe you deserve better.

And I have an additional point for the Iranian people to ponder. Here in the West, President Rouhani and Foreign Minister Zarif are often held apart from the regime's unwise terrorist and malign behavior. They are treated somehow differently.

The West says, "Boy, if only they could control Ayatollah Khamenei and Qasem Soleimani then things would be great." Yet, Rouhani and Zarif are your elected leaders. Are they not the most responsible for your economic struggles? Are these two not responsible for wasting Iranian lives throughout the Middle East?

It's worth the Iranian people considering, because instead of helping their own citizens, the regime continues to seek a corridor stretching from Iran's borders to the shores of the Mediterranean. Iran wants this corridor to transport fighters and an advanced weapons system to Israel's doorsteps. Indeed in recent months, the IRGC has flown an armed drone into Israeli airspace and launched salvos of rockets into the Golan Heights from Syria. Our steadfast ally has asserted the sovereign right of self-defense in response, a stance the United States will continue to unequivocally support.

So the bet – the bet that the JCPOA would increase Middle East stability was a bad one for America, for Europe, for the Middle East, and indeed for the entire world. It is clear that the JCPOA has not ended Iran's nuclear ambitions, nor did it deter its quest for a regional hegemony. Iran's leaders saw the deal as the starting gun for the march across the Middle East.

So, the path forward. America's commitment to the Iran strategy President Trump laid down in October remains. It will now be executed outside of the JCPOA.

We'll continue to work with allies to counter the regime's destabilizing activities in the region, block their financing of terror, and address Iran's proliferation of missiles and other advanced weapons systems that threaten peace and stability. We will also ensure Iran has no path to a nuclear weapon – not now, not ever.

Following our withdrawal from the JCPOA, President Trump has asked me to achieve these goals on Iran. We'll pursue those goals along several lines of effort.

First, we will apply unprecedented financial pressure on the Iranian regime. The leaders in Tehran will have no doubt about our seriousness.

Thanks to our colleagues at the Department of Treasury, sanctions are going back in full effect and new ones are coming. Last week we imposed sanctions on the head of Iran's central bank and other entities that were funneling money to the IRGC Qods Force. They were also providing money to Hizballah and other terrorist organizations. The Iranian regime should know that this is just the beginning.

This sting of sanctions will be painful if the regime does not change its course from the unacceptable and unproductive path it has chosen to one that rejoins the league of nations. These will indeed end up being the strongest sanctions in history when we are complete.

The regime has been fighting all over the Middle East for years. After our sanctions come in force, it will be battling to keep its economy alive.

Iran will be forced to make a choice: either fight to keep its economy off life support at home or keep squandering precious wealth on fights abroad. It will not have the resources to do both.

Second, I will work closely with the Department of Defense and our regional allies to deter Iranian aggression.

8/20/2018

After the Deal: A New Iran Strategy

We will ensure freedom of navigation on the waters in the region. We will work to prevent and counteract any Iranian malign cyber activity. We will track down Iranian operatives and their Hizballah proxies operating around the world and we will crush them. Iran will never again have carte blanche to dominate the Middle East.

And I'd remind the leadership in Iran what President Trump said: If they restart their nuclear program, it will mean bigger problems – bigger problems than they'd ever had before.

Third, we will also advocate tirelessly for the Iranian people. The regime must improve how it treats its citizens. It must protect the human rights of every Iranian. It must cease wasting Iran's wealth abroad.

We ask that our international partners continue to add their voice to ours in condemning Iran's treatment of its own citizens.

The protests – the protests of the past few months show that the Iranian people are deeply frustrated with their own government's failures.

The Iranian economy is struggling as a result of bad Iranian decisions. Workers aren't getting paid, strikes are a daily occurrence, and the rial is plummeting. Youth unemployment is at a staggering 25 percent.

Government mismanagement of Iran's natural resources has led to severe droughts and other environmental crises as well.

Look, these problems are compounded by enormous corruption inside of Iran, and the Iranian people can smell it. The protests last winter showed that many are angry at the regime that keeps for itself what the regime steals from its people.

And Iranians too are angry at a regime elite that commits hundreds of millions of dollars to military operations and terrorist groups abroad while the Iranian people cry out for a simple life with jobs and opportunity and with liberty.

The Iranian regime's response to the protests has only exposed the country's leadership is running scared. Thousands have been jailed arbitrarily, and at least dozens have been killed.

As seen from the hijab protests, the brutal men of the regime seem to be particularly terrified by Iranian women who are demanding their rights. As human beings with inherent dignity and inalienable rights, the women of Iran deserve the same freedoms that the men of Iran possess.

But this is all on top of a well-documented terror and torture that the regime has inflicted for decades on those who dissent from the regime's ideology.

The Iranian regime is going to ultimately have to look itself in the mirror. The Iranian people, especially its youth, are increasingly eager for economic, political, and social change.

The United States stands with those longing for a country of economic opportunity, government transparency, fairness, and greater liberty.

We hope, indeed we expect, that the Iranian regime will come to its senses and support – not suppress – the aspirations of its own citizens.

We're open to new steps with not only our allies and partners, but with Iran as well. But only if Iran is willing to make major changes.

As President Trump said two weeks ago, he is ready, willing, and able to negotiate a new deal. But the deal is not the objective. Our goal is to protect the American people.

Any new agreement will make sure Iran never acquires a nuclear weapon, and will deter the regime's malign behavior in a way that the JCPOA never could. We will not repeat the mistakes of past administrations, and we will not renegotiate the JCPOA itself. The Iranian wave of destruction in the region in just the last few years is proof that Iran's nuclear aspirations cannot be separated from the overall security picture.

So what should it be? We must begin to define what it is that we demand from Iran.

First, Iran must declare to the IAEA a full account of the prior military dimensions of its nuclear program, and permanently and verifiably abandon such work in perpetuity.

Second, Iran must stop enrichment and never pursue plutonium reprocessing. This includes closing its heavy water reactor.

Third, Iran must also provide the IAEA with unqualified access to all sites throughout the entire country.

Iran must end its proliferation of ballistic missiles and halt further launching or development of nuclear-capable missile systems.

Iran must release all U.S. citizens, as well as citizens of our partners and allies, each of them detained on spurious charges.

Iran must end support to Middle East terrorist groups, including Lebanese Hizballah, Hamas, and the Palestinian Islamic Jihad.

Iran must respect the sovereignty of the Iraqi Government and permit the disarming, demobilization, and reintegration of Shia militias.

Iran must also end its military support for the Houthi militia and work towards a peaceful political settlement in Yemen.

Iran must withdraw all forces under Iranian command throughout the entirety of Syria.

Iran, too, must end support for the Taliban and other terrorists in Afghanistan and the region, and cease harboring senior al-Qaida leaders.

Iran, too, must end the IRG Qods Force's support for terrorists and militant partners around the world.

And too, Iran must end its threatening behavior against its neighbors – many of whom are U.S. allies. This certainly includes its threats to destroy Israel, and its firing of missiles into Saudi Arabia and the United Arab Emirates. It also includes threats to international shipping and destructive – and destructive cyberattacks.

That list is pretty long, but if you take a look at it, these are 12 very basic requirements. The length of the list is simply a scope of the malign behavior of Iran. We didn't create the list, they did.

From my conversations with European friends, I know that they broadly share these same views of what the Iranian regime must do to gain acceptance in the international community. I ask that America's allies join us in calling for the Iranian Government to act more responsibly.

In exchange for major changes in Iran, the United States is prepared to take actions which will benefit the Iranian people. These areas of action include a number of things.

First, once this is achieved, we're prepared to end the principal components of every one of our sanctions against the regime. We're happy at that point to re-establish full diplomatic and commercial relationships with Iran. And we're prepared to admit⁽ⁱ⁾ Iran to have advanced technology. If Iran makes this fundamental strategic shift, we, too, are prepared to support the modernization and reintegration of the Iranian economy into the international economic system.

But relief from our efforts will come only when we see tangible, demonstrated, and sustained shifts in Tehran's policies. We acknowledge Iran's right to defend its people. But not its actions which jeopardize world's citizens.

Also, in contrast to the previous administration, we want to include Congress as a partner in this process. We want our efforts to have broad support with the American people and endure beyond the Trump Administration. A treaty would be our preferred way to go.

Unlike the JCPOA, which was broadly rejected across both sides of the aisle, an agreement that President Trump proposes would surely garner this type of widespread support from our elected leaders and the American people.

In the strategy we laid out today, we want the support of our most important allies and partners in the region and around the globe. Certainly our European friends, but much more than that.

I want the Australians, the Bahrainis, the Egyptians, the Indians, the Japanese, the Jordanians, the Kuwaitis, the Omanis, the Qataris, the Saudi Arabians, South Korea, the UAE, and many, many others worldwide to join in this effort against the Islamic Republic of Iran. I know that those countries share the same goals. They understand the challenge the same way that America does. Indeed, we welcome any nation which is sick and tired of the nuclear threats, the terrorism, the missile proliferation, and the brutality of a regime which is at odds with world peace, a country that continues to inflict chaos on innocent people.

Indeed, while to some the changes in Iranian behavior we seek may seem unrealistic, we should recall that what we are pursuing was the global consensus before the JCPOA.

For example, in 2012, President Obama said, quote, "The deal we'll accept is [that] they end their nuclear program," end of quote. That didn't happen. In 2006, the P5 voted at the Security Council for Iran to immediately suspend all enrichment activities. That didn't happen.

In 2013, the French foreign minister said he was wary of being sucked into a, quote, "con game," end of quote, over allowing Iran to continue uranium enrichment.

In 2015, John Kerry said, quote, "We don't recognize the right to enrich," end of quote. Yet the Iranians are enriching even as we sit here today.

So we're not asking anything other than that Iranian behavior be consistent with global norms, global norms widely recognized before the JCPOA. And we want to eliminate their capacity to threaten our world with those nuclear activities.

With respect to its nuclear activities, why would we allow Iran more capability than we have permitted the United Arab Emirates and that we're asking for the Kingdom of Saudi Arabia? We understand that our reimposition of sanctions and the coming pressure campaign on the Iranian regime will pose financial and economic difficulties for a number of our friends. Indeed, it imposes economic challenges to America as well. These are markets our businesses would love to sell into as well. And we want to hear their concerns.

But we will hold those doing prohibited business in Iran to account. Over the coming weeks, we will send teams of specialists to countries around the world to further explain administration policy, to discuss the implications of sanctions we imposition, and to listen.

I know. I've spent a great deal of time with our allies in my first three weeks. I know that they may decide to try and keep their old nuclear deal going with Tehran. That is certainly their decision to make. They know where we stand.

Next year marks the 40th anniversary of the Islamic Republic – Revolution in Iran. At this milestone, we have to ask: What has the Iranian Revolution given to the Iranian people? The regime reaps a harvest of suffering and death in the Middle East at the expense of its own citizens. Iran's economy is stagnant and without direction and about to get worse. Its young people are withering under the weight of frustrated ambitions. They are longing to pursue the freedoms and opportunities of the 21st century.

Iran's leaders can change all of this if they choose to do so. Ali Khamenei has been supreme leader since 1989. He will not live forever, nor will the Iranian people abide the rigid rules of tyrants forever. For two generations, the Iranian regime has exacted a heavy toll on its own people and the world. The hard grip of repression is all that millions of Iranians have ever known.

Now is the time for the supreme leader and the Iranian regime to summon the courage to do something historically beneficial for its own people, for this ancient and proud nation.

As for the United States, our eyes are clear as to the nature of this regime, but our ears are open to what may be possible. Unlike the previous administration, we are looking for outcomes that benefit the Iranian people, not just the regime.

If anyone, especially the leaders of Iran, doubts the President's sincerity or his vision, let them look at our diplomacy with North Korea. Our willingness to meet with Kim Jong-un underscores the Trump administration's commitment to diplomacy to help solve the greatest challenges, even with our staunchest adversaries. But that willingness, that willingness has been accompanied by a painful pressure campaign that reflects our commitment to resolve this challenge forever.

To the ayatollah, to President Rouhani, and to other Iranian leaders: understand that your current activities will be met with steely resolve.

My final message today is, in fact, to the Iranian people. I want to repeat President Trump's words from October. President Trump said that, "We stand in total solidarity with the Iranian regime's longest-suffering victims: its own people. The citizens of Iran have paid a heavy price for the violence and extremism of their leaders. The Iranian people long to reclaim their country's proud history, its culture, its civilization, and its cooperation with its neighbors."

It is America's hope that our labors toward peace and security will bear fruit for the long-suffering people of Iran. We long to see them prosper and flourish as in past decades and, indeed, as never before.

Today, the United States of America is proud to take a new course towards that objective.

Thank you. (Applause.)

MS JAMES: Thank you so very much. Bold, concise, unambiguous. We appreciate you taking this forum here at the Heritage Foundation to deliver that message. Looking at – and you listed during your speech several of our allies and friends and partners, many of whom are angry, some disappointed. How are you going to bring them on board? How are you going to use your best diplomatic skills to bring them along with us?

SECRETARY POMPEO: These strategic changes in the world come together when countries decide on an objective that is shared, and that always begins with a shared interest and values. I spent the first couple of weeks of my time as Secretary of State working to try to see if there wasn't a way to fix the deal. I spoke with my European counterparts. I traveled there. In my 13th hour as Secretary of State I was on the ground in Brussels speaking with my European counterparts. We couldn't get it done. We couldn't reach agreement there.

The United States intends to work hard at the diplomatic piece of working alongside all of our partners. We focus on the Europeans, but there are scores of countries around the world who share our concerns and are equally threatened by the Iranian regime. It's that shared interest, it's the value set which will ultimately drive, I believe, a global response to this – to the world's largest state sponsor of terror. I'm convinced it can take place. My team is going to work diligently to do that. We're going to do so in the context of trying to address the concerns of all of our partners, and I am convinced that over a period of time there will be a broad recognition that the strategy that President Trump has laid out is the right one that will put Iran in a place where it will one day rejoin civilization in the way that we all hope that it will.

MS JAMES: It's clear through your comments this morning that you truly want tough sanctions. And I think that there is some remaining concern about how are you going to deal with the nuclear concerns. Can you speak to that for just a bit? And let me say to our audience, by the way, that I wish we had more time with the Secretary this morning, and there will be an abrupt and a hard stop because we have to get him out to the CIA and – for the swearing-in ceremony, and we don't want you late for that.

So talk to us about --

SECRETARY POMPEO: I got to go back one more time.

MS JAMES: One more time. (Laughter.)

SECRETARY POMPEO: Look, the nuclear file is imperative. It presents the largest, most severe threat for sure. The JCPOA fell short. It was a delay. Our aim is to get that permanently fixed. I mentioned quickly, right, we ask our other Middle Eastern partners to do hard things. We put a 123 agreement in front of them and say, "This is what you have to do." And they say, "Hey, the Iranians enrich." That's reasonable. That seems to me a reasonable point.

Well, our demands on Iran aren't unreasonable. Give up your program. End it. Should they choose to go back, should they begin to enrich, we're fully prepared to respond to that as well. I'm certainly not going to share with you today precisely what our response will be. But we watch them talk. We've heard them say – I hope that they'll make a different decision, that they'll choose a different path. We welcome them taking a path that other nations in the region are beginning to take as well.

MS JAMES: Well, can you explain for us the sanctions structure and how you intend to target the Iranian regime without hurting our European friends?

SECRETARY POMPEO: Well, any time sanctions are put in place, countries have to give up economic activity. So the Americans have given up economic activity now for an awfully long time, and I'll concede there are American companies who would love to do business with the Islamic Republic of Iran. There's a huge market there. It's a big, vibrant, wonderful peoples. But everyone is going to have to participate in this. Every country is going to have to understand that we cannot continue to create wealth for Qasem Soleimani.

Right, that's what this is. At the end of the day, this money has flowed to him. The economics have permitted them to run roughshod across the Middle East. Our effort is to strangle his economic capacity to do harm to the Middle East and to the world. Nuclear programs aren't cheap. To the extent we are effective at making it more difficult on the Iranian regime, we will reduce their capacity to continue to build out their nuclear weapon system as well.

MS JAMES: You've laid out a very, very bold plan this morning. Do you have a timeframe for getting all this done?

SECRETARY POMPEO: So the sanctions are back in place and are winding down over the next 100 and what, 55 days? There are – there's lots more work in place. It is a effort across all of government. We are working certainly diplomatically in the lead, but Department of Commerce, Department of Defense, each of us has the same mission from President Trump. I can't put a timeline

8/20/2018

After the Deal: A New Iran Strategy

on it. But at the end of the day, the Iranian people will decide the timeline. At the end of the day, the Iranian people will get to make a choice about their leadership. If they make the decision quickly, that would be wonderful. If they choose not to do so, we will stay hard at this until we achieve the outcomes that I set forward today.

MS JAMES: Well, Mr. Secretary, again, on behalf of the Heritage Foundation and the scholars here who have been working on these issues for a very long time, we want to thank you. Again, it was a bold vision – clear, concise, unambiguous – and we want to congratulate you and the President, and we wish you Godspeed.

I am going to ask you to remain seated while the Secretary exits. I have about eight more questions here, but --

SECRETARY POMPEO: For another day.

MS JAMES: For another day.

SECRETARY POMPEO: Thank you all very much for being here.

MS JAMES: Thank you so much. (Applause.)

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REMARKS

Remarks by President Trump on Iran Strategy

NATIONAL SECURITY & DEFENSE

Issued on: **October 13, 2017**



Diplomatic Reception Room

12:53 P.M. EDT

THE PRESIDENT: Thank you very much. My fellow Americans: As President of the United States, my highest obligation is to ensure the safety and security of the American people.

History has shown that the longer we ignore a threat, the more dangerous that threat becomes. For this reason, upon taking office, I've ordered a complete strategic review of our policy toward the rogue regime in Iran. That review is now complete.

Today, I am announcing our strategy, along with several major steps we are taking to confront the Iranian regime's hostile actions and to ensure that Iran never, and I mean never, acquires a nuclear weapon.

Our policy is based on a clear-eyed assessment of the Iranian dictatorship, its sponsorship of terrorism, and its continuing aggression in the Middle East and all around the world.

Iran is under the control of a fanatical regime that seized power in 1979 and forced a proud people to submit to its extremist rule. This radical regime has raided the wealth of one of the world's oldest and most vibrant nations, and spread death, destruction, and chaos all around the globe.

Beginning in 1979, agents of the Iranian regime illegally seized the U.S. embassy in Tehran and held more than 60 Americans hostage during the 444 days of the crisis. The Iranian-backed terrorist group Hezbollah twice bombed our embassy in Lebanon — once in 1983 and again in 1984. Another Iranian-supported bombing killed 241 Americans — service members they were, in their barracks in Beirut in 1983.

In 1996, the regime directed another bombing of American military housing in Saudi Arabia, murdering 19 Americans in cold blood.

Iranian proxies provided training to operatives who were later involved in al Qaeda's bombing of the American embassies in Kenya, Tanzania, and two years later, killing 224 people, and wounding more than 4,000 others.

The regime harbored high-level terrorists in the wake of the 9/11 attacks, including Osama bin Laden's son. In Iraq and Afghanistan, groups supported by Iran have killed hundreds of American military personnel.

The Iranian dictatorship's aggression continues to this day. The regime remains the world's leading state sponsor of terrorism, and provides assistance to al Qaeda, the Taliban, Hezbollah, Hamas, and other terrorist networks. It develops, deploys, and proliferates missiles that threaten American troops and our allies. It harasses American ships and threatens freedom of navigation in the Arabian Gulf and in the Red Sea. It imprisons Americans on false charges. And it launches cyberattacks against our critical infrastructure, financial system, and military.

The United States is far from the only target of the Iranian dictatorship's long campaign of bloodshed. The regime violently suppresses its own citizens; it shot unarmed student protestors in the street during the Green Revolution.

This regime has fueled sectarian violence in Iraq, and vicious civil wars in Yemen and Syria. In Syria, the Iranian regime has supported the atrocities of Bashar al-Assad's regime and condoned Assad's use of chemical weapons against helpless civilians, including many, many children.

Given the regime's murderous past and present, we should not take lightly its sinister vision for the future. The regime's two favorite chants are "Death to America" and "Death to Israel."

Realizing the gravity of the situation, the United States and the United Nations Security Council sought, over many years, to stop Iran's pursuit of nuclear weapons with a wide array of strong economic sanctions.

But the previous administration lifted these sanctions, just before what would have been the total collapse of the Iranian regime, through the deeply controversial 2015 nuclear deal with Iran. This deal is known as the Joint Comprehensive Plan of Action, or JCPOA.

As I have said many times, the Iran Deal was one of the worst and most one-sided transactions the United States has ever entered into. The same mindset that produced this deal is responsible for years of terrible trade deals that have sacrificed so many millions of jobs in our country to the benefit of other countries. We need negotiators who will much more strongly represent America's interest.

The nuclear deal threw Iran's dictatorship a political and economic lifeline, providing urgently needed relief from the intense domestic pressure the sanctions had created. It also gave the regime an immediate financial boost and over \$100 billion dollars its government could use to fund terrorism.

The regime also received a massive cash settlement of \$1.7 billion from the United States, a large portion of which was physically loaded onto an airplane and flown into Iran. Just imagine the sight of those huge piles of money being hauled off by the Iranians waiting at the airport for the cash. I wonder where all that money went.

Worst of all, the deal allows Iran to continue developing certain elements of its nuclear program. And importantly, in just a few years, as key restrictions disappear, Iran can sprint towards a rapid nuclear weapons breakout. In other words, we got weak inspections in exchange for no more than a purely short-term and temporary delay in Iran's path to nuclear weapons.

What is the purpose of a deal that, at best, only delays Iran's nuclear capability for a short period of time? This, as President of the United States, is unacceptable. In other countries, they think in terms of 100-year intervals, not just a few years at a time.

The saddest part of the deal for the United States is that all of the money was paid up front, which is unheard of, rather than at the end of the deal when they have shown they've played by the rules.

But what's done is done, and that's why we are where we are.

Iranian regime has committed multiple violations of the agreement. For example, on two separate occasions, they have exceeded the limit of 130 metric tons of heavy water. Until recently, the Iranian regime has also failed to meet our expectations in its operation of advanced centrifuges.

The Iranian regime has also intimidated international inspectors into not using the full inspection authorities that the agreement calls for.

Iranian officials and military leaders have repeatedly claimed they will not allow inspectors onto military sites, even though the international community suspects some of those sites were part of Iran's clandestine nuclear weapons program.

There are also many people who believe that Iran is dealing with North Korea. I am going to instruct our intelligence agencies to do a thorough analysis and report back their findings beyond what they have already reviewed.

By its own terms, the Iran Deal was supposed to contribute to "regional and international peace and security." And yet, while the United States adheres to our commitment under the deal, the Iranian regime continues to fuel conflict, terror, and turmoil throughout the Middle East and beyond. Importantly, Iran is not living up to the spirit of the deal.

So today, in recognition of the increasing menace posed by Iran, and after extensive consultations with our allies, I am announcing a new strategy to address the full range of Iran's destructive actions.

First, we will work with our allies to counter the regime's destabilizing activity and support for terrorist proxies in the region.

Second, we will place additional sanctions on the regime to block their financing of terror.

Third, we will address the regime's proliferation of missiles and weapons that threaten its neighbors, global trade, and freedom of navigation.

And finally, we will deny the regime all paths to a nuclear weapon.

Today, I am also announcing several major steps my administration is taking in pursuit of this strategy.

The execution of our strategy begins with the long-overdue step of imposing tough sanctions on Iran's Islamic Revolutionary Guard Corps. The Revolutionary Guard is the Iranian Supreme Leader's corrupt personal terror force and militia. It has hijacked large portions of Iran's economy and seized massive religious endowments to fund war and terror abroad. This includes arming the Syrian dictator, supplying proxies and partners with missiles and weapons to attack civilians in the region, and even plotting to bomb a popular restaurant right here in Washington, D.C.

I am authorizing the Treasury Department to further sanction the entire Islamic Revolutionary Guard Corps for its support for terrorism and to apply sanctions to its officials, agents, and affiliates. I urge our allies to join us in taking strong actions to curb Iran's continued dangerous and destabilizing behavior, including thorough sanctions outside the Iran Deal that target the regime's ballistic missile program, in support for terrorism, and all of its destructive activities, of which there are many.

Finally, on the grave matter of Iran's nuclear program: Since the signing of the nuclear agreement, the regime's dangerous aggression has only escalated. At the same time, it has received massive sanctions relief while continuing to develop its missiles program. Iran has also entered into lucrative business contracts with other parties to the agreement.

When the agreement was finalized in 2015, Congress passed the Iran Nuclear Agreement Review Act to ensure that Congress's voice would be heard on the deal. Among other conditions, this law requires the President, or his designee, to certify that the suspension of sanctions under the deal is "appropriate and proportionate" to measure — and other measures taken by Iran to terminate its illicit nuclear program. Based on the factual record I have put forward, I am announcing today that we cannot and will not make this certification.

We will not continue down a path whose predictable conclusion is more violence, more terror, and the very real threat of Iran's nuclear breakout.

That is why I am directing my administration to work closely with Congress and our allies to address the deal's many serious flaws so that the Iranian regime can never threaten the world with

nuclear weapons. These include the deal's sunset clauses that, in just a few years, will eliminate key restrictions on Iran's nuclear program.

The flaws in the deal also include insufficient enforcement and near total silence on Iran's missile programs. Congress has already begun the work to address these problems. Key House and Senate leaders are drafting legislation that would amend the Iran Nuclear Agreement Review Act to strengthen enforcement, prevent Iran from developing an inter- — this is so totally important — an intercontinental ballistic missile, and make all restrictions on Iran's nuclear activity permanent under U.S. law. So important. I support these initiatives.

However, in the event we are not able to reach a solution working with Congress and our allies, then the agreement will be terminated. It is under continuous review, and our participation can be cancelled by me, as President, at any time.

As we have seen in North Korea, the longer we ignore a threat, the worse that threat becomes. It is why we are determined that the world's leading sponsor of terrorism will never obtain nuclear weapons.

In this effort, we stand in total solidarity with the Iranian regime's longest-suffering victims: its own people. The citizens of Iran have paid a heavy price for the violence and extremism of their leaders. The Iranian people long to — and they just are longing, to reclaim their country's proud history, its culture, its civilization, its cooperation with its neighbors.

We hope that these new measures directed at the Iranian dictatorship will compel the government to reevaluate its pursuit of terror at the expense of its people.

We hope that our actions today will help bring about a future of peace, stability, and prosperity in the Middle East -- a future where sovereign nations respect each other and their own citizens.

We pray for a future where young children — American and Iranian, Muslim, Christian, and Jewish — can grow up in a world free from violence, hatred, and terror.

And, until that blessed day comes, we will do what we must to keep America safe.

Thank you, God bless you, and God bless America. Thank you.

8/20/2018

Remarks by President Trump on Iran Strategy

END

1:11 P.M. EDT

**REMARKS**

Remarks by President Trump on the Joint Comprehensive Plan of Action

FOREIGN POLICYIssued on: **May 8, 2018**

Diplomatic Reception Room

2:13 P.M. EDT

THE PRESIDENT: My fellow Americans: Today, I want to update the world on our efforts to prevent Iran from acquiring a nuclear weapon.

The Iranian regime is the leading state sponsor of terror. It exports dangerous missiles, fuels conflicts across the Middle East, and supports terrorist proxies and militias such as Hezbollah, Hamas, the Taliban, and al Qaeda.

Over the years, Iran and its proxies have bombed American embassies and military installations, murdered hundreds of American servicemembers, and kidnapped, imprisoned, and tortured American citizens. The Iranian regime has funded its long reign of chaos and terror by plundering the wealth of its own people.

No action taken by the regime has been more dangerous than its pursuit of nuclear weapons and the means of delivering them.

In 2015, the previous administration joined with other nations in a deal regarding Iran's nuclear program. This agreement was known as the Joint Comprehensive Plan of Action, or JCPOA.

In theory, the so-called “Iran deal” was supposed to protect the United States and our allies from the lunacy of an Iranian nuclear bomb, a weapon that will only endanger the survival of the Iranian regime. In fact, the deal allowed Iran to continue enriching uranium and, over time, reach the brink of a nuclear breakout.

The deal lifted crippling economic sanctions on Iran in exchange for very weak limits on the regime’s nuclear activity, and no limits at all on its other malign behavior, including its sinister activities in Syria, Yemen, and other places all around the world.

In other words, at the point when the United States had maximum leverage, this disastrous deal gave this regime — and it’s a regime of great terror — many billions of dollars, some of it in actual cash — a great embarrassment to me as a citizen and to all citizens of the United States.

A constructive deal could easily have been struck at the time, but it wasn’t. At the heart of the Iran deal was a giant fiction that a murderous regime desired only a peaceful nuclear energy program.

Today, we have definitive proof that this Iranian promise was a lie. Last week, Israel published intelligence documents long concealed by Iran, conclusively showing the Iranian regime and its history of pursuing nuclear weapons.

The fact is this was a horrible, one-sided deal that should have never, ever been made. It didn’t bring calm, it didn’t bring peace, and it never will.

In the years since the deal was reached, Iran’s military budget has grown by almost 40 percent, while its economy is doing very badly. After the sanctions were lifted, the dictatorship used its new funds to build nuclear-capable missiles, support terrorism, and cause havoc throughout the Middle East and beyond.

The agreement was so poorly negotiated that even if Iran fully complies, the regime can still be on the verge of a nuclear breakout in just a short period of time. The deal’s sunset provisions are totally unacceptable. If I allowed this deal to stand, there would soon be a nuclear arms race in the Middle East. Everyone would want their weapons ready by the time Iran had theirs.

Making matters worse, the deal’s inspection provisions lack adequate mechanisms to prevent, detect, and punish cheating, and don’t even have the unqualified right to inspect many important

locations, including military facilities.

Not only does the deal fail to halt Iran's nuclear ambitions, but it also fails to address the regime's development of ballistic missiles that could deliver nuclear warheads.

Finally, the deal does nothing to constrain Iran's destabilizing activities, including its support for terrorism. Since the agreement, Iran's bloody ambitions have grown only more brazen.

In light of these glaring flaws, I announced last October that the Iran deal must either be renegotiated or terminated.

Three months later, on January 12th, I repeated these conditions. I made clear that if the deal could not be fixed, the United States would no longer be a party to the agreement.

Over the past few months, we have engaged extensively with our allies and partners around the world, including France, Germany, and the United Kingdom. We have also consulted with our friends from across the Middle East. We are unified in our understanding of the threat and in our conviction that Iran must never acquire a nuclear weapon.

After these consultations, it is clear to me that we cannot prevent an Iranian nuclear bomb under the decaying and rotten structure of the current agreement.

The Iran deal is defective at its core. If we do nothing, we know exactly what will happen. In just a short period of time, the world's leading state sponsor of terror will be on the cusp of acquiring the world's most dangerous weapons.

Therefore, I am announcing today that the United States will withdraw from the Iran nuclear deal.

In a few moments, I will sign a presidential memorandum to begin reinstating U.S. nuclear sanctions on the Iranian regime. We will be instituting the highest level of economic sanction. Any nation that helps Iran in its quest for nuclear weapons could also be strongly sanctioned by the United States.

America will not be held hostage to nuclear blackmail. We will not allow American cities to be threatened with destruction. And we will not allow a regime that chants "Death to America" to gain

access to the most deadly weapons on Earth.

Today's action sends a critical message: The United States no longer makes empty threats. When I make promises, I keep them. In fact, at this very moment, Secretary Pompeo is on his way to North Korea in preparation for my upcoming meeting with Kim Jong-un. Plans are being made. Relationships are building. Hopefully, a deal will happen and, with the help of China, South Korea, and Japan, a future of great prosperity and security can be achieved for everyone.

As we exit the Iran deal, we will be working with our allies to find a real, comprehensive, and lasting solution to the Iranian nuclear threat. This will include efforts to eliminate the threat of Iran's ballistic missile program; to stop its terrorist activities worldwide; and to block its menacing activity across the Middle East. In the meantime, powerful sanctions will go into full effect. If the regime continues its nuclear aspirations, it will have bigger problems than it has ever had before.

Finally, I want to deliver a message to the long-suffering people of Iran: The people of America stand with you. It has now been almost 40 years since this dictatorship seized power and took a proud nation hostage. Most of Iran's 80 million citizens have sadly never known an Iran that prospered in peace with its neighbors and commanded the admiration of the world.

But the future of Iran belongs to its people. They are the rightful heirs to a rich culture and an ancient land. And they deserve a nation that does justice to their dreams, honor to their history, and glory to God.

Iran's leaders will naturally say that they refuse to negotiate a new deal; they refuse. And that's fine. I'd probably say the same thing if I was in their position. But the fact is they are going to want to make a new and lasting deal, one that benefits all of Iran and the Iranian people. When they do, I am ready, willing, and able.

Great things can happen for Iran, and great things can happen for the peace and stability that we all want in the Middle East.

There has been enough suffering, death, and destruction. Let it end now.

Thank you. God bless you. Thank you.

(The presidential memorandum is signed.)

Q Mr. President, how does this make America safer? How does this make America safer?

THE PRESIDENT: Thank you very much. This will make America much safer. Thank you very much.

Q Is Secretary Pompeo bringing the detainees home?

THE PRESIDENT: Thank you. Secretary Pompeo is, right now, going to North Korea. He will be there very shortly in a matter of virtual — probably an hour. He's got meetings set up. We have our meeting scheduled. We have our meeting set. The location is picked — the time and the date. Everything is picked. And we look forward to having a very great success.

We think relationships are building with North Korea. We'll see how it all works out. Maybe it will, maybe it won't. But it can be a great thing for North Korea, South Korea, Japan and the entire world. We hope it all works out.

Thank you very much.

Q Are the Americans being freed?

Q Are the Americans coming home, Mr. President?

THE PRESIDENT: We'll all soon be finding out. We will soon be finding out. It would be a great thing if they are. We'll soon be finding out. Thank you very much.

END

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Human rights situation that require the attention of the Council

Report of the Special Rapporteur on the situation of human rights in the Islamic Republic of Iran***Summary*

The present report is submitted to the Human Rights Council pursuant to resolution 31/19. The report communicates developments in the human rights situation of the Islamic Republic of Iran that have transpired since the submission of the report of the former Special Rapporteur to the 71st session of the General Assembly in October 2016.

During its 33rd session, the Human Rights Council appointed Ms. Asma Jahangir as Special Rapporteur on the situation of human rights in the Islamic Republic of Iran.

The present report outlines the Special Rapporteur's activities since her appointment by the Human Rights Council, examines ongoing issues, and presents some of the most recent and pressing developments in the country's human rights situation.. It is envisaged that a number of important issues not covered in the present report will be addressed in the Special Rapporteur's future reports to the General Assembly and the Human Rights Council.

* The present report was submitted after the deadline as a result of consultations with the State concerned.

** The annex to the present report is circulated in the language of submission only.

Contents

	<i>Page</i>
I Introduction.....	3
A. Methodology	4
II. Civil and political rights.....	4
A. Right to life.....	4
B. Right to be free from torture or cruel, inhuman or degrading treatment or punishment.....	7
C. The independence of the legal profession and the judiciary.....	8
D. Right to a fair trial	10
E. Freedom of expression, opinion, and access to information.....	12
F. Freedom of association, assembly, and human rights defenders	13
G. Right to a fair trial	15
III. Women's Rights.....	16
IV. Conclusion and recommendations	19
Annex	
List of Baha'i Prisoners	22

I. Introduction

1. The Human Rights Council appointed Ms. Asma Jahangir as Special Rapporteur on the situation of human rights in the Islamic Republic of Iran during its 33rd Session.

2. Since her appointment, the Special Rapporteur has received a high number of communications and held various consultations with civil society organizations including non-governmental organizations, intellectuals, lawyers and victims. With the view to ensuring continuity of the reporting on the situation of human rights in Iran, the Special Rapporteur has also taken into account the communications sent by her predecessor since the submission of his last report to the General Assembly. The present report therefore covers the period from June to December 2016. Comments were received from the Government of the Islamic Republic of Iran and some integrated which were related to factual information. The Special Rapporteur is grateful for this input and looks forward to future cooperation in this regard.

3. The Special Rapporteur takes note of the Iranian government's improved engagement with the special procedures through increased dialogue with her predecessor, and by way of invitations in 2015 to the Special Rapporteurs on the right to food and on the negative impact of unilateral and coercive measures on the enjoyment of human rights to visit the country.¹ She notes however that the Government has still not accepted the requests made since 2002 by the Special Rapporteurs on the independence of lawyers and judges; extrajudicial, summary or arbitrary executions; freedom of religion or belief; minority issues; and the protection of the right to freedom of opinion and expression; as well as requests from the Working Groups on the issue of discrimination against women in law and in practice, on Enforced or Involuntary Disappearances and on Arbitrary Detention.²

4. The Special Rapporteur regrets that her study of information she received does not reveal any notable improvement in the situation of human rights in the country. She notes that the situation in areas like independence of judiciary and lawyers, freedom of expression and use of arbitrary detentions continues to be a matter of serious concern. Some measures are underway but their implementation and effectiveness is yet to be assessed.

5. On 19 December 2016, President Hassan Rouhani signed and published the final version of the Citizens' Rights Charter and called on the Government to work towards its full implementation. The Charter contains 120 articles and covers a wide array of rights ranging from freedom of opinion, expression and press, access to information, judicial justice, minority and ethnic rights, fair trial and women's rights. According to the Charter, the president will appoint a special assistant for coordinating and pursuing appropriate measures to implement the Charter. He must also submit annual reports on progress towards implementation of the Charter.³ The Special Rapporteur is encouraged by this policy and hopes that it will be implemented in a way that promote a genuine participation of all components of the Iranian civil society.

A. Methodology

6. The Special Rapporteur notes that any assessment of the human rights situation in any country requires an understanding of the effect of laws, policies, and practices on the

¹ See OHCHR:

http://spinternet.ohchr.org/_Layouts/SpecialProceduresInternet/ViewCountryVisits.aspx?Lang=en

² Ibid.

³ <http://dolat.ir/detail/286714>; <http://www.dailymail.co.uk/wires/afp/article-4047800/Irans-Rouhani-unveils-landmark-bill-rights.html>.

enjoyment of human rights. In the current report, the Special Rapporteur therefore extensively refers to the existing legal and policy framework. She also makes reference to the recommendations made by the international human rights mechanisms.

7. Four treaty bodies, the Committee on the Elimination of Racial Discrimination, the Human Rights Committee, the Committee on Economic, Social and Cultural Rights and the Committee on the Rights of the Child have considered reports presented by the Government since 2010 and made specific recommendations to the Government. According to the Government, they received 291 recommendations; 131 were accepted, 59 were partially supported and 101 were rejected.⁴

8. The current report also presents information relayed by apparent victims of rights violations and civil society actors located inside and outside the country as well as information provided by the Iranian government. A total of 33 communications sent by the Special Rapporteur jointly with other special procedures mandate holders were addressed to the Government in 2016. Of these, five were sent by the new mandate holder. These communications addressed cases of torture and ill treatment, executions, violations of the guarantees for fair trials, arbitrary arrests and detention of journalists, lawyers and human rights activists, the persecution of religious minorities, and reprisals against individuals for their contact with United Nations human rights mechanisms. The Government responded to 21 of these communications.

9. In December, the Special Rapporteur held her first consultations with civil society representatives. She also met with representatives of the Government of the Islamic Republic of Iran in Geneva and expressed her willingness to visit the country in the framework of her mandate. A visit by the Special Rapporteur, particularly at this juncture where the citizens of Iran are under internal and external pressure would be mutually beneficial for all concerned parties..

II. Civil and political rights

A. The right to life

10. The Iranian Government received a total of 29 and 41 recommendations related to its use of capital punishment during the first and second cycles of its UPR in 2010 and 2014, respectively. Recommendations include calls on the Iranian Government to abolish the death penalty for juvenile offenders; establish a moratorium on the death penalty for crimes not considered “most serious” by international standards; establish a moratorium on the use of capital punishment; and ban stoning and public executions. None of these recommendations, to date, have received effective follow-up. Death penalty under the drug abuse laws are only executed after approval of the Chief Justice or the Attorney General.

11. Human rights organizations tracking executions in the Islamic Republic of Iran estimate that at least 530 executions took place in 2016. As in previous years, the majority of these executions were for not the “most serious” drug-related offences, .

12. The Special Rapporteur takes note of her predecessor’s concern regarding reports alleging that drug offenders are often deprived of basic due process and fair trial rights. This includes long periods of incommunicado and pretrial detention, lack of adequate access to a lawyer and/or to a proper defence, allegations that drug offenders are subjected to beatings and coerced confessions which are later used in revolutionary courts to secure their death

⁴ It should be noted that the United Nations considers all recommendations that are not accepted in their entirety (i.e. “partial acceptances”) as rejections.

sentences. She observes that the recently amended Criminal Procedure Code which mandates that all death sentences, including those for drug offences be reviewed by the Supreme Court does not seem to have led to any significant change in this respect.

13. The Special Rapporteur is also concerned about the continued practice of public execution, which has already been documented in several past reports of her predecessor as well as of the Secretary General. It is reported that some executions took place in public places in the presence of children, this has however been denied by the State Party. According to some non-governmental sources, most of the public executions are attended by large crowds, which include children. This shows that the serious concerns expressed by the Committee on the Rights of the Child about the impact on children of these executions have so far been disregarded.

14. Reportedly two executions took place in August 2016. In both instances, basic international human rights fair trial standards and due process guarantees were reportedly disregarded⁵.

15. The Islamic Republic of Iran has reportedly executed the highest number of juvenile offenders in the world during the past decade. Despite an absolute ban on the practice under international law, the penal code continues to explicitly retain the death penalty for boys of at least fifteen lunar years of age and girls of at least 9 lunar years for qisas (retribution in kind) or hudud crimes, like homicide, adultery or sodomy⁶. As a result of the 2013 amendments to the penal code, judges are now required to assess the mental capacity of juvenile offenders before issuing a death sentence to determine if they understood the consequences of their actions at the time they committed hudud-related crimes.⁷ In January 2015, Iran's Supreme Court issued a ruling requiring that all courts retroactively apply the new amendment for cases adjudicated prior to 2013 if juvenile defendants petition for a retrial of their capital sentences.⁸ Amendments to the penal code in 2013 also repeal capital punishment for juveniles found guilty of violating drug-related offences.

16. In the concluding observations it issued in January, the Committee on the Rights of the Child (CRC) expressed great concern about the ongoing execution of juveniles, and called on the Iranian government to rescind reservations that sanction judicial disregard of CRC provisions. It also called on the Government to define juveniles as anyone under the age of 18, in line with CRC standards, and to raise the age of criminal responsibility without discriminating between boys and girls.⁹

17. At least five young men who were below the age of 18 at the time of their alleged offence were executed in 2016, namely Hoshang Zare, Mehdi Rajaei, Khaled Kordi, Moslem Abarian, and Hasan Afshar. In December, three others, namely Mr. Salar Shadizadi, Mr. Vali Yousef Zehi and Mr. Himan Ouraminejad were reportedly at imminent risk of execution for crimes they allegedly committed while they were below the age of 18. Mr. Salar Shadizadi, had reportedly been granted a retrial in early 2016 after the authorities halted his scheduled execution. However, he was later considered by a criminal court "mentally mature" at the time of the crime and reportedly resented to death. The Government of the Islamic Republic of Iran informed the Special Rapporteur that the death verdict against Himan Ouraminejad was cancelled following an agreement between the concerned families. According to the Government, others were commuted on compassionate grounds.

⁵ See <http://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=20425&LangID=E>.

⁶ Articles 146-47 of the Islamic Penal Code.

⁷ Article 91 of the Islamic Penal Code.

⁸ <http://www.rrk.ir/Laws/ShowLaw.aspx?Code=2460>.

⁹ CRC/C/IRN/CO/3-4 paras 28, 35, 36, 48 and 92.

18. According to non-governmental sources, the vast majority of executions of persons convicted as juveniles are not officially reported by the Government.¹⁰ The figures of convicted children are not known but there are definitely over 78 on death row as of December 2016. Some of them have been languishing for years under a death sentence..

19. Mr. Mohammad Reza Haddadi, who was convicted for a crime he allegedly committed when he was 15 and sentenced to death in 2004, has been on death row for the last 12 years and was spared execution a fourth time in May 2016. The Government informed the Special Rapporteur that that he was arrested and prosecuted on charges of kidnapping, intentional murdering, and hiding the body of the victim and sentenced to Qisas and 16 years of imprisonment.

20. As a result of the 2013 amendments to the penal code, judges are now required to assess the mental capacity of juvenile offenders before issuing a death sentence to determine if they understood the consequences of their actions at the time they committed hudud-related crimes. The Special Rapporteur was informed that the criteria used by courts to assess mental capacity vary widely and is inconsistently applied by courts throughout the country.¹¹ Fifteen children were sentenced to death for the first time under the revised juvenile sentencing guidelines of the 2013 Islamic Penal Code.

21. Mr. Alireza Tajiki was sentenced to death in 2013 after a criminal court convicted him for the murder and rape of a friend which he allegedly committed when he was 15 years old. Mr. Tajiki was reportedly placed in solitary confinement for 15 days, denied access to a lawyer and allegedly subjected to torture and other forms of ill treatment. In 2014, the Supreme Court quashed the conviction and sentence due to lack of evidence and ordered the trial court to determine Mr. Tajiki's maturity. In November 2014, the trial court determined whether the defendant had the requisite "mental maturity" during the commission of the crime. In February 2015, the Supreme Court affirmed the lower court's ruling. In May 2016, Mr. Tajiki, aged 19 years was at risk of execution. The Government informed the Special Rapporteur that the prosecutor had issued an order to suspend the retribution verdict until further notice and that efforts were being made to obtain the consent of the family of the murdered victim. They indicated that the process of fair trial had been completely observed, including effective access to private attorneys. No information was provided in response to the allegations that Mr. Tajiki was submitted to torture and ill treatment and at the time of writing this report, the situation of this young man was unknown.

22. The Special Rapporteur is aware that on 16 July 2016, the Government introduced legislation called the "Juveniles and Children's Criminal Procedure Bill" to the parliament for review. According to Note No. 3 of Article 33 of this bill, the judiciary should consider an alternative punishment of two to eight years' imprisonment in a juvenile correctional facility for juvenile offenders convicted of crimes that carry the death penalty or life imprisonment.¹² The Special Rapporteur welcomes this initiative but regrets that limited developments towards the adoption of this law were observed during the second half of 2016.

23. International human rights standards ratified by Iran impose an absolute ban on the execution of persons who were under 18 at the time of their offence, regardless of the circumstances and nature of the crime committed. The Special Rapporteur urges the Government to establish an immediate moratorium on the executions of persons convicted while they were under the age of 18, to accelerate the adoption process of the Juveniles and Children's Criminal Procedure Bill and to commute all death sentences handed down on minors to sentences in line with international juvenile justice standards.

¹⁰ <https://www.amnesty.org/en/documents/mde13/3112/2016/en/>.

¹¹ *Ibid.*

¹² http://rc.majlis.ir/fa/legal_draft/show/981094

B. Right to be free from torture or cruel, inhuman or degrading treatment or punishment

24. The Government accepted none of the 20 recommendations regarding torture and other forms of cruel, inhumane punishments submitted during the 2014 UPR circle.

25. The Special Rapporteur notes as positive the adoption of article 197 of the Code of Criminal Procedure, which explicitly acknowledges the right of the accused to remain silent during preliminary investigations, and of article 60, which explicitly prohibits the use of coercion, obscene/derogatory language, suggestive/deceptive or irrelevant questioning. However, she noticed that forms of torture are not defined in Iranian law and that the new code has not established the necessary procedures for investigating torture allegations.

26. Since her appointment, the Special Rapporteur has received numerous reports about the use of torture and other cruel, inhuman or degrading treatment or punishment. This includes the continued use of amputations,¹³ blinding and floggings as a form of punishment,¹⁴ reliance on physical and mental torture or ill-treatment to coerce confessions (mostly during pre-trial detention), use of prolonged period in solitary confinement and the denial of access to proper and necessary medical treatment for detainees. Rights groups have documented at least two amputations¹⁵, one blinding and several flogging sentences in 2016¹⁶.

27. According to official Iranian media, the Government carried out a blinding sentence in November in one of the prisons near Tehran. The same month, authorities reportedly blinded both eyes of a man from Kurdistan province identified as “Mohammad Reza” as punishment for throwing lime into the eyes of a child which blinded her¹⁷. In December, finger amputation sentences were carried out for two men detained in Orumieh Prison on charges of robbery. Seventy prisoners were allegedly forced to watch the sentence¹⁸. The Government has denied these allegations.

28. In November, Mr. Keywan Karimi, a prominent Kurdish filmmaker was orally summoned to present himself to receive a flogging sentence of 223 lashes. He had been sentenced in October 2015 to six years of imprisonment on the charge of “insulting Islamic sanctities” in connection with a music video clip the authorities found on his hard drive; and to 223 lashes on the charge of “illicit relations falling short of adultery” for “shaking hands” and “being under one roof” with a female friend “who had not covered her head and neck”. In its response, the Government indicates that Mr. Karimi was charged with insult against sanctities, sentenced to 5 years of imprisonment on the basis of article 513 of the Islamic Penal Code.

29. As highlighted in past reports, the Government rejects the notion that amputations and floggings amount to torture and maintained that they are effective deterrents to criminal activity. It also reported that 4,332 complaints alleging rights violations were submitted in the past four years, including torture and ill treatment, and that “only a small percentage” warranted action. No specific information was however provided regarding prosecutions or convictions of individuals alleged to be involved in the torture or ill treatment of detainees.

¹³ Articles 217-88 of the Islamic Penal Code.

¹⁴ See A/71/418 para. 22.

¹⁵ <https://hra-news.org/fa/uncategorized/a-5594>.

¹⁶ <http://www.isna.ir/news/95030703729>.

¹⁷ <https://iranhr.net/en/articles/2698/>.

¹⁸ <https://www.hra-news.org/2016/hranews/a-9009> - / (Human Rights Activists in Iran – Dec. 26, 2016).

30. The Special Rapporteur, as her predecessor, also received numerous documented cases of persons allegedly subjected to torture and ill treatment with the view to extracting confessions from them. The practice of prolonged period in solitary confinement was documented in various reports of the Special Rapporteur's predecessor. There are also numerous reports and instances where prisoners were deprived of family visits and/or of medical care.

31. In a report it published in July 2016, a non-governmental source highlighted 18 cases of denial of medical treatment¹⁹ and indicated that the objective of this practice was to intimidate and punish political prisoners and prisoners of conscience. More than a half of the 16 communications sent by the Special Rapporteur to the Iranian authorities during the second half of 2016, include allegations of denial of medical treatment.

32. In the case of Ms. Akbari Monfared, who was serving a 15 years in prison in relation to her membership in the banned opposition group known as the People's Mojahedin Organization of Iran (PMOI), the denial of medical treatment reportedly took place after she published a letter demanding justice for her brothers and sisters who were reportedly executed in 1988. The Government responded to most of these cases indicating that prisoners were in good health condition and that they were benefiting from proper health and medical facilities.

33. In June, Ms. Narges Mohammadi, a prominent human rights activist went on her hunger strike for 20 days to regain access to her children. According to the Government, she was sentenced to one year in prison for propaganda against the system, five years in prison for assembly and colluding against the national security, and ten years for establishing and running an unlicensed and illegal group. Based on Article 134 of Islamic Penal Code, the sentences run concurrently, and thus she is serving ten years' imprisonment. In December, Ms. Nazanin Ratcliffe a British-Iranian charity worker whose detention was considered as arbitrary by the United Nations Working Group on Arbitrary Detention²⁰, was reportedly pressured to choose between moving her two-year-old daughter into prison or signing a document renouncing all her rights regarding her child²¹.

C. The independence of the legal profession and the judiciary

34. The Special Rapporteur notes that international standards recognize that lawyers shall be entitled to form and join self-governing professional associations to represent their interests" and that these associations shall exercise their functions without external interference.²² Independence of lawyers and the legal profession is essential for the promotion and protection of human rights and a fair administration of justice.

35. On 13 July 2016, the Government introduced a bill called the Bill of Formal Attorney ship that has been under consideration by the Parliament for several years and could severely compromise the independence of the Iranian Bar Association.²³ In once again 2012, the International Bar Association and the Special Rapporteur's predecessor expressed concern over the content of this bill.

¹⁹ http://www.amnestyusa.org/sites/default/files/mde_13.4196.2016_health_taken_hostage_-_cruel_denial_of_medical_care_in_irans_prisons_final.pdf.

²⁰ <http://www.ohchr.org/Documents/Issues/Detention/Opinions/Session76/28-2016.pdf>.

²¹ <http://www.amnestyusa.org/get-involved/take-action-now/urgent-action-update-prisoner-of-conscience-not-allowed-visits-from-daughter-iran-ua-11716-0>.

²² <http://www.ohchr.org/EN/ProfessionalInterest/Pages/RoleOfLawyers.aspx>.

²³ http://rc.majlis.ir/fa/legal_draft/show/982984.

36. The legal profession is not independent as the Law on attorney qualifications enacted in 1997 gives the judiciary the authority to vet and exclude candidates from holding a post in the bar associations. Reportedly dozens of prominent lawyers have been rejected from contesting elections to the board of directors of the bar association by the Supreme Disciplinary Court of Judges.

37. At least 50 lawyers have reportedly been prosecuted since June 2009 for representing prisoners of conscience, political detainees or “national security” prisoners. On 20 May 2016, the Special Rapporteur’s predecessor and other United Nations experts issued a joint statement expressing concern about the situation of lawyers and human rights defenders, serving heavy sentences for their peaceful activities or simply for carrying out their professional duties. The experts noted that in addition to detaining human rights lawyers, their continued targeting and harassment by the authorities had apparently “forced some lawyers to limit their professional activities or leave the profession altogether.”²⁴

38. Among the lawyers the statement referred to was Mr. Soltani who was jailed in 2012, the same year, he received the International Bar Association Human Rights Institute’s award. The Government informed that Mr. Soltani was sentenced to 10 years of imprisonment for formation and management of an illegal organization and one year of imprisonment for act of Propagation against the Islamic Republic of Iran, five years of imprisonment for acting against security of the country through assembly and collusion with the aim of disturbing national security and one year imprisonment for obtaining money through illegitimate means. The Government added that Mr. Soltani misused his position as an attorney and was sentenced to disbarment for twenty years, following completion of his imprisonment. The Government denied that Mr. Soltani was deprived of family visits and adequate medical care. The Special Rapporteur regrets that the Iranian society is losing its valuable talent and people of integrity to the confines of prisons in the country.

39. The question of the separation of powers remains an obstacle for the independence of the judicial system. The judiciary plays a vital role in interpreting often vaguely defined national security law. However this role can only be undertaken effectively if the rules for the appointments of members of the judiciary are transparent and made on the criteria of competence and integrity. It has been widely reported that judges are often handpicked and influenced by the executive branch of the State. The Iranian judiciary has parallel forms of system. The public courts have general jurisdiction over all disputes whilst specialized courts, such as revolutionary courts, military courts, the special clerical courts, the high tribunal for judicial discipline and the court of administrative justice have functional areas of specialization.

D. Right to a fair trial

40. In early 2013 a revised version of the Penal Code was implemented for an experimental period of five years and in June 2015 amendments were made to the new Criminal Procedure Code. The Special Rapporteur takes note of her predecessor’s conclusion that “the amended provisions, if properly implemented, could remedy some of the problems raised by the human rights mechanisms”, including concerns expressed by member states during the Government’s 2010 and 2014 cycles of the UPR. During the 2014 UPR cycle, the Government received 13 recommendations related to fair trial standards and judicial independence. She notes, however, that many of the code’s provisions violate Iran’s

²⁴ The Government accepted three recommendations out of 16 regarding human rights defenders during its 2014 UPR.

obligations under international human rights law, and that the implementation of certain of the new provisions have not yet resulted in better respect for the right to a fair trial.

41. According to international law, any substantive grounds for arrest or detention must be prescribed by law and should be defined with sufficient precision to avoid overly broad or arbitrary interpretation or application. The Special Rapporteur's predecessor observed that a number of offences are vaguely and broadly defined. These include crimes such as: "crimes against God,²⁵ insulting or cursing the Holy Prophet (PBUH), consensual heterosexual or same-sex relations between adults,²⁶ corruption on earth (*efsad-e-fel-arz*)²⁷ and apostasy."²⁸ Individuals convicted of some of these crimes are not generally allowed to seek a pardon or have their sentences commuted, in contravention of international law.

42. Other articles in the Penal Code that restrict the peaceful exercise of a range of other civil and political rights integral to the facilitation of democratic processes in the country often fall under the category of *ta'zir* crimes. These acts are considered to be in conflict with religious or State interests, but have no specific penalties under Shari'a law. These include article 513, which criminalize "insults" against the "Islamic sanctities," article 514 which criminalizes "insults" directed at the first Supreme Leader, and article 609 criminalizing insults to other government officials. *Ta'zir* provisions also criminalize "national security offences" for which political dissidents are often tried and convicted. These provisions are often so vague and broadly worded that they allow the government to severely limit speech and punish peaceful assembly and association. The risk of arbitrariness is further exacerbated by the lack of independence of the judiciary.

43. The Special Rapporteur observes from the cases brought to her attention that in many instances, the right to anyone arrested to be promptly informed about the charges against him or her is disrespected. The Special Rapporteur also notes that individuals may be arrested without being shown a warrant. Several such cases where individuals and their families were not provided with information regarding the reasons and circumstances of their arrest or their whereabouts were reported to her during the reporting period. Often, those who are called in for interrogation had no idea of the identity of those who had initiated the investigation against them.

44. The Special Rapporteur notes that one of the most important achievements of the Criminal Procedure Code is improved protections for access to legal counsel, especially during the interrogation of suspects by either law enforcement or judiciary officials. Article 48 of the CPC provides that the accused can request access to counsel as soon as he is approached by law enforcement officials or during criminal proceedings, and article 190 of the Code guarantees the right of the accused to access a lawyer during preliminary investigations.²⁹ The law calls for defendants to be informed of these rights before the

²⁵ <https://www.hrw.org/report/2012/08/28/codifying-repression/assessment-irans-new-penal-code>.

²⁶ Articles 221-41 of the Islamic Penal Code.

²⁷ Islamic Penal Code, Article 286.

²⁸ Apostasy is not specifically codified as a crime in the Islamic Penal Code but is a hudud crime under Shari'a law. Iran's judiciary can issue sentences based on apostasy pursuant to Article 167 of the constitution and 220 of the CPC.

²⁹ <https://www.amnesty.org/en/documents/mde13/2708/2016/en/>. Under the old code discretion was given to judges to decide whether to allow the involvement of a lawyer during the investigation phase in national security cases or in cases where he determined that such involvement would result in "corruption." In practice, this meant that individuals accused of national security crimes were almost never granted the right to a lawyer during the investigation and pretrial phase, rendering them vulnerable to abuse such as ill-treatment, torture, coerced confessions or enforced disappearance by law enforcement forces, Intelligence Ministry officials or others. Article 33 of the Criminal Procedure Code (1999).

investigation begins, and if he is summoned, the right to access to lawyer must be mentioned in the summons. Violations of these rights, or failure to communicate them to the accused will result in disciplinary action, but will not impact the admissibility of evidence obtained under these conditions.³⁰ Article 190 of the Code states that the court must appoint a lawyer for persons accused of capital crimes or offenses that incur sentences of life imprisonment if the accused fails to retain one themselves. The State is not bound to appoint lawyers for other serious cases.³¹

45. The Special Rapporteur is concerned that individuals accused of national security, capital, political or press crimes, and those accused of offences that incur life sentences, are required to select their counsel from an official pool of lawyers chosen by the Head of the Judiciary during the investigative phase of the trial.³² Indeed, the code allows for restrictions on defendants' access to evidence gathered in support of allegations in national security cases.³³ These restrictions constitute major impediment to realizing due process and fair trial rights.³⁴ It also infringes upon the independence of the legal profession.

46. Among the cases brought to the attention of the Government, the case of Mr. Baquer raises serious concern as to the right to a fair trial. Mr. Baquer Namazi, aged 80, is a retired Iranian provincial governor of the Khuzestan province and retired official who has served as the UNICEF representative in several countries. In February 2016, he was arrested in Tehran by Iranian security agents and taken to Evin prison. At the time of his arrest, he was visiting Tehran to try and secure his son's release, Siamak Namazi, who had been arrested in October 2015. Both of them hold dual Iranian-American citizenship. In October 2016, Iranian authorities had still not made the charges against Mr. Siamak Namazi public and no formal charges had been presented against his father. Neither of them allegedly had access to their lawyers, nor were they allowed to communicate regularly with their family. Although no response was received from the Government, the Special Rapporteur learnt that Tehran Prosecutor Abbas Jafari Dolatabadi confirmed on 16 October 2016 that the Namazis and three others had been sentenced to 10 years in prison each for "espionage and collusion with an enemy state", "the United States."

47. Between 2015 and 2016, the United Nations Working Group on Arbitrary Detention ruled that the detention of seven individuals, namely Mr. Mohammad Reza Pourshajari, Mr. Jason Rezaia, Ms. Zeinab Jalalian³⁵, Ms. Bahareh Hedayat, Mr. Mohammad Hossein Rafiee Fanoood, Ms. Nazanin Zaghari-Ratcliffe and Mr. Robert Levinson, was arbitrary³⁶. For all

³⁰ Article 190, note 1 of the CPC (2015). It is important to note that prior to the latest round of amendments to the CPC, this note said that any investigation resulting from the violation of the right to allow the accused access to a lawyer would be "null and void." Last-minute amendments changed this and instead provided for punishment of judicial officials and others who violate this right.

³¹ Article 190, note 2 of the CPC (2015). This requirement does not, however, exist for other heavy punishments such as amputations and long-term prison sentences.

³² Article 48, note, of the Criminal Procedure Code (2015).

³³ Article 191 of the CPC (2015).

³⁴ <https://www.amnesty.org/en/documents/mde13/2708/2016/en/>.

³⁵ The government claims that she was pardoned and is now free.

³⁶ <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G15/166/59/PDF/G1516659.pdf>.
<https://documents-dds-ny.un.org/doc/UNDOC/GEN/G16/048/62/PDF/G1604862.pdf>.
http://www.ohchr.org/Documents/Issues/Detention/Opinions/Session75/Opinion_2016_1_Iran.pdf.
http://www.ohchr.org/Documents/Issues/Detention/Opinions/Session75/Opinion_2016_2_Iran.pdf.
<http://www.ohchr.org/Documents/Issues/Detention/Opinions/Session76/25-2016.pdf>.
<http://www.ohchr.org/Documents/Issues/Detention/Opinions/Session76/28-2016.pdf>.
http://www.ohchr.org/Documents/Issues/Detention/Opinions/Session77/A-HRC-WGAD-2016-50_en.pdf.

these cases, the Working Group judged that international guarantees of a fair trial were disrespected. The Working Group also concluded that the arrest and detention of five of them was directly linked to the exercise of their right to freedom of opinion and expression. At the time of drafting this report, only Ms. Bahareh Hedayat had been released from jail.

E. Freedom of expression, opinion, and access to information

48. The Government accepted 3 recommendations (out of 16) regarding freedom of expression during its 2014 UPR. They included recommendations to amend laws to uphold the internationally guaranteed rights of free speech and a free press and to guarantee the protection of civil and political rights for all, in particular dissidents and members of minority groups.³⁷ The Government however rejected a number of them indicating that they were “contrary to the country’s fundamental values, Islamic tenets, and the Constitution.”³⁸

49. The Special Rapporteur welcomes the declaration made by President Rouhani in November about the necessity for news media to feel safe while doing their jobs and notes that similar declaration had been made in the past. While this recognition at the highest level is obviously of a great importance, it does not seem to have yet translated into concrete measures to guarantee the freedom of the press. On the contrary, threats against press freedom have continued to be reported during the second half of 2016.

50. On 18 May 2016, Iran’s parliament adopted the Political Crimes Bill, which mandates the Judiciary to prosecute such crimes in open court, before a jury. Certain provisions of this law, including Article 1 appear to criminalize attempts to “reform the country’s policies,” and Article 2 reaffirms the Government’s authority to criminalize the “publication of lies,” as well as insults or defamation against government officials such as the president and his deputies, the head of the judiciary, and parliamentary members.³⁹ Moreover, the Special Rapporteur is aware that the Government is reportedly preparing to introduce two bills to parliament, which, if passed, could further erode press freedom and freedom of expression in the country. The first bill is designed to replace the current restrictive Press Law, and the second would establish a state organization to rival independent journalists. Some journalists see it as an attempt to bring all media outlets and journalists under direct state control.⁴⁰

51. The Special Rapporteur has received reports, as did her predecessor, indicating that the Government continues to sentence individuals for the legitimate exercise of these rights. The second half of 2016 has been marked by a new series of arrests and detention of journalists, writers, social media activists and human rights defenders. In August, an appeal court in the city of Saveh upheld a lower court decision that Mohammad Reza Fathi a blogger and journalist should receive 459 lashes because of his posts about city officials.⁴¹ **Under Articles 609 and 698, of the Islamic Penal Code, criticizing government officials or publishing false news is punishable by 74 lashes. The government however drew the attention of the Special Rapporteur to the fact that “in Iran insulting committed leaders,**

³⁷ A/HRC/14/12.

³⁸ Islamic Republic of Iran Universal Periodic Review, 2014. Responses to Recommendations. http://www.upr-info.org/sites/default/files/document/iran_islamic_republic_of/session_20_-_october_2014/recommendations_and_pledges_iran_2014.pdf.

³⁹ <http://www.reuters.com/article/us-iran-politics-idUSKCN0V20P9>. It is important to note that these actions are already criminalised in the Islamic Penal Code and other laws such as the Press Law. This bill, however, would allow defendants the right to a jury trial in open court if it is determined that the crimes they committed qualify as “political.”

⁴⁰ <https://www.iranhumanrights.org/2016/10/hassan-rouhani-government-bills-to-restrict-media/>

⁴¹ <https://rsf.org/en/news/press-freedom-violations-recounted-real-time-january-december-2016>

great personalities and thinkers, is unthinkable and many countries including Iran have criminalised such insulting behaviours”.

52. As of 13 December 2016, at least 24 journalists, bloggers and social media activists were reportedly either in detention or sentenced for their peaceful activities as of 13 December 2016 and reports suggest that many others are regularly subjected to interrogations, surveillance and other forms of harassment and intimidation.⁴² The Special Rapporteur has also received reports indicating that the Government continues to place restrictions on access to information by filtering websites, intimidating and prosecuting Internet users, bloggers and social media activists, and throttling Internet speeds. According to these reports, some 5 million websites remain blocked in the country, with the top 500 blocked websites dedicated to the arts, social issues, news and other popular culture issues.

F. Freedom of association, assembly, and human rights defenders

53. In a joint statement issued in May, the Special Rapporteur’s predecessor and several other experts expressed outrage at the 16 years sentence handed down to Ms. Narges Mohammadi, a prominent human rights defender who was prosecuted for her membership in a group that advocates for the abolition of the death penalty. Ms. Mohammadi had previously been jailed in connection with her activities on behalf of the Center for Human Rights Defenders, an organization formerly headed by Nobel Peace Laureate Shirin Ebadi’s which was shut down by the Government in 2008.

54. Ms. Golrokh Ebrahimi Iraee and her husband, Mr. Arash Sadeghi, both human rights activists were imprisoned in June and October 2016. They were arrested in 2014 by men believed to be members of the Revolutionary Guard who reportedly did not show any arrest warrant. Mr. Sadeghi was reportedly subjected to torture during interrogation while Ms. Ebrahimi was reportedly subjected to secret detention, solitary confinement for 20 days and hours of interrogation during which she could hear her husband being verbally abused. Both were denied access to a lawyer during interrogations as well as before the Revolutionary Court in Tehran. Mr. Sadeghi was sentenced to a 15-year prison sentence in Evin Prison for charges which include “spreading propaganda against the system”, “gathering and colluding against national security” and “insulting the founder of the Islamic Republic”. The evidence presented to support the charges against him consists of printed copies of his Facebook messages and emails to journalists and human rights activists abroad. Ms. Iraee was charged with “insulting the sacred” and “propaganda against the state” on the allegation that she had written an unpublished fictional story about a protagonist who burned the Koran after watching a film about stoning in Iran, in addition to several of her Facebook posts. She was given a 5-year prison sentence. In December 2016, Mr. Sadeghi ended a 71-day hunger strike after his wife was released on bail. However, despite his critical medical condition he was reportedly denied specialized medical care outside the prison. According to the Government, Ms. Golrokh Ebrahimi received Islamic clemency and went on leave.

55. In August, responding to a communication sent in April by several experts, the Government indicated that Ms. Mohammadi had been sentenced to only five years in prison, and that her numerous offences of law have nothing to do with her legal social activity and the above-mentioned verdict is issued based on legal standards, the claim of her arbitrary arrest is also incorrect and refuted.” The Special Rapporteur was however informed that on 18 May 2016, Branch 15 of the Revolutionary Court sentenced Mohammadi to ten years in prison for “membership in the [now banned] Step by Step to stop the Death,” and five years

⁴² Reporters Without Borders: <http://www.rsf-persan.org/article17582.html>.

for “assembly and collusion against national security,” and one year for “propaganda against the state”, a sentence that was upheld by the Appeals Court in September 2016.

56. In October, 15 members of the Parliament sent a letter calling on to Judiciary Chief Ayatollah Sadegh Larijani to reverse her sentence.⁴³ The Parliamentarians described Mohammadi as a person who “has for years worked for women’s rights” and argued that “issuing such sentences against critics would only raise the cost of constructive criticism, isolate critics and drive society into stagnation”. They also pointed out that she was the mother of two young children and was suffering from various life-threatening illnesses. At the end of the year however, no measure had been taken to release Narges Mohammadi. Moreover, it was reported that the director of public relations for the governor’s office in Qazvin, 89 miles (143 kms) northwest of Tehran, was arrested for inviting friends online to support the release of the human rights activist.⁴⁴ He was released a few hours later after posting 15-million-tomans bail (\$4,700 USD).

57. Several other human rights defenders were jailed in 2016 and many were still incarcerated at the end of the year. Mr. Ali Shariati and Saeed Shirzad, both went on hunger strike in protest of their five-year prison sentences for peaceful activism reportedly related to participation in a non-violent protest to condemn acid attacks against women and defending children’s rights, respectively.⁴⁵ In November, Ms. Atena Daemi, an anti-death penalty campaigner, was reportedly brutally taken away from her parents’ home to begin serving a seven-year prison sentence she received in relation to her numerous activities against the death penalty.

58. In November, a cleric, son of one of Iran’s founding revolutionaries was sentenced to several years in prison after he released a decades-old audio tape in which his father denounced the mass execution of political prisoners during the summer of 1988. Mr. Ahmad Montazeri was arrested on charges of “acting against the national security” and “releasing a classified audio file”. He was also charged for “propaganda against the system”. Mr. Montazeri’s father, a Grand Ayatollah, was one of few Iranian leaders to voice opposition to the reported 1988 execution of thousands of political dissidents who had already been tried and sentenced to prison in detention facilities throughout the country.⁴⁶

59. In addition to lawyers and human rights defenders, the Special Rapporteur takes note of restrictions on the freedom of association and assembly of workers and labor activists who are often not allowed to establish independent unions.⁴⁷ Although the Government has allowed an increasing number of peaceful gatherings by workers protesting unpaid wages and other conditions, arrest and detention of labor union leaders and activists are not uncommon.

60. In October, prominent teachers’ rights activists and union leaders Mr. Jafar Azimzadeh, Mr. Esmail Abdi and Mr. Mahmoud Beheshti-Langeroudi were summoned back to prison for their peaceful activism on national security-related charges such as “assembly and collusion against the national security” and “propaganda against the State”.⁴⁸ The same month, an Iranian court reportedly sentenced worker’s rights activists Mr. Jafar Azimzadeh and Mr. Shapour Ehsani Rad to 11 years in prison each for the participation in labour

⁴³ <http://www.isna.ir/news/95072514536/شود-اعمال-محمدی-مخبر-چرونده-نگار-محمدی-اعمال-شود>.

⁴⁴ <https://www.iranhumanrights.org/2016/12/iranian-official-arrested-for-supporting-release-of-imprisoned-human-rights-activist/>.

⁴⁵ <http://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=21071&LangID=E#sthash.X4h2UtKF.dpuf>

⁴⁶ <http://www.isna.ir/news/95090704435/ابلاغ-شد-حکم-احمد-منتظری-ابلاغ-شد>.

⁴⁷ The Government accepted eight recommendations (out of 13) regarding labor rights during its 2014 UPR.

⁴⁸ <https://www.iranhumanrights.org/2016/11/three-summoned-the-union-activist/>.

unions.⁴⁹ In December, members of one of Iran's oldest labor unions peacefully demanding their past due housing allowances and other benefits in front of the Tehran municipality building were violently attacked by anti-riot police.⁵⁰

G. Right to take part in the conduct of public affairs

61. On 21 November 2016, the Parliament passed a law regulating the activities of political parties. The law prohibits parties from operating until they obtain two permits from a five-member commission comprising members of Parliament, the judiciary, and the Interior Ministry. The law requires applicants to submit, among other things, details of their views about cultural, economic, social, political, administrative and legal issues in the country. Applicants are also required to explicitly state their adherence to the constitution and the principle of *velayat-e faqih* in their manifestos and founding documents, and inform the Interior Ministry at least 72 hours before any gatherings or demonstrations. Article 5 of the law provides a list of categories of individuals who are prohibited from membership in political parties, including individuals suspected of being spies by security and intelligence forces.⁵¹

62. In December, the trial of seven former reformist politicians who had been charged with "assembly and collusion against national security" and "membership in an illegal group" began in a Tehran revolutionary court.⁵² On 5 November 2016, two days before their originally scheduled trial date, the defendants sent a letter to parliament criticizing the judiciary for targeting political opposition members through the use of vaguely-defined national security law, and for denying them fundamental due process rights including adequate access to lawyers. The seven senior members of the now-banned reformist political party, the Islamic Iran Participation Front (IIPF, also known as *Hezb-e Mosharekat*) are Mr. Mohammad Reza Khatami, Mr. Mohammad Naimipour, Mr. Mohsen Safaie Farahani, Mr. Hamidreza Jalaiepour, Mr. Hossein Kashefi, Mr. Ali Shakouri-Rad and Mr. Azar Mansouri.⁵³

63. The Special Rapporteur notes that former presidential candidates and opposition figures, Messrs. Hossein Mousavi and Mehdi Karroubi, and Ms. Zahra Rahnavard, will have soon spent six full years under house arrest in the absence of charges. Security and intelligence forces placed the opposition figures under house arrest in February 2011 after they protested against the results of the disputed 2009 presidential election.⁵⁴

III. Women's Rights

64. The Government accepted 27 of 60 recommendations regarding the rights of women during its 2014 UPR review. They included recommendations on gender discrimination, early marriage, access to health and education, political and economic participation, and domestic violence. However, it rejected recommendations aimed, inter alia, at ensuring equal

⁴⁹ Two Labor Rights Activist Sentenced to 11 Years in Prison for Peaceful Activism." International Campaign on Human rights in Iran. (19 Oct, 2016) <https://www.iranhumanrights.org/2016/10/jafar-azimzadeh-and-shapour-ehsani-rad>

⁵⁰ <https://www.iranhumanrights.org/2016/12/labor-protest-police-intervention/>.

⁵¹ <http://dolat.ir/detail/285644>.

⁵² <http://www.mehrnews.com/news/3840476/>- رسیدگی به اتهامات ۷ عضو سابق جبهه مشارکت - طرح ایرادات کیفر خواست

⁵³ <https://www.iranhumanrights.org/2016/11/7-reformers-activists/>.

⁵⁴ A/HRC/25/61 para. 77(c).

rights and opportunities for women and girls (138.100) or at ensuring equal treatment of women in law and practice (138.105).

65. The Special Rapporteur regrets that no progress has been made towards the ratification of the Convention on the Elimination of Discrimination against Women and the elimination of legal provisions, which discriminate women in various fields. It is particularly disturbing that blatantly discriminatory provisions such as those contained in the penal code which stipulates that the value of a woman's life is equal to half of a man's⁵⁵ remain in force in the country. Of concern is also possible adoption of new discriminatory legal provisions against women.

66. While noting that some positive aspects of the law on the Reduction of Office Hours Act for Women with Special Circumstances⁵⁶ adopted by the Parliament in July 2016, which reduces the working hours of women from 44 to 36 hours a week without reducing their salaries, fears have been expressed that this law would unintentionally erect barriers allowing women to enter or remain in the workforce and would primarily affect women heads of household, those with children under the age of seven and women with children or spouses with disabilities or incurable and chronic diseases⁵⁷. Attempts by the Vice-President for Women and Family Affairs, Ms. Mowlaverdi to introduce draft language covering men in similar situations were ultimately rejected by the parliament.⁵⁸

67. In August, Iran's newly elected parliament re-introduced the controversial "Comprehensive Population and Family Excellence Plan" which aim is to "increase the pregnancy rate to 2.5 percent of the quantitative population growth until the year 2025 and requires public and private sector employers to give hiring preference to men compared to women and prohibits hiring "single individuals" to faculty positions in all public and private education and research institutions"⁵⁹. Of concerns is also the "Plan to Protect Hijab and Modesty" which, if adopted, would restrict women's right to work by limiting working hours from 7am to 10 pm and mandate gender segregation in the workplace.⁶⁰

68. After years of implementation of an effective family planning education program, the "Bill to Increase Fertility Rate and Prevent Population Decline" (Bill 446)⁶¹ foresees to outlaw surgical contraception, restrict access to contraception, ban the provision of information on contraceptive methods, and reduce funding for government family planning programs.⁶²

69. In November, intelligence forces allegedly arrested women's rights activist Alieh Motlabzadeh for attending a workshop in the nearby country of Georgia. At the writing of this report, she had been released on bail and was awaiting further court proceedings. Ms. Motlabzadeh was among at least 20 women's rights activists interrogated by authorities for

⁵⁵ Article 550 of the Islamic Penal Code.

⁵⁶ <http://www.iranhumanrights.org/2016/07/bill-to-reduce-the-working-hours-of-women/>.

⁵⁷ http://www.rc.majlis.ir/fa/legal_draft/state/847722.

⁵⁸ <http://www.isna.ir/fa/news/93042413829/>.

⁵⁹ http://rc.majlis.ir/fa/legal_draft/show/845276.

⁶⁰ Report of the Special Rapporteur on the situation of human rights in the Islamic Republic of Iran. (p. 16, #57). 12 March 2015.

⁶¹ Guardian Council's Research Centre, The Bill to Increase Fertility Rates and Prevent Population Decline. 7 October 2014. <http://www.shora-rc.ir/portal/File/ShowFile.aspx?ID=f0eed7e0-66ec-4a02-8c3e-151f96ef0ae8>.

⁶² Joint Letter in support of the 2016 UNGA Resolution on the Promotion and Protection of Human Rights in the Islamic Republic of Iran. Impact Iran. 12 December 2016. <http://impactiran.org/joint-ngo-letter-in-support-of-2016-unga-resolution-on-hr-in-iran/>

participation in this workshop⁶³. Earlier in 2016, several women, who had been involved in the 2015 campaign for increased representation of women in the parliamentary election were summoned for long, intensive interrogations by the Revolutionary Guards. At the end of 2016, Mr. Ali Shariati was still on hunger strike in protest against the five-year sentence he received on charge of acting against national security after participating, in 2014, in a protest against acid attacks, which had occurred in the city of Isfaha and had left at least seven women permanently disfigured. It seems that at the end of the year none of the perpetrators of the attacks had been apprehended.

70. Child marriage remains legally possible for girls aged 13 and for boys aged 15. Even younger children can be married with the permission of the court but the marriage may not be consummated until puberty. In June, a spokesperson for the Tehran-based Association to Protect the Rights of Children stated that child marriages had reached alarming levels and stressed that approximately 17 percent of all marriages in the country involve girls married with old men. Forced marriages are though prohibited by law

71. Discriminatory laws and regulations that require women to observe the Islamic dress code, or hijab, continue to be enforced by security and law enforcement officials but also by citizens in accordance with the 2015 legislation. It says that “Plan to protect promoters of virtue and presenters of vice” empowers ordinary Iranian citizens to enforce laws that prohibit acts considered to be vices under sharia, including enforcement of the hijab.⁶⁴ Security Commander for the Boushehr region announced in June in official media that 64 000 women had received warning for “bad hijab”⁶⁵. Through a social media campaign launched in July, Iranian men started protesting against women compulsory veiling and advocating for change. While this campaign received a lot of support, authorities reaffirmed on several occasions the need to strictly monitor compliance with hijab rules. Women who appear without an Islamic *hijab* continue to risk arrest and imprisonment of between 10 days and two months, or a fine of up to 500,000 rials. Such encouragement by the government gives rise to vigilantes, who harass and intimidate women.

72. The Special Rapporteur notes that the Iranian legal framework fails to adequately protect women from violence and to criminalize marital rape. She notes that certain provisions might even condone sexual abuse, such as article 1108 which obliges wives to fulfill the sexual needs of their husbands at all times. Similar concerns apply to provisions such as articles 301 and 612, of the 2013 Islamic Penal Code, which provide for lighter punishment if a murder is committed by a father or paternal grandfather of the victim and even allows judges to release the perpetrator without any punishment. These provisions, as observed by the Committee on the Rights of the Child, pave the way for total impunity in the case of killings in the name of so-called honour.

IV. Ethnic and Religious Minority Rights

73. The Special Rapporteur notes that the Government accepted only two of 25 recommendations regarding ethnic and religious minorities during its 2014 UPR.

74. The Special Rapporteur is particularly concerned “at the continuing systematic discrimination, harassment, and targeting of adherents to the Baha’i faith.” She notes that discrimination against the Baha’i community in Iran is legally sanctioned by a lack of

⁶³ International Campaign of Human Rights in Iran (29 Nov. 2016).

<https://www.iranhumanrights.org/2016/11/womens-rights-activist-arrested/>.

⁶⁴ <http://www.shora-rc.ir/Portal/File/ShowFile.aspx?ID=b19d40ae-ef4e-44ff-b556-fcb9bfff4758>.

⁶⁵ <http://mahboobha.ir/tag/>.

constitutional recognition and the absence of other legal protections for adherents of this faith.

75. There are currently 90 Baha'is in prison⁶⁶, all reportedly detained on false charges related solely to their religious beliefs and practices. The list includes seven Baha'i leaders who received ten year sentences and currently remain in prison for allegedly "disturbing national security," "spreading propaganda against the regime," and "engaging in espionage." Their arrests in 2008, and sentencing in 2010, provoked an international outcry.⁶⁷

76. On 25 September 2016, Mr. Farhang Amiri, a Baha'i, was murdered outside his home in the central city of Yazd by two young men who were later arrested and confessed they attacked him because he was a Baha'i.⁶⁸

77. In addition to arbitrary arrests, detentions and prosecutions of Baha'is, authorities continue reportedly continue to destroy the community's religious sites and cemeteries while pursuing activities that economically deprive Baha'is of their right to work. This policy is in line with a 1991 directive issued by the Supreme Council of the Cultural Revolution that calls on the authorities to systematically prevent the integration, progress and success of Iran's Baha'i community.⁶⁹ These policies include restrictions on types of businesses and jobs Baha'i citizens can have, shuttering and blacklisting of Baha'i-owned businesses, pressure on business owners to dismiss Baha'i employees, and seizures of businesses and property. In November, for example, authorities indefinitely shuttered dozens of businesses owned by Baha'is after some owners closed their establishments to honour the birthdays of two of the Faith's holiest figures.⁷⁰

78. The Special Rapporteur also expresses her concern regarding the targeting and harsh treatment of Iranian Christians from Muslim backgrounds and members of various Sufi groups, including the Nematollahi Gonabadi order and members of Yarsan (also known as Ahl-e Haq), considered "deviant faiths" by the authorities and some members of the clerical establishment.⁷¹ These groups continue to face arbitrary arrest, harassment and detention, and are often accused of national security crimes such as "acting against the national security" or "propaganda against the state." Under Iranian law, individuals, including Christians of Muslim backgrounds, can be prosecuted for the crime of apostasy although the crime is not specifically codified as a crime in the Islamic Penal Code. The Special Rapporteur notes that apostasy laws clearly contravene Iran's obligation to protect the right to freedom of religion or belief.

79. Violations of the rights of ethnic minorities continue to be reported in the country. Almost one fifth of the executions that took place in Iran in 2016 concerned Kurdish prisoners.⁷² Among those executions, 21 were related to the crime of "moharebeh" (serious offences, caused by a lethal weapon) and one to the membership in a Kurdish political party. Kurdish political prisoners are said to represent almost half of the total number of political prisoners in Iran.

80. The Special Rapporteur is seriously concerned about the alleged indiscriminate and blind use of lethal force towards Kurdish Kulbaran, which could be related to their ethnic

⁶⁶ See report annex.

⁶⁷ <https://www.bic.org/8-years/profiles-seven-imprisoned-iranian-bahai-leaders#xoKGJ3RpGYIT1LOu.97>.

⁶⁸ <https://www.bic.org/focus-areas/situation-iranian-bahais/current-situation#SS37IS7E7ePA5SHh.99>.

⁶⁹ <http://news.bahai.org/documentlibrary/TheBahaiQuestion.pdf>.

⁷⁰ <https://www.iranhumanrights.org/2016/11/bahai-life-rights-karaj/>

⁷¹ <https://www.hrw.org/news/2013/07/24/iran-sufi-activists-convicted-unfair-trials>.

⁷² Annual Report on Human Rights Violations in Kurdistan 2016 -Association for Human Rights in Kurdistan of Iran-Geneva

affiliation. The Kulbaran are Kurdish couriers who engage in smuggling commodities at the border. Due to the high rate of unemployment in Kurdistan provinces, this activity is generally the only way for them to provide for themselves and their family. In 2016, Iranian border security forces reportedly killed 51 kulbars and injured 71 others, which is about twice as much as the previous year.

V. Conclusions and Recommendations

81. Since her appointment, the Special Rapporteur was contacted by a large number of Iranians both outside and inside the country. She is extremely disturbed by the level of fear of those who tried to communicate with her. She notes that interlocutors living outside the country expressed fear, mainly of possible reprisals against their family members living in the Islamic Republic of Iran.

82. The Special Rapporteur observes that profound legal and structural changes are required for any significant improvement of the human rights situation to take place in the Islamic Republic of Iran. The adoption of the Citizen Rights Charter is a positive step in this direction and the Special Rapporteur hopes that the implementation of the Charter will give impetus to a genuine participatory process of all components of Iranian civil society.

83. While noting as positive the Government willingness to explore steps to reduce the number of executions in the country, the Special Rapporteur is however deeply concerned over the alarming level of executions, including of juveniles in the country. She urges the Government to immediately and unconditionally prohibit the sentencing of children to death and to engage in a comprehensive process of commutation of all death sentences handed down on persons currently on death row for crimes committed under the age of 18. The Special Rapporteur also reiterates calls made by her predecessor to establish a moratorium on the use of the death penalty and urges the Government to accelerate the process of amending its Anti Narcotic Law and to replace the death penalty for drug related offences by penalties which comply with relevant international standards. The Government should also put an end to public executions.

84. The legislation of the Islamic Republic of Iran continues to authorize punishments such as flogging, blinding, amputation and stoning of individuals convicted of certain offences in breach of the absolute prohibition of torture and other forms of ill treatment. The Special Rapporteur recalls that the right to be free from torture or cruel, inhuman or degrading treatment or punishment can never be limited or interfered with whatever circumstances and urges the Government to abolish any provision which authorize such punishments.

85. The Special Rapporteur is concerned that the administration of justice is undermined by the proliferation of judicial decision making bodies. In this respect, she draws attention to the recommendations made by the Working Group on Arbitrary Detention following the visit it undertook in the country to abolish revolutionary tribunals and religious courts. She is also concerned about the lack of independence of the judiciary. She recalls that the principle of the separation of powers is the bedrock upon which the requirements of judicial independence and impartiality are founded. The Special Rapporteur urges the Islamic Republic of Iran to refrain from any interference with the judicial process and to uphold the integrity of judges, prosecutors and lawyers, notably by ensuring that appointment of judges are transparent and based on merit and by protecting them, their families and professional associates against all forms of violence, threat, retaliation, intimidation and harassment as a result of discharging their functions. A self-regulating independent bar association or council should be urgently established to oversee the process of admitting candidates to the legal

profession, provide for a uniform code of ethics and conduct, and enforce disciplinary measures, including disbarment.

86. The Special Rapporteur welcomes the recent amendments of the penal code and the code of criminal procedure. She however regrets that the amendments have not yet translated into better protection from arbitrary arrest and detention as shown by the number of cases highlighted in this report. The Special Rapporteur urges the Government to adopt all the necessary measures to effectively guarantee the right of anyone to be free from arbitrary deprivation of their liberty. In this respect, she echoes the recommendations made by her predecessor on the necessity to amend broadly defined criminal offences, to strengthen fair trial safeguards, to investigate all allegations of torture and ill treatment and to hold accountable those found guilty.

87. The harassment and widespread arrest and detention of persons exercising their freedom of opinion and expression or their activities as human rights defenders demonstrate that the authorities continue to exert a high level of control over citizens and severely limit democratic space. The Special Rapporteur recalls that freedom of opinion and freedom of expression are indispensable conditions for the full development of the person, are essential for any society and constitute the foundation stone for every free and democratic society. The Government has the responsibility to ensure that human rights defenders do not face prosecution for promoting and advancing human rights in the country.

88. The Special Rapporteur urges the Government to guarantee the freedom of the press and media and to release all prisoners who have been jailed for exercising their right to freedom of opinion and expression. Among them are the persons mentioned in paragraph 50 of this report who were the subject of an Opinion of the Working Group on Arbitrary Detention. All political prisoners and prisoners of conscience should be released so that an atmosphere is created which inspires confidence and gives hope to citizens that the human rights situation in the country may improve.

89. The Special Rapporteur urges the Islamic Republic of Iran to take proactive steps to promote the full realization of the rights of human rights defenders and to refrain from any acts that violate the rights of human rights defenders because of their human rights work. The government should take strict measures to ensure that the security and intelligence apparatus does not use reprisals against families of those who monitor or campaign against human rights violations or express views that are contrary to government policies.

90. The Special Rapporteur is particularly concerned about the limited progress made toward the elimination of discrimination against women and girls in law and practice and about bills currently before the parliament which, if adopted might jeopardize women's empowerment. The Special Rapporteur is also concerned about new restrictions on women and girls' freedom of movement and about the high handed manner of enforcement of compulsory dress code. The Special Rapporteur calls on the Government to ratify the Convention on the elimination of discrimination against women, to amend and repeal all laws which discriminate women and girls and to refrain from adopting laws and measures which would further undermine the empowerment of women and their participation into the labour force. She urges the Government to ensure women and girls' freedom of movement and guarantee their fundamental right to physical education, physical activity and sport. Laws and regulations that require women and girls to observe the Islamic dress code infringe their right to have, adopt and profess or not a religion or belief and do not take into account the various religious components of the Iranian society. These laws should be reviewed and the Government should respect the right of anyone to privacy and ensure that security forces refrain from acting as moral guardians of the citizens.

91. The Special Rapporteur expresses concern over the persistence of child marriage. She recalls that child marriage constitutes a harmful practice and in certain circumstance could even meet the international legal definition of slavery. Child marriage can never be considered as in the best interests of the child. The Special Rapporteur urges the Government to prohibit all forms of child marriage and develop awareness-raising campaigns and programmes on the harmful effects of this practice on the physical and mental health and well-being of girls, targeting households, local authorities, religious leaders, and judges and prosecutors, as recommended by the Committee on the Rights of the Child.

92. The situation of recognised and unrecognised religious minorities remains a matter of serious concern. Bahai's continue to be systematically discriminated, targeted, and deprived them of the right to a livelihood. The Special Rapporteur urges the authorities to recognise that freedom of religion or belief entails the freedom to choose a religion or belief, and that measures restricting eligibility for civil, political, social or economic privileges, or imposing special restrictions on the practice of other faiths, violate the prohibition of discrimination based on religion or belief and the guarantee of equal protection under article 26 of the International Covenant on Civil and Political Rights.

Annex

List of Baha'i Prisoners

Name	Arrest Date	Location of arrest/City of residence	Date of Trial /Court order issued	Sentence	Charges	Date of Release
Mrs. Mahvash Shahriari Sabet	25-May-05	Tehran	Without trial	Release on bail	Participation in the training institute	28-Jun-05
	05-Mar-08	Mashhad	Trial ended 14-Jun-10	20 years' imprisonment	1) Engaging in propaganda against the regime of the Islamic Republic of Iran; 2) espionage in support of the tyrannical, fabricated and occupying regime of Israel; 3) Forming and managing illegal groups and gatherings to for the purpose of disruption to the national security of Iran; 4) Collaboration with the tyrannical, fabricated, hostile and occupying regime of Israel against the Islamic Republic of Iran; 5) Conspiracy and assembly for the purpose of action against the internal and external security of Iran and to tarnish	

Mrs. Fariba Kamalabadi Taefi	25-May-05	Tehran	Without trial	Release on bail	the reputation of the Islamic Republic of Iran in the international arena; 6)
	26-Jul-05	Mashhad	Without trial	Release on bail	Participation in collecting classified documents and providing them to foreigners with the purpose of disruption of the national security
	14-May-08	Tehran (Tehran)	Trial ended 14-Jun- 10	Release on bail 20 years' imprisonment	Participation in the training institute N/A 1) Engaging in propaganda against the regime of the Islamic Republic of Iran; 2) espionage in support of the tyrannical, fabricated and occupying regime of Israel; 3) Forming and managing illegal groups and gatherings to for the purpose of disruption to the national security of Iran; 4) Collaboration with the tyrannical, fabricated, hostile and occupying regime of Israel against the Islamic Republic of Iran; 5) Conspiracy and assembly for the purpose of action
					28-Jun-05 19-Sep-05

Mr. Jamaloddin Khanjani	25-Sep-07	Isfahan (Isfahan)	Trial ended 14-Jun-10	20 years' imprisonment	<p>against the internal and external security of Iran and to tarnish the reputation of the Islamic Republic of Iran in the international arena; 6) Participation in collecting classified documents and providing them to foreigners with the purpose of disruption the national security</p> <p>N/A</p> <p>02-Oct-07</p> <p>1) Engaging in propaganda against the regime of the Islamic Republic of Iran; 2) espionage in support of the tyrannical, fabricated and occupying regime of Israel; 3) Forming and managing illegal groups and gatherings to for the purpose of disruption to the national security of Iran; 4) Collaboration with the tyrannical, fabricated, hostile and occupying regime of Israel against the Islamic Republic of Iran; 5) Conspiracy and</p>
	14-May-08	Tehran (Tehran)	Trial ended 14-Jun-10	20 years' imprisonment	

assembly for the purpose of action against the internal and external security of Iran and to tarnish the reputation of the Islamic Republic of Iran in the international arena; 6) Participation in collecting classified documents and providing them to foreigners with the purpose of disruption of the national security

1) Engaging in propaganda against the regime of the Islamic Republic of Iran; 2) espionage in support of the tyrannical, fabricated and occupying regime of Israel; 3) Forming and managing illegal groups and gatherings to for the purpose of disruption to the national security of Iran; 4) Collaboration with the tyrannical, fabricated, hostile and occupying regime of Israel against the Islamic Republic of Iran; 5) Conspiracy and

Mr. Afif Naimi 14-May-08 Tehran (Tehran) Trial ended 14-Jun-20 years' imprisonment
10

Mr. Saeid Rezaie Tazangi	25-May-05	Shiraz	Was not tried	Release on bail	assembly for the purpose of action against the internal and external security of Iran and to tarnish the reputation of the Islamic Republic of Iran in the international arena; 6) Participation in collecting classified documents and providing them to foreigners with the purpose of disruption of the national security	29-Jun-05
	25-May-05	Shiraz	Was not tried	Release on bail		N/A
Mr. Behrouz Azizi Tavakkoli	26-Jul-05	Mashhad	Without trial	Release on bail	Membership of Yaran (group managing the affairs of the Bahá'í community in Iran) and involvement in teaching the [Bahá'í Faith]	15-Nov-05
	26-Jul-05	Mashhad	Without trial	Release on bail	Membership of Yaran (group managing the affairs of the Bahá'í community in Iran) and involvement in teaching the [Bahá'í Faith]	15-Nov-05
Mr. Behrouz Azizi Tavakkoli	14-May-08	Tehran (Tehran)	Trial ended 14-Jun-10	20 years' imprisonment	1) Engaging in propaganda against the regime of the Islamic Republic of Iran; 2) espionage in	

support of the tyrannical, fabricated and occupying regime of Israel; 3) Forming and managing illegal groups and gatherings to for the purpose of disruption to the national security of Iran; 4) Collaboration with the tyrannical, fabricated, hostile and occupying regime of Israel against the Islamic Republic of Iran; 5) Conspiracy and assembly for the purpose of action against the internal and external security of Iran and to tarnish the reputation of the Islamic Republic of Iran in the international arena; 6) Participation in collecting classified documents and providing them to foreigners with the purpose of disruption to the national security

1) Engaging in propaganda against the regime of the Islamic Republic of Iran; 2) espionage in

Mr. Vahid Tizfahm 14-May-08 Tehran (Tehran) Trial ended 14-Jun-10 20 years' imprisonment

support of the tyrannical, fabricated and occupying regime of Israel; 3)				
Forming and managing illegal groups and gatherings to for the purpose of disruption to the national security of Iran; 4)				
Collaboration with the tyrannical, fabricated, hostile and occupying regime of Israel against the Islamic Republic of Iran; 5)				
Conspiracy and assembly for the purpose of action against the internal and external security of Iran and to tarnish the reputation of the Islamic Republic of Iran in the international arena; 6)				
Participation in collecting classified documents and providing them to foreigners with the purpose of disruption the national security				
Activities against national security, propaganda against the regime and membership in the	Mr. Jalayer Vahdat	04-Aug-05	Mashhad	(05Apr2010)
				N/A
				28-Aug-05

26-Jan-09	Mashhad	Mashhad	(May/Jun2010)	5 years imprisonment and 10 year ban on leaving the country	unlawful Bahai administration	12-May-09
24-Oct-10--Started serving sentence	Mashhad	Mashhad	First court on 15/16-Aug-09. Then: 25-Oct-09 (sentence was appealed)	Sentence of 5 years imprisonment and 10 years not leaving the country was changed to 5 years imprisonment	Teaching against the regime, taking action against national security, and illegal dissemination of CDs, teaching the Faith, and insulting religious sanctities	
Mr. Vesal Mahboubi 25-Apr-11	Sari (Mazandaran)	Sari (Mazandaran)		1 year -sentence has been appealed	N/A	
Ms. Sanaz Tafazoli 27-Jun-11	Mashhad	Mashhad	N/A	N/A	N/A	
Mr. Afshin Heyratian 03-Jun-10	Tehran (Tehran)	Tehran (Tehran)	N/A	4 years imprisonment	Charged with activities related to human rights issues and writing articles	21-Jul-10
20-Aug-2011	Tehran	Tehran	06-Nov-10	4 years imprisonment (sentence was appealed)	Assembly and conspiracy, with criminal intent, against national security and membership in the perverse sect of Bahaism.	
Ms. Nasim Bagheri 27-Apr-14				Court date: 8 October 2013	N/A	
Mr. Azizollah Samandari 14-Jan-09	Tehran (Tehran)	Tehran (Tehran)	N/A	Release on bail	Activities against National Security, association with hostile countries, teaching the Faith	14-Jan-09
07-Jul-12	Tehran (Tehran)	Tehran (Tehran)	N/A	4 years	Collaboration with the Yaran (group managing the affairs of the Bahá'í	07-Jul-12

Mr. Hamid Eslami	14-Jul-12	Shiraz (Fars)	Unknown	N/A	community in Iran) providing information technology support
Mr. Navid Khanjani	02-Mar-10	Isfahan (Isfahan)	N/A	N/A	Membership in illegle groups in opposition to regime. Propaganda against thre regime in the interest of groups in opposition to regime
	22-Aug-12	Tabriz (East Azerbaijan)	Court of appeal upheld verdict 10-Aug-11	12 years' imprisonment + 5 million rial (~US\$500) fine	Collaboration with human rights activists Engaging in human rights activities, illegal assembly (in support of university students deprived of higher education), and disturbance of the general public's opinion
Mr. Kayvan Rahimian	06-Mar-05	Tehran			N/A
	Summoned 28 July 2011	Tehran (Tehran)	27-Feb-12	Release on bail	Using falsely obtained degrees, illegal counselling, running illegal classes, defrauding the public
	30-Sep-12	Tehran (Tehran)	12-Jun-12	5 years' imprisonment + 97,877,000 rial fine (~US\$8,000)	Assembly and collusion with intent to commit acts of crime against national security, membership in the perverse sect of Bahatism, and earning illegal income

Mr. Farhad Fahandej	17-Oct-12	Gorgan (Golestan)	N/A	10 years imprisonment	Collaboration with hostile governments, disturbing national security, propaganda against the regime, formation of hostile groups
Mr. Farahmand Sanaie	17-Oct-12	Gorgan (Golestan)	N/A	5 years imprisonment	Collaboration with hostile governments, disturbing national security, propaganda against the regime, formation of hostile groups
Mr. Kamal Kashani	17-Oct-12	Gorgan (Golestan)	N/A	5 years imprisonment	Collaboration with hostile governments, disturbing national security, propaganda against the regime, formation of hostile groups
Mr. Siamak Sadri	18-Nov-12	Gorgan (Golestan); Rajateshahr	Sentenced May 2013	5 years imprisonment	Collaboration with hostile governments, disturbing national security, propaganda against the regime, formation of hostile groups
Mr. Payam Markazi	18-Nov-12	Gorgan (Golestan)	Sentenced May 2013	5 years imprisonment	Collaboration with hostile governments, disturbing national security, propaganda against the regime, formation of hostile groups
Mr. Foad Fahandej	18-Nov-12	Gorgan (Golestan)	Sentenced May 2013	5 years imprisonment	Collaboration with hostile governments, disturbing national security, propaganda against the regime, formation of hostile groups

Mr. Kourosh Ziari	20-Nov-12	Gonbad (Golestan)	Court hearing: 24 April 2013, Issuance of verdict: 21 May 2013	5 years imprisonment	formation of hostile groups Managing an illegal group for [the purpose] of disturbing [national] security
Mr. Foad Moghaddam	22-May-11	Isfahan	Without trial	Release on bail	25-Jun-11 Collaboration with Bahá'í Institute for Higher Education Collaboration with Bahá'í Institute for Higher Education
Mr. Pooya Tebyanian	08-Mar-09	Semnan	Tried 30 June 2012; Sentence issued 09 July 2012; Appealed verdict without result. Tried 15 April 2009; Verdict issued 31 May 2009; Appeal court verdict 29-April-2010	5 years' imprisonment under Ta'zir law 18 months imprisonment	Propaganda against the regime May-11
Mr. Farzin Sadri Dowlatabadi	19-Oct-13	Gorgan	Tried on 16-Apr-12; Appeals verdict issued 12 August 2012	6.5 years' imprisonment	Propaganda against the regime of the Islamic Republic of Iran and membership in and organizing illegal groups and assemblies N/A
Mr. Shamim Naimi	23-Jul-12	Tehran	Release on bail	Release on bail	Propaganda against the regime and activity against national security 02-Sep-12
Ms. Elham Farahani Naimi	10-Jul-12	Tehran	10-Nov-2012; 18 February 2013;	3 years imprisonment (appealed sentence) Release on bail	Propaganda against the regime and activity against national security Propaganda against the regime and activity national security 08-Sep-12

Mr. Adel Naimi	28-April-2014 - began serving sentence 10-Jul-12	Tehran Tehran (Tehran)	04-Feb-13	4 years imprisonment N/A (appealed sentence)	Initially announced: a. Activity against national security; b. Espionage; c. Participating in the clandestine organization of Baháism. In court document: Organizing the Baháist sect, teaching; holding [self-defense] spray; engaging in propaganda against the regime of the Islamic Republic of Iran"	Unknown
Mr. Farhad Eghbali	20-Nov-12 Began serving sentence on 30-Aug- 2014	Gorgan	N/A N/A	N/A 5 year	N/A N/A	Unknown
Mr. Shahab Dehghani	10-Jul-12 12-Jul-13	Tehran Tehran	N/A N/A	N/A 4 year	N/A propaganda activities against the sacred regime of the Islamic Republic, teaching the perverse ideologies of Baháism, and activities intended to mislead the youth. Activity against national security	N/A Unknown
Ms. Mona Mehrabi Mr. Faramarz Lotfi	16-Feb-15 Sometime between 24/27 September	Tehran Tonekabon	Unknown	Unknown N/A	Unknown N/A	Unknown

2013 - After a raid of his home, he was taken to an unknown place									
On 03-Feb-2015, he was summoned to court to hear his decree, and was immediately transferred to prison	Tonekabon	03-Feb-15	N/A	Activities against the national security, and propaganda against the regime					
Mr. Ziaollah Ghaderi 03-Feb-2015 - he was summoned to court to hear his decree, and was immediately transferred to prison	Tonekabon	03-Feb-15	Unknown	Activities against the national security, and propaganda against the regime					
Mr. Soroush Garshasbi 21-Nov-09	Tonekabon - Mazandaran	08-Jun-10	N/A	N/A	Sometime in December 2009 - Precise date is unknown				
Began serving sentence on 03-Feb-2015	Tonekabon	03-Feb-15	N/A	Activities against the national security, and propaganda against the regime					
Mr. Manouchehr Kholousi 29-Nov-13- Detained	Mashhad		N/A	N/A	Unknown				
Approx. end of November 2013/ beginning of December	Mashhad		N/A	Charged with propaganda against the Islamic Republic of Iran and activities against national security	29 January 2014				
	Mashhad			Activities against the national security, and propaganda against the regime					
Ms. Elham Karampisheh Began serving sentence on 16-02-2015	Tehran		N/A	N/A					
				Activities against the national security, and propaganda against the regime					

Mrs. Safa Forghani	Began serving sentence on 16-02-2015	Tehran	N/A	N/A	
Mr. Mehrdad Forghani	began serving sentence on 17-02-2015	Varamin	N/A	N/A	
Ms. Laleh Mehdi-zhad	10-Mar-15	Tehran	N/A	N/A	
Mrs. Fariba Ashtari	31-Jul-12		Court hearing held for 20 Baha'is on 24 August 2013 in Branch 1 of the Revolutionary Court in Yazd	3 Years imprisonment	Propaganda against the sacred regime of the Islamic Republic of Iran, and assembly and collusion against national security
	21 February 2015 - Summoned to Yazd Central Prison om	Yazd	13 April 2014 - Court of Appeals in Yazd	2 years imprisonment under Ta'zir law and one year suspended imprisonment	Propaganda against the Islamic Republic [of Iran] and propaganda in support of groups or organizations opposing the Islamic Republic of Iran
Mr. Naser Bagheri Ghalat	Began serving sentence on 27-02-2015	Yazd	N/A	N/A	Propaganda against the regime
Mr. Faez Bagheri Ghalat	Began serving sentence on 27-02-2015	Yazd	N/A	N/A	Propaganda against the regime
Mrs. Shabnam Mottahed	31-Jul-12	Yazd	Court hearing held for 20 Baha'is on 24 August 2013 in Branch 1 of the Revolutionary Court in Yazd	2 years imprisonment under Ta'zir law and 1 year suspended imprisonment	Propaganda against the sacred regime of the Islamic Republic of Iran, and assembly and collusion against national security
	18-Mar-2015 - Began imprisonment	Yazd	13 April 2014 - Court of Appeals in Yazd	2 years imprisonment under Ta'zir law and 1 year suspended imprisonment	Propaganda against the regime of the Islamic Republic [of Iran] and propaganda in support of groups or organizations

Mr. Iman Rashidi Ezzabadi	31-Jul-12	<p>19-Mar-2015 - Began Yazd imprisonment</p> <p>13 April 2014 - Court of Appeals in Yazd</p> <p>13 April 2014 - Court of Appeals in Yazd</p>	<p>1 year suspended imprisonment</p> <p>3 years imprisonment under Ta'zir law and 1 year suspended imprisonment</p> <p>3 years imprisonment under Ta'zir law and 1 year suspended imprisonment</p>	<p>13 April 2014 - Court of Appeals in Yazd</p> <p>13 April 2014 - Court of Appeals in Yazd</p> <p>13 April 2014 - Court of Appeals in Yazd</p>	<p>4 year imprisonment for 20 Baha'is on 24 August 2013 in Branch 1 of the Revolutionary Court in Yazd</p> <p>3 years imprisonment under Ta'zir law and 1 year suspended imprisonment</p> <p>2 years imprisonment</p>	<p>Released after 27 days providing bail of 80 million Toman</p> <p>Propaganda against the sacred regime of the Islamic Republic of Iran, and assembly and collusion against national security</p> <p>Propaganda against the regime of the Islamic Republic [of Iran] and propaganda in support of groups or organizations opposing the Islamic Republic of Iran</p> <p>Propaganda against the sacred regime of the Islamic Republic of Iran, and assembly and collusion against national security</p> <p>Propaganda against the regime of the Islamic Republic [of Iran] and propaganda in support of groups or organizations opposing the Islamic Republic of Iran</p>	<p>opposing the Islamic Republic of Iran</p> <p>Propaganda against the sacred regime of the Islamic Republic of Iran, and assembly and collusion against national security</p> <p>Propaganda against the regime of the Islamic Republic [of Iran] and propaganda in support of groups or organizations opposing the Islamic Republic of Iran</p> <p>Propaganda against the sacred regime of the Islamic Republic of Iran, and assembly and collusion against national security</p> <p>Propaganda against the regime of the Islamic Republic [of Iran] and propaganda in support of groups or organizations opposing the Islamic Republic of Iran</p>
Mr. Mehran Eslami Amirabadi	01-Oct-12	<p>04-Apr-2015 - began Yazd imprisonment</p>	<p>1 year suspended imprisonment</p>	<p>13 April 2014 - Court of Appeals in Yazd</p> <p>13 April 2014 - Court of Appeals in Yazd</p>	<p>2 years imprisonment</p> <p>1 year suspended imprisonment</p>	<p>06-Oct-12</p> <p>Propaganda against the sacred regime of the Islamic Republic of Iran, and assembly and collusion against national security</p> <p>Propaganda against the regime of the Islamic Republic [of Iran] and propaganda in support of groups or organizations opposing the Islamic Republic of Iran</p>	<p>opposing the Islamic Republic of Iran</p> <p>Propaganda against the sacred regime of the Islamic Republic of Iran, and assembly and collusion against national security</p> <p>Propaganda against the regime of the Islamic Republic [of Iran] and propaganda in support of groups or organizations opposing the Islamic Republic of Iran</p>
Mr. Fariborz Baghi Asrabadi	Jul/ Aug 2012	<p>07-Mar-2015 - Began Yazd imprisonment</p>	<p>1 year suspended imprisonment</p>	<p>13 April 2014 - Court of Appeals in Yazd</p> <p>13 April 2014 - Court of Appeals in Yazd</p>	<p>3 years imprisonment</p> <p>1 year suspended imprisonment</p>	<p>Unknown</p> <p>Propaganda against the sacred regime of the Islamic Republic of Iran, and assembly and collusion against national security</p> <p>Propaganda against the regime of the Islamic Republic [of Iran] and propaganda in support of groups or organizations opposing the Islamic Republic of Iran</p>	<p>opposing the Islamic Republic of Iran</p> <p>Propaganda against the sacred regime of the Islamic Republic of Iran, and assembly and collusion against national security</p> <p>Propaganda against the regime of the Islamic Republic [of Iran] and propaganda in support of groups or organizations opposing the Islamic Republic of Iran</p>

Ms. Rouha Imani	12-May-15	Kerman	N/A	N/A	N/A	interest of groups and/or organizations opposing the regime of the Islamic Republic.
Ms. Naghme Gilanpour	25-May-15	Rasht	N/A	N/A	N/A	Assembly for propaganda against the regime
Mr. Foad Yazdani	25-May-15	Rasht	N/A	N/A	N/A	Assembly for propaganda against the regime released on bail
	N/A	N/A	appeared in court - date is unknown (reported in Jan 2016)	sentenced to six months' imprisonment under ta'zir law	N/A	
Mr. Peyman Yazdani	25-May-15	Rasht	N/A	N/A	N/A	Assembly for propaganda against the regime released on bail
	N/A	N/A	appeared in court - date is unknown (reported in Jan 2016)	sentenced to six months' imprisonment under ta'zir law	N/A	
Mrs. Atefeh Zahedi (Azarnoush)	13-Apr-15	Hamadan	N/A	N/A	N/A	Propaganda against the regime 15-Apr-15
	May/June 2015	Hamadan	Trial held on 5 August 2015, sentence was announced on 15 August 2015	one year's imprisonment under Ta'zir law	N/A	Propaganda against the regime
Mrs. Parvaneh Seifi (Ayyoubi)	21-Apr-15	Hamadan	N/A	N/A	N/A	Propaganda against the regime 22-Apr-15
	May/June 2015	Hamadan	Trial held on 5 August 2015; sentence announced on 15 August 2015	one year's imprisonment under Ta'zir law	N/A	Propaganda against the regime
Mr. Saba Golshan	02-Aug-12	Isfahan	Court hearing held for 20 Baha'is on 24 August 2013 in Branch 1 of the	5 years: 4 years imprisonment under Ta'zir law and one	N/A	"Propaganda against the sacred regime of the Islamic Republic of Iran", and

	Revolutionary Court in Yazd	year suspended imprisonment	“assembly and collusion against national security” --- person in charge of Isfahan Baha’i community
	13 April 2014 - Court of Appeals in Yazd	4 years	1. Propaganda against the regime of the Islamic Republic; 2. Propaganda in the interest of groups and/or organizations opposing the regime of the Islamic Republic.
Mr. Shahin Rashedi	Hamadan	07-Apr-15	Propaganda against the regime 10-Apr-15
		Awaiting court trial	N/A
		Trial held on 5 August 2015/ sentence announced on 15 August 2015	Propaganda against the regime N/A
Ms. Mina Mobin Hemmati	Hamadan	13-Apr-15	Propaganda against the regime 15-Apr-15
		May/June 2015	
		Trial held on 5 August 2015/ sentence announced on 15 August 2015	Propaganda against the regime
Mr. Masoud Azarmoush	Hamadan	13-Apr-15	Propaganda against the regime 15-Apr-15
		May/June 2015	
		Trial held on 5 August 2015/ sentence announced on 15 August 2015	Charged for owning satellite dish
Mr. Hamid Azarmoush	Hamadan	13-Apr-15	Propaganda against the regime N/A
		May/ June 2015	
		Trial held on 5 August 2015/ sentence announced on 15 August 2015	Propaganda against the regime
		1 year imprisonment under Ta'zir law and two years exile to Khash	Propaganda against the regime
		1 year imprisonment under Ta'zir law and two years exile to Khash	Propaganda against the regime

Ms. Farideh Ayyoubi 21-Apr-15	Hamadan		Trial held on 5 August 2015/ sentence announced on 15 August 2015	one year's imprisonment under Ta'zir law	Propaganda against the regime	N/A
	Hamadan	May/June 2015	Trial held on 5 August 2015/ sentence announced on 15 August 2015	one year's imprisonment under Ta'zir law	Propaganda against the regime	N/A
Mrs. Romina Rahimian	Hamadan	May/June 2015	Trial held on 5 August 2015/ sentence announced on 15 August 2015	one year's imprisonment under Ta'zir law	Propaganda against the regime	N/A
Mr. Mehran Khandel	Hamadan	May/June 2015	Trial held on 5 August 2015/ sentence announced on 15 August 2015	one year's imprisonment under Ta'zir law	Propaganda against the regime	N/A
Ms. Fataneh Moshtagh	Hamadan	Oct/Nov 2012	Trial held on 5 August 2015/ sentence announced on 15 August 2015	one year's imprisonment under Ta'zir law	Propaganda against the regime	N/A
Mr. Shahram Eshraghi Najafabadi	N/A	1983/84	N/A	1 year	Propaganda against the regime	Unknown
	Isfahan	31-Jul-12	Court hearing held for 20 Baha'is on 24 August 2013 in Branch 1 of the Revolutionary Court in Yazd	4 years: 3 years imprisonment under Ta'zir law and 1 year suspended	"Propaganda against the sacred regime of the Islamic Republic of Iran", and "assembly and collusion against national security" --- person in charge of Isfahan Baha'i community	Approx: Sep 2012: Released on bail
	Isfahan		13 April 2014 - Court of Appeals in Yazd	N/A	1. Propaganda against the regime of the Islamic Republic; 2. Propaganda in the interest of groups and/or organizations opposing the regime	

Ms. Helia Moshagh	15-Nov-15	Tehran	N/A	N/A	N/A	of the Islamic Republic.	N/A
Mrs. Azita Rafizadeh (Koushk-Baghi)	12March 2013		N/A	N/A			N/A
	summoned to the Revolutionary court.						
	Summoned by telephone to serve her sentence (April 2015)	Karaj	Convicted in Feb 2015	4 years		Activity against national security by membership in BIHE	N/A
Mr. Peyman Koushk-Baghi	12March 2013	N/A	N/A				N/A
	summoned to the Revolutionary court.						
	28-Feb-16	Karaj	May 2015: sentenced to five years of imprisonment under ta'zir law			Activity against national security by membership in BIHE	N/A
Mr. Afshin Seyyed Ahmad	08-Nov-12	Tehran	N/A	sentenced to three years imprisonment			N/A
	Began serving sentence on 28-06-2016						
Mr. Yashar Rezvani	02-Aug-16	Unknown	N/A	N/A			N/A
Mr. Farzan Shadman	28-Sep-16	Shiraz	N/A	N/A			N/A
Mr. Farid Shadman	28-Sep-16	Shiraz	N/A	N/A			N/A
Ms. Parisa Rouhizadegan	28-Sep-16	Shiraz	N/A	N/A			N/A
Mr. Shamim Akhlaghi	28-Sep-16	Shiraz	N/A	N/A			N/A
Mrs. Sahba Farahbakhsh	28-Sep-16	Shiraz	N/A	N/A			N/A
Ms. Ahdiyeh Enayati	28-Sep-16	Shiraz	N/A	N/A			N/A
Mrs. Shadi Aghdam	28-Sep-16	Shiraz	N/A	N/A			N/A
Mr. Varqa Kavyani	28-Sep-16	Shiraz	N/A	N/A			N/A
Mr. Soroush Ighani	28-Sep-16	Shiraz	N/A	N/A			N/A
Mr. Farzad Delaram	02-Oct-16	Shiraz	N/A	N/A			N/A
Mrs. Rouhiyyeh Nariman	02-Oct-16	Shiraz	N/A	N/A			N/A
Ms. Bahareh Nowrouzi	03-Oct-16	Shiraz	N/A	N/A			N/A
Ms. Rezvan Yazdani	22-Nov-16	Shiraz	N/A	N/A			N/A

Ms. Nasim Kashaninejad	22-Nov-16	Shiraz	N/A	N/A	N/A
Mr. Saeed Azimi	25-Oct-16	Isfahan	N/A	N/A	N/A
Mr. Amrollah Khaleghian	21-Dec-16	Kerman	N/A	N/A	N/A
Mr. Soheil Keshavarz	24-Dec-16	Ghazvin	N/A	N/A	N/A
Mr. Samir Kholousi	30-Dec-16	Kerman	N/A	N/A	N/A
Mrs. Rouhiyyeh Zeinali	03-Jan-17	Kerman	N/A	N/A	N/A
Mr. Mahbod Eftehadi	01-Jan-17	Yazd	N/A	N/A	N/A
Mr. Borhan Esmali	02-Jan-17	Borazjan of Bushehr	N/A	N/A	N/A

This document is explanatory only and does not have the force of law. Please see particularly the legally binding provisions cited below governing the sanctions. This document does not supplement or modify the statutory authorities, Executive orders, or regulations.

Frequently Asked Questions Regarding the Re-Imposition of Sanctions Pursuant to the May 8, 2018 National Security Presidential Memorandum Relating to the Joint Comprehensive Plan of Action (JCPOA)

1. GENERAL QUESTIONS

1.1. Effective May 8, 2018, what sanctions snap back into place?

On May 8, 2018, the President announced his decision to cease the United States' participation in the Joint Comprehensive Plan of Action (JCPOA), and to begin re-imposing, following a wind-down period, the U.S. nuclear-related sanctions that were lifted to effectuate the JCPOA sanctions relief. In conjunction with this announcement, the President issued a National Security Presidential Memorandum (NSPM) directing the Secretary of State and the Secretary of the Treasury to prepare immediately for the re-imposition of all of the U.S. sanctions lifted or waived in connection with the JCPOA, to be accomplished as expeditiously as possible and in no case later than 180 days from the date of the NSPM.

To implement the President's direction, the Departments of State and of the Treasury will take steps necessary to establish a 90-day and a 180-day wind-down period for activities involving Iran that were consistent with the U.S. sanctions relief provided for under the JCPOA. FAQs 1.2. and 1.3. below set out in further detail which sanctions will be re-imposed in which time frame.

Pursuant to the NSPM, the State Department revoked certain statutory waivers issued to implement the JCPOA sanctions relief, issued the necessary statutory sanctions waivers to provide for a wind-down period, and plans to take appropriate action to keep such waivers in place for the duration of the relevant wind-down periods. Following November 4, 2018, OFAC expects that all the U.S. nuclear-related sanctions that had been lifted under the JCPOA will be re-imposed and in full effect.

Persons engaging in activity undertaken pursuant to the U.S. sanctions relief provided for in the JCPOA should take the steps necessary to wind down those activities by either August 6, 2018, or November 4, 2018, as applicable, to avoid exposure to sanctions or an enforcement action under U.S. law. [05-08-2018]

1.2. Which sanctions will be re-imposed after the 90-day wind-down period ending on August 6, 2018?

After the 90-day wind down period ends on August 6, 2018, the U.S. government will re-impose the following sanctions that were lifted pursuant to the JCPOA, including sanctions on associated services related to the activities below:

- i. Sanctions on the purchase or acquisition of U.S. dollar banknotes by the Government of Iran;

- ii. Sanctions on Iran's trade in gold or precious metals;
- iii. Sanctions on the direct or indirect sale, supply, or transfer to or from Iran of graphite, raw, or semi-finished metals such as aluminum and steel, coal, and software for integrating industrial processes;
- iv. Sanctions on significant transactions related to the purchase or sale of Iranian rials, or the maintenance of significant funds or accounts outside the territory of Iran denominated in the Iranian rial;
- v. Sanctions on the purchase, subscription to, or facilitation of the issuance of Iranian sovereign debt; and
- vi. Sanctions on Iran's automotive sector.

In addition, following the 90-day wind-down period that ends on August 6, 2018, the U.S. government will revoke the following JCPOA-related authorizations under U.S. primary sanctions regarding Iran:

- i. The importation into the United States of Iranian-origin carpets and foodstuffs and certain related financial transactions pursuant to general licenses under the Iranian Transactions and Sanctions Regulations, 31 C.F.R. part 560 (ITSR);
- ii. Activities undertaken pursuant to specific licenses issued in connection with the *Statement of Licensing Policy for Activities Related to the Export or Re-export to Iran of Commercial Passenger Aircraft and Related Parts and Services* (JCPOA SLP); and
- iii. Activities undertaken pursuant to General License I relating to contingent contracts for activities eligible for authorization under the JCPOA SLP.

Persons engaging in the activities listed above undertaken pursuant to the U.S. sanctions relief provided for in the JCPOA should take the steps necessary to wind down those activities by August 6, 2018, to avoid exposure to sanctions or an enforcement action under U.S. law. (See FAQ 2.1. below for a description of activities that would not be prohibited or sanctionable during the wind-down period). [05-08-2018]

1.3. Which sanctions will be re-imposed after the 180-day wind-down period ending on November 4, 2018?

Following the 180-day wind-down period ending on November 4, 2018, the U.S. government will re-impose the following sanctions that were lifted pursuant to the JCPOA, including sanctions on associated services related to the activities below:

- i. Sanctions on Iran's port operators, and shipping and shipbuilding sectors, including on the Islamic Republic of Iran Shipping Lines (IRISL), South Shipping Line Iran, or their affiliates;
- ii. Sanctions on petroleum-related transactions with, among others, the National Iranian Oil Company (NIOC), Naftiran Intertrade Company (NICO), and National Iranian Tanker Company (NITC), including the purchase of petroleum, petroleum products, or petrochemical products from Iran;

- iii. Sanctions on transactions by foreign financial institutions with the Central Bank of Iran and designated Iranian financial institutions under Section 1245 of the National Defense Authorization Act for Fiscal Year 2012 (NDAA);
- iv. Sanctions on the provision of specialized financial messaging services to the Central Bank of Iran and Iranian financial institutions described in Section 104(c)(2)(E)(ii) of the Comprehensive Iran Sanctions and Divestment Act of 2010 (CISADA);
- v. Sanctions on the provision of underwriting services, insurance, or reinsurance; and
- vi. Sanctions on Iran's energy sector.

In addition, effective November 5, 2018, the U.S. government will revoke the authorization for U.S.-owned or -controlled foreign entities to wind down certain activities with the Government of Iran or persons subject to the jurisdiction of the Government of Iran that were previously authorized pursuant to General License H. (See FAQ 4.4. below).

Furthermore, no later than November 5, 2018, the U.S. government will re-impose, as appropriate, the sanctions that applied to persons removed from the List of Specially Designated Nationals and Blocked Persons (SDN List) and/or other lists maintained by the U.S. government on January 16, 2016.

Persons engaging in the activity listed above undertaken pursuant to the U.S. sanctions relief provided for in the JCPOA should take the steps necessary to wind down those activities by November 4, 2018, to avoid exposure to sanctions or an enforcement action under U.S. law. (See FAQ 2.1. below for a description of activities that would not be prohibited or sanctionable during the wind-down period.) [05-08-2018]

1.4. Are the sanctions lifted via Executive Order 13716 reinstated as of August 7, 2018?

Executive Order of August 6, 2018, "Reimposing Certain Sanctions With Respect to Iran" (the "New Iran E.O.") reimposes relevant provisions of E.O.s 13574, 13590, 13622, and 13645 that were revoked by E.O. 13716 at the end of the applicable wind-down period (i.e., on or after August 7, 2018, or on or after November 5, 2018, depending on the activity involved). In addition, to provide clarity and consolidate relevant authorities into a single document, the New Iran E.O. revokes E.O.s 13716 and 13628 and continues in effect certain sanctions authorities provided for in those E.O.s. [08-06-2018]

1.5. Do the FAQs and Guidance posted on OFAC's website relating to the JCPOA sanctions relief remain in effect?

As noted above, the President has directed the Secretaries of State and of the Treasury to re-impose U.S. sanctions that were lifted or waived to effectuate the JCPOA sanctions relief as set out in sections II, III, IV, and V of the [Guidance Document](#) at the end of the

applicable wind-down period. Furthermore, although the sanctions waivers described in section VI of the Guidance Document are no longer in place, they have been replaced with waivers that will allow for the orderly wind-down of activities as specified above. Persons engaging in activity undertaken pursuant to the U.S. sanctions relief provided for in the JCPOA should take the steps necessary to wind down their activities between May 8, 2018 and August 6, 2018, or between May 8, 2018 and November 4, 2018, as applicable, to avoid exposure to sanctions or an enforcement action under U.S. law. The JCPOA Guidance and [JCPOA FAQs](#) issued on January 16, 2016, as amended, remain available on OFAC's website only to assist persons in determining which activities were not sanctionable or prohibited between January 16, 2016 and May 8, 2018, and to determine how best to wind down such activity. To the extent there are inconsistencies between the JCPOA FAQs, including guidance on wind-down, and other guidance provided by the Department of State or the Department of the Treasury on or after May 8, 2018, the later-issued guidance should be treated as governing. [05-08-2018]

2. WIND-DOWN

2.1. How long is the wind-down period and what types of activities are allowed?

The U.S. government has a past practice of working with U.S. or third-country companies to minimize the impact of sanctions on the legitimate activities of those parties undertaken prior to the imposition of sanctions.

To implement the May 8, 2018 NSPM, the Departments of State and of the Treasury will establish a 90-day and a 180-day wind-down period, as applicable, for activities involving Iran that were consistent with the U.S. sanctions lifting under the JCPOA. (See FAQs 1.2. and 1.3. above for a list of activities subject to the 90- day or 180-day wind-down period.)

Consistent with this guidance from the President, the Department of State has revoked certain statutory waivers issued to implement the JCPOA sanctions relief, issued the necessary sanctions waivers to provide for an appropriate wind-down period, and plans to take appropriate action to keep such waivers in place for the duration of the relevant wind-down period, *i.e.*, until August 6, 2018, or November 4, 2018, depending on the activity. Non-U.S., non-Iranian persons are advised to use these time periods to wind-down their activities with or involving Iran that will become sanctionable at the end of the applicable wind-down period.

In the event that a non-U.S. non-Iranian person is owed payment after the conclusion of the wind-down period on August 6, 2018, or November 4, 2018, as applicable, for goods or services fully provided or delivered to an Iranian counterparty prior to August 6, 2018, or November 4, 2018, as applicable, pursuant to a written contract or written agreement entered into prior to May 8, 2018, and such activities were consistent with U.S. sanctions in effect at the time of delivery or provision, the U.S. government would allow the non-U.S., non-Iranian person to receive payment for those goods or services according to the terms of the written contract or written agreement. Similarly, if a non-U.S., non-Iranian

person is owed repayment after August 6, 2018, or November 4, 2018, as applicable, for loans or credits extended to an Iranian counterparty prior to the end of the 90-day or 180-day wind-down period, as applicable, provided that such loans or credits were extended pursuant to a written contract or written agreement entered into prior to May 8, 2018, and such activities were consistent with U.S. sanctions in effect at the time the loans or credits were extended, the U.S. government would allow the non-U.S., non-Iranian person to receive repayment of the related debt or obligation according to the terms of the written contract or written agreement. This allowance is designed for non-U.S., non-Iranian parties to be made whole for debts and obligations owed or due to them for goods or services fully provided or delivered or loans or credit extended to an Iranian party prior to the end of the 90-day or 180-day wind-down period, as applicable. Any payments would need to be consistent with U.S. sanctions, including that payments could not involve U.S. persons or the U.S. financial system, unless the transactions are exempt from regulation or authorized by OFAC.

Consistent with the conditions described above, OFAC will take steps to allow U.S. persons and U.S.-owned or -controlled foreign entities until August 6, 2018, or November 4, 2018, as applicable, to wind down operations in or business involving Iran conducted pursuant to an OFAC authorization, and to receive payments according to the terms of the written contract or written agreement entered into prior to May 8, 2018, for goods or services fully provided or delivered pursuant to an OFAC authorization. As soon as administratively feasible, OFAC intends, via Federal Register publication, to replace General License H, General License I, and the general licenses set forth at 31 C.F.R. §§ 560.534 and 560.535 (relating to trade in Iranian-origin carpets and foodstuffs) with more narrowly scoped authorizations to allow U.S. persons and, as appropriate, U.S.-owned or -controlled foreign entities, to engage in all transactions ordinarily incident and necessary to wind down activities that were previously authorized pursuant to General License H, General License I, or the general licenses set forth at 31 C.F.R. §§ 560.534 and 560.535 and to receive payments according to the terms of the written contract or written agreement entered into prior to May 8, 2018, for goods or services fully provided or delivered pursuant to an OFAC authorization.

The provision or delivery of additional goods or services and/or the extension of additional loans or credits to an Iranian counterparty after August 6, 2018, or November 4, 2018, as applicable, including pursuant to written contracts or written agreements entered into prior to May 8, 2018, may result in the imposition of U.S. sanctions unless such activities are exempt from regulation, authorized by OFAC, or otherwise not sanctionable.

The U.S. government would evaluate matters falling outside the above parameters on a case-by-case basis.

See FAQs 1.2. and 1.3. above for a list of activities subject to the 90-day or 180-day wind-down period. [05-08-2018]

2.2. Can I engage in new activity involving Iran if the activity will not extend beyond the end of the relevant wind-down period?

At the end of the wind-down periods, the State Department does not expect to issue further broad waivers of relevant statutory authorities, and OFAC plans to revoke the general and specific licenses issued in connection with the sanctions relief provided under the JCPOA that may remain in effect as of that time. (See FAQs 4.1.-4.5. for more details on the wind-down approach for general and specific licenses.) Prior to August 6, 2018, or November 4, 2018, as applicable, persons engaging in activity consistent with the U.S. sanctions relief specified in the JCPOA should take the steps necessary to wind down operations by that date to avoid exposure to sanctions or an enforcement action when the applicable wind-down period ends. When considering a potential enforcement or sanctions action with respect to activities engaged in after August 6, 2018, or November 4, 2018, as applicable, OFAC will evaluate efforts and steps taken to wind down activities and will assess whether any new business was entered into involving Iran during the applicable wind-down period. [05-08-2018]

2.3 Under what circumstances are goods or services considered “fully provided or delivered” prior to the expiration of the relevant wind-down period, as referenced in FAQ 2.1 above?

OFAC looks to the industry standard to determine whether particular goods or services are considered fully provided or delivered prior to the expiration of the relevant wind-down period. As a general matter, goods or services will be considered fully provided or delivered when the party providing or delivering the goods or services has performed all the actions and satisfied all the obligations necessary to be eligible for payment or other agreed-to compensation. With respect to goods exported to or from Iran, at a minimum, title to the goods must have transferred to the relevant party. [08-06-2018]

2.4 Can I, as a non-U.S., non-Iranian person, receive payments after the relevant wind-down period ends for goods or services that were fully provided or delivered during the relevant wind-down period pursuant to contracts entered into prior to May 8, 2018?

Yes, subject to the conditions set out below and in FAQ 2.1 above, non-U.S., non-Iranian persons may receive payment after the end of the relevant wind-down period for goods or services fully provided or delivered to an Iranian counterparty prior to expiration of the relevant wind-down period (see FAQ 2.3 above). In particular, the goods or services must have been fully provided or delivered prior to the end of the applicable wind-down period pursuant to a written contract or written agreement entered into prior to May 8, 2018; the relevant activities must have been consistent with U.S. sanctions in effect at the time of delivery or provision, including that the activities did not involve persons on the SDN List at the time of the transaction; and any payments must be consistent with U.S. sanctions, including that payments can not involve U.S. persons or the U.S. financial

system, unless the transactions are exempt from regulation or authorized by OFAC. [08-06-2018]

2.5 Can I, as a U.S. person or U.S.-owned or -controlled foreign entity, receive payments after the relevant wind-down period ends for goods or services that were fully provided or delivered during the relevant wind-down period under an OFAC wind-down authorization and pursuant to a contract entered into prior to May 8, 2018?

The wind-down authorizations allow U.S. persons and U.S.-owned or -controlled foreign entities to receive payments for activities conducted pursuant to such wind-down authorizations only during their validity periods. For example, a U.S.-owned or -controlled foreign entity may receive payment through 11:59 p.m. eastern standard time on November 4, 2018 for Iran-related activities undertaken pursuant to section 560.537 of the ITSR (winding down of transactions relating to U.S.-owned or -controlled foreign entities).

Any payment following the end of the relevant wind-down period for activities undertaken pursuant to a wind-down authorization, including from an Iranian counterparty, would require specific authorization from OFAC. OFAC will evaluate such requests for specific licenses on a case-by-case basis.

Any request for a specific license should provide sufficient details for OFAC to evaluate the application, including: whether the relevant transactions complied with U.S. sanctions as in effect at the time of the transactions; whether the activities were performed under a written contract or written agreement entered into prior to May 8, 2018; and why the applicant was unable to receive the payment for which authorization is sought prior to the end of the relevant wind-down period. OFAC will generally deny requests to receive payment for activities that were not authorized under the relevant wind-down authorizations or that were not undertaken pursuant to a written contract or written agreement entered into prior to May 8, 2018. [08-06-2018]

2.6 Can I enter into a new contract or engage in new business activity during the relevant wind-down period that is in furtherance of a contract entered into prior to May 8 and is ordinarily incident and necessary to the wind down of Iran-related business? For example, is it sanctionable if a new purchase order is entered into during the wind-down period if such business is contemplated under a Master Services Agreement entered into prior to May 8?

Provided that the new contract or business is in furtherance of, a written contract or written agreement entered into prior to May 8, 2018, and is necessary and ordinarily incident to the wind down of activities under the pre-May 8, 2018 written contract or written agreement, generally, OFAC would not consider entering into such new contracts during the relevant wind-down period to be sanctionable as new business. OFAC will evaluate matters falling outside these parameters on a case-by-case basis to determine whether the activity is sanctionable or violates OFAC regulations. [08-06-2018]

2.7 Is it sanctionable for non-U.S., non-Iranian persons to engage in transactions related to the provision of humanitarian and consumer goods to Iran?

The U.S. maintains broad authorizations and exceptions under U.S. sanctions that allow for the sale of agricultural commodities, food, medicine, and medical devices to Iran by U.S. persons and non-U.S. persons. Broadly speaking, transactions for the sale of agricultural commodities, food, medicine, or medical devices to Iran are not sanctionable unless they involve certain persons on the SDN List, including designated Iranian financial institutions or the Islamic Revolutionary Guard Corps (IRGC), or otherwise sanctionable conduct. Additional guidance relating to these authorizations and exceptions can be found on the OFAC website here [hyperlink to https://www.treasury.gov/resource-center/sanctions/Programs/Documents/iran_guidance_med.pdf] and here [hyperlink to https://www.treasury.gov/resource-center/sanctions/Programs/Documents/hum_exp_iran.pdf].

Transactions by non-U.S. persons related to the export to Iran of consumer goods that do not fall within these exceptions, but are not expressly targeted by U.S. sanctions should not involve persons on the SDN List, including designated Iranian financial institutions or the IRGC. In addition, such transactions should not involve U.S. persons or transit the U.S. financial system, unless the activities and/or transactions are exempt from regulation or authorized by OFAC. [08-06-2018]

3. SANCTIONS LISTINGS

3.1. Will the persons that were placed on the List of Persons Identified as Blocked Solely Pursuant to Executive Order 13599 (E.O. 13599 List) on JCPOA Implementation Day (January 16, 2016) be put back on the SDN List?

No later than November 5, 2018, OFAC expects to move persons identified as meeting the definition of the terms “Government of Iran” or “Iranian financial institution” from the List of Persons Blocked Solely Pursuant to E.O. 13599 (the “E.O. 13599 List”) to the SDN List. OFAC will not add these persons to the SDN List on May 8, 2018, to allow for the orderly wind down by non-U.S., non-Iranian persons of activities that had been undertaken prior to May 8, 2018, consistent with the U.S. sanctions relief provided for under the JCPOA involving persons on the E.O. 13599 List. The Government of Iran and Iranian financial institutions remain persons whose property and interests in property are blocked pursuant to E.O. 13599 and section 560.211 of the ITSR, and U.S. persons continue to be broadly prohibited from engaging in transactions or dealing with the Government of Iran and Iranian financial institutions. Beginning on November 5, 2018, activities with most persons moved from the E.O. 13599 List to the SDN List will be subject to secondary sanctions. Such persons will have a notation of “Additional Sanctions Information – Subject to Secondary Sanctions” in their SDN List entry.

The United States has and continues to enforce multiple authorities that target a range of Iranian malign activity outside of Iran’s nuclear program, including Iran’s support for terrorism, ballistic missile program, human rights abuses, and destabilizing activity in the region. Treasury will continue to target aggressively anyone who engages in such sanctionable activity, regardless of whether the individual or entity was removed from the SDN List on Implementation Day. [05-08-2018]

3.2. As of May 8, 2018, do secondary sanctions attach to the persons that were removed from the SDN List and/or other OFAC sanctions lists on Implementation Day?

No. However, no later than November 5, 2018, OFAC will re-impose, as appropriate, the sanctions that applied to persons removed from the SDN List and/or other lists maintained by OFAC on January 16, 2016. Depending on the authority or authorities pursuant to which these actions to re-list are taken, there may be secondary sanctions exposure for parties that engage in certain activities with these persons after their re-listing. Persons subject to secondary sanctions will have a notation of “Additional Sanctions Information – Subject to Secondary Sanctions” in their SDN List entry. Transactions conducted during the wind-down periods involving persons removed from the SDN List on January 16, 2016 could be sanctionable to the extent they are outside the scope of the wind-down waivers issued by the State Department or involve persons on the SDN List or conduct described in [JCPOA FAQ A.3.ii-iii](#). OFAC recommends that a person conducting activities in Iran or with Iranian persons during the wind-down periods exercise due diligence sufficient to ensure that it is not knowingly engaging in

transactions with persons on the SDN List or in activities that would be sanctionable under authorities targeting Iran's malign activities.

The United States has and continues to enforce multiple authorities that target a range of Iranian malign activity outside of Iran's nuclear program, including Iran's support for terrorism, ballistic missile program, human rights abuses, and destabilizing activity in the region. Treasury will continue to target aggressively anyone who engages in such sanctionable activity, regardless of whether the individual or entity was removed from the SDN List on Implementation Day. [05-08-2018]

4. LICENSING

4.1. Will OFAC continue to consider license applications under the *Statement of Licensing Policy for Activities Related to the Export or Re-export to Iran of Commercial Passenger Aircraft and Related Parts and Services (JCPOA SLP)*?

No. Following the issuance of the May 8, 2018 NSPM, OFAC rescinded the JCPOA SLP and will no longer evaluate applications under the JCPOA SLP. OFAC will still consider applications, however, under the safety of flight statement of licensing policy found in 31 C.F.R. § 560.528. [05-08-2018]

4.2. Does OFAC anticipate revoking specific licenses issued under the JCPOA SLP?

Yes. To the extent they have not yet expired, OFAC expects to revoke the specific licenses issued pursuant to the JCPOA SLP and issue authorizations to provide for a wind-down period that will end on August 6, 2018. License applications that were submitted to OFAC pursuant to the JCPOA SLP but for which no license has been issued will be returned without action. Applicants may resubmit their applications for consideration under the safety of flight statement of licensing policy found in 31 C.F.R. § 560.528. [05-08-2018]

4.3. Is General License I (GL I) still in effect?

Following the issuance of the May 8, 2018 NSPM, OFAC removed from its website, and will no longer evaluate applications under, the JCPOA SLP. At that time, OFAC announced its intention to revoke, as soon as is administratively feasible, GL I, which authorized U.S. persons to enter into, and to engage in transactions that are ordinarily incident to the negotiation of and entry into, contingent contracts for activities eligible for authorization under the JCPOA SLP. OFAC also announced its intention to publish in the Federal Register a revised authorization for the wind-down of activities authorized pursuant to GL I. The wind-down of those activities authorized pursuant to GL I must be completed by August 6, 2018.

OFAC has revoked GL I and issued a wind-down general license that authorizes, through August 6, 2018, the wind down of activities involving Iran that were previously

authorized pursuant to GL I. This wind-down general license will appear at 31 C.F.R. § 560.536. [05-08-2018; updated on 06-27-2018]

4.4. Is General License H (GL H) still in effect during the wind-down period?

Following the issuance of the May 8, 2018 NSPM, OFAC announced its intention to revoke GL H, which authorized U.S.-owned or -controlled foreign entities to engage in certain activities involving Iran, as soon as is administratively feasible. OFAC also announced its intention to issue a revised authorization for the wind down of activities involving Iran authorized pursuant to GL H. The wind-down of those activities authorized pursuant to GL H must be completed by November 4, 2018. Any activities by U.S.-owned or -controlled foreign entities that continue after the wind-down period concludes on November 4, 2018, in violation of the ITSR may be subject to enforcement actions by OFAC. In considering what potential enforcement or sanctions actions to take with respect to activities engaged in after November 4, 2018, OFAC will take into account the efforts to wind down activities involving Iran prior to that date.

OFAC has revoked GL H and issued a wind-down general license that authorizes, through November 4, 2018, the wind down of activities involving Iran that were previously authorized pursuant to GL H. This wind-down general license will appear at 31 C.F.R. § 560.537. [05-08-2018; updated on 06-27-2018]

4.5. Can I continue to import Iranian-origin carpets and foodstuffs after May 8, 2018?

Following the issuance of the May 8, 2018 NSPM, OFAC announced its intention to amend the general licenses at 31 C.F.R. §§ 560.534 (authorizing the importation into the United States of, and dealings in, certain Iranian-origin carpets and foodstuffs) and 560.535 (authorizing certain related letters of credit and brokering services) as soon as is administratively feasible in order to narrow the scope of those general licenses to authorize the wind-down of activities by August 6, 2018, that were undertaken consistent with the sanctions relief provided for in the JCPOA. Any activities by U.S. persons or U.S.-owned or -controlled foreign entities that continue after the wind-down period concludes on August 6, 2018, in violation of the ITSR may be subject to enforcement actions by OFAC. In considering what potential enforcement or sanctions actions to take with respect to activities engaged in after August 6, 2018, OFAC will take into account the efforts to wind-down activities involving Iran prior to that date.

OFAC has amended the ITSR to narrow the scope of the general licenses at 31 C.F.R. §§ 560.534 and 560.535 to authorize the wind down, through August 6, 2018, of activities that were previously authorized under those general licenses. [05-08-2018; updated on 06-27-2018]

5. **OTHER**

5.1. Will the United States resume efforts to reduce Iran's crude oil sales?

Yes. The sanctions lifted under section 1245(d) of the NDAA will be re-imposed following a 180-day wind-down period, and the United States will again pursue efforts to reduce Iran's sales of crude oil under the NDAA during and following that period. For more information about NDAA sanctions, [see Topic NDAA \(Section 1245 of the National Defense Authorization Act for Fiscal Year 2012\)](#). [05-08-2018]

5.2. How and when will significant reduction exceptions be determined?

The State Department will evaluate and make determinations with respect to significant reduction exceptions provided for in section 1245(d)(4)(D) of the NDAA at the end of the 180-day wind-down period. Countries seeking such exceptions are advised to reduce their volume of crude oil purchases from Iran during this wind-down period. Consistent with past practice, the Secretary of State, in consultation with the Secretary of the Treasury, the Secretary of Energy, and the Director of National Intelligence, would make such determinations following a process of rigorous due diligence. For the initial set of such determinations, the State Department intends to consider relevant evidence in assessing each country's efforts to reduce the volume of crude oil imported from Iran during the 180-day wind-down period, including the quantity and percentage of the reduction in purchases of Iranian crude oil, the termination of contracts for future delivery of Iranian crude oil, and other actions that demonstrate a commitment to decrease substantially such purchases. The State Department expects to engage in consultations with countries currently purchasing Iranian crude oil during the 180-day wind-down period. [05-08-2018]

U.S. DEPARTMENT OF THE TREASURY

Resource Center

May 2018 Guidance on Reimposing Certain Sanctions with Respect to Iran

11/5/2018

On May 8, 2018, the President announced his decision to cease the United States' participation in the Joint Comprehensive Plan of Action (JCPOA) and to begin re-imposing the U.S. nuclear-related sanctions that were lifted to effectuate the JCPOA sanctions relief, following a wind-down period. In conjunction with this announcement, the President issued National Security Presidential Memorandum-11 directing the U.S. Department of the Treasury and other Departments and Agencies to take the actions necessary to implement his decision.

Consistent with the President's guidance, Departments and Agencies implemented 90-day and 180-day wind-down periods for activities involving Iran that were consistent with the U.S. sanctions relief specified in the JCPOA. To effectuate the wind-down periods, the State Department has issued the necessary statutory sanctions waivers for the duration of the relevant wind-down periods. In addition, the Department of the Treasury's Office of Foreign Assets Control (OFAC) has revoked, or amended, as appropriate, general and specific licenses issued in connection with the JCPOA. OFAC also issued new authorizations to allow the wind down of transactions and activities that were authorized pursuant to the revoked or amended general and specific licenses.

August 6, 2018, marks the final day of the 90-day wind-down period. The President has issued [Executive Order 13846 \(E.O.\) of August 6, 2018, "Reimposing Certain Sanctions With Respect to Iran"](#), which reimposes relevant provisions of five Iran sanctions E.O.s that were revoked or amended by E.O. 13716 of January 16, 2016. Executive Order 13846 is effective at 12:01 a.m. eastern daylight time (EDT) on August 7, 2018, at which time the sanctions subject to the 90-day wind-down period will come into effect pursuant to Executive Order 13846 and, as appropriate, relevant statutory provisions that will no longer be within the scope of the waiver actions taken by the Secretary of State.

In addition, certain wind-down general licenses (GLs) previously issued by OFAC expire at 11:59 p.m. EDT on August 6, 2018. For detailed information regarding which GLs expire on August 6 and which sanctions are reimposed on August 7, see FAQ 1.2 of the [Frequently Asked Questions Regarding the Re-Imposition of Sanctions Pursuant to the May 8, 2018 National Security Presidential Memorandum Relating to the Join Comprehensive Plan of Action \(JCPOA\)](#).

The 180-day wind-down period ends at 11:59 p.m. eastern standard time (EST) on November 4, 2018, and the remaining sanctions that had been lifted or waived pursuant to the JCPOA come back into full effect on November 5, 2018. For information about which sanctions will be reimposed on November 5, 2018, see FAQ 1.3 of the [Frequently Asked Questions Regarding the Re-Imposition of Sanctions Pursuant to the May 8, 2018 National Security Presidential Memorandum Relating to the JCPOA](#). OFAC will publish additional guidance with respect to the end of the 180-day wind-down period no later than November 4, 2018.

OFAC has posted to its website updated [additional frequently asked questions \(FAQs\)](#) that provide guidance on the sanctions that are to be reimposed and the relevant wind-down periods. In addition, OFAC has posted to its website [FAQs relating to E.O 13846](#).

The U.S. government will continue to make aggressive use of its authorities to target Iran's malign behavior.

Waiver Determinations and Findings

Acting under the authorities vested in me as Secretary of State, including through the applicable delegations of authority, I hereby make the following determinations and certifications:

Pursuant to Sections 1244(i), 1245(g), 1246(e), and 1247(f) of the Iran Freedom and Counter-Proliferation Act of 2012 (subtitle D of title XII of Public Law 112-239, 22 U.S.C. 8801 *et seq.*) (IFCA), I determine that it is vital to the national security of the United States to waive the imposition of sanctions under the following provisions, to the extent necessary to implement the Joint Comprehensive Plan of Action (JCPOA), including the U.S. commitments with respect to sanctions described in Sections 17.1-17.2 and 17.5 of Annex V of the JCPOA, effective as provided in the last paragraph below:

1. Section 1244(c)(1) of IFCA¹ for:
 - a. transactions by non-U.S. persons²; and
 - b. transactions by U.S. persons for the sale of commercial passenger aircraft and spare parts and components for such aircraft, and associated services to Iran as described in Section 5.1.1 of Annex II to the JCPOA, provided that OFAC has issued any required licenses;

excluding any transactions involving persons on OFAC's list of Specially Designated Nationals and Blocked Persons³ (hereinafter the SDN List);

¹ Pursuant to section 1244(c)(2)(C)(iii) of IFCA, the relevant sanction in Section 1244(c)(1) continues not to apply, by its terms, in the case of Iranian financial institutions that have not been designated for the imposition of sanctions in connection with Iran's proliferation of weapons of mass destruction or delivery systems for weapons of mass destruction, support for international terrorism, or abuses of human rights (as described in section 1244(c)(3)).

² For purposes of the waivers set forth herein, the term "transactions by non-U.S. persons" includes transactions by non-U.S. entities that are owned or controlled by a U.S. person ("U.S.-owned or controlled foreign entities") to the extent U.S.-owned or -controlled foreign entities are authorized by the Office of Foreign Assets Control (OFAC) of the Department of the Treasury to engage in such transactions.

³ On Implementation Day of the JCPOA, individuals and entities identified in Attachment 3 to Annex II of the JCPOA will be removed from the SDN List and, as appropriate, the Foreign Sanctions Evaders List and/or the Non-SDN Iran Sanctions Act List. For transactions with individuals or entities that have been removed from the SDN List but that remain blocked solely pursuant to Executive Order 13599, this waiver applies only if and to the extent necessary to implement the JCPOA, including the U.S. commitments with respect to sanctions described in Sections 17.1-17.2 and 17.5 of Annex V of the JCPOA.

2. Section 1244(d) of IFCA for transactions by non-U.S. persons, excluding any transactions involving persons on the SDN List;
3. Section 1244(h)(2) of IFCA for transactions by foreign financial institutions, excluding any transactions involving persons on the SDN List;
4. Sections 1245(a)(1)(A) of IFCA for transactions by non-U.S. persons, excluding any transactions involving persons on the SDN List;
5. Sections 1245(a)(1)(B) of IFCA for transactions by non-U.S. persons, excluding any transactions involving persons on the SDN List;
6. Section 1245(a)(1)(C) of IFCA for transactions by non-U.S. persons for the sale, supply, or transfer directly or indirectly to or from Iran of materials described in Section 1245(d), and for associated services, with respect to materials that are:
 - (a) to be used in connection with the energy, shipping, or shipbuilding sector of Iran, or resold, retransferred, or otherwise supplied to an end user in one or more such sectors;
 - (b) sold, supplied, or transferred to any individual or entity blocked solely pursuant to E.O. 13599, or resold, retransferred, or otherwise supplied to such an individual or entity; and
 - (c) determined pursuant to Section 1245(e)(3) to be used as described in that section, or resold, retransferred, or otherwise supplied for use in the nuclear program of Iran;

excluding transactions involving: (i) persons on the SDN List; (ii) the sale, supply, or transfer of materials described in section 1245(d) that have not been approved by the procurement channel established pursuant to paragraph 16 of United Nations Security Council Resolution 2231 and Section 6 of Annex IV of the JCPOA, in cases in which the procurement channel applies; or (iii) the sale, supply, or transfer of materials described in section 1245(d) if the material is sold, supplied, or transferred, or resold, retransferred, or otherwise supplied directly or indirectly, for use in connection with the military or ballistic missile program of Iran;

7. Section 1245(c) of IFCA for transactions by non-U.S. persons that are within the scope of the waivers under Section 1245(a)(1) of IFCA as described in paragraphs 4-6 above, excluding any transactions involving persons on the SDN List;
8. Section 1246(a)(1)(A) of IFCA⁴ for the provision of underwriting services or insurance or reinsurance by non-U.S. persons in connection with activities involving Iran that are described in Sections 17.1-17.2 and 17.5 of Annex V of the JCPOA, excluding any transactions involving persons on the SDN List;
9. Section 1246(a)(1)(B)(i) of IFCA for the provision of underwriting services or insurance or reinsurance by non-U.S. persons, excluding any transactions involving persons on the SDN List;
10. Section 1246(a)(1)(B)(ii) of IFCA for the provision of underwriting services or insurance or reinsurance by non-U.S. persons for transactions that are within the scope of the waivers under section 1245(a)(1)(B) and (C) of IFCA as described in paragraphs 5-6 above, excluding any transactions involving persons on the SDN List;
11. Section 1246(a)(1)(C) of IFCA for the provision of underwriting services or insurance or reinsurance by non-U.S. persons to or for any individual or entity blocked solely pursuant to E.O. 13599, excluding any transactions involving persons on the SDN List;
12. Section 1246(a) of IFCA for the provision of underwriting services or insurance or reinsurance by U.S. persons for the sale of commercial passenger aircraft and related parts and services to Iran as described in Section 5.1.1 of Annex II of the JCPOA, provided that OFAC has issued any required licenses, excluding any transactions involving persons on the SDN List; and

⁴ Pursuant to section 1246(a)(1)(C) of IFCA, the relevant sanction in section 1246(a)(1) continues not to apply, by its terms, in the case of Iranian financial institutions that have not been designated for the imposition of sanctions in connection with Iran's proliferation of weapons of mass destruction or delivery systems for weapons of mass destruction, support for international terrorism, or abuses of human rights (as described in section 1246(b)).

13. Section 1247(a) of IFCA⁵ to the extent required for transactions by foreign financial institutions, excluding any transactions involving persons on the SDN List.

Pursuant to section 1245(d)(5) of the National Defense Authorization Act for FY 2012 (Public Law 112-81), as amended, I determine that it is in the national security interest of the United States to waive the imposition of sanctions under Section 1245(d)(1) to the extent necessary to implement the JCPOA, including the U.S. commitments with respect to sanctions described in Sections 17.1-17.2 and 17.5 of Annex V of the JCPOA, for transactions by foreign financial institutions with the Central Bank of Iran, excluding any transactions involving persons on the SDN List, effective as provided in the last paragraph below.

Pursuant to sections 212(d)(1) and 213(b)(1) of the Iran Threat Reduction and Syria Human Rights Act of 2012 (Public Law 112-158) (TRA) and section 4(c)(1)(A) of the Iran Sanctions Act of 1996 (Public Law 104-172, 50 U.S.C. 1701 note) (ISA), I find that it is vital to the national security interests of the United States to issue waivers regarding the application of sanctions under the following provisions for individuals and entities that engage in or propose to engage in the activities described in (1)-(3) below, effective as provided in the last paragraph below:

1. Section 212(a) of the TRA for transactions by non-U.S. nationals in cases where the transactions are for activities described in Sections 4.2.1, 4.3, and 4.4 of Annex II of the JCPOA and do not involve persons on the SDN List.
2. Section 213(a) of the TRA for transactions by non-U.S. nationals in cases where the transactions are for activities described in Section 4.1.5 and 4.1.7 of Annex II of the JCPOA and do not involve persons on the SDN List.
3. Section 5(a) of ISA for transactions by non-U.S. nationals in cases where the transactions are for activities described in Sections 4.2.1,

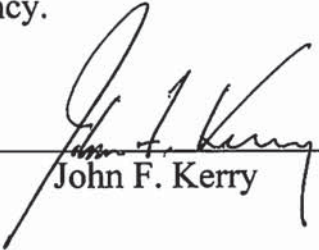
⁵ Pursuant to section 1247(a) of IFCA, the relevant sanction in section 1247(a) still continues not to apply, by its terms, in the case of Iranian financial institutions that have not been designated for the imposition of sanctions in connection with Iran's proliferation of weapons of mass destruction or delivery systems for weapons of mass destruction, support for international terrorism, or abuses of human rights (as described in section 1247(b)).

4.3.1, 4.3.2, 4.3.4, and 4.3.6 of Annex II of the JCPOA and do not involve persons on the SDN List.

The waivers and findings set forth above shall take effect upon confirmation by the Secretary of State that Iran has implemented the nuclear-related measures specified in Sections 15.1-15.11 of Annex V of the JCPOA as verified by the International Atomic Energy Agency.

OCT 18 2015

Date



John F. Kerry

Please note that on May 8, 2018, the President announced his decision to cease the United States' participation in the Joint Comprehensive Plan of Action (JCPOA), and to begin re-imposing the U.S. nuclear-related sanctions that were lifted to effectuate the JCPOA sanctions relief, following a wind-down period. This document remains available on OFAC's website only to assist persons in determining which activities were consistent with the JCPOA sanctions lifting, as in effect from January 16, 2016 through May 8, 2018. Please note that the Departments of State and of the Treasury have issued additional guidance regarding activities that may be undertaken during the wind-down periods. To the extent there are discrepancies between this document and guidance issued by the Department of State or the Department of the Treasury on or after May 8, 2018, the later-issued guidance should be treated as governing.

This document remains available on OFAC’s website only to assist persons in determining which activities were consistent with the JCPOA sanctions lifting, as in effect from January 16, 2016 through May 8, 2018. Please note that the Departments of State and of the Treasury have issued additional guidance regarding activities that may be undertaken during the wind-down periods. To the extent there are discrepancies between this document and guidance issued by the Department of State or the Department of the Treasury on or after May 8, 2018, the later-issued guidance should be treated as governing.

**Issued on January 16, 2016
Last Updated on December 15, 2016**

This document is explanatory only and does not have the force of law. Please see particularly the legally binding provisions cited below governing the sanctions. This document does not supplement or modify the statutory authorities, Executive orders, or regulations.

Frequently Asked Questions Relating to the Lifting of Certain U.S. Sanctions Under the Joint Comprehensive Plan of Action (JCPOA) on Implementation Day¹

A. GENERAL QUESTIONS

A. 1. What is Implementation Day? When does the lifting of sanctions under the JCPOA go into effect?

Implementation Day, which is January 16, 2016, marks the day on which the International Atomic Energy Agency (IAEA) verified that Iran implemented its nuclear-related commitments described in sections 15.1-15.11 of Annex V of the JCPOA. Simultaneous with the IAEA verification, the European Union (EU) and United States took the actions necessary to lift sanctions as set out in sections 16 and 17, respectively, of Annex V of the JCPOA. Following confirmation by the Secretary of State that the IAEA verified that Iran met its commitments, the Department of the Treasury’s Office of Foreign Assets Control (OFAC) updated its website to notify the public that the U.S. sanctions commitments described in section 17 of Annex V of the JCPOA have been implemented. [01-16-2016]

A. 2. What sanctions were lifted on Implementation Day? What activities involving Iran are covered by the lifting of sanctions on Implementation Day?

On Implementation Day, the United States lifted the nuclear-related “secondary sanctions” described in sections 4.1-4.7 of Annex II and 17.1-17.2 of Annex V of the JCPOA and detailed below. Secondary sanctions generally are directed toward non-U.S. persons² for specified conduct involving Iran that occurs entirely outside of U.S. jurisdiction.

¹ For additional information regarding the subjects covered in these Frequently Asked Questions (FAQs), please see the *Guidance Relating to the Lifting of Certain U.S. Sanctions Pursuant to the Joint Comprehensive Plan of Action on Implementation Day* ([Guidance Document](#)) issued by the U.S. Department of the Treasury and the U.S. Department of State.

² For the purpose of these FAQs, the term “non-U.S. person” means any individual or entity excluding any United States citizen, permanent resident alien, entity organized under the laws of the United States or any jurisdiction

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

Specifically, on Implementation Day, the United States lifted the following secondary sanctions:

- Financial and banking-related sanctions (*see* sections 4.1 of Annex II and 17.1 of Annex V of the JCPOA and section C of these FAQs);
- Sanctions on the provision of underwriting services, insurance, or re-insurance in connection with activities that are consistent with the JCPOA (*see* sections 4.2 of Annex II and 17.1 of Annex V of the JCPOA and section D of these FAQs);
- Sanctions on Iran’s energy and petrochemical sectors (*see* sections 4.3 of Annex II and 17.1 of Annex V of the JCPOA and section B of these FAQs);
- Sanctions on transactions with Iran’s shipping and shipbuilding sectors and port operators (*see* sections 4.4 of Annex II and 17.1 of Annex V of the JCPOA and section E of these FAQs);
- Sanctions on Iran’s trade in gold and other precious metals (*see* sections 4.5 of Annex II and 17.1 of Annex V of the JCPOA and section F of these FAQs);
- Sanctions on trade with Iran in graphite, raw or semi-finished metals such as aluminum and steel, coal, and software for integrating industrial processes, in connection with activities that are consistent with the JCPOA (*see* sections 4.6 of Annex II and 17.2 of Annex V of the JCPOA and section G of these FAQs);
- Sanctions on the sale, supply, or transfer of goods and services used in connection with Iran’s automotive sector (*see* sections 4.7 of Annex II and 17.1 of Annex V of the JCPOA and section H of these FAQs); and

within the United States (including foreign branches), or any person in the United States. However, an entity that is owned or controlled by a United States person and established or maintained outside the United States (a “U.S.-owned or -controlled foreign entity”) is eligible to participate in transactions or activities subject to the sanctions lifting under the JCPOA only to the extent the U.S.-owned or -controlled foreign entity is authorized by OFAC to engage in such transactions or activities, including pursuant to General License H (*see* section K of these FAQs).

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

- Sanctions on associated services for each of the categories above (*see* sections 4.1-4.7 of Annex II and 17.1-17.2 of Annex V of the JCPOA) (*see* FAQ A.7 for a discussion of “associated services”).

In addition to the lifting of the nuclear-related secondary sanctions set out above, on Implementation Day, the United States removed over 400 individuals and entities from OFAC’s List of Specially Designated Nationals and Blocked Persons (SDN List), the Foreign Sanctions Evaders List (FSE List), and/or the Non-SDN Iran Sanctions Act List (NS-ISA List), as appropriate, pursuant to its commitment under sections 4.8.1 of Annex II and 17.3 of Annex V of the JCPOA. The names of those individuals and entities are set out in [Attachment 3](#) to Annex II of the JCPOA. Beginning on Implementation Day, non-U.S. persons will no longer be subject to sanctions for conducting transactions with any of the more than 400 individuals and entities set out in Attachment 3 to Annex II of the JCPOA, including the Central Bank of Iran (CBI) and the specified Iranian financial institutions, provided these transactions do not involve persons on the SDN List after Implementation Day or conduct described in FAQ A.3.ii-iii. That said, secondary sanctions continue to apply to non-U.S. persons for conducting transactions with any of the more than 200 Iranian or Iran-related individuals and entities who remain or are placed on the SDN List, notwithstanding the lifting of secondary sanctions on categories and sectors as set out above (*see* FAQ A.6).

Pursuant to its commitments under sections 4 of Annex II and 17.4 of Annex 5, the United States terminated Executive Orders 13574, 13590, 13622, and 13645, and sections 5-7 and 15 of Executive Order 13628 (*see* FAQs A.8 and A.9).

Pursuant to sections 5 of Annex II and 17.5 of Annex V of the JCPOA, the United States has committed to license three categories of activity that would otherwise be prohibited under the Iranian Transactions and Sanctions Regulations, 31 C.F.R. Part 560 (ITSR), provided that the transactions do not involve individuals and entities on the SDN List and are otherwise consistent with the JCPOA and applicable U.S. law. Accordingly, on Implementation Day, OFAC issued:

- A Statement of Licensing Policy allowing for the case-by-case licensing of individuals and entities seeking to export, reexport, sell, lease, or transfer to Iran commercial passenger aircraft, and related parts and services, for exclusively commercial passenger aviation (*see* section J of these FAQs);

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

- A general license authorizing U.S.-owned or -controlled foreign entities to engage in certain activities involving Iran (*see* section K of these FAQs); and
- A general license, which is effective upon publication in the *Federal Register*, authorizing the importation into the United States of Iranian-origin carpets and foodstuffs, including pistachios and caviar (*see* section L of these FAQs).

The U.S. commitments to lift secondary sanctions described in these FAQs do not apply to transactions or activities involving individuals and entities who remain or are placed on OFAC’s SDN List after Implementation Day and are without prejudice to any other U.S. sanctions that may apply under legal provisions other than those cited in section 4 of Annex II of the JCPOA.³ [01-16-2016]

A. 3. Broadly, what U.S. sanctions against Iran remain in place after Implementation Day? What activities involving Iran trigger sanctions after Implementation Day?

A number of U.S. sanctions authorities with respect to Iran remain in place after Implementation Day, including those set out below.

- i. *Primary U.S. Sanctions.* The U.S. domestic trade embargo on Iran remains in place. Even after Implementation Day, with limited exceptions, U.S. persons⁴ – including U.S. companies – continue to be broadly prohibited from engaging in transactions or dealings with Iran or its government. In addition, the Government of Iran and Iranian financial institutions remain persons whose property and interests in property are blocked under Executive Order 13599 and section 560.211 of the ITSR, and U.S. persons continue to be broadly prohibited from engaging in transactions or dealings with the Government of Iran and Iranian financial institutions, with the exception of transactions that are exempt from regulation or authorized by OFAC. Unless an exemption or express OFAC authorization applies, U.S. persons continue to have an obligation to block the

³ For example, a transaction involving Iran that would be sanctionable under an authority that is not lifted pursuant to the JCPOA (e.g., a U.S. sanctions authority relating to Yemen or Syria) remains sanctionable under that other authority after Implementation Day.

⁴ For the purpose of primary U.S. sanctions administered by OFAC and these FAQs, the term “U.S. person” means any United States citizen, permanent resident alien, entity organized under the laws of the United States or any jurisdiction within the United States (including foreign branches), or any person in the United States. *See* section 560.314 of the ITSR. While a U.S. branch of a foreign financial institution would be considered a U.S. person for the purposes of the ITSR, the foreign financial institution located outside the United States would not.

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

property and interests in property of all individuals and entities that meet the definition of the Government of Iran or an Iranian financial institution, regardless of whether or not the individual or entity has been identified by OFAC on the E.O. 13599 List (*see* FAQ I.2). In addition, non-U.S. persons continue to be prohibited from knowingly⁵ engaging in conduct that seeks to evade U.S. restrictions on transactions or dealings with Iran or that causes the export of goods or services from the United States to Iran.

ii. *Designation authorities.* In addition, after Implementation Day, the United States retains a number of authorities to counter Iran’s other activities, including the following authorities which are also listed in section VII.B of the [Guidance Document](#):

- *Support for terrorism:* Executive Order 13224 (blocking property and prohibiting transactions with persons who commit, threaten to commit, or support terrorism);
- *Iran’s human rights abuses:*
 - Executive Orders 13553 and 13628 (implementing sections 105, 105A, and 105B of CISADA (related to persons who are responsible for or complicit in human rights abuses committed against the citizens of Iran; transfers of goods or technologies to Iran that are likely to be used to commit serious human rights abuses against the people of Iran; and persons who engage in censorship or similar activities with respect to Iran)); and
 - Executive Order 13606 (relating to the provision of information technology used to further serious human rights abuses);
- *Proliferation of WMD and their means of delivery, including ballistic missiles:* Executive Orders 12938 and 13382;

⁵ For the purpose of these FAQs, with respect to conduct, a circumstance, or a result, the term “knowingly” means that a person has actual knowledge, or should have known, of the conduct, the circumstance, or the result (*see* FAQ [289](#)).

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Issued on January 16, 2016
Last Updated on December 15, 2016

- Support for persons involved in human rights abuses in Syria or for the Government of Syria: Executive Orders 13572 and 13582; and
- Support for persons threatening the peace, security, or stability of Yemen: Executive Order 13611.

These authorities generally provide the ability to impose blocking sanctions on individuals and entities that meet specified criteria, including for providing material support to persons engaged in the activities targeted by the authority.

- iii. *Secondary Sanctions targeting dealings by non-U.S. persons with Iran-related persons remaining on the SDN List after Implementation Day or involving trade in certain materials involving Iran.* After Implementation Day, secondary sanctions continue to attach to significant⁶ transactions with: (1) Iranian persons that are on the SDN List; (2) the Islamic Revolutionary Guard Corps (IRGC) and its designated agents or affiliates; and (3) any other person on the SDN List designated under Executive Order 13224 or Executive Order 13382 in connection with Iran’s proliferation of weapons of mass destruction (WMD) or their means of delivery or Iran’s support for international terrorism (*see* FAQ A.6). In addition, sanctions targeting certain activities related to trade in materials described in section 1245(d) of the Iran Freedom and Counter-Proliferation Act of 2012 (IFCA) that are outside the scope of the JCPOA and related waivers remain in place.

See section VII of the [Guidance Document](#) for additional information regarding U.S. legal authorities directed toward, or that have been used to address, U.S. concerns with respect to Iran, which are outside the scope of the JCPOA and remain in place following Implementation Day. [01-16-2016]

A. 4. How did the United States lift sanctions on Implementation Day?

On Implementation Day, the United States lifted the secondary sanctions described in sections 4.1-4.8 of Annex II and 17.1-17.4 of Annex V of the JCPOA by (1) issuing waivers of certain statutory sanctions provisions, (2) committing to refrain from exercising certain discretionary sanctions authorities, (3) removing certain individuals

⁶ For the purpose of these FAQs, OFAC will rely on the interpretation set out in 561.404 of the IFSR in determining whether transactions, financial transactions, or financial services are significant (*see* FAQ [289](#)).

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

and entities from OFAC’s sanctions lists, and (4) revoking certain Executive orders and specified sections of an Executive order.

- ***Waivers and Non-Exercise of Discretionary Authorities.*** On October 18, 2015, or “[Adoption Day](#)” under the JCPOA, the Department of State issued [contingent waivers](#) of certain statutory sanctions provisions. These waivers came into effect on Implementation Day upon confirmation by the Secretary of State that Iran implemented the nuclear-related measures specified in sections 15.1-15.11 of Annex V of the JCPOA, as verified by the IAEA. Sections II and VI of the [Guidance Document](#) provide details on the specific provisions waived on Implementation Day and certain discretionary sanctions authorities the United States has committed not to exercise.
- ***Removal of Sanctions Listings.*** On Implementation Day, the individuals and entities set out in [Attachment 3](#) to Annex II of the JCPOA were removed from the SDN List, FSE List, and/or NS-ISA List, as appropriate (*see* FAQ I.1).
- ***Termination of Executive Orders.*** On Implementation Day, the President issued an Executive order revoking Executive Orders 13574, 13590, 13622, and 13645, and sections 5-7 and 15 of Executive Order 13628, as provided for in section 17.4 of Annex V of the JCPOA (*see* FAQs A.8 and A.9).

In addition, on Implementation Day, the United States issued a Statement of Licensing Policy and two general licenses to implement its commitments under sections 5 of Annex II and 17.5 of Annex V of the JCPOA (*see* sections J, K, and L of these FAQs). [01-16-2016]

A. 5. Are U.S. persons able to engage in any of the transactions with Iran outlined in the JCPOA?

The United States committed under the JCPOA to license U.S. persons to engage in certain transactions related to three categories of activity set out in section 5 of Annex II of the JCPOA (*see* sections J, K, and L of these FAQs). However, post-Implementation Day, U.S. persons continue to be generally prohibited from engaging in transactions or dealings involving Iran, including the Government of Iran and Iranian financial institutions, with the exception of specific activities that are exempt from regulation or

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

authorized by OFAC, including the three categories of activity that the United States committed to licensing. Following Implementation Day, U.S. persons continue to be authorized to undertake a range of activities involving Iran pursuant to general licenses issued by OFAC, including for example the longstanding authorization for exports to Iran of agricultural commodities (including food), medicine, and medical supplies. [01-16-2016]

A. 6. Post-Implementation Day, are transactions with Iran-related persons who remain on the SDN List sanctionable? How do I know if secondary sanctions attach to a transaction with a person on the SDN List?

Yes. While over 400 individuals and entities were removed from the SDN list on Implementation Day, secondary sanctions continue to apply to non-U.S. persons who knowingly facilitate significant financial transactions with or provide material or certain other support to those Iranian or Iran-related persons that remain or are placed on the SDN List.

In particular, after Implementation Day, secondary sanctions continue to attach to such activities with: (1) Iranian persons that remain or are placed on the SDN List; (2) the IRGC and its designated agents or affiliates; and (3) any other person on the SDN List designated under Executive Order 13224 or Executive Order 13382 in connection with Iran’s proliferation of WMD or their means of delivery or Iran’s support for international terrorism.

To assist the public, SDN List entries for these persons contain the phrase “Subject to Secondary Sanctions” in the “Additional Sanctions Information” field. In addition, SDN List entries for persons subject to secondary sanctions pursuant to section 104(c)(2)(E) of the Comprehensive Iran Sanctions, Accountability, and Divestment Act of 2010 (CISADA) include special identifying tags: the IRGC and its designated agents or affiliates are identified with the tag “[IRGC]” and SDNs designated pursuant to Executive Order 13224 or Executive Order 13382 in connection with, respectively, Iran’s proliferation of WMD or their means of delivery or Iran’s support for international terrorism are identified with the tag “[IFSR].”

For a list of additional activities that can subject a foreign financial institution to secondary sanctions pursuant to CISADA, *see* [FAQ 149](#).

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

In addition, U.S. persons continue to be generally prohibited from dealing with persons on the SDN List. The SDN List has the potential to change and persons should continue to monitor the SDN List for the most up-to-date information. [01-16-2016]

A. 7. Is the provision of associated services that are ordinarily incident to the underlying activities for which sanctions have been lifted pursuant to the JCPOA allowed? What does the term “associated services” mean when used in Annex II of the JCPOA?

Yes. Beginning on Implementation Day, non-U.S. persons may provide associated services that are ordinarily incident to those activities for which sanctions have been lifted as described in sections 4.1-4.7 of Annex II and 17.1-17.2 of Annex V of the JCPOA, provided such services are consistent with the JCPOA and do not involve persons on the SDN List or other activities that would be sanctionable under U.S. law. As a general matter, U.S. persons are prohibited from providing associated services in connection with activities involving Iran; however, they may be authorized by OFAC to provide such services in connection with activities authorized pursuant to a specific license, such as for exports of commercial passenger aircraft and related parts and services covered by the commitment in sections 5.1.1 of Annex II and 17.5 of Annex V of the JCPOA (*see* section J of these FAQs), or under a general license, such as that for the importation of Iranian-origin carpets and foodstuffs into the United States pursuant to the commitment in sections 5.1.3 of Annex II and 17.5 of Annex V of the JCPOA (*see* section L of these FAQs). For purposes of those activities for which sanctions have been lifted as described in sections 4.1-4.7 of Annex II and 17.1-17.2 of Annex V of the JCPOA, the term “associated services” means any service – including technical assistance, training, insurance, re-insurance, brokering, transportation, or financial service – necessary and ordinarily incident to the underlying activity for which sanctions have been lifted pursuant to the JCPOA. [01-16-2016]

A. 8. Did the Executive order issued on Implementation Day terminate any sanctions?

Yes. As provided for in sections 4 of Annex II and 17.4 of Annex V of the JCPOA, the Executive order published on Implementation Day revoked Executive Orders 13574, 13590, 13622, and 13645, and sections 5-7 and 15 of Executive Order 13628. However, sanctions authorities contained in the remaining sections of Executive Order 13628 remain in effect.

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

The Executive order that was published on Implementation Day has no effect on the national emergency declared in 1995 with respect to Iran, which remains in place, or on any Executive order issued in furtherance of that national emergency other than Executive Orders 13574, 13590, 13622, 13628, and 13645. [01-16-2016]

A. 9. Did the Executive order issued on Implementation Day impose new sanctions with respect to Iran?

No. The new Executive order did not impose any new sanctions with respect to Iran. However, the Executive order includes certain technical provisions that relate to the implementation of statutory authorities that are outside the scope of U.S. commitments with respect to sanctions described in sections 4.1-4.8 and 5 of Annex II and sections 17.1-17.3 and 17.5 of Annex V of the JCPOA. Specifically, these provisions apply to the extent sanctions are imposed pursuant to sections 1244(c)(1), 1244(d)(1)(A), 1245(a)(1), and 1246(a) of IFCA with respect to transactions or activities that are outside the scope of the U.S. commitments with respect to sanctions under the JCPOA. [01-16-2016]

A. 10. What is Transition Day? What will happen on Transition Day?

Transition Day will occur eight years from [Adoption Day](#), which occurred on October 18, 2015, or upon the date the IAEA has reached the Broader Conclusion that all nuclear material in Iran is used for peaceful activities, whichever is earlier.

On Transition Day, the United States will remove individuals and entities set out in [Attachment 4](#) to Annex II of the JCPOA from the SDN List and/or the FSE List, as set out in section 21.3 of Annex V of the JCPOA.⁷

In addition, the United States will seek such legislative action as may be appropriate to terminate, or modify to effectuate the termination of, the statutory sanctions set forth in sections 4.1-4.5, 4.7, and 4.9 of Annex II of the JCPOA and the statutory sanctions described in section 4.6 of Annex II, in connection with activities consistent with the JCPOA, as set out in sections 21.1-21.2 of Annex V of the JCPOA. OFAC anticipates issuing further guidance on Transition Day measures prior to Transition Day. [01-16-2016]

⁷ Pursuant to relevant statutes and Executive orders, the U.S. government retains the ability to remove persons from the relevant sanctions lists prior to Transition Day if the circumstances warrant.

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

A. 11. What happens to the sanctions suspended under the JPOA?

The sanctions that were temporarily suspended under the Joint Plan of Action of November 24, 2013, as extended (JPOA), are a subset of those sanctions that were lifted on Implementation Day pursuant to the JCPOA. Consequently, upon Implementation Day, the JPOA ceased to be in effect and the relevant sanctions lifting was provided as part of the JCPOA. [01-16-2016]

B. ENERGY AND PETROCHEMICAL SECTORS

B. 1. The JCPOA provides that, on Implementation Day, the United States will cease efforts to reduce Iran’s crude oil sales, including limitations on the quantities of Iranian crude sold, the jurisdictions that can purchase Iranian crude oil, and how Iranian oil revenues can be used. Are non-U.S. persons able to purchase Iranian oil beginning on Implementation Day?

Yes. As a result of the U.S. commitments specified in sections 4.3 of Annex II and 17.1 of Annex V of the JCPOA, beginning on Implementation Day, the United States is no longer pursuing efforts to reduce Iran’s sales of crude oil under the National Defense Authorization Act for Fiscal Year 2012 (NDAA) (including limitations on the quantity of crude sold and the jurisdictions that can purchase Iranian crude oil). The restriction on use of proceeds of sales of Iranian petroleum and petroleum products for bilateral trade with Iran, which previously applied to the 20 jurisdictions with a so-called “significant reduction exception” under the NDAA, no longer apply. In addition, the restrictions on Iranian oil revenues held abroad have been lifted.

Consequently, beginning on Implementation Day, secondary sanctions do not apply to non-U.S. persons that purchase, acquire, sell, transport, or market Iranian crude oil, provided that the transactions do not involve persons on the SDN List or conduct described in FAQ A.3.ii-iii.

U.S. persons continue to be generally prohibited under the ITSR from involvement in the activity described above. In addition, transactions related to the above-mentioned activity are prohibited from transiting the U.S. financial system. [01-16-2016]

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

B. 2. Can non-U.S. persons invest in Iran's oil, gas, and petrochemical sectors beginning on Implementation Day?

Yes. As a result of the U.S. commitments specified in sections 4.3 of Annex II and 17.1 of Annex V of the JCPOA, beginning on Implementation Day, the United States lifted sanctions on investments by non-U.S. persons in the oil, gas, or petrochemical sectors of Iran. As a result, non-U.S. persons are no longer subject to sanctions for investing in Iran's oil, gas, or petrochemical sectors (including through participation in joint ventures), provided that transactions do not involve persons on the SDN List or conduct described in FAQ A.3.ii-iii. [01-16-2016]

B. 3. Can non-U.S. persons provide goods and services in connection with Iran's energy sector beginning on Implementation Day?

Yes. As a result of the U.S. commitments specified in sections 4.3 of Annex II and 17.1 of Annex V of the JCPOA, beginning on Implementation Day, it is no longer sanctionable for non-U.S. persons to provide goods, services (including financial services), or technology used in connection with Iran's energy sector, the development of Iran's petroleum resources, including the domestic production of refined petroleum products and petrochemical products, or associated services, provided that transactions do not involve persons on the SDN List or conduct described in FAQ A.3.ii-iii. [01-16-2016]

B. 4. Beginning on Implementation Day, can non-U.S. persons purchase, acquire, sell, transport, or market petroleum, petrochemical products, and natural gas from Iran?

Yes. On Implementation Day, the United States lifted secondary sanctions on the purchase, acquisition, sale, transport, or marketing of petroleum, petroleum products (including refined petroleum products), petrochemical products, and natural gas (including liquefied natural gas) from Iran, and the provision of associated services. As a result, beginning on Implementation Day, non-U.S. persons are no longer subject to sanctions for engaging in such activities, provided that transactions do not involve persons on the SDN List or conduct described in FAQ A.3.ii-iii. [01-16-2016]

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

B. 5. Beginning on Implementation Day, can non-U.S. persons export, sell, or provide refined petroleum products and petrochemical products to Iran?

Yes. On Implementation Day, the United States lifted secondary sanctions on the export, sale, or provision of refined petroleum products and petrochemical products to Iran. As a result, beginning on Implementation Day, non-U.S. persons are no longer subject to sanctions for engaging in these activities, provided that transactions do not involve persons on the SDN List or conduct described in FAQ A.3.ii-iii. [01-16-2016]

B. 6. Beginning on Implementation Day, can U.S. persons export, sell, or provide goods, services, or technology to Iran’s energy sector?

No. Under section 560.204 of the ITSR, U.S. persons continue to be broadly prohibited from exporting any goods, services, or technology directly or indirectly to Iran, with the exception of transactions that are exempt from regulation or authorized by OFAC (*see* FAQ M.9). [01-16-2016]

B. 7. Beginning on Implementation Day, are non-U.S. persons able to engage in transactions with Iran’s energy sector, including the National Iranian Oil Company (NIOC), the Naftiran Intertrade Company (NICO), and the National Iranian Tanker Company (NITC)?

Yes. On Implementation Day, the United States lifted secondary sanctions on Iran’s energy sector. As part of its efforts to give effect to this relief, the United States resolved a number of past designations and determinations, including the Department of the Treasury’s determination with respect to NIOC under section 312 of the TRA. In particular, the Department of the Treasury determined that NIOC is no longer an agent or affiliate of the IRGC. Beginning on Implementation Day, non-U.S. persons are no longer subject to sanctions for engaging in activities with Iran’s energy sector, including transactions with NIOC, NITC, and NICO, and the provision of associated services, provided that transactions do not involve persons on the SDN List or conduct described in FAQ A.3.ii-iii. [01-16-2016]

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Issued on January 16, 2016
Last Updated on December 15, 2016

B. 8. Beginning on Implementation Day is it permissible to make payments for Iranian oil through the U.S. financial system?

No. The JCPOA provides that, on Implementation Day, the United States ceased efforts to reduce Iran's crude oil sales and lifted secondary sanctions on investment in Iran's oil, gas, and petrochemical sectors, as well as on the export, sale or provision of refined petroleum. This lifting of sanctions pertains solely to non-U.S. persons, and U.S. persons continue to be prohibited from engaging in activities related to Iran's energy sector. Similarly, as a general matter, U.S. financial institutions continue to be prohibited from processing payments related to Iranian oil. [01-16-2016]

C. FINANCIAL AND BANKING MEASURES

C. 1. Which financial and banking sanctions are relieved under the JCPOA?

Pursuant to U.S. commitments in sections 4.1 of Annex II and 17.1 of Annex V of the JCPOA, beginning on Implementation Day, secondary sanctions do not apply to non-U.S. persons who engage in:

- Financial and banking transactions with individuals and entities removed from the SDN List, FSE List, and/or NS-ISA List, as appropriate, on Implementation Day (including sanctions on the opening and maintenance of correspondent and payable-through accounts, investments, foreign exchange transactions, and letters of credit). Individuals and entities that were removed include the CBI and most other Iranian financial institutions, NIOC, NICO, NITC, and other specified individuals and entities identified by OFAC as the Government of Iran on the SDN List. For the full list of individuals and entities that were removed from SDN List, FSE List, and/or NS-ISA List on Implementation Day, see [Attachment 3](#) to Annex II of the JCPOA;
- Transactions and other activity related to the Iranian rial;
- Provision of U.S. bank notes to the Government of Iran, including the provision of material support for such transactions;
- The purchase, subscription to, or facilitation of the issuance of Iranian sovereign debt, including governmental bonds; and
- The provision of financial messaging services to the CBI and other Iranian financial institutions removed from the SDN List on Implementation Day.

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

The U.S. commitments also include the lifting of bilateral trade limitations on CBI revenues held abroad, including limitations on their transfer, as set forth in section 1245(d) of the NDAA. As a result of the lifting of these sanctions, foreign financial institutions⁸ are able to conduct transactions with respect to the CBI’s previously restricted funds abroad unless such transactions involve persons that remain on the SDN List or conduct described in FAQ A.3.ii-iii.

U.S. persons continue to be generally prohibited under the ITSR from involvement in the activity described above. In addition, transactions related to the above-mentioned activity are prohibited from transiting the U.S. financial system. [01-16-2016]

C. 2. What sanctions on the CBI were lifted? What sanctions on the CBI remain?

As a general matter, non-U.S. persons, including foreign financial institutions, can engage in financial and banking transactions with the CBI beginning on Implementation Day without exposure to sanctions. U.S. persons, however, continue to be broadly prohibited from engaging in transactions or dealings with the Government of Iran and Iranian financial institutions, including the CBI, with the exception of transactions that are exempt from regulation or authorized by OFAC. In addition, unless an exemption or express OFAC authorization applies, U.S. persons must, pursuant to Executive Order 13599 and the ITSR, continue to block the property and interests in property of these persons. [01-16-2016]

⁸ A foreign financial institution is defined in section 561.308 of the Iranian Financial Sanctions Regulations, 31 C.F.R. part 561 (IFSR), as any foreign entity that is engaged in the business of accepting deposits, making, granting, transferring, holding, or brokering loans or credits, or purchasing or selling foreign exchange, securities, commodity futures or options, or procuring purchasers and sellers thereof, as principal or agent. It includes but is not limited to depository institutions, banks, savings banks, money service businesses, trust companies, securities brokers and dealers, commodity futures and options brokers and dealers, forward contract and foreign exchange merchants, securities and commodities exchanges, clearing corporations, investment companies, employee benefit plans, dealers in precious metals, stones, or jewels, and holding companies, affiliates, or subsidiaries of any of the foregoing. For purposes of the lifting of sanctions set out in sections 4.1.1-4.1.7 of Annex II and 17.1 of Annex V of the JCPOA, the effects of the sanctions lifting described for non-U.S. financial institutions extend to the activities outside of U.S. jurisdiction of international financial institutions, including those identified in 22 U.S.C. § 262r(c)(2).

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

C. 3. After Implementation Day, will foreign financial institutions be subject to sanctions for conducting or facilitating transactions with persons removed from the SDN List?

No. As set out in the JCPOA, foreign financial institutions are able to conduct or facilitate financial transactions with persons listed in [Attachment 3](#) to Annex II of the JCPOA who have been removed from the SDN List, FSE List, and/or NS-ISA List, as appropriate, provided that such transactions do not involve persons on the SDN List or conduct described in FAQ A.3.ii-iii. This would include transactions by foreign financial institutions that have branches in the United States, provided that the branches in the United States are not directly or indirectly involved in the transactions. In addition, such transactions may not transit the U.S. financial system. [01-16-2016]

C. 4. Will foreign financial institutions be subject to sanctions for opening or maintaining correspondent accounts for Iranian financial institutions removed from the SDN List?

No. As set out in the JCPOA, foreign financial institutions will not be not subject to secondary sanctions for opening or maintaining correspondent accounts for Iranian financial institutions listed in [Attachment 3](#) to Annex II of the JCPOA that have been removed from the SDN List, FSE List, and/or NS-ISA List, as appropriate, provided that such activity does not include conduct described in FAQ A.3.ii-iii, and provided further that the foreign financial institution does not conduct or facilitate, and is not otherwise involved in, specific transactions or banking relationships with Iranian individuals and entities, including financial institutions, on the SDN List. Any transactions processed to or through the United States or that involve a U.S. person, directly or indirectly, continue to be prohibited unless they are exempt from regulation or authorized by OFAC. [01-16-2016]

C. 5. The JCPOA provides that the United States will lift secondary sanctions related to the provision of financial messaging services to the CBI and Iranian financial institutions set out in Attachment 3 to Annex II on Implementation Day. Does this mean that these Iranian banks can receive specialized financial messaging services from non-U.S. providers?

Yes. As detailed in section 4.1.6 of Annex II of the JCPOA, the United States will not impose sanctions on non-U.S. persons that provide specialized financial messaging

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

services to, or enable or facilitate direct or indirect access to such services for, the CBI or Iranian financial institutions, with the exception of entities that remain or are placed on the SDN List (as of Implementation Day, Iranian financial institutions remaining on the SDN List are: Ansar Bank, Bank Saderat, Bank Saderat PLC, and Mehr Bank).

U.S. persons – including U.S. financial institutions – continue to be broadly prohibited from engaging in transactions involving Iran, including the provision of specialized financial messaging services to, or enabling or facilitating direct or indirect access to such services for, the CBI or Iranian financial institutions, unless the transactions are exempt from regulation or authorized by OFAC. In addition, *see* FAQ C.7 regarding prohibitions on clearing U.S. dollar transactions involving Iranian persons through the United States. [01-16-2016]

C. 6. Are U-turn transactions involving the United States allowed after Implementation Day?

No. After Implementation Day, U.S. persons continue to be prohibited from exporting goods, services (including financial services), or technology directly or indirectly to Iran. The so-called “U-turn general license,” which allowed U.S. dollar clearing activities involving Iran prior to its revocation in November 2008, was not reinstated on Implementation Day, and U.S. financial institutions continue to be prohibited from clearing transactions involving Iran, with the exception of transactions that are exempt or authorized by a general or specific license issued pursuant to the ITSR. [01-16-2016]

C. 7. After Implementation Day, can foreign financial institutions, including foreign-incorporated subsidiaries of U.S. financial institutions, process transactions denominated in U.S. dollars or maintain U.S. dollar-denominated accounts on behalf of the Government of Iran or any person subject to the jurisdiction of the Government of Iran, such as NIOC or the CBI?

Yes. Foreign financial institutions, including foreign-incorporated subsidiaries of U.S. financial institutions, may process transactions denominated in U.S. dollars or maintain U.S. dollar-denominated accounts that involve Iran or persons ordinarily resident in Iran, or in which there is an interest of a person whose property and interests in property are blocked solely pursuant to Executive Order 13599 and section 560.211 of the ITSR, including NIOC, the CBI, and other individuals and entities that meet the definition of the Government of Iran or an Iranian financial institution, provided that such transactions or

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

account activities do not involve, directly or indirectly, the United States financial system or any United States person, and do not involve any person on the SDN List or conduct described in FAQ A.3.ii-iii. *See* section K of these FAQs for information on General License H, which authorizes U.S.-owned or -controlled foreign entities to engage in certain activities involving Iran.

However, even after Implementation Day, foreign financial institutions, including foreign-incorporated subsidiaries of U.S. financial institutions, need to continue to ensure they do not process U.S. dollar-denominated transactions involving Iran through the U.S. financial system or otherwise involve U.S. financial institutions (including their foreign branches), given that U.S. persons continue to be prohibited from exporting goods, services (including financial services), or technology directly or indirectly to Iran, with the exception of transactions that are exempt or authorized by a general or specific license issued pursuant to the ITSR. U.S. persons continue to be prohibited from engaging in any transactions involving Iran, including in currencies other than the U.S. dollar, with the exception of transactions that are exempt or authorized by OFAC. [01-16-2016; updated on 10-07-2016]

C. 8. The JCPOA provides that the United States will lift secondary sanctions on the provision of U.S. bank notes to the Government of Iran on Implementation Day. What does this entail?

As detailed in section 4.1.3 of Annex II of the JCPOA, beginning on Implementation Day, the provision of U.S. bank notes to the Government of Iran by non-U.S. persons is no longer sanctionable, provided that the transaction does not involve any person on the SDN List or conduct described in FAQ A.3.ii-iii. U.S. persons continue to be prohibited from directly or indirectly providing U.S. bank notes to the Government of Iran. In addition, transactions related to the above-mentioned activity continue to be prohibited from transiting the U.S. financial system. [01-16-2016]

C. 9. What are the due diligence expectations for U.S. financial institutions in investigating Iran-related transactions?

For purposes of overall sanctions compliance, Treasury expects that U.S. financial institutions will continue to implement a risk-based compliance program that tailors internal policies, procedures, and processes to appropriately mitigate their sanctions exposure.

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

For all OFAC sanctions programs – including the Iran sanctions program – a financial institution should ensure that it has the appropriate procedures in place to identify, escalate, interdict, and report transactions that are in violation of sanctions regulations. OFAC continues to provide industry-specific guidance on compliance policies and procedures on its website, and specific questions relating to Iran-related transactions can be directed to the OFAC Hotline at 1-800-540-6322 or 202-622-2490. For more information regarding best practices in complying with the sanctions administered by OFAC, please *see* FAQ [116](#). [01-16-2016]

C. 10. After Implementation Day, are foreign financial institutions subject to sanctions for processing transactions involving activity for which sanctions have been lifted under the JCPOA?

No. Beginning on Implementation Day, foreign financial institutions are able to conduct or facilitate financial transactions in connection with activities for which sanctions have been lifted on Implementation Day, provided that the transactions do not involve persons on the SDN List and such activity does not include conduct described in FAQ A.3.ii-iii. Foreign financial institutions should continue to undertake their customary due diligence to ensure that they are not facilitating transactions that remain sanctionable. [01-16-2016]

C. 11. Will foreign financial institutions be exposed to sanctions for transacting with Iranian financial institutions if those Iranian financial institutions have banking relationships with Iranian persons on the SDN List?

Beginning on Implementation Day, non-U.S., non-Iranian financial institutions engaging in transactions with Iranian financial institutions (including the CBI) not appearing on the SDN List will not be exposed to sanctions as a result of those Iranian financial institutions engaging in transactions or banking relationships involving Iranian individuals or entities, including financial institutions, on the SDN List, provided that the non-U.S., non-Iranian financial institution does not conduct or facilitate, and is not otherwise involved in, those specific transactions or banking relationships with the individuals and entities on the SDN List.

For example, a European-headquartered bank that transacts with the CBI or any other non-designated Iranian financial institution is not subject to secondary sanctions – even if

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

the CBI separately has banking relationships with individuals or entities on the SDN List – provided that the European bank is not involved with any of the CBI’s transactions involving individuals or entities that remain on the SDN List. [01-16-2016]

C. 12. Would the issuance of credit cards by non-U.S. financial institutions to Iranian persons not on the SDN List be sanctionable?

No. The issuance of credit cards by non-U.S. financial institutions to non-SDN Iranian nationals would not be prohibited under OFAC sanctions regulations. Foreign financial institutions, however, should be aware that the ITSR prohibit the processing of payments involving Iran by U.S. persons in general, including by or through U.S. financial institutions, with the exception of transactions that are exempt or authorized by an applicable general or specific license issued pursuant to the ITSR. Moreover, there may be secondary sanctions implications to processing credit card transactions if such transactions involve persons on the SDN List or conduct described in FAQ A.3.ii-iii. [01-16-2016]

C. 13. The JCPOA provides that the United States will lift secondary sanctions on the Iranian rial on Implementation Day. Does this mean that foreign financial institutions are able to buy and sell Iranian rials?

Yes. As detailed in section 4.1.2 of Annex II of the JCPOA, beginning on Implementation Day, it is no longer sanctionable for foreign financial institutions to conduct or facilitate any significant transaction related to the purchase or sale of Iranian rials (or a derivative, swap, future, forward, or other similar contract whose value is based on the exchange rate of the Iranian rial) or maintain funds or accounts outside of the territory of Iran denominated in the Iranian rial. [01-16-2016]

C. 14. What U.S. financial and banking measures with respect to Iran remain in place after Implementation Day?

After Implementation Day, the United States retains the authority to impose correspondent or payable-through account sanctions on foreign financial institutions that (1) knowingly facilitate significant financial transactions on behalf of any Iranian person included on the SDN List, pursuant to section 1247 of IFCA, or (2) facilitate or conduct significant financial transactions for persons that remain designated in connection with Iran’s proliferation of WMD or their means of delivery or Iran’s support for international

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

terrorism, pursuant to section 104(c)(2)(E)(ii) of CISADA, as amended. Sanctions under section 104(c)(2)(E)(ii) of CISADA no longer apply to transactions with individuals and entities removed from the SDN List on Implementation Day (*see* FAQ I.6).

Further, even after Implementation Day, the prohibitions set forth in the ITSR remain in place, including the prohibition in section 560.204 of the ITSR on the exportation, reexportation, sale, or supply, directly or indirectly, from the United States, or by a U.S. person, wherever located, of any goods, technology, or services to Iran or the Government of Iran, with the exception of transactions that are exempt from regulation or authorized by OFAC (*see* FAQ M.9). Consequently, the clearing of U.S. dollar- or other currency-denominated transactions through the U.S. financial system or involving a U.S. person remain prohibited, unless the transactions are exempt from regulation or authorized by OFAC.

Finally, the JCPOA does not impact the November 2011 finding by the Department of the Treasury’s Financial Crimes Enforcement Network (FinCEN) that Iran is a Jurisdiction of Primary Money Laundering Concern. Pursuant to section 311 of the USA PATRIOT Act, the Department of the Treasury has the authority to require U.S. domestic financial institutions to take “special measures” with respect to jurisdictions, financial institutions, or international transactions of primary money laundering concern. The November 2011 finding is based upon multiple factors including activities outside the scope of the JCPOA and the related sanctions lifting.

See FAQ A.3 and section VII of the [Guidance Document](#) for an overview of key U.S. legal authorities that remain in place after Implementation Day. [01-16-2016]

C. 15. Can U.S. financial institutions transact with, including by opening or maintaining correspondent accounts for, non-U.S., non-Iranian financial institutions that maintain correspondent banking relationships with Iranian financial institutions that are not on the SDN List?

Yes. U.S. financial institutions can transact with, including by opening or maintaining correspondent accounts for, non-U.S., non-Iranian financial institutions that maintain correspondent banking relationships or otherwise transact with Iranian financial institutions that are not on the SDN List. It remains prohibited, however, for non-U.S. financial institutions to route transactions involving Iran to or through the U.S. financial system, or involve U.S. persons in such transactions, unless the transactions are exempt

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

from regulation or authorized by OFAC. Non-U.S., non-Iranian financial institutions should have appropriate systems and controls to ensure that they do not route transactions involving Iran to or through the U.S. financial system unless the transactions are exempt from regulation or authorized by OFAC. [06-08-2016; updated on 10-07-2016]

C. 16. Can a non-U.S., non-Iranian entity (including a non-U.S., non-Iranian financial institution) engage in transactions with Iranian persons not on the SDN List even though one or more U.S. persons serve on that entity’s Board of Directors or as senior managers (e.g., Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Chief Compliance Officer)? Must these U.S. persons be recused or “walled off” from the entity’s Iran-related business?

The presence of one or more U.S. persons on the Board of Directors or serving as a senior manager of a non-U.S., non-Iranian entity does not necessarily preclude that entity from transacting with Iranian persons that are not on the SDN List. Unless authorized by OFAC, however, U.S. persons must be walled off or “ring-fenced” from Iran-related business because, with limited exceptions, U.S. persons continue to be broadly prohibited from engaging in or facilitating transactions or dealings with Iran or its government. The prohibitions on the exportation or reexportation of services to Iran and facilitation have been in place for decades, and are consistent with prohibitions applied across a range of U.S. sanctions programs administered by OFAC.

Non-U.S., non-Iranian entities establishing policies regarding how to wall off the U.S. persons from the institution’s Iran-related business should consider instituting a blanket recusal policy (as opposed to case-by-case abstentions, which, depending on the facts and circumstances, could be considered a prohibited facilitation and/or export of services under the ITSR) for U.S. person directors, senior managers, and other employees with respect to Iran-related matters. The institution of a blanket recusal policy requiring that all U.S. person employees of a non-U.S., non-Iranian entity not be involved in Iran-related activities would not be considered prohibited activity under the ITSR. In instances where national laws prohibit the recusal of a U.S. person executive from the decision-making processes of his or her non-U.S. employer, including those involving Iran-related business, the executive or employer should consult with their counsel and/or approach OFAC for additional guidance. [06-08-2016]

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Issued on January 16, 2016
Last Updated on December 15, 2016

D. INSURANCE MEASURES

D. 1. How does the lifting of sanctions provided under the JCPOA affect the provision of insurance for transactions involving Iran?

The JCPOA provides that, on Implementation Day, the United States will lift certain sanctions on the provision of underwriting services, insurance, or reinsurance in connection with activities that are consistent with the JCPOA, including activities by non-U.S. persons with individuals and entities set forth in [Attachment 3](#) to Annex II of the JCPOA. The provision of underwriting services, insurance, or reinsurance by non-U.S. persons for activity that is consistent with the JCPOA is not sanctionable as of Implementation Day, provided that the transactions do not involve persons on the SDN List or conduct described in FAQ A.3.ii-iii. [01-16-2016]

D. 2. Is payment by non-U.S. persons of insurance or reinsurance claims made after Implementation Day for activity that is consistent with the JCPOA but that took place and was sanctionable prior to Implementation Day sanctionable?

Beginning on Implementation Day, OFAC will not impose sanctions on a non-U.S. person for payment of an insurance or reinsurance claim arising from an incident that occurred prior to that day, provided that the underlying activity would not be sanctionable at the time of the payment and the transaction does not involve persons on the SDN List. Non-U.S. persons should ensure that the only sanctions implicated by the underlying activity are sanctions that have been lifted pursuant to the JCPOA prior to paying claims related to Iran. To the extent a claim payment involves a U.S. person, the payment of such claim remains prohibited even after Implementation Day and requires an authorization from OFAC prior to payment. [01-16-2016]

D. 3. Can insurers or reinsurers provide underwriting services, insurance, or reinsurance to NITC or Islamic Republic of Iran Shipping Lines (IRISL) vessels or vessels owned by non-U.S. persons when chartered by NITC or IRISL?

Beginning on Implementation Day, it is not sanctionable for non-U.S. persons to provide underwriting services, insurance, or reinsurance to NITC or IRISL vessels or vessels

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

owned by non-U.S. persons when chartered by NITC or IRISL, provided that the transactions do not involve persons on the SDN List or conduct described in FAQ A.3.ii-iii.

U.S. persons continue to be generally prohibited from exporting goods, services, or technology directly or indirectly to Iran, and it continues to be prohibited for U.S. persons to provide underwriting services, insurance, or reinsurance to NITC or IRISL, including extending insurance coverage to, or paying claims involving, NITC or IRISL. For additional guidance for U.S. insurers participating in worldwide insurance markets through global insurance policies, please *see* FAQ [102](#). [01-16-2016]

D. 4. Can non-U.S. insurers or reinsurers provide underwriting services, insurance, or reinsurance for a vessel that has been chartered by a non-U.S. person or owned by a non-U.S. person that is transporting crude oil from Iran?

Yes. Beginning on Implementation Day, it is not sanctionable for non-U.S. persons to provide underwriting services, insurance, or reinsurance for vessels transporting crude oil from Iran, provided that the transactions do not involve persons on the SDN List or conduct described in FAQ A.3.ii-iii.

U.S. persons continue to be generally prohibited from exporting goods, services, or technology directly or indirectly to Iran, including extending insurance coverage to, or paying claims involving, the transportation of Iranian crude. For additional guidance for U.S. insurers operating in the global market, please *see* FAQ [102](#). [01-16-2016]

D. 5. Can U.S. insurers or reinsurers provide underwriting services, insurance, or reinsurance related to activities by non-U.S. persons that are no longer sanctionable following Implementation Day?

No. The sanctions lifting provided for in the JCPOA largely applies to the activities of non-U.S. persons. After Implementation Day, U.S. persons continue to be generally prohibited from exporting goods, services, or technology directly or indirectly to Iran that are not exempt from regulation or authorized by OFAC, including extending insurance coverage to, or paying claims involving, Iran. For additional guidance for U.S. insurers operating in the global market, please *see* FAQ [102](#). [01-16-2016]

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

D. 6. What role can U.S. insurers and reinsurers have in Protection and Indemnity (P&I) clubs in order to remain compliant with U.S. sanctions?

The sanctions lifting provided for in the JCPOA largely applies to the activities of non-U.S. persons. After Implementation Day, U.S. persons continue to be generally prohibited from exporting goods, services, or technology directly or indirectly to Iran, including extending insurance coverage to, or paying claims involving, Iran, with the exception of transactions that are exempt or authorized by OFAC. For additional guidance for U.S. insurers operating in the global market, please *see* FAQ [102](#). [01-16-2016]

D. 7. Can U.S. insurers provide travel insurance to individuals traveling to Iran?

Yes, travel insurance continues to be exempt from regulation by OFAC as ordinarily incident to travel. Please *see* FAQ [104](#). [01-16-2016]

E. SHIPPING, SHIPBUILDING, AND PORT SECTORS

E. 1. The JCPOA provides that the United States will lift certain sanctions on transactions with Iran’s shipping and shipbuilding sectors and port operators on Implementation Day. Does this mean that non-U.S. persons can engage in transactions with Iran’s shipping and shipbuilding sectors?

Yes. As a result of the U.S. commitments specified in sections 4.4 of Annex II and 17.1 of Annex V of the JCPOA, on Implementation Day, the United States lifted secondary sanctions on Iran’s shipping and shipbuilding sectors and port operators in Iran, including sanctions on the sale, supply, or transfer to or from Iran of significant goods or services used in connection with Iran’s shipping and shipbuilding sectors (including port services such as bunkering, inspection, classification, and financing); sanctions on transactions with entities determined to be part of the shipping or shipbuilding sectors of Iran (including IRISL, South Shipping Line, and NITC), and persons determined to be Iranian port operators (including the port operator(s) of Bandar Abbas, provided that such persons are no longer controlled by a person on the SDN List); and sanctions on the provision of associated services for the foregoing. As a result, beginning on Implementation Day, non-U.S. persons are no longer subject to sanctions for engaging in such activities, provided that the transactions do not involve persons on the SDN List or conduct described in FAQ A.3.ii-iii.

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Last Updated on December 15, 2016**

In addition, it is no longer sanctionable for non-U.S. persons to own, operate, control, or insure a vessel used to transport crude oil, petroleum products (including refined petroleum products), petrochemical products, or natural gas (including liquefied natural gas) to or from Iran, or to sell, lease, or provide vessels to Iran (including to IRISL, NITC, and South Shipping Lines or their affiliates), provided that transactions do not involve persons on the SDN List or conduct described in FAQ A.3.ii-iii.

U.S. persons continue to be generally prohibited under the ITSR from involvement in the activity described above. In addition, transactions related to the above-mentioned activity are prohibited from transiting the U.S. financial system. [01-16-2016]

E. 2. The JCPOA provides for the lifting of U.S. sanctions on transactions with persons determined to be port operators in Iran, to include the operator(s) of Bandar Abbas (provided that the port operator(s) of Bandar Abbas is no longer controlled by a person on the SDN List). Are transactions with Tidewater Middle East Co. still considered sanctionable?

Based on publicly available information, as of Implementation Day (January 16, 2016), it appears Tidewater Middle East Co. (Tidewater) is not the port operator of Bandar Abbas. Accordingly, secondary sanctions would not apply solely on the basis of engaging in transactions, with or conducting trade through, Bandar Abbas so long as the transactions or trade does not involve a person on the SDN List.

Tidewater, a port operating company on the SDN List that is owned by Iran’s Islamic Revolutionary Guard Corps (IRGC), remains on the SDN List after Implementation Day, and transactions by U.S. and non-U.S persons with Tidewater continue to be sanctionable. As always, persons should exercise caution to avoid engaging in transactions with persons on the SDN List. [01-16-2016]

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Last Updated on December 15, 2016**

F. GOLD AND OTHER PRECIOUS METALS

F. 1. The JCPOA provides that the United States will lift secondary sanctions related to Iran’s trade in gold and other precious metals. Does this mean that non-U.S. persons can buy gold from and/or sell gold to Iran?

Yes. Pursuant to its commitment under sections 4.5 of Annex II and 17.1 of Annex V of the JCPOA, the United States lifted sanctions on the direct or indirect sale, supply, export, or transfer to or from Iran, including the Government of Iran, by non-U.S. persons of gold and other precious metals, as well as associated services that are required to facilitate such transactions. As a result, non-U.S. persons are no longer subject to sanctions for engaging in such activities or transactions, provided that they do not involve persons on the SDN List or conduct described in FAQ A.3.ii-iii.

For the purposes of implementing U.S. commitments under the JCPOA and these FAQs, the term “precious metals” includes silver (including silver plated with gold or platinum, unwrought or in semi-manufactured forms, or in powder form); gold (including gold plated with platinum, unwrought or in semi-manufactured forms, or in powder form); base metals or silver, clad with gold, not further worked than semi-manufactured; platinum, unwrought or in semi-manufactured forms, or in powder form; iridium; osmium; palladium; rhodium; ruthenium; base metals, silver or gold, clad with platinum, not further worked than semi-manufactured; and waste and scrap of precious metal or of metal clad with precious metals, other waste and scrap containing precious metal or precious-metal compounds, of a kind used principally for the recovery of precious metal. [01-16-2016]

G. SOFTWARE AND METALS

G. 1. The JCPOA provides that, on Implementation Day, the United States will lift sanctions related to trade with Iran in certain materials and software. What materials are included within the scope of the lifting?

Pursuant to its commitment under sections 4.6 of Annex II and 17.2 of Annex V of the JCPOA, the United States lifted secondary sanctions on the direct or indirect sale, supply, or transfer to or from Iran of graphite, raw or semi-finished metals such as aluminum and steel, coal, and software for integrating industrial processes, including the provision of associated services in connection with the foregoing. As a result, beginning on

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

Implementation Day, non-U.S. persons are no longer subject to sanctions for engaging in such activities, provided such transactions are consistent with the JCPOA (*see* FAQ G.2) and do not involve persons on the SDN List or conduct described in FAQ A.3.ii-iii. [01-16-2016]

G. 2. How does United States interpret the phrase “consistent with the JCPOA” in the context of the lifting of sanctions on trade with Iran in certain materials and software?

For purposes of the lifting of sanctions on Implementation Day on trade by non-U.S. persons with Iran in certain materials and software (*see* FAQ G.1), the United States considers transactions involving the following to be inconsistent with the JCPOA: (1) persons on the SDN List, including the IRGC; (2) transfers of such materials or software for use in the military or ballistic missile programs of Iran; and (3) transfers that have not been approved by the procurement channel established by the JCPOA and paragraph 16 of UN Security Council Resolution 2231 (2015) if the transfer of the item is subject to the procurement channel. [01-16-2016]

G. 3. Does the lifting of sanctions related to materials and software also lift U.S. export control requirements and export prohibitions under the ITSR?

No. The lifting of sanctions discussed in FAQ G.2 above relates only to transactions by non-U.S. persons in goods that are not subject to U.S. export controls. U.S. export controls, including all licensing requirements, and prohibitions under the ITSR continue to apply to exports and reexports by U.S. persons or from the United States to Iran or the Government of Iran, as well as reexports by non-U.S. persons of items with 10 percent or more U.S.-controlled content to Iran or the Government of Iran, if undertaken with knowledge or reason to know that the reexportation is intended specifically for Iran or the Government of Iran (*see* FAQ M.9). [01-16-2016]

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Last Updated on December 15, 2016**

H. AUTOMOTIVE SECTOR

H. 1. The JCPOA provides that the United States will lift secondary sanctions on the sale, supply, or transfer of goods and services used in connection with Iran’s automotive sector. Does this mean that non-U.S. persons can sell to Iran goods and services used in connection with the automotive sector?

Yes. Under the JPOA, U.S. sanctions on the sale, supply, or transfer by non-U.S. persons of goods and services used in connection with Iran’s automotive sector were temporarily suspended. On Implementation Day, pursuant to its commitment under sections 4.7 of Annex II and 17.1 of Annex V of the JCPOA, the United States lifted secondary sanctions on the direct or indirect sale, supply, or transfer to Iran of goods or services used in connection with the automotive sector of Iran, including the provision of associated services. As a result, beginning on Implementation Day, non-U.S. persons are no longer subject to sanctions for engaging in such activities or transactions provided that they do not involve persons on the SDN List or conduct described in FAQ A.3.ii-iii. See FAQs [310](#), [311](#), [316](#), and [317](#) for a discussion of “Iran’s automotive sector” and goods and services associated with Iran’s automotive sector. [01-16-2016]

H. 2. Can U.S. auto manufacturers export or reexport U.S.-origin finished vehicles or U.S.-origin auto parts to Iran?

No. U.S. persons as defined in section 560.314 of the ITSR, including U.S. auto manufacturers, continue to be generally prohibited from the exportation, reexportation, sale, or supply, directly or indirectly, from the United States of any goods, technology, or services to Iran’s automotive sector or the Government of Iran. [01-16-2016]

H. 3. Can non-U.S. persons reexport U.S.-origin finished vehicles or U.S.-origin auto parts to Iran?

Non-U.S. persons continue to be prohibited from reexporting from a third country to Iran, directly or indirectly, any goods, technology, or services that have been exported from the United States if they know or have reason to know that the reexportation is intended specifically for Iran or the Government of Iran and the items are controlled for export from the United States to Iran. Additionally, non-U.S. persons – including U.S.-owned or -controlled foreign entities (*see* FAQ K.2) – continue to be prohibited from reexporting to Iran or the Government of Iran items containing 10 percent or more U.S.-controlled

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

content if undertaken with knowledge or reason to know that the reexportation is intended specifically for Iran or the Government of Iran. *See also* FAQ M.9. Additional export controls administered by the Department of Commerce may also apply. [01-16-2016]

I. DESIGNATIONS AND OTHER SANCTIONS LISTINGS

I. 1. The JCPOA provides that the United States will remove certain individuals and entities from the SDN List on Implementation Day. What did this entail? What is the effect on those removed from the SDN List and what happens to those remaining on the SDN List?

Pursuant to U.S. commitments under sections 4.8.1 of Annex II and 17.3 of Annex V of the JCPOA, on Implementation Day, the individuals and entities set out in [Attachment 3](#) to Annex II were removed from the SDN List, FSE List, and/or NS-ISA List. Non-U.S. persons are no longer subject to secondary sanctions for engaging in transactions with the over 400 individuals and entities removed from the SDN List on Implementation Day, provided that the transactions do not otherwise involve persons that remain or are placed on the SDN List or conduct described in FAQ A.3.ii-iii. For more information on individuals and entities set out in Attachment 3 to Annex II who are marked with an asterisk because they have been identified previously by OFAC as meeting the definition of the term “Government of Iran” or “Iranian financial institution,” see FAQ I.3.

After Implementation Day, Iranian and Iran-related persons on the SDN List remain subject to secondary sanctions (*see* FAQ A.6), and secondary sanctions continue to attach to transactions involving such persons, even if the underlying activity is one for which sanctions have been lifted under the JCPOA. [01-16-2016]

I. 2. What is the E.O. 13599 List and how should U.S. persons treat individuals and entities on this list?

To assist U.S. persons in meeting their obligations under the ITSR, OFAC has made available on its website a List of Persons Identified as Blocked Solely Pursuant to Executive Order 13599 ([E.O. 13599 List](#)). The purpose of this list is to clarify that, regardless of their removal from the SDN List, persons that OFAC previously identified as meeting the definition of the Government of Iran or an Iranian financial institution continue to meet those definitions and continue to be persons whose property and

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

interests in property are blocked pursuant to Executive Order 13599 and section 560.211 of the ITSR (*see* FAQ I.3). Unless an exemption or express OFAC authorization applies, U.S. persons, wherever located, are prohibited from engaging in any transaction with, and must continue to block the property and interests in property of, persons on the E.O. 13599 List, as well as any other person meeting the definition of the Government of Iran or an Iranian financial institution. [01-16-2016]

I. 3. Do identified Government of Iran individuals and entities and Iranian financial institutions removed from the SDN List on Implementation Day pursuant to the JCPOA (*i.e.* the asterisked individuals and entities listed in Attachment 3 to Annex II of the JCPOA) remain subject to U.S. blocking? Do U.S. persons still have to block transactions with persons removed from the SDN List on Implementation Day?

[Attachment 3](#) to Annex II of the JCPOA sets out the individuals and entities that were removed from the SDN List, FSE List, and/or NS-ISA List, as appropriate, on Implementation Day pursuant to the U.S. commitment under sections 4.8.1 of Annex II and 17.3 of Annex V of the JCPOA. A number of the individuals and entities listed in Attachment 3 to Annex II are marked with an asterisk next to their name, denoting that they have been previously identified by OFAC as meeting the definition of the term “Government of Iran” or “Iranian financial institution,” as set forth, in Executive Order 13599 and sections 560.304 and 560.324, respectively of the ITSR. Beginning on Implementation Day, secondary sanctions no longer apply to transactions involving these entities. However, U.S. persons continue to have an obligation under Executive Order 13599 and the ITSR to block the property and interests in property of all individuals and entities that meet these definitions, regardless of whether the individual or entity has been identified by OFAC or included on any OFAC-administered sanctions list, including the E.O. 13599 List (*see* FAQ I.2). U.S. persons also continue to be prohibited generally from engaging in transactions or dealings with these individuals and entities pursuant to the ITSR.

The property and interests in property of those persons in Attachment 3 to Annex II of the JCPOA without an asterisk next to their name are no longer subject to blocking on Implementation Day so long as they do not meet the definition of the “Government of Iran” or “Iranian financial institution” set out in the ITSR and Executive Order 13599. U.S. persons continue to be prohibited generally from engaging in transactions involving

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Last Updated on December 15, 2016**

Iran pursuant to the ITSR, with the exception of transactions that are exempt from regulation or authorized by OFAC. [01-16-2016]

I. 4. Do non-U.S. persons face secondary sanctions exposure for dealing with individuals and entities on the E.O. 13599 List?

No. Secondary sanctions do not attach to transactions involving persons on the E.O. 13599 List, provided that the activities do not involve persons on the SDN List or conduct described in FAQ A.3.ii-iii. [01-16-2016]

I. 5. On Implementation Day, are sanctions lifted on the individuals and entities listed in Attachment 4 to Annex II of the JCPOA?

No. The individuals and entities set out in [Attachment 4](#) to Annex II of the JCPOA will remain on the SDN List until Transition Day unless the U.S. government takes action to remove them before that time. Transactions with these individuals or entities continue to be sanctionable until they are removed from the SDN List. [01-16-2016]

I. 6. Could foreign financial institutions still be sanctioned under CISADA for engaging in transactions with Iranian persons?

Yes, if such persons are on the SDN List after Implementation Day. While sanctions under section 104(c)(2)(E)(ii) of CISADA no longer apply to transactions with individuals and entities removed from the SDN List on Implementation Day, CISADA 104(c)(2)(E)(ii) remains in place and significant transactions with persons designated in connection with Iran’s proliferation of WMD or their means of delivery or Iran’s support for international terrorism – i.e., persons on the SDN List with the [IFSR] program tag – remain sanctionable (*see* FAQ A.6). [01-16-2016]

J. COMMERCIAL PASSENGER AVIATION

J. 1. How has the commitment in the JCPOA to allow the export, reexport, sale, lease, or transfer of commercial passenger aircraft and related parts and services to Iran been implemented?

OFAC issued a [Statement of Licensing Policy](#) (SLP), effective on Implementation Day, establishing a favorable licensing policy regime through which U.S. persons and, where

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

there is a nexus to U.S. jurisdiction, non-U.S. persons may request specific authorization from OFAC to engage in transactions for the export, reexport, sale, lease, or transfer of commercial passenger aircraft and related parts and services to Iran, provided that the licensed items are used exclusively for commercial passenger aviation. Specific licenses issued pursuant to the SLP will include appropriate conditions to ensure that licensed activities do not involve, and no licensed aircraft, goods, or services are re-sold or re-transferred to, any person on OFAC’s SDN List. [01-16-2016]

J. 2. What type of aircraft can be provided to Iran pursuant to the JCPOA commitment?

Specific licenses may be issued for U.S. persons or, where there is a nexus to U.S. jurisdiction, non-U.S. persons to export, reexport, sell, lease, or transfer to Iran U.S.-origin commercial passenger aircraft or commercial passenger aircraft that contains 10 percent or more U.S.-controlled content. For more information on how to calculate U.S.-controlled content, see section 560.420 of the ITSR. The types of aircraft that may be approved under the SLP include wide-body, narrow-body, regional, and commuter aircraft used for commercial passenger aviation. The types of aircraft not eligible for licensing under the SLP include cargo aircraft, state aircraft, unmanned aerial vehicles, military aircraft, and aircraft used for general aviation or aerial work. [01-16-2016]

J. 3. What services would be considered ordinarily incident and necessary to a licensed transaction for the export, reexport, sale, lease, or transfer of commercial passenger aircraft and related parts and services to Iran?

Under section 560.405 of the ITSR, U.S. persons are authorized to engage in transactions that are ordinarily incident to a licensed transaction and necessary to give effect thereto. Services that are ordinarily incident and necessary to give effect to a licensed export, reexport, sale, lease, or transfer of a commercial passenger aircraft to Iran, or a licensed export, reexport, sale, lease, or transfer of related parts and services to Iran, include transportation, legal, insurance, shipping, delivery, and financial payment services provided in connection with the licensed export transaction. For example, a U.S. person’s provision of insurance to cover the shipment of a licensed component from a U.S. manufacturer to an Iranian customer would be ordinarily incident to the licensed export transaction. In contrast, a U.S. person’s provision of insurance to cover the component over a period of years after it has been exported to Iran would not be ordinarily incident to the licensed export transaction and would require separate

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

authorization from OFAC. *See* FAQ J.4 for additional information on associated services that can be separately authorized. [01-16-2016]

J. 4. What types of associated services could be authorized in licenses issued to U.S. persons related to the export, reexport, sale, lease, or transfer of commercial passenger aircraft and related parts and services to Iran?

Applications submitted pursuant to the SLP should include all the parties involved in the transactions and describe in detail all related transactions and dealings the parties anticipate undertaking that would otherwise be prohibited by 31 C.F.R. part 560. These transactions and dealings may include, for example, the provision of warranty, maintenance, repair services, safety-related inspections, and training related to commercial passenger aircraft and spare parts and components for such aircraft exported to Iran pursuant to a specific license issued under the SLP, provided that the items and services for which authorization is sought are to be used exclusively for commercial passenger aviation. [01-16-2016]

J. 5. Can U.S. persons seek a specific license to provide associated services that are not otherwise authorized by an existing specific license for the export, reexport, sale, lease, or transfer of commercial passenger aircraft or related parts and services to Iran?

OFAC will consider applications from U.S. persons to provide associated services otherwise prohibited by 31 C.F.R. part 560 that are not within the scope of an existing specific license issued pursuant to the SLP, and are not ordinarily incident and necessary to give effect to a licensed transaction pursuant to section 560.405 of the ITSR. Requests to provide such associated services must relate to a specific export, reexport, sale, lease, or transfer of a commercial passenger aircraft or related parts and services. This means, for example, that OFAC will consider applications under the SLP for a U.S. financial institution to finance the sale of a particular commercial passenger aircraft, but not an application to provide aircraft financing services in general. *See* FAQ J.6 for information on the provision of associated services by non-U.S. persons. [01-16-2016]

J. 6. Do non-U.S. persons need a specific license to provide associated services in connection with commercial passenger aircraft or parts and components for such aircraft that have been licensed for export or reexport to Iran? Or for commercial

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

passenger aircraft or parts and components for such aircraft that have not been licensed for export or reexport to Iran?

OFAC authorization is not required for non-U.S. persons to provide associated services to Iranian parties, provided that the transaction does not involve U.S. persons or the export or reexport to Iran of items that would require a license for export from the United States to Iran, is conducted outside of U.S. jurisdiction, and does not involve the U.S. financial system. However, even after Implementation Day, secondary sanctions will continue to attach to transactions with Iranian or Iran-related individuals or entities that remain or are placed on the SDN List.

OFAC will consider applications under the SLP from non-U.S. persons to provide associated services that would otherwise be prohibited by 31 C.F.R. part 560, such as those involving the export or reexport of items from the United States to Iran or the reexport of U.S.-controlled items from a third-country to Iran that require a license under section 560.205 of the ITSR. [01-16-2016]

J. 7. Does the JCPOA impact the ability of airlines to fly into or out of Iran? Are U.S. persons allowed to fly on Iranian airlines?

The JCPOA does not impact the prohibition on U.S. airlines operating flights to or from Iran. Secondary sanctions continue to attach to significant transactions with Mahan Air and other Iranian persons on the SDN List (*see* FAQ A.3.iii).

U.S. persons are allowed to engage in transactions that are ordinarily incident to travel to or from Iran, including flying on Iranian airlines, with the exception of airlines, such as Mahan Air, that are designated under the Global Terrorism Sanctions Regulations, 31 C.F.R. part 594 (GTSR). Airlines designated pursuant to the GTSR are included on OFAC’s SDN List (available at <http://sanctionssearch.ofac.treas.gov/>) and are labeled with the program tag [SDGT]. [01-16-2016]

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Last Updated on December 15, 2016**

J. 8. Is additional authorization from the Department of Commerce be needed for the export, reexport, sale, lease, or transfer of commercial passenger aircraft and spare parts and components for such aircraft to Iran, if such activities are licensed by OFAC under the SLP?

Transactions authorized by OFAC pursuant to the SLP do not need separate authorization from the Department of Commerce, unless the action or activity involves an item (including information) that is prohibited by, or otherwise requires a license under, part 744 of the Export Administration Regulations (EAR) or participation in any transaction involving a person whose export privileges have been denied pursuant to parts 764 or 766 of the EAR. Exports or reexports to individuals and entities listed on the Department of Commerce’s Denied Persons List and, in some cases, the Entity List will require separate authorization from the Department of Commerce and further coordination between OFAC and the U.S. Department of State. The Denied Persons List may be accessed at <http://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern/denied-persons-list> and the Entity List may be accessed at <http://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern/entity-list>. Applicants seeking to engage in transactions that would require separate authorization from the Department of Commerce should submit an application to it when submitting an application to OFAC pursuant to the SLP; the application to OFAC should also identify any individuals or entities that may give rise to a requirement for a separate authorization from the Department of Commerce. [01-16-2016]

J. 9. Why did OFAC issue General License I (GL I)?

As a general matter, unless authorized by OFAC, U.S. persons are prohibited from entering into contracts – contingent or otherwise – involving Iran or the Government of Iran. In addition, U.S. persons are prohibited from engaging in activities that are ordinarily incident to the negotiation of or entry into a contract involving Iran or the Government of Iran if such activities implicate the prohibitions of the ITSR (e.g., activities that may involve the importation of services from, or exportation of services to, an Iranian party).

Authorizing U.S. persons to enter into, and to engage in transactions that are ordinarily incident to the negotiation of and the entry into, contingent contracts for activities eligible for authorization under the *Statement of Licensing Policy for Activities Related to the Export or Re-export to Iran of Commercial Passenger Aircraft and Related Parts and*

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Last Updated on December 15, 2016**

Services (SLP) will allow for more efficient processing of specific license applications for the export or re-export to Iran of commercial passenger aircraft and related parts and services submitted under the SLP. However, GL I does not authorize transactions related to the negotiation of contracts – contingent or otherwise – involving individuals and entities on the SDN list.

Non-U.S. persons are not prohibited under the ITSR from entering into contracts – contingent or otherwise – involving Iran or the Government of Iran that are eligible for authorization under the SLP. However, prior to performing activities eligible for authorization under the SLP, non-U.S. persons must obtain a specific license from OFAC. [03-24-16]

J. 10. Does GL I authorize the export or re-export of commercial passenger aircraft and/or related parts or services to Iran?

No. GL I does not authorize the export or re-export of any aircraft or related parts or services to Iran. Persons interested in exporting or re-exporting commercial passenger aircraft and related parts and services to Iran under the SLP are required to submit a specific license application to OFAC. [03-24-16]

J. 11. What information should be included in specific license applications submitted under the SLP?

Persons seeking to export or re-export commercial passenger aircraft and/or related parts and services under the SLP should include as much detail about the transaction as possible. As an initial matter, applications must include the following information: 1) the types and number of aircraft being exported or leased; 2) the Export Control Classification Number(s) for the aircraft, related parts, and/or technology being exported or leased; 3) the Iranian airline receiving the aircraft; 4) the proposed end-use of the aircraft; and 5) any other information that may be relevant to the processing of the request. [03-24-16]

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Last Updated on December 15, 2016**

J. 12. Is the negotiation of and entry into a Nondisclosure Agreement (NDA) in connection with the negotiation of a contingent contract for activities eligible for authorization under the SLP authorized by GL I?

Yes. However, the enforcement of any breach of an NDA against an Iranian party does not fall within the scope of the authorization in GL I and may require separate authorization. [03-24-16]

K. FOREIGN ENTITIES OWNED OR CONTROLLED BY U.S. PERSONS

K. 1. The JCPOA provides for the licensing of non-U.S. entities that are owned or controlled by a U.S. person (“U.S.-owned or -controlled foreign entities”) to engage in activities with Iran that are consistent with the JCPOA and U.S. law. How is this commitment being implemented?

The commitment to license U.S.-owned or -controlled foreign entities to engage in activities with Iran that are consistent with the JCPOA and U.S. law has been implemented through OFAC’s issuance of [General License H: Authorizing Certain Transactions Relating to Foreign Entities Owned or Controlled by a United States Person](#) (GL H). GL H was published on OFAC’s website on January 16, 2016. [01-16-2016]

K. 2. What is considered a U.S.-owned or -controlled foreign entity for purposes of the U.S. commitment under the JCPOA to license certain activities involving Iran?

An entity established or maintained outside the United States is “owned or controlled” by a U.S. person if the U.S. person: (1) holds a 50 percent or greater equity interest by vote or value in the entity; (2) holds a majority of seats on the board of directors of the entity; or (3) otherwise controls the actions, policies, or personnel decisions of the entity. *See* section 560.215 of the ITSR and FAQ K.17. [01-16-2016; updated on 06-08-2016]

K. 3. What activities can U.S.-owned or -controlled foreign entities undertake pursuant to GL H?

Pursuant to [GL H](#), U.S.-owned or -controlled foreign entities are permitted to engage in transactions with the Government of Iran or any person subject to the jurisdiction of the Government of Iran that would otherwise be prohibited by section 560.215 of the ITSR (i.e., activities that would be prohibited pursuant to the ITSR if engaged in by a U.S.

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Last Updated on December 15, 2016**

person or in the United States), *with the exception of* transactions specified in paragraph (c) of GL H. In particular, paragraph (c) provides that U.S.-owned or -controlled foreign entities engaging in transactions pursuant to GL H may not export or reexport U.S.-origin goods to Iran without separate authorization from OFAC, as further described in FAQ K.13. The authorization provided under GL H is not limited to specific economic sectors or industries. [01-16-2016]

K. 4. For purposes of the U.S. commitment in section 5.1.2 of Annex II of the JCPOA, what activities are consistent with the JCPOA and applicable U.S. laws and regulations?

Activities by U.S.-owned or -controlled foreign entities that are within the scope of [GL H](#) will be deemed to be consistent with the JCPOA and the laws and regulations administered by OFAC. Individuals and entities acting pursuant to GL H remain responsible for complying with other applicable U.S. laws and regulations, including, for example, the Federal Food, Drug, and Cosmetic Act.

Transactions that are not authorized under GL H because they are inconsistent with the JCPOA and/or U.S. law include transactions involving: (1) the direct or indirect exportation or reexportation of goods, technology, or services from the United States (without separate authorization from OFAC); (2) any transfer of funds to, from, or through the U.S. financial system; (3) any individual or entity on the SDN List or any activity that would be prohibited by non-Iran sanctions administered by OFAC if engaged in by a U.S. person or in the United States; (4) any individual or entity identified on the FSE List; (5) any activity involving any item subject to the Export Administration Regulations (EAR) that is prohibited by, or requires a license under, part 744 of the EAR; or participation in any transaction with a person whose export privileges have been denied pursuant to part 764 or 766 of the EAR (without authorization from the Department of Commerce); (6) any military, paramilitary, intelligence, or law enforcement entity of the Government of Iran, or any official, agent, or affiliate thereof; (7) any activity that is sanctionable under Executive Order 12938 or 13382 (relating to Iran’s proliferation of weapons of mass destruction and their means of delivery, including ballistic missiles); Executive Order 13224 (relating to international terrorism); Executive Order 13572 or 13582 (relating to Syria); Executive Order 13611 (relating to Yemen); or Executive Order 13553 or 13606, or section 2 or 3 of Executive Order 13628 (relating to Iran’s commission of human rights abuses against its citizens); or (8) any nuclear activity

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Last Updated on December 15, 2016**

involving Iran that is subject to the JCPOA procurement channel and that has not been approved through that procurement channel process. [01-16-2016]

K. 5. Who could be held liable for transactions conducted by a U.S.-owned or -controlled foreign entity that are outside the scope of GL H?

A U.S. person will continue to be liable for civil penalties provided for in section 206(b) of the International Emergency Economic Powers Act if any foreign entity that it owns or controls engages in activity outside the scope of [GL H](#) or other relevant authorization provided by OFAC that would violate the prohibition set forth in section 560.215 of the ITSR. *See* section 560.701(a)(3) of the ITSR. [01-16-2016]

K. 6. What are U.S. persons permitted to do with respect to transactions undertaken pursuant to GL H?

[GL H](#) authorizes U.S. persons to engage in “activities related to the establishment or alteration of operating policies and procedures of a United States entity or a U.S.-owned or -controlled foreign entity” to the extent necessary to allow a U.S.-owned or -controlled foreign entity to engage in transactions with Iran that are authorized by GL H. This authorization in GL H is intended to cover the involvement of U.S. person board members, senior management, and employees of either a U.S. parent company or a U.S.-owned or -controlled foreign entity in the establishment or alteration of operating policies and procedures of the U.S. parent company or any of its owned or controlled foreign entities, to the extent necessary to allow any of the U.S.-owned or -controlled foreign entities to engage in transactions with Iran authorized under GL H. The authorization for U.S. persons is also intended to cover U.S. persons who may be hired as outside legal counsel or consultants to draft, alter, advise, or consult on such operating policies and procedures.

Under this provision of GL H, U.S. persons, including senior management of a U.S. parent company or its owned or controlled foreign entities, may be involved in the initial determination to engage in activities with Iran authorized by GL H, as well as the establishment or alteration of the necessary policies and procedures. However, GL H does not authorize U.S. person involvement in the ongoing Iran-related operations or decision making of its owned or controlled foreign entity engaging in activities with Iran authorized by GL H after these actions are taken. U.S. persons *may not* be involved in the Iran-related day-to-day operations of a U.S.-owned or -controlled foreign entity,

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Last Updated on December 15, 2016**

including by approving, financing, facilitating, or guaranteeing any Iran-related transaction by the foreign entity. *See* sections 560.208 and 560.417 of the ITSR. [01-16-2016]

K. 7. Under GL H, are U.S. persons allowed to provide training on the new or revised policies and procedures?

Yes. [GL H](#) authorizes U.S. persons, including employees and outside legal counsel and consultants, to provide training, advice, and counseling on the new or revised operating policies and procedures, provided that these services are not provided to facilitate transactions in violation of U.S. law. For example, U.S. person employees of a U.S. parent company or a U.S.-owned or -controlled foreign entity are authorized to provide training on the new or revised operating policies and procedures to employees of a U.S.-owned or -controlled foreign entity covered by such policies. They are also authorized to provide training on the revised operating policies and procedures to employees of the U.S. parent company. [01-16-2016]

K. 8. What are U.S. persons who work in U.S.-owned or -controlled foreign entities permitted to do with respect to transactions undertaken pursuant to GL H?

U.S. persons working in U.S.-owned or -controlled foreign entities are authorized under [GL H](#) to engage in activities related to the establishment or alteration of corporate policies and procedures of the U.S. parent company of the U.S.-owned or -controlled foreign entities, as well as corporate policies and procedures of the U.S.-owned or -controlled foreign entities, to the extent the establishment or alteration of such policies is necessary to allow the U.S.-owned or -controlled foreign entity to engage in transactions authorized under GL H. This authorization extends to the involvement of U.S. persons in the initial determination to engage in activities with Iran authorized by GL H; however, it does not extend to the involvement of U.S. persons in the Iran-related day-to-day operations of a U.S.-owned or -controlled foreign entity engaging in activities with Iran authorized by GL H (*see* FAQs K.6 and K.7). With the exception of the authorizations in GL H, U.S. persons remain prohibited from engaging in or facilitating transactions or dealings involving Iran that are not exempt from regulation or authorized by OFAC. [01-16-2016]

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Last Updated on December 15, 2016**

K. 9. GL H authorizes U.S. persons to “make available” any automated and globally integrated computer, accounting, email, telecommunications, or other business support system, platform, database, application, or server necessary to store, collect, transmit, generate, or otherwise process documents or information related to transactions by foreign entities they own or control that are authorized by GL H (hereinafter referred to as “Authorized Business Support Systems”). Does this allow U.S. parent companies to provide foreign entities they own or control with access to Authorized Business Support Systems that are owned or operated by third-party service providers?

Yes. The authorization in [GL H](#) permits U.S. parent companies to make available to foreign entities they own or control Authorized Business Support Systems that are owned and/or operated for the U.S. parent company on a contract basis by one or more third-party service providers. Likewise, U.S. person third-party service providers are authorized to make available to a U.S.-owned or -controlled foreign entity Authorized Business Support Systems that they provide to the U.S. parent company on a contract basis. [01-16-2016]

K. 10. What does “automated” mean in reference to the Authorized Business Support Systems enumerated in GL H?

In the context of [GL H](#), the term “automated” refers to Authorized Business Support Systems that operate passively and without human intervention to facilitate the flow of data between and among the U.S. parent company and its owned or controlled foreign entities. For example, an enterprise resource planning (ERP) system that utilizes a U.S.-based server – without any human intervention in the United States – to generate a purchase order initiated by a Dubai-based, non-U.S. person employee of a U.S.-owned or -controlled foreign entity would be considered “automated” for the purposes of GL H. In contrast, if the ERP system required the intervention of an individual located in the United States to complete a request initiated by a Dubai-based, non-U.S. person employee of a U.S.-owned or -controlled foreign entity, such as a U.S. person performing data entry or internal processing for the creation of a customer record, such system would not be considered “automated” for the purposes of GL H. *See* FAQ K.12 for additional information on human intervention vis-à-vis Authorized Business Support Systems. [01-16-2016]

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Last Updated on December 15, 2016**

K. 11. What does “globally integrated” mean in reference to the Authorized Business Support Systems enumerated in GL H?

In the context of [GL H](#), the term “globally integrated” refers to an Authorized Business Support System that is broadly available to, and in general use by, the U.S. parent company’s global organization, including the U.S. parent company and its owned or controlled foreign entities. For example, a sales lead database maintained on a server at a U.S. parent company that is broadly available to, and in general use by, the U.S. parent company’s non-U.S. entities would be considered “globally integrated” for the purposes of GL H. In contrast, a similar database containing information maintained in the United States that is not broadly available to the U.S. parent company’s non-U.S. entities or lines of business performed by such entities would not be considered “globally integrated” for the purposes of GL H. [01-16-2016]

K. 12. Is all human intervention vis-à-vis Authorized Business Support Systems outside the scope of GL H?

No. Activities related to the establishment or maintenance of Authorized Business Support Systems that meet the requirements of [GL H](#) – including routine or emergency maintenance by U.S. persons – are authorized as ordinarily incident and necessary to give effect to transactions authorized by paragraph (b) of GL H. *See* section 560.405 of the ITSR. [01-16-2016]

K. 13. Can U.S.-owned or -controlled foreign entities rely on GL H to export U.S.-origin goods to Iran?

No. [GL H](#) does not provide any authorization relating to the exportation or reexportation of U.S.-origin goods to Iran. Beginning on Implementation Day, unless the transactions are exempt from regulation or authorized by OFAC, U.S.-owned or -controlled foreign entities continue to be prohibited from the exportation, reexportation, sale, or supply, directly or indirectly, from the United States of any goods, technology, or services if the items are destined for Iran or the Government of Iran at the time they leave the United States. In addition, non-U.S. persons – including U.S.-owned or -controlled foreign entities – continue to be prohibited from reexporting from a third country, directly or indirectly, any goods, technology, or services that have been exported from the United States if they know or have reason to know that the reexportation is intended specifically for Iran or the Government of Iran and the items are controlled for export from the United

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Last Updated on December 15, 2016**

States to Iran. Non-U.S. persons – including U.S.-owned or -controlled foreign entities – also continue to be prohibited from reexporting from a third country items containing 10 percent or more U.S.-controlled content, if undertaken with knowledge or reason to know that the reexportation is intended specifically for Iran or the Government of Iran. However, the exportation or reexportation of U.S.-origin goods that are designated as EAR99 from a third country to Iran without knowledge or reason to know at the time of export from the United States that the goods are intended specifically for Iran is not prohibited. Additional export controls administered by the Department of Commerce may also apply. [01-16-2016]

K. 14. Does GL H authorize a U.S. person to alter its policies and procedures, or the policies or procedures of its owned or controlled foreign entity, to allow the U.S.-owned or -controlled foreign entity to establish a physical presence inside Iran?

Yes. [GLH](#) authorizes a U.S. parent to alter its policies and procedures, and/or the policies and procedures of its owned or controlled foreign entity, to allow the U.S.-owned or -controlled foreign entity to establish a physical presence inside Iran. U.S.-owned or -controlled foreign entities, however, continue to be prohibited from the exportation, reexportation, sale, or supply, directly or indirectly, from the United States of any goods, technology, or services if the items are destined for Iran or the Government of Iran at the time they leave the United States (*see* FAQs K.13 and M.9). [06-08-2016]

K. 15. Are U.S.-owned or -controlled foreign entities considered U.S. persons?

No. The term *United States person* or *U.S. person*, as it is defined in section 560.314 of the ITSR, means any United States citizen, permanent resident alien, entity organized under the laws of the United States or any jurisdiction within the United States (including foreign branches), or any person in the United States. Although U.S.-owned or -controlled entities are subject to the prohibitions of the ITSR pursuant to section 560.215 (and eligible for the authorizations of GL H), they are not considered U.S. persons under the ITSR. [06-08-2016]

K. 16. Does GL H authorize U.S.-owned or -controlled foreign entities to engage in transactions with individuals and entities on the E.O. 13599 list?

Yes. [GLH](#) authorizes U.S.-owned or -controlled foreign entities to engage in transactions with individuals and entities on the E.O. 13599 List that are within the scope

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

of the general license (*see* FAQ I.2 for additional information on the E.O. 13599 List).
[06-08-2016]

K. 17. Does OFAC aggregate the interests of multiple U.S. persons in determining whether an entity established or maintained outside the United States is a U.S.-owned or -controlled foreign entity for purposes of GL H and section 560.215 of the ITSR?

Yes, with certain exceptions. As a general matter, an entity established or maintained outside the United States is considered owned or controlled by a U.S. person if, in the aggregate, one or more U.S. persons hold(s) a 50 percent or greater equity interest by vote or value in the entity or if one or more U.S. persons hold(s) a majority of seats on the board of directors of the entity. A determination as to whether one or more U.S. persons otherwise control(s) the actions, policies, or personnel decisions of a foreign entity is a fact-specific, case-by-case determination, but in making such a determination, OFAC would look to the aggregated ownership interests held, and indicia of control exercised, by all relevant U.S. persons.

In the specific case of companies organized under the laws of a country other than the United States that are publicly traded or where ownership interests are otherwise widely dispersed, OFAC would not regard such an entity to be owned or controlled by a U.S. person if U.S. persons, in the aggregate, passively hold more than 50 percent of the shares of such entity but no one U.S. person holds a controlling share in the company. However, such a company could still be considered a U.S.-owned or -controlled foreign entity to the extent one or more of the other criteria for ownership or control are met.
[06-08-2016]

K. 18. In cases where multiple U.S. persons, in the aggregate, own or control a foreign entity, are U.S. persons authorized under GL H to amend the policies and procedures of stakeholding U.S. companies and the policies and procedures of the U.S.-owned or -controlled foreign entity?

Yes. In cases where U.S. persons, in the aggregate, own or control a foreign entity, U.S. persons are permitted to amend the policies and procedures of U.S. entities that own a portion of the U.S.-owned or -controlled foreign entity, as well as the policies and procedures of the U.S.-owned or -controlled foreign entity, to the extent necessary to allow the U.S.-owned or -controlled foreign entity to engage in transactions with Iran that are authorized under [GL H](#) (*see* FAQ K.6 for additional details on the extent to which

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

U.S. persons can engage in altering policies and procedures related to transactions with Iran). [06-08-2016]

K. 19. Does GL H authorize a U.S. person to establish or alter the operating policies and procedures of a United States entity or a U.S.-owned or -controlled foreign entity more than once?

Yes. A U.S. person can undertake additional changes to such operating policies and procedures so long as the changes are not with respect to, or for the purpose of facilitating, any particular transaction(s) involving Iran by the U.S.-owned or -controlled foreign entity. [06-08-2016; updated on 10-07-2016]

K. 20. Must U.S. persons employed by or serving on the Board of Directors of a U.S.-owned or -controlled foreign entity be recused or “walled off” from all Iran-related business of that entity? Can U.S. person employees simply abstain from voting on Iran-related matters?

In general, unless authorized by OFAC, U.S. persons employed by or serving on the board of directors of a U.S.-owned or -controlled foreign entity (or any other foreign entity) must be recused or “walled off” from all Iran-related business of that entity, except for certain limited activities with respect to Iran that are authorized under section (a) of that GL (*see* FAQs K.8 and K.9).

U.S. persons are authorized under [GL H](#) to allow for such a recusal through the establishment or alteration of policies and procedures of their owned or controlled foreign entities. U.S.-owned or -controlled foreign entities (and other foreign entities) should consider instituting a blanket recusal policy (as opposed to case-by-case abstentions, which, depending on the facts and circumstances, could be considered a prohibited facilitation and/or export of services under the ITSR) for U.S. person directors, managers, and other employees with respect to Iran-related matters (*see* FAQ C.16). [06-08-2016]

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Issued on January 16, 2016
Last Updated on December 15, 2016

K. 21. Must the U.S. parent company of a U.S.-owned or -controlled foreign entity engaging in transactions with Iran pursuant to GL H remove itself from all day-to-day operations of its owned or controlled foreign entity, or just those related to Iran?

If a U.S. parent company's owned or controlled foreign entity engages in transactions with Iran pursuant to [GL H](#), and also conducts transactions with other non-sanctioned jurisdictions, the U.S. parent company and its board members, senior management, and employees may continue to be involved in the U.S.-owned or -controlled foreign entity's day-to-day operations with non-sanctioned jurisdictions. [06-08-2016]

K. 22. Can a U.S. person receive reports from its owned or controlled foreign entities that detail transactions conducted pursuant to GL H, including reporting on transactions that the U.S. person is required to disclose to the Securities and Exchange Commission?

Yes. A U.S. person may receive reports from its owned or controlled foreign entities that include details on transactions the foreign entity conducted with Iran pursuant to [GL H](#). However, U.S. persons remain prohibited from engaging in Iran-related activities of U.S.-owned or -controlled foreign entities and cannot attempt to influence Iran-related business decisions of such entities based on such reports. [06-08-2016]

L. IMPORTS OF IRANIAN-ORIGIN CARPETS AND FOODSTUFFS

L. 1. Under the JCPOA, the United States committed to license, upon Implementation Day, the importation into the United States of Iranian-origin carpets and foodstuffs, including pistachios and caviar. What types of Iranian-origin carpets and foodstuffs may be imported into the United States under the general license?

Pursuant to its commitment under the JCPOA, the United States is authorizing the importation into the United States of Iranian-origin carpets and foodstuffs, including pistachios and caviar. This general license, which is effective upon publication in the *Federal Register*, covers: (1) carpets and other textile floor coverings and carpets used as wall hangings that are classified under chapter 57 or heading 9706.00.0060 of the Harmonized Tariff Schedule of the United States and (2) foodstuffs intended for human consumption that are classified under chapters 2-23 of the Harmonized Tariff Schedule of the United States. Carpets and foodstuffs imported pursuant to the general license will

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

still be subject to all other laws and regulations applicable to goods imported into the United States, including generally applicable laws and regulations administered by other U.S. departments and agencies, such as the Department of Agriculture, Department of Commerce, the Food and Drug Administration, and the Department of Homeland Security.

The following are examples of transactions that are permitted under the general license: (1) A United States person living abroad is permitted to purchase or sell an Iranian-origin carpet, as long as the sale is not to Iran, the Government of Iran, an Iranian financial institution, or any other person whose property and interests in property are blocked pursuant to section 560.211 of the ITSR.

(2) A United States person may process a documentary collection relating to the importation into the United States of Iranian-origin pistachios, but payment under the documentary collection may not involve the crediting of an Iranian account, as defined in section 560.320 of the ITSR. [01-16-2016]

L. 2. How can U.S. persons pay Iranian companies for these imports?

Under the ITSR, U.S. depository institutions and registered brokers or dealers in securities are authorized to process transfers of funds to or from Iran, or for the direct or indirect benefit of persons in Iran or the Government of Iran, if the transfer arises from, and is ordinarily incident and necessary to give effect to, an underlying transaction that has been authorized by a general or specific license issued pursuant to, or set forth in, the ITSR and does not involve crediting or debiting an Iranian account, as defined in section 560.320 of the ITSR (*see* section 560.516 of the ITSR). This payment mechanism is available for transactions related to generally-licensed importations of Iranian-origin carpets and foodstuffs. For additional information regarding this payment mechanism, *see* FAQ [242](#).

In addition, subject to certain conditions, U.S. depository institutions are authorized under the general license to process letters of credit for payments for Iranian-origin carpets and foodstuffs, and U.S. persons are also authorized to act as brokers for the purchase or sale of the categories of Iranian-origin carpets and foodstuffs covered by the general license.

The following are examples of transactions that are permitted under the general license:

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

(1) A United States depository institution may issue a letter of credit in favor of an exporter in Iran to finance the importation into the United States of Iranian-origin caviar; the letter of credit may be confirmed by a third-country bank that is not included within the definition of the term Government of Iran or an Iranian financial institution.

(2) A United States depository institution may advise or confirm a letter of credit issued by a third-country bank that is not included within the definition of the term Government of Iran or an Iranian financial institution to finance the purchase from a third country of Iranian-origin carpets by a U.S. person or third-country national.

(3) A United States person may broker the sale of Iranian-origin carpets from Iran to a third-country national located outside Iran or to another U.S. person wherever located.

(4) A bank that is owned or controlled by the Government of Iran may forward letter of credit documents, strictly on a documentary collection basis, either directly to a United States depository institution or to a third-country bank that is not included within the definition of the term Government of Iran or an Iranian financial institution and that is party to a letter of credit issued by a United States depository institution. The Iranian bank may not, however, send the documents on an “approval” basis, since it is not and cannot be party to the letter of credit. [01-16-2016]

M. OTHER

M. 1. Are Iranian citizens who are permanent residents of the United States or dual U.S.-Iranian citizens located anywhere in the world generally permitted to conduct business or trade with Iranian companies or operate a business in Iran?

No. Both an Iranian citizen who is a permanent resident alien of the United States and an individual who is a dual U.S.-Iranian citizen meet the definition of a U.S. person set forth in section 560.314 of the ITSR, regardless of where in the world they are located. U.S. persons are generally prohibited under the ITSR from engaging in transactions or dealings involving Iran that are not exempt from regulation or authorized by OFAC. However, OFAC has issued a number of general licenses that authorize U.S. persons, including Iranian citizens who are permanent residents of the United States and dual U.S.-Iranian citizens located anywhere in the world, to conduct certain activities with regard to Iran that would otherwise be prohibited under the ITSR, such as the exportation

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Last Updated on December 15, 2016**

to Iran of agricultural commodities (including food), medicine, and medical supplies and the exportation of hardware, software, and services incident to personal communications. The United States committed in the JCPOA to license certain activities involving U.S. persons, including the sale to Iran of commercial passenger aircraft and related parts and services, provided they are used exclusively for commercial passenger aviation; the importation of Iranian-origin carpets and foodstuffs; and activities involving Iran conducted by foreign subsidiaries of U.S. companies. [01-16-2016]

M. 2. What level of due diligence is expected from industry since there is no relief for the IRGC in the JCPOA, given the IRGC plays a significant role in the Iranian economy?

After Implementation Day, non-U.S. persons who knowingly conduct significant financial transactions with Iranian or Iran-related persons on the SDN List, including the IRGC, continue to be exposed to sanctions (*see* FAQ A.6).

OFAC recommends that a person considering business in Iran or with Iranian persons conduct due diligence sufficient to ensure that it is not knowingly engaging in transactions with the IRGC or other Iranian or Iran-related persons on the SDN List (*see* FAQ A.6), and keep records documenting that due diligence. U.S. persons may refer to FAQ [116](#) for additional guidance on compliance expectations for intermediary banks. [01-16-2016]

M. 3. How will we know if sanctions snap back? How far in advance will we know that sanctions are to snap back?

The United States is committed to ensuring the JCPOA’s success, and will make every effort to resolve any concerns through the procedures established under the JCPOA. In the event that we are unable to resolve our concerns through the established procedures, the U.S. government would communicate this information clearly to the public via the same channels used to communicate previous JPOA and JCPOA updates. We are unable to predict how far in advance notice will be given in the event that sanctions snap back. [01-16-2016]

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

M. 4. In the event of a snapback, will sanctions apply retroactively to legitimate business activity that takes place after Implementation Day but before the snapback occurs?

No. The United States has committed not to retroactively impose sanctions for legitimate activity undertaken after Implementation Day. Transactions conducted after the snapback occurs, however, could be sanctionable to the extent they implicate activity for which sanctions have been re-imposed. The JCPOA does not grandfather contracts signed prior to snapback. For more information regarding snapback, please *see* FAQ M. 5. [01-16-2016; updated on 12-15-2016]

M. 5. In the past the U.S. government has authorized a wind-down period when new sanctions came into effect to allow companies to disengage from Iran. Will a wind-down period be provided in the event sanctions are re-imposed on Iran?

The U.S. government has a past practice of working with U.S. or third-country companies to minimize the impact of sanctions on the legitimate activities of those parties undertaken prior to the imposition of sanctions, and we anticipate doing the same in the event of a JCPOA sanctions snapback.

As a general matter, in the event of a JCPOA sanctions snapback, the U.S. government would provide non-U.S., non-Iranian persons a 180-day period to wind down operations in or business involving Iran that was consistent with the U.S. sanctions lifting under the JCPOA and undertaken pursuant to a written contract or written agreement entered into prior to snapback.

In the event that a non-U.S., non-Iranian person is owed payment at the time of snapback for goods or services fully provided or delivered to an Iranian counterparty prior to snapback pursuant to a written contract or written agreement entered into prior to snapback and such activities were consistent with U.S. sanctions in effect at the time of delivery or provision, the U.S. government would allow the non-U.S., non-Iranian person to receive payment for those goods or services according to the terms of the written contract or written agreement. Similarly, if a non-U.S., non-Iranian person is owed repayment for loans or credits extended to an Iranian counterparty prior to snapback pursuant to a written contract or written agreement entered into prior to snapback and such activities were consistent with U.S. sanctions in effect at the time the loans or credits were extended, the U.S. government would allow the non-U.S., non-Iranian person to receive repayment of the related debt or obligation according to the terms of the

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

written contract or written agreement. This allowance is designed for non-U.S., non-Iranian parties to be made whole for debts and obligations owed or due to them for goods or services fully provided or delivered or loans or credit extended to an Iranian party prior to snapback. Any payments would need to be consistent with U.S. sanctions, including that payments could not involve U.S. persons or the U.S. financial system, unless the transactions are exempt from regulation or authorized by OFAC.

To the extent that snapback results in the revocation of general or specific licenses issued by OFAC, the U.S. government would, consistent with the conditions described above, provide U.S. persons and U.S.-owned or -controlled foreign entities a 180-day period to wind down operations in or business involving Iran conducted pursuant to an OFAC authorization, and to receive payments according to the terms of the written contract or written agreement entered into prior to snapback for goods or services fully provided or delivered pursuant to an OFAC authorization prior to snapback.

With the exception of goods or services necessary to wind down operations in or business involving Iran during the 180-day period, the provision or delivery of additional goods or services and/or the extension of additional loans or credits to an Iranian counterparty after snapback, including pursuant to written contracts or written agreements entered into prior to snapback, may result in the imposition of U.S. sanctions unless such activities are exempt from regulation, authorized by OFAC, or not otherwise sanctionable.

The U.S. government would evaluate matters falling outside the above parameters on a case-by-case basis.

If U.S. sanctions were to snap back in whole or in part, OFAC would provide additional guidance in this regard on its website. [01-16-2016; updated on 12-15-2016]

M. 6. The Main Text of the JCPOA, paragraph 30, states that “Following the lifting of sanctions under this JCPOA as specified in Annex II, ongoing investigations on possible infringements of such sanctions may be reviewed in accordance with applicable national laws.” What does this mean with respect to any investigations into or enforcement of U.S. sanctions violations?

As a general matter, the nuclear-related sanctions that are the subject of U.S. commitments in Annex II of the JCPOA are secondary sanctions that are directed toward the activity of non-U.S. persons occurring outside of the United States that is not

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

otherwise subject to U.S. jurisdiction. To the extent an ongoing investigation of a non-U.S. person relates to activity within the scope of the secondary sanctions to be lifted on Implementation Day, the U.S. government will not sanction the non-U.S. person under those authorities following Implementation Day.

Notwithstanding the JCPOA, the U.S. government will continue to administer and enforce a range of sanctions with respect to Iran, including the domestic trade embargo implemented through the ITSR. The ITSR largely prohibit U.S. persons from exporting, directly or indirectly, goods, technology, and services to, or importing goods, technology, and services from, Iran. Under longstanding practice, apparent sanctions violations are analyzed in light of the laws and regulations that were in place at the time of the underlying activities, and civil and criminal enforcement authorities are applied accordingly. Investigations into apparent violations of U.S. sanctions authorities that were not lifted on Implementation Day, including the ITSR, will not be affected by the JCPOA, and future enforcement actions may follow. Similarly, investigations into apparent violations resulting from pre-Implementation Day activities that would be within the scope of authorizations available beginning on Implementation Day will not be affected by the JCPOA, and future enforcement actions may follow. [01-16-2016]

M. 7. Do the U.S. commitments with respect to sanctions contained in the JCPOA alter or impact any prior enforcement actions OFAC has taken with respect to any entity, including non-U.S. financial institutions?

No. None of the enforcement actions that OFAC has finalized to date, including any settlement agreement or the terms and conditions set forth therein, will be altered or impacted in any way by implementation of the JCPOA. To the extent that any party, including a non-U.S. financial institution, has entered into a settlement agreement with OFAC, the party will continue to be bound by that agreement after Implementation Day. [01-16-2016]

M. 8. Do the U.S. commitments with respect to sanctions contained in the JCPOA alter or impact any prior enforcement actions by regulatory authorities other than OFAC?

OFAC does not expect the JCPOA to alter or impact any prior enforcement actions by other regulatory authorities. Specific questions regarding the potential impact of the JCPOA on enforcement actions taken by other agencies, such as settlement agreements, consent orders, or cease and desist orders agreed to or issued by federal, state, and/or

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**Issued on January 16, 2016
Last Updated on December 15, 2016**

local banking regulators, or deferred prosecution agreements that violators have entered into with the U.S. Department of Justice and/or state or local law enforcement agencies, should be directed to the relevant regulatory or enforcement agency. [01-16-2016]

M. 9. After Implementation Day, are U.S. persons able to export, reexport, sell, or provide goods, services, or technology to Iran? And can non-U.S. persons export, reexport, sell, or provide U.S. goods, services, or technology to Iran?

No, unless the transaction is exempt from regulation or authorized by OFAC. Under section 560.204 of the ITSR, U.S. persons continue to be broadly prohibited from exporting any goods, services, or technology directly or indirectly to Iran, with the exception of transactions that are exempt from regulation or authorized by OFAC. Furthermore, section 560.204 of the ITSR generally prohibits the exportation, reexportation, sale, or supply, directly or indirectly, of any goods, technology, or services from the United States or by U.S. persons 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 that 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. These prohibitions remain in place even if secondary sanctions on the transaction or activity have been lifted under the JCPOA.

In addition, pursuant to section 560.205 of the ITSR, non-U.S. persons continue to be prohibited from reexporting from a third country, directly or indirectly, any goods, technology, or services that have been exported from the United States if they know or have reason to know that the reexportation is intended specifically for Iran or the Government of Iran and the items are controlled for export from the United States to Iran. Non-U.S. persons also continue to be prohibited from reexporting from a third country items containing 10 percent or more U.S.-controlled content, if undertaken with knowledge or reason to know that the reexportation is intended specifically for Iran or the Government of Iran. However, the exportation or reexportation of U.S.-origin goods that are designated as EAR99 under the EAR from a third country to Iran without knowledge or reason to know at the time of export from the United States that the goods are intended specifically for Iran would not be prohibited. Additional export controls administered by the Department of Commerce may also apply. [01-16-2016]

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Last Updated on December 15, 2016**

M. 10. Is it sanctionable for non-U.S. persons to engage in transactions with an entity that is not on the SDN List, but that is minority owned, or that is controlled in whole or in part, by an Iranian or Iran-related person on the SDN List?

It is not necessarily sanctionable for a non-U.S. person to engage in transactions with an entity that is not on the SDN List but that is minority owned, or that is controlled in whole or in part, by an Iranian or Iran-related person on the SDN List. However, OFAC recommends exercising caution when engaging in transactions with such entities to ensure that such transactions do not involve Iranian or Iran-related persons on the SDN List (*see* FAQ A.6). [10-07-2016]

M. 11. For non-U.S. persons conducting due diligence on a potential Iranian counterparty, does OFAC consider only checking the SDN List to be sufficient due diligence?

Screening the names of Iranian counterparties against the SDN List is a step that would generally be expected, but that is not necessarily sufficient (*see* FAQ A.6). In addition to checking the SDN List, non-U.S. persons should consult with their local regulators regarding due diligence expectations in their domestic jurisdictions. In particular, the non-U.S. person should ensure that its due diligence procedures conform to its internal risk-assessment and overall compliance policies, which – in addition to other business considerations – should be based on best practices of the particular industry at issue and conform to guidance and expectations of the non-U.S. person’s home country regulators. OFAC suggests maintaining records documenting those due diligence efforts (*see* FAQ M.2). [10-07-2016]

M. 12. Does OFAC expect non-U.S. financial institutions to conduct due diligence on their customer’s Iranian customers?

OFAC considers the appropriate level of due diligence to depend on the financial institution’s role in a transaction (*see* [FAQ 116](#)). While OFAC would consider it a best practice for a non-U.S. financial institution to perform due diligence on its own customers, OFAC does not expect a non-U.S. financial institution to repeat the due diligence its customers have performed on an Iranian customer unless the non-U.S. financial institution has reason to believe that those processes are insufficient. Non-U.S. financial institutions should consult with their local regulators regarding due diligence expectations in their domestic jurisdictions. [10-07-2016]

U.S. DEPARTMENT OF THE TREASURY

Resource Center

OFAC FAQs: Iran Sanctions

OFAC FAQ Index	General Questions	Sanctions Compliance	Sanctions Lists and Files	Iran Sanctions	Other Sanctions Programs
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Search OFAC FAQs Using Treasury Recommendations:

Search

Skip to the Following Topics:

- Comprehensive Iran Sanctions, Accountability, and Divestment Act of 2010 (CISADA)
- Treasury CISADA Findings Against Bank of Kunlun
- Executive Order 13599 (Blocking Property of the Government of Iran and Iranian Financial Institutions)
- NDAA (Section 1245 of the National Defense Authorization Act for Fiscal Year 2012)
- Executive Order 13606 (the GHRIVITY E.O.)
- Foreign Sanctions Evaders (FSE) Executive Order (Prohibiting Certain Transactions with and Suspending Entry into the United States of Foreign Sanctions Evaders with Respect to Iran and Syria)
- Executive Order 13622, "Authorizing Additional Sanctions With Respect to Iran"
- Determination Pursuant to Section 312 of the Iran Threat Reduction and Syria Human Rights Act
- Section 4 of Executive Order "Authorizing the Implementation of Certain Sanctions Set Forth in the Iran Threat Reduction and Syria Human Rights Act of 2012 and Additional Sanctions with Respect to Iran"
- Iranian Transactions and Sanctions Regulations and the Statement of Licensing Procedure on Support Of Human Rights-, Humanitarian-, and Democracy-Related Activities With Respect to Iran
- Implementation of Section 504 of the Iran Threat Reduction and Syria Human Rights Act of 2012
- Iran Freedom and Counter-Proliferation Act of 2012 (IFCA)
- General Licenses (GL) for Agricultural Commodities, Medicine, and Medical Devices in the Iranian Transactions and Sanctions Regulations
- Extension of Temporary Sanctions Relief to Implement the Joint Plan of Action between the P5 + 1 and the Islamic Republic of Iran
- Iranian General License with Respect to Certain Services, Software, and Hardware Incident to Personal Communications (Iranian General License D-1)
- Payments or the Facilitation of Payments to Iranian Civil Aviation Authorities for Overflights of Iran or Emergency Landing in Iran
- Joint Comprehensive Plan of Action "Adoption Day"
- Provision of Routine Goods and Services by non-U.S. persons to Diplomatic Missions of the Government of Iran
- The Lifting of Certain U.S. Sanctions Under the Joint Comprehensive Plan of Action (JCPOA) on Implementation Day
- Additional Iran-related Questions From Financial Institutions
- Amendments to General Licenses for the Exportation or Reexportation of Agricultural Commodities, Medicine, and Medical Devices to Iran
- Amendment to the Definition of "Iranian-origin goods" or "goods of Iranian origin" in the Iranian Transactions and Sanctions Regulations
- Countering America's Adversaries Through Sanctions Act (CAATSA) Section 105
- Guidance Related to Humanitarian Assistance with Regard to the November 12, 2017 Earthquake in Iran
- Frequently Asked Questions Regarding Executive Order 13846 of August 6, 2018, "Reimposing Certain Sanctions With Respect to Iran"
- Frequently Asked Questions Regarding Executive Order "Imposing Sanctions with Respect to the Iron, Steel, Aluminum, and Copper Sectors of Iran" of May 8, 2019

CISADA (Comprehensive Iran Sanctions, Accountability, and Divestment Act of 2010)

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149. What activities by foreign financial institutions can subject them to CISADA sanctions?

As described in the Iranian Financial Sanctions Regulations, the sanctionable activities of a foreign financial institution are:

- Facilitating the efforts of the [Government of Iran](#) (GOI) to acquire or develop Weapons of Mass Destruction (WMD) or delivery systems for WMD or to provide support for terrorist organizations or acts of international terrorism;

- Facilitating the activities of a person subject to financial sanctions pursuant to UNSCRs 1737 , 1747 , 1803 , or 1929 , or any other Security Council resolution that imposes sanctions with respect to Iran;
- Engaging in money laundering, or facilitating efforts by the Central Bank of Iran or any other Iranian financial institution, to carry out either of the facilitating activities described above; or
- Facilitating a significant transaction or transactions or providing significant financial services for: (i) the Islamic Revolutionary Guard Corps or any of its agents or affiliates whose property and interests in property are blocked pursuant to the International Emergency Economic Powers Act (IEEPA), or (ii) a financial institution whose property and interests in property are blocked pursuant to IEEPA in connection with Iran's proliferation of WMD, Iran's proliferation of delivery systems for WMD, or Iran's support for international terrorism.

150. Where can I find a list of Islamic Revolutionary Guard Corps (IRGC) affiliates and Iran-linked financial institutions “blocked pursuant to the International Emergency Economic Powers Act (IEEPA)”?

The list of blocked IRGC affiliates and blocked Iran-linked financial institutions is dynamic and is based on the identity of “designated” persons, which refers both to natural persons (i.e., individuals) and legal persons (such as corporations and other entities). The most recent list of designated persons – which includes most, but not all, blocked entities* – can be found at www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx. The listings of designated IRGC entities will be followed by the tag [IRGC]; those of designated Iran-linked financial institutions will have the tag [IFSR].

**Under Department of the Treasury regulations, designated persons are those that are named on the list. All interests in property of such persons are blocked, and such persons are considered to have an interest in all property and entities in which they own, directly or indirectly, a 50 percent or greater interest. As a result, such property and entities are also blocked, even if they do not themselves appear on the list.*

151. How do the Iranian Financial Sanctions Regulations (IFSR) define “U.S. financial institutions”?

The Iranian Financial Sanctions Regulations (IFSR) define “U.S. financial institutions” to include: depository institutions, banks, savings banks, money service businesses, trust companies, insurance companies, securities brokers and dealers, commodities exchanges, clearing corporations, investment companies, employee benefit plans, and U.S. holding companies, U.S. affiliates, or U.S. subsidiaries of any of these entities. Covered institutions include those branches, offices, and agencies of foreign financial institutions that are located in the United States.

152. How do the Iranian Financial Sanctions Regulations (IFSR) define “foreign financial institutions”?

The Iranian Financial Sanctions Regulations (IFSR) define “foreign financial institutions” to include foreign depository institutions, banks, savings banks, money service businesses, trust companies, securities brokers and dealers, commodities exchanges, clearing corporations, investment companies, employee benefit plans, and holding companies, affiliates, or subsidiaries of any of these entities.

153. How do the Iranian Financial Sanctions Regulations (IFSR) define the term “knowingly”?

The term “knowingly” as used in the IFSR means that a person has actual knowledge or should have known of specific conduct, a circumstance, or a result. In other words, the IFSR could be implicated if the Treasury Department finds that a foreign financial institution knew or should have known that it engaged in one or more of the sanctionable activities.

154. How does the Treasury Department determine whether a transaction or financial service is “significant” for purposes of the Iranian Financial Sanctions Regulations (IFSR)?

As set out in the IFSR, in determining whether a transaction or financial service is “significant,” the Treasury Department may consider: (1) the size, number, frequency, and nature of the transaction(s); (2) the level of awareness of management of the transaction(s) and whether or not the transaction(s) are a part of a pattern of conduct; (3) the nexus between the foreign financial institution involved in the transaction(s) and a blocked Islamic Revolutionary Guard Corps individual or entity or blocked Iran-linked financial institution; (4) the impact of the transaction(s) on the goals of the Comprehensive Iran Sanctions, Accountability, and Divestment Act (CISADA) ; (5) whether the transaction(s) involved any deceptive practices; and (6) other factors the Treasury Department deems relevant on a case-by-case basis.

155. When are the prohibitions and strict conditions on foreign financial institutions' correspondent accounts or payable-through accounts in the United States effective?

A finding by the Treasury Department that a [foreign financial institution](#) knowingly engages in one or more of the sanctionable activities is necessary before the Treasury Department can prohibit or impose strict conditions on the opening or maintaining in the United States of [correspondent accounts](#) or [payable-through accounts](#) for that foreign financial institution.

156. How will U.S. and foreign financial institutions know that the Treasury Department has made such a finding?

As a general matter, the Treasury Department will reach out to foreign financial institutions to inquire about their conduct before making a finding. If the Treasury Department decides to impose strict condition(s), the Treasury Department will issue an order or a regulation that sets out the strict condition(s) to be imposed on the U.S. [correspondent accounts](#) or U.S. [payable-through accounts](#) of the relevant foreign financial institution and publish the order or regulation in the Federal Register. The Federal Register is available at www.gpo.gov/fdsys/. If the Treasury Department decides to prohibit the opening or maintaining of U.S. correspondent accounts or U.S. payable-through accounts for a foreign financial institution, the Treasury Department will add the name of the foreign financial institution and publish it to the [part 561 list](#).

157. How will the Treasury Department enforce the Iranian Financial Sanctions Regulations (IFSR) with respect to U.S. entities?

Any U.S. person who violates the correspondent account provisions of the [IFSR](#) may be subject to civil penalties of up to the greater of \$250,000 or twice the transaction value, and criminal penalties for willful violations of up to \$1 million and 20 years in prison. A U.S. financial institution may be subject to civil penalties of up to the greater of \$250,000 or twice the transaction value, if any person that it owns or controls violates the IFSR prohibition on engaging in any transaction with or benefitting the Islamic Revolutionary Guard Corps (IRGC) or any of its agents or affiliates whose property and interests in property are blocked pursuant to the [International Emergency Economic Powers Act](#) (IEEPA), and if the U.S. financial institution knew or should have known that the person violated the IFSR.

158. Can the application of any part(s) of the Iranian Financial Sanctions Regulations (IFSR) be waived by the Department of the Treasury?

The [Comprehensive Iran Sanctions, Accountability, and Divestment Act](#) (CISADA) provides for a waiver of the sanctions under the Iranian Financial Sanctions Regulations (IFSR) if the Secretary of the Treasury determines that a waiver is necessary to the national interest of the United States.

159. Where can I find the text of the Iranian Financial Sanctions Regulations?

The text of the Iranian Financial Sanctions Regulations (IFSR) can be found at: www.treasury.gov/resource-center/sanctions/Programs/Documents/fr75_49836.pdf.

Executive Order 13599 (Blocking Property of the Government of Iran and Iranian Financial Institutions)

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On February 5, 2012, the President signed [Executive Order 13599](#) to implement section 1245(c) of the National Defense Authorization Act for Fiscal Year 2012, Public Law 112-81 ("NDAA") and to take additional steps with respect to Iran. Effective as of 12:01 a.m. eastern standard time on February 6, 2012, the order blocks all property and interests in property of the [Government of Iran](#) (including the Central Bank of Iran), all [Iranian financial institutions](#), and all persons determined by the Secretary of the Treasury, in consultation with the Secretary of State, 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 the order. [02-06-2012]

160. Section 1 of E.O. 13599 blocks all property and interests in property of the Government of Iran, including the Central Bank of Iran, and of all Iranian financial institutions, that are in the United States, that come within the United States, or that come within the possession or control of U.S. persons (including overseas branches). Can you provide further clarification about this provision of E.O. 13599?

[E.O. 13599](#) requires U.S. persons to block (i.e., freeze) all property and interests in property of the Government of Iran, including the Central Bank of Iran, and of all Iranian financial institutions, which also includes the Central Bank of Iran. This

means that all individuals and entities that meet the definition of “Government of Iran” (“GOI”) as defined by section 7(d) of the new E.O. as well as all Iranian financial institutions (whether or not they meet the definition of the GOI) are now blocked. Previously, under the Iranian Transactions Regulations, [31 C.F.R. part 560 \(the “ITR”\)](#), financial institutions and other U.S. persons were prohibited from engaging in transactions with the GOI. Under those prior rules, U.S. financial institutions receiving instructions to execute transactions involving these entities were not required to block the transactions, but were instead required to reject those instructions rather than carry them out, unless the transactions were exempt, authorized, or not prohibited by OFAC. The Executive Order defines an “Iranian financial institution” as a financial institution organized under the laws of Iran or any jurisdiction within Iran (including foreign branches), any financial institution in Iran, any financial institution, wherever located, owned or controlled by the Government of Iran, and any financial institution, wherever located, owned or controlled by any of the aforementioned entities.

As a result, transactions involving entities bearing the [IRAN] tag on OFAC’s List of Specially Designated Nationals and Blocked Persons (“[SDN List](#)”) will now need to be blocked unless exempt or authorized by OFAC. Going forward, the [IRAN] tag will connote that a person or entity meets the definition of the term “GOI” or “Iranian Financial Institution”. OFAC will continue to update the SDN List and may add, delete, or edit entries as appropriate.

E.O. 13599 blocks the property and interests in property of any individual or entity that comes within its definition of the term “Government of Iran” regardless of whether it is listed on the SDN List, and similarly it blocks the property and interests in property of all Iranian financial institutions as defined in the order regardless of whether the Iranian financial institution is listed on the SDN List.

E.O. 13599 builds upon the prohibitions in the ITR, which remain in effect.

Please note, pursuant to OFAC guidance, even when an entity does not itself appear on the SDN List or otherwise meet the definition of the GOI or an Iranian financial institution, the property and interests in property of that entity are blocked if the entity is owned, directly or indirectly, 50% or more by a person whose property and interests in property are blocked pursuant to an Executive Order or regulations administered by OFAC. [02-06-2012]

161. If all property and interests in property of the Government of Iran, including the Central Bank of Iran, and of all Iranian financial institutions are blocked, can I conduct transactions involving the Government of Iran that have been previously authorized by OFAC?

Generally yes. Under new General License A, almost all transactions that are authorized under existing general licenses issued pursuant to the Iranian Transactions Regulations ([ITR](#)) or under existing OFAC specific licenses will continue to be authorized under the authority of [E.O. 13599](#). However, transactions previously authorized under one existing ITR general license are not authorized pursuant to E.O. 13599. Specifically, the closing of accounts of the Government of Iran or an Iranian financial institution and the lump sum transfer of the balances to an account outside of the United States, which is authorized by sections 560.517(a)(3) & (b)(2) of the ITR, is not authorized by General License A, and, therefore, those transactions are prohibited by E.O. 13599 and the accounts must be blocked. In addition, General License A does not authorize any payments from blocked funds or debits to blocked accounts, with a limited exception for payments from funds or debits to accounts blocked under the [Iranian Assets Control Regulations](#) (the hostage crisis blocking program that began in 1979) that are authorized by specific licenses issued by OFAC.

New General License B authorizes U.S. depository institutions and U.S. registered brokers or dealers in securities to process noncommercial, personal remittances, to or from Iran, or for or on behalf of individuals ordinarily resident in Iran who are not included in the term “Government of Iran”, provided that such funds transactions are not made by, to, or through a financial institution blocked pursuant to the Weapons of Mass Destruction Proliferators Sanctions Regulations, 31 C.F.R. part 544 (the “[WMDPSR](#)”), or the Global Terrorism Sanctions Regulations, 31 C.F.R. part 594 (the “[GTSR](#)”), or a person whose property and interests in property are blocked pursuant to any other part of 31 C.F.R. chapter V, or any Executive order, except an Iranian financial institution whose property and interests in property are blocked solely pursuant to E.O. 13599.

Transactions not previously authorized by OFAC that involve property or interests in property of the Government of Iran, including the Central Bank of Iran, or of Iranian financial institutions must be blocked. [02-06-2012]

162. Are U.S. persons still required to comply with the Iranian Transactions Regulations (ITR)?

Yes. [E.O. 13599](#) builds upon the prohibitions of the [ITR](#), and the prohibitions of the ITR remain in effect. [02-06-2012]

163. What are the differences and similarities between E.O. 13599 and the Iranian Transactions Regulations (ITR)?

The ITR prohibit virtually all direct or indirect transactions involving Iran or the Government of Iran by U.S. persons or with a nexus to the United States, unless otherwise authorized by OFAC or exempted by statute, but they do not contain blocking provisions. [E.O. 13599](#) requires U.S. persons to block all property and interests in property of the Government of

Iran, including the Central Bank of Iran, and of Iranian financial institutions, which also includes the Central Bank of Iran, unless it relates to a transaction that is exempted by statute or authorized by OFAC.

To illustrate the difference between how a transaction would be treated under the ITR and the new E.O., imagine a commercial wire transfer being processed through the U.S. financial system by order of a third-country, non-U.S. company for credit to a third-country financial institution in favor of a correspondent account it maintains for an Iranian financial institution. The transaction is not exempt or authorized by a general or specific license, and the Iranian bank is not blocked pursuant to the GTSR or the WMDPSR. Previously, under the ITR, any U.S. financial institution handling the transaction would have needed to reject the payment because allowing it to be processed would constitute a prohibited exportation of services to Iran. With the new E.O. in place, the U.S. financial institution would be required to block (“freeze”) that transaction. [02-06-2012]

164. The Iranian Transactions Regulations (ITR) authorize U.S. depository institutions and U.S. registered brokers or dealers in securities to process transfers of funds to or from Iran if the transfer is a non-commercial, personal remittance. Are U.S. depository institutions and U.S. registered brokers or dealers in securities still authorized to process such payments to or from a Government of Iran-owned bank that is not otherwise designated pursuant to another part of 31 C.F.R. Chapter V?

General License B under [E.O. 13599](#) authorizes U.S. depository institutions and U.S. registered brokers or dealers in securities to process noncommercial, personal remittances to or from Iran provided that the payment is not made by, to, or through a financial institution designated by OFAC under the WMDPSR, or the GTSR, or a person whose property and interests in property are blocked pursuant to any other part of 31 C.F.R. chapter V, or any Executive order, except an Iranian financial institution whose property and interests in property are blocked solely pursuant to E.O. 13599. Exempt or authorized transactions to or from Iran may also be processed subject to the above conditions.

Such transactions must be processed through a third country, as U.S. banks are prohibited from operating correspondent accounts for Iranian banks. The transactions may involve the use of blocked Iranian financial institutions as long as the Iranian financial institution is blocked solely pursuant to E.O. 13599 (and not pursuant to any other Executive order or part of 31 C.F.R. chapter V) and there is a third-country, non-U.S. financial institution as an intermediary between the U.S. financial institution and the Iranian financial institution. [02-06-2012]

165. To what extent are U.S. persons expected to conduct enhanced due diligence to determine if transactions contain a Government of Iran interest?

[E.O. 13599](#) requires U.S. persons to block all property and interests in property of the Government of Iran, unless otherwise exempt or authorized by OFAC.

Please contact the OFAC Hotline at 202-622-2490 or 1-800-540-6322, or by email at OFAC_Feedback@treasury.gov, for guidance regarding entities that you suspect are owned or controlled by the Government of Iran that do not appear on the [SDN List](#). As a general matter, OFAC expects financial institutions to conduct due diligence on their own direct customers (including, for example, their ownership structure) to confirm that those customers are not persons whose property and interests in property are blocked.

With regard to other types of transactions where a financial institution is acting solely as an intermediary and fails to block transactions involving a sanctions target, OFAC will consider the totality of the circumstances surrounding the bank’s processing of the transaction to determine what, if any, regulatory response is appropriate. [02-06-2012]

166. OFAC’s SDN List contains a list of entities identified by OFAC as being the Government of Iran. Should U.S. persons now block the property and interests in property of those entities?

Yes, U.S. persons should now block the property and interests in property of the Government of Iran entities appearing on the [SDN List](#), unless OFAC has authorized the underlying transaction or the transaction is exempt. [02-06-2012]

167. OFAC has granted my company a license under the Trade Sanctions Reform and Export Enhancement Act of 2000 (“TSRA”) and the Iranian Transactions Regulations (ITR). Can I continue to conduct the licensed transaction?

Under General License A issued pursuant to [E.O. 13599](#), transactions authorized under existing specific licenses issued pursuant to [TSRA](#) and the [ITR](#) are authorized under E.O. 13599 until the specific license expires, per the terms of the license. [02-06-2012]

168. OFAC has issued me a (non-TSRA) specific license related to Iran, or the Government of Iran. Can I continue to conduct the licensed transactions?

Under General License A issued pursuant to [E.O. 13599](#), transactions authorized by (non-TSRA) specific licenses issued prior to the issuance of E.O. 13599 and issued pursuant to any part of 31 C.F.R. chapter V are also authorized under E.O. 13599. As set forth in General License A, in most cases these new authorizations under E.O. 13599 are in effect until the expiration date of the individual specific license, or, if the specific license has no expiration date, until April 6, 2012. [02-06-2012]

NDAA (Section 1245 of the National Defense Authorization Act for Fiscal Year 2012)

[Print this topic](#)

On December 31, 2011, the President signed into law the National Defense Authorization Act for Fiscal Year 2012, Public Law 112-81 (“[NDAA](#)”). Section 1245 of this statute requires the President to block the property and interests in property subject to U.S. jurisdiction of all Iranian financial institutions, including the Central Bank of Iran (“CBI”). It also aims to reduce Iranian oil revenues and discourage transactions with the CBI by providing for sanctions on foreign financial institutions that knowingly conduct or facilitate certain significant financial transactions with the CBI. Although the sanctions on foreign financial institutions authorized by section 1245 are similar to the financial sanctions under [the Comprehensive Iran Sanctions, Accountability, and Divestment Act](#) of 2010 (22 U.S.C. 8513(c)) (“[CISADA](#)”) (i.e., prohibiting and/or imposing strict conditions on opening or maintaining correspondent accounts or payable-through accounts in the United States), there are differences in the scope and operation of the two statutes. [02-14-2012]

169. What is the NDAA?

On December 31, 2011, the President signed into law the National Defense Authorization Act ([NDAA](#)). Section 1245 of the NDAA requires the President to block the property and interests in property subject to U.S. jurisdiction of all Iranian financial institutions, including the Central Bank of Iran (CBI). It also aims to reduce Iranian oil revenues and discourage transactions with the CBI by providing for sanctions on foreign financial institutions that knowingly conduct or facilitate certain significant financial transactions with the CBI. [02-14-2012]

170. What activities can trigger sanctions on a foreign financial institution under the NDAA?

For private financial institutions, the Act mandates that the President sanction those institutions that are found to knowingly conduct or facilitate any significant transactions with a U.S.-designated Iranian financial institution or with the Central Bank of Iran (CBI) – whether for the purchase of petroleum or otherwise – unless the transaction is for the sale of food, medicine, or medical devices to Iran. For all transactions with the CBI other than petroleum purchases, this provision takes effect on February 29, 2012, i.e., 60 days after the enactment of the Act. The timing of the petroleum purchase sanctions is discussed immediately below.

Private financial institutions and all other foreign financial institutions – including central banks or foreign state-owned or -controlled banks – potentially face sanctions under the [NDAA](#) if they knowingly conduct or facilitate significant financial transactions for the purchase of Iranian petroleum or petroleum products with a U.S.-designated Iranian financial institution or with the CBI after the provision takes effect as early as June 28, 2012, i.e., 180 days after enactment.* This NDAA provision may be held in abeyance beyond June 28, 2012, depending on the President’s determination on the availability and price of alternative supplies. Foreign central and foreign state-owned or -controlled banks are also subject to these sanctions if the transactions are for the sale of petroleum or petroleum products to Iran and they occur after June 28, 2012.

All foreign financial institutions, including private and state-owned institutions, remain subject to section 104(c) of [the Comprehensive Iran Sanctions, Accountability, and Divestment Act](#) ([CISADA](#)), which calls for sanctions on foreign financial institutions that are found to have knowingly engaged in facilitating significant transactions for specific Iranian-linked individuals and entities. [02-14-2012]

**Irrespective of the timeframes set forth in the NDAA, any foreign financial institution that knowingly facilitates significant transactions with any U.S.-designated Iranian financial institution would still be subject to CISADA.*

171. Does the NDAA (National Defense Authorization Act) repeal or amend Section 104(c) of CISADA (the Comprehensive Iran Sanctions, Accountability, and Divestment Act)?

No. Any foreign financial institution that knowingly facilitates significant transactions or provides significant financial services for a U.S.-designated, Iranian-linked financial institution can be sanctioned under section 104(c) of [CISADA](#) and section

561.201 of the [Iranian Financial Sanctions Regulations](#) (“IFSR”) even if those transactions are not sanctionable under section 1245(d) of the [NDAA](#) . Though the NDAA imposes sanctions on foreign financial institutions similar to financial sanctions under CISADA and the IFSR (i.e., prohibiting and/or imposing strict conditions on opening or maintaining [correspondent accounts](#) or [payable-through accounts](#) in the United States), there are differences in the scope and operation of the statutes. [02-14-2012]

172. How does Executive Order 13599, “Blocking Property of the Government of Iran and Iranian Financial Institutions,” and the blocking of all Iranian financial institutions affect the financial sanctions provisions in CISADA? Do CISADA sanctions now apply to financial transactions with any Iranian financial institution?

The [Comprehensive Iran Sanctions, Accountability, and Divestment Act](#) (CISADA) applies to transactions with only those Iranian financial institutions that are designated in connection with Iran’s WMD or terrorism activities and are denoted on OFAC’s List of Specially Designated Nationals and Blocked Persons ([the SDN list](#)) with the [IFSR] tag. While [E.O. 13599](#) does block the property of all [Iranian financial institutions](#), that action is not grounded in the authorities that relate to counterproliferation or counterterrorism, and therefore does not implicate CISADA. [02-14-2012]

173. Are there any exceptions to the sanctions provisions in the National Defense Authorization Act (NDAA)?

Yes. The [NDAA](#) includes an exception that prohibits the President from imposing sanctions “with respect to any person for conducting or facilitating a transaction for the sale of food, medicine, or medical devices to Iran.” [02-14-2012]

174. What are definitions for the following NDAA terms: “significant financial transaction,” “knowingly,” “owned or controlled by the government of a foreign country,” “food, medicine, and medical devices,” “foreign financial institution,” “Iranian financial institution,” “significantly reduced,” and “whether the price and supply of petroleum and petroleum products produced in countries other than Iran is sufficient”?

“significant financial transaction”

The [Iranian Financial Sanctions Regulations](#) (IFSR), which implement section 104(c) of the [Comprehensive Iran Sanctions, Accountability, and Divestment Act](#) (CISADA), identify factors to be used in determining what is significant (as it relates to transactions) in [31 C.F.R § 561.404](#), which allows the Secretary of the Treasury to consider the “totality of the facts and circumstances” while providing a list of seven broad factors that can play a role in the determination, including: (1) the size, number, and frequency of transactions; (2) the nature of the transaction(s); (3) the level of awareness of management and whether the transaction(s) are part of a pattern of conduct; (4) the nexus between the transaction(s) and a blocked person; (5) the impact of the transaction(s) on statutory objectives; (6) whether the transaction(s) involve deceptive practices; and (7) such other factors that the Secretary deems relevant on a case-by-case basis. Treasury anticipates closely modeling the definition of “significant” for National Defense Authorization Act ([NDAA](#)) purposes on the IFSR.

We anticipate utilizing a broad definition of “financial transaction” that encompasses “any transfer of value involving a financial institution.” The term “transaction” includes, but is not limited to, the following:

- The holding of nostro, vostro, or loro accounts for or with the Central Bank of Iran or designated banks, such as Bank Mellī Iran and/or Bank Saderat Iran, including any of their branches or subsidiaries worldwide (collectively the “Listed Parties”);
- The provision of trade finance and/or letter of credit services for or with Listed Parties;
- The provision of guarantees or similar instruments for or with Listed Parties;
- The provision of investment products or instruments for Listed Parties and/or the participation with Listed Parties in investments;
- The receipt or origination of wire transfers on behalf of or involving Listed Parties;
- The acceptance of commercial paper (both retail and wholesale) drawn on Listed Parties, and the clearance of such paper (including, but not limited to, checks and similar drafts);
- The receipt or origination of ACH or ATM transactions with Listed Parties; and/or
- Any other transactions for or on behalf of, directly or indirectly, Listed Parties and/or with Listed Parties serving as correspondents, respondents, or beneficiaries. That would include transactions where the Listed Parties do not appear on the face of the transaction but where the transaction is undertaken with knowledge of the involvement of a Listed Party based on a relationship that exists through a third party such as a money exchange or trading house.

“knowingly”

The [IFSR](#) defines “knowingly” with respect to conduct, a circumstance, or a result, to mean that an entity or individual had actual knowledge, or should have known, about the conduct, the circumstance, or the result. [31 C.F.R. § 561.314](#). Treasury anticipates closely modeling the definition of this term on the [IFSR](#).

“owned or controlled by the government of a foreign country”

The [Iranian Transactions Regulations](#) (“[ITR](#)”) define “an entity owned or controlled by the Government of Iran” in [section 560.313](#). Borrowing from that definition, a financial institution “owned or controlled by the government of a foreign country” would be deemed to include a financial institution in which a foreign government owns a 50% or greater interest or which is otherwise controlled by a foreign government. Treasury anticipates closely modeling the definition of this term under the [NDAA](#) on the [ITR](#) definition.

“food, medicine, and medical devices”

“Food”: The October 2011 general license for the [ITR](#) and the [Sudanese Sanctions Regulations](#) (“[SSR](#)”) authorizing certain food exports to Iran and Sudan defines “food” as “items that are intended to be consumed by and provide nutrition to humans or animals in Iran – including vitamins and minerals, food additives and supplements, and bottled drinking water – and seeds that germinate into items that are intended to be consumed by and provide nutrition to humans or animals in Iran.” The regulations also specify that food does not include alcoholic beverages, cigarettes, gum, or fertilizer. Treasury anticipates closely modeling the definition of this term under the [NDAA](#) on this license definition.

“Medicine”: [ITR](#) section [560.530\(e\)\(2\)](#) states that: “For the purposes of this part, the term medicine has the same meaning given the term ‘drug’ in section 201 of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 321) but does not include any item listed on the Commerce Control List in the Export Administration Regulations, 15 CFR part 774, supplement no. 1 (excluding items classified as EAR 99).” Similarly, under the Trade Sanctions Reform and Export Act (“[TSRA](#)”), 22 U.S.C. 7201(5), “[t]he term ‘medicine’ has the meaning given the term ‘drug’ in section 321 of title 21.” Treasury anticipates closely modeling the definition of this term under the [NDAA](#) on the [ITR](#) and [TSRA](#).

“Medical Devices”: [ITR](#) section [560.530\(e\)\(3\)](#) states that: “For the purposes of this part, the term medical device has the meaning given the term ‘device’ in section 201 of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. § 321) but does not include any item listed on the Commerce Control List in the Export Administration Regulations, 15 CFR part 774, supplement no. 1 (excluding items classified as EAR 99).” Similarly, under [TSRA](#), 22 U.S.C. 7201(4), “[t]he term ‘medical device’ has the meaning given the term ‘device’ in section 321 of title 21.” Treasury anticipates closely modeling the definition of this term under the [NDAA](#) on the [ITR](#) and [TSRA](#).

“foreign financial institution”

“Foreign financial institution” is defined in [section 1245 of the NDAA](#) with reference to section 104(i) of [CISADA](#) (22 U.S.C. § 8513(i)). As further defined in the [IFSR](#), a “foreign financial institution” is “any foreign entity that is engaged in the business of accepting deposits, making, granting, transferring, holding, or brokering loans or credits, or purchasing or selling foreign exchange, securities, commodity futures or options, or procuring purchasers and sellers thereof, as principal or agent. It includes but is not limited to depository institutions, banks, savings banks, money service businesses, trust companies, securities brokers and dealers, commodity futures and options brokers and dealers, forward contract and foreign exchange merchants, securities and commodities exchanges, clearing corporations, investment companies, employee benefit plans, and holding companies, affiliates, or subsidiaries of any of the foregoing.” [31 C.F.R. § 561.308](#). It does not include “the international financial institutions identified in 22 U.S.C. 262r(c)(2), the International Fund for Agricultural Development, or the North American Development Bank.” [31 C.F.R. § 561.308](#). Treasury anticipates closely modeling the definition of this term under the [NDAA](#) on the [IFSR](#).

“Iranian financial institution”

This term is defined in [E.O. 13599](#) as: “a financial institution organized under the laws of Iran or any jurisdiction within Iran (including foreign branches), any financial institution in Iran, any financial institution, wherever located, owned or controlled by the Government of Iran, and any financial institution, wherever located, owned or controlled by any of the foregoing.” Such financial institutions include, but are not limited to, any foreign entity that is engaged in the business of accepting deposits, making, granting, transferring, holding, or brokering loans or credits, or purchasing or selling foreign exchange, securities, or commodity futures or options, or procuring purchasers and sellers thereof, as principal or agent. It includes but is not limited to depository institutions, banks, savings banks, money service businesses, trust companies, insurance companies, securities brokers and dealers, commodity futures and options brokers and dealers, forward contract and foreign exchange merchants, securities and commodities exchanges, clearing corporations, investment companies, employee benefit plans, and holding companies, affiliates, or subsidiaries of any of the foregoing.

“significantly reduced”

The Secretary of State, in consultation with the Secretary of the Treasury, the Secretary of Energy, and the Director of National Intelligence, will make determinations as to whether any country has significantly reduced the volume of Iranian crude oil purchases. Any determinations will be preceded by a process of rigorous due diligence. The Secretary of State intends to consider relevant evidence in assessing each country's efforts to reduce the volume of crude oil imported from Iran, including the quantity and percentage of the reduction in purchases of Iranian crude oil over the relevant period, termination of contracts for future delivery of Iranian crude oil, and other actions that demonstrate a commitment to substantially decrease such purchases.

“whether the price and supply of petroleum and petroleum products produced in countries other than Iran is sufficient”

The President will make a determination, based on the reports required by subparagraph (A) of Section 1245(d)(4) of the NDAA , as to whether the price and supply of petroleum and petroleum products produced in countries other than Iran is sufficient to permit purchasers of petroleum and petroleum products from Iran to reduce significantly in volume their purchases from Iran. [02-14-2012]

175. What is the scope of “petroleum products” under the law?

As defined by the U.S. Energy Information Administration (EIA), petroleum products include unfinished oils, liquefied petroleum gases, pentanes plus, aviation gasoline, motor gasoline, naphtha-type jet fuel, kerosene-type jet fuel, kerosene, distillate fuel oil, residual fuel oil, petrochemical feedstocks, special naphthas, lubricants, waxes, petroleum coke, asphalt, road oil, still gas, and miscellaneous products obtained from the processing of crude oil (including lease condensate), natural gas, and other hydrocarbon compounds. In keeping with the EIA's standard definition, petroleum products do not include natural gas, liquefied natural gas, biofuels, methanol, and other non-petroleum fuels. [02-14-2012]

176. If oil is being provided as payment for an outstanding debt, is such a transfer considered a “financial transaction”?

If a transfer involves a financial institution it would likely be considered a financial transaction. [02-14-2012]

177. If the Central Bank of Iran (CBI) is involved in providing settlement services for a transaction, or is otherwise acting solely as an intermediary in a transaction between a non-designated Iranian bank and a foreign financial institution, is the foreign financial institution deemed to be engaging in a transaction with the CBI?

Section 1245 targets any significant transactions “with” the CBI; a transaction involving the CBI in an intermediary role would likely be viewed as a transaction “with” the CBI. [02-14-2012]

178. Are barter trades involving the Central Bank of Iran (CBI) considered “financial transactions” under Section 1245?

If a transfer involves a financial institution it would likely be considered a financial transaction. [02-14-2012]

179. Does the definition of “significant financial transaction” exclude the passive holding of Central Bank of Iran (CBI) reserves? Is the U.S. willing to give assurances that this will not be a basis for sanctions?

This will be a case-by-case determination and will require specifics on what “passive holding” entails. As a general matter, we would likely not view the holding of reserves as sanctionable in the following circumstances: the accounts are frozen or restricted, under which the CBI would be allowed to maintain accounts that it had already opened as of December 31, 2011, but would otherwise be unable to direct the disposition of those funds, with ordinary commercial interest payments and routine roll-overs of time deposits under pre-existing instructions being the only new transactions. [02-14-2012]

180. Are payments made under contracts existing prior to the date of enactment of the National Defense Authorization Act (NDAA) statute (December 31, 2011) exempted from the definition of “significant transactions”?

No general exception will be provided for payments arising out of pre-existing contracts. The assessment of whether such payments are “significant” will be done on a case-by-case basis in line with the criteria discussed in [FAQ #174](#). [02-14-2012]

181. Will the U.S. refrain from sanctioning foreign financial institutions that receive funds from the Central Bank of Iran (CBI) to repay loans? What if these loans were granted for projects that might be subject to the food, medicine, and medical device exemptions under the National Defense Authorization Act (NDAA)?

As noted, no general exception will be provided for payments arising out of pre-existing contracts. The assessment of whether such payments are “significant” will be done on a case-by-case basis in line with the criteria discussed in [FAQ #174](#). Regarding payments for food, medicine, and medical devices, the [NDAA](#) does not allow sanctions based on transactions for the sale of food, medicine, or medical devices to Iran. Payments related to the export of broader humanitarian items would be dealt with in our analysis of what constitutes a “significant financial transaction” and would be considered on a case-by-case basis. [02-14-2012]

182. Is there a difference between entities that have been designated by the United States Government for illicit conduct, such as proliferation of weapons of mass destruction or support for terrorism, and those that are being blocked under E.O. 13599? How can I tell which entities appear on the Specially Designated National (SDN) List for which reasons?

Both blocked and designated entities appear on [the SDN List](#).

“Blocked” persons, in the context of [E.O. 13599](#), appear on the SDN List due to the United States Government’s identification of these entities as the Government of Iran and/or as an [Iranian financial institution](#). Such entities are identified on the SDN List with the tag [IRAN]. For example, Bank Keshavarzi is a Government of Iran owned Iranian financial institution and is identified with the [IRAN] tag. Additionally, the National Iranian Oil Company (NIOC) is a non-financial institution that has been identified as the Government of Iran and bears the [IRAN] tag.

“Designated” persons appear on the SDN List due to the United States Government’s having determined that they meet the criteria set forth in any of a number of other Executive Orders concerning, for example, assisting Iran’s weapons of mass destruction development, or aiding international terrorism and designating them for such activities. Such entities are identified on the SDN List with various tags other than [IRAN], such as [NPWMD] or [SDGT]. For example, Islamic Republic of Iran Shipping Lines is listed as: “IRISL [NPWMD].”

Note that many entries on the SDN List have more than one tag. For example: Bank Saderat Iran has three tags: [SDGT], indicating that it has been sanctioned for providing services to terrorism; [IRAN], indicating that it is the Government of Iran; and [IFSR], referring to the Iranian Financial Sanctions Regulations to signal to third country financial institutions that engage with entities with this tag that they risk sanctions under CISADA. [02-14-2012]

Executive Order 13606 (the GHRIVITY E.O.)

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On April 22, 2012, the President signed [Executive Order 13606](#) Blocking The Property And Suspending Entry into the United States of Certain Persons with Respect to Grave Human Rights Abuses by the Governments of Iran and Syria Via Information Technology (the “GHRIVITY E.O.”). Effective 12:01 a.m. eastern daylight time on April 23, 2012, the GHRIVITY E.O. blocks all property and interests in property of persons listed in its Annex, and all persons determined by the Secretary of the Treasury, in consultation with or at the recommendation of the Secretary of State, to meet the criteria in the order. [04-23-2012]

183. Why did the President issue the GHRIVITY E.O.?

The [GHRIVITY E.O.](#) follows prior Executive orders issued by the President in response to the commission of human rights abuses by the Governments of Iran and Syria. With the GHRIVITY E.O., the President recognized that the commission of serious human rights abuses against the people of Iran and Syria by their governments, facilitated by computer and network disruption, monitoring, and tracking by those governments, threatens the national security and foreign policy of the United States. The GHRIVITY E.O. targets this activity in order to deter and disrupt such abuses. [04-23-2012]

184. What does the GHRIVITY E.O. do?

The [GHRIVITY E.O.](#) blocks (i.e., freezes) the property and interests in property of, among others, any person determined by the Secretary of the Treasury, in consultation with or at the recommendation of the Secretary of State, (1) to have operated, or to have directed the operation of, information and communications technology that facilitates computer or network disruption, monitoring, or tracking that could assist in or enable serious human rights abuses by or on behalf of the Government of Iran or the Government of Syria; or (2) to have sold, leased, or otherwise provided, directly or indirectly, goods, services, or technology to Iran or Syria likely to be used to facilitate such activities.

U.S. persons in possession of property or interests in property belonging to persons listed in the Annex to the GHRIVITY E.O., or designated in the future by Treasury under the E.O., are obligated to block the property and report the blocking to OFAC within 10 days of blocking. Entities that are 50% or more owned by persons blocked by the GHRIVITY E.O. are also blocked, regardless of whether such entities appear on the Annex or OFAC's list of Specially Designated Nationals and Blocked Persons ("SDN list"). [04-23-2012]

185. What type of activities does the GHRIVITY E.O. target?

The GHRIVITY E.O. targets the provision and use of information and communications technology to facilitate computer or network disruption, monitoring, or tracking that could assist in or enable serious human rights abuses by or on behalf of the Government of Iran or the Government of Syria. It is not intended to block exports of technology that enable the Syrian and Iranian people to freely communicate among themselves and with the outside world.

"Information and communications technology" means any hardware, software, or other product or service primarily intended to fulfill or enable the function of information processing and communication by electronic means, including transmission and display, including via the Internet. [04-23-2012]

186. How do I know that a person has been designated under the GHRIVITY E.O.?

Persons designated under the GHRIVITY E.O. appear on the publicly available Specially Designated Nationals List (SDN list) bearing the [HRIT] tag. U.S. persons are obligated to block property involving the persons bearing the tag [HRIT] on the SDN list, unless the transaction is exempt or otherwise authorized by OFAC. [04-23-2012]

187. Does the GHRIVITY E.O. prohibit me from exporting technology to companies that do business with Iran or Syria?

This E.O. does not generally prohibit transactions involving persons that do business with Iran or Syria, unless the person has been designated pursuant to this order. You should consult with the Department of Commerce's Bureau of Industry and Security (BIS) regarding exports to companies that do business with Syria. [04-23-2012]

188. If I am a non-U.S. company that exports information and communications technology to Iran or Syria, will I be designated under the GHRIVITY E.O.?

The measures in this order are designed primarily to address the need to prevent entities located in whole or in part in Iran and Syria from facilitating or committing serious human rights abuses. These measures are not designed to prevent the provision of information and communications technology necessary to enable the Iranian and Syrian people to freely communicate with each other and the outside world. That said, those providing communications technology to Iran or Syria that has the potential to facilitate computer or network disruption, monitoring, or tracking should exercise great caution given Iran and Syria's use of this technology to assist in the commission of serious human rights abuses. [04-23-2012]

189. Would I need authorization from OFAC or BIS if I wanted to export goods or technology to persons blocked under the GHRIVITY E.O.?

Yes. For more information regarding exports of goods or technology to persons blocked under the GHRIVITY E.O. please contact OFAC or BIS. [04-23-2012]

190. Are existing licenses issued by the U.S. Government involving persons designated under the GHRIVITY E.O. still valid?

U.S. persons who have been issued licenses involving persons designated under the GHRIVITY E.O. should check with the issuing agency regarding the validity of their licenses. [04-23-2012]

FSE Executive Order (Prohibiting Certain Transactions with and Suspending Entry into the United States of Foreign Sanctions Evaders with Respect to Iran and Syria)

[Print this topic](#)

191. What does Executive Order 13608 “Prohibiting Certain Transactions with and Suspending Entry into the United States of Foreign Sanctions Evaders with Respect to Iran and Syria” do?

This [Executive Order](#) gives Treasury new authorities. First, it strengthens Treasury’s ability to address behavior by foreign individuals and entities determined to have violated, attempted to violate, conspired to violate, or caused a violation of U.S. sanctions on Syria or Iran. This E.O. also gives Treasury the authority to impose sanctions on foreign persons who have facilitated deceptive transactions for or on behalf of persons subject to U.S. sanctions.

Transactions by U.S. persons or within the United States involving persons sanctioned under this authority are prohibited, effectively cutting the listed persons off from the U.S. marketplace and financial system. By cutting off access to the U.S. marketplace and financial system to such sanctions evaders, Executive Order 13608 provides Treasury with a powerful tool to prevent and deter such behavior and to hold such persons accountable and to convince them to change their behavior. Publicly identifying such persons will also allow U.S. persons to avoid unwittingly engaging in transactions with identified foreign persons that may expose U.S. persons to the risk of sanctions violations. [05-01-2012]

192. Why was this authority needed?

[Executive Order 13608](#) expands Treasury’s ability to address the behavior of foreign persons determined to have violated or attempted to violate U.S. sanctions on Syria or Iran, or to have facilitated deceptive transactions on behalf of persons subject to those sanctions, where the foreign person had no physical, financial, or other presence in the United States and did not submit to U.S. administrative proceedings. Treasury may use this authority where it appears that a foreign person violated U.S. sanctions on Iran or Syria but may not meet criteria for designation under existing Executive Orders. Executive Order 13608 will provide a means through which Treasury can limit the risk to U.S. commercial and financial systems posed by foreign persons determined to have violated U.S. sanctions on Iran or Syria, or to have engaged in deceptive transactions for or on behalf of persons subject to U.S. sanctions on Iran or Syria.

Such a listing under Executive Order 13608 also provides Treasury with the capability to put the world on notice as to such foreign persons’ activity and the risk of similar future activity. Such identification will help prevent U.S. persons from unwittingly engaging in transactions with foreign persons that may pose a risk of sanctions violations. [05-01-2012]

193. What are the repercussions of an individual or entity being identified under Executive Order 13608?

If an individual or entity is made subject to sanctions under this authority, U.S. persons generally may no longer provide to or procure from such individual or entity any goods, services, or technology. From a practical standpoint, it means that the sanctioned individual or entity will be cut off from the U.S. commercial and financial systems. [05-01-2012]

194. Are U.S. persons required to block the property of individuals and entities identified under Executive Order 13608?

No. Identifications or listings under [Executive Order 13608](#) do not block any assets. However, a U.S. person may not provide or procure goods or services, including financial services, or technology to or from a listed person without authorization from OFAC, unless the transaction is otherwise exempt from regulation under the [International Emergency Economic Powers Act](#) (e.g., certain travel-related transactions). [05-01-2012]

336. How do I know whether a person is identified under E.O. 13608?

Please refer to the [Foreign Sanctions Evaders \(FSE\) List](#). [02-06-2014]

195. I am a financial institution. What do I do if I receive a wire transfer involving a listed party?

A U.S. financial institution must reject any wire transfer involving a listed person and file a report with OFAC within 10 days. [05-01-2012]

196. I am a financial institution and I hold an account for a listed person. What do I do with the funds?

The account is not blocked; however, it is restricted and you cannot allow it to be operated without authorization from OFAC. [05-01-2012]

197. What are U.S. persons obligated to do with property of a person listed under Executive Order 13608?

Property of a listed person is not blocked, but U.S. persons must have authorization from OFAC to provide or procure such property to or from a listed person, or to provide or procure services to or from a listed person in connection with such property. Additionally, wire transfers involving the assets of an Executive Order 13608-listed person must be rejected. [05-01-2012]

198. May a U.S. person deal with an Executive Order 13608-listed person so long as the dealing does not involve Iran or Syria?

No. U.S. persons are prohibited from all transactions or dealings described in [Executive Order 13608](#) with persons listed under Executive Order 13608, unless authorized by OFAC or where the transaction is otherwise exempt from regulation under the [International Emergency Economic Powers Act](#). [05-01-2012]

199. How is an identification or listing under Executive Order 13608 different from a designation?

Like a designation, a U.S. person is prohibited, unless authorized by OFAC or if the underlying transaction is exempt from regulation under the [International Emergency Economic Powers Act](#), from dealing with an identified or listed person. Unlike a blocking designation, the property and the interests in property of a person listed under Executive Order 13608 are not blocked. [05-01-2012]

200. How is this different from lists maintained by the Department of Commerce?

Treasury's authority under [Executive Order 13608](#) has some similarities to Commerce's authority under the [Export Administration Regulations](#) ("EAR"). Commerce may impose denial orders on persons (both foreign and U.S.) who have committed violations of the EAR or present an imminent risk of committing a violation. These individuals or organizations are listed on Commerce's Denied Persons List. It is prohibited to deal with Denied Persons in any export transaction involving items (commodities, software, and technology) subject to the EAR. Treasury's authority under Executive Order 13608 complements Commerce's authority by addressing at least two types of sanctions violations that are outside the scope of the EAR. Specifically, Treasury may prohibit the provision of services (in addition to goods and technology) to or from identified or listed persons and Treasury may prohibit transactions or dealings involving goods and technology that are not subject to the EAR. However, unlike Commerce's authority, Treasury's authority to sanction or list an individual or entity under Executive Order 13608 may be implemented only with respect to foreign individuals or entities. [05-01-2012]

201. May a U.S. person deal with a person listed under Executive Order 13608 in a transaction that was previously licensed by OFAC?

No. U.S. persons cannot have any dealings with a person identified or listed under this Executive Order absent specific authorization from OFAC pursuant to the [Executive Order 13608](#), unless the transaction is exempt from regulation under the [International Emergency Economic Powers Act](#). [05-01-2012]

202. What if the transaction is already underway?

If a transaction is underway at the time of a listing, a U.S. person must cease dealing with the listed person and the U.S. person is prohibited from engaging in transactions or dealings in or related to any goods, services, or technology to or from the listed person, unless the transaction is exempt under the [International Emergency Economic Powers Act](#), or until such time that OFAC authorizes the transactions pursuant to the [Executive Order 13608](#). Additionally, if the transaction underway involves a wire transfer, a U.S. financial institution must reject it and file a report with OFAC within 10 days.

Like all of its programs, OFAC has the authority under Executive Order 13608 to license transactions that are consistent with U.S. foreign policy. [05-01-2012]

203. Can a U.S. person use a listed person to facilitate personal remittances to or from Iran or Syria?

No. Without specific authorization from OFAC, U.S. persons cannot use a listed person to process personal remittances. [05-01-2012]

204. Will Treasury pursue an enforcement action before identifying or listing a person pursuant to Executive Order 13608?

The authorities granted under [this Executive Order](#) are in addition to current authorities that Treasury has to pursue an enforcement action for violations of U.S. law, and Treasury is not required to pursue a civil enforcement action prior to identifying or listing a person pursuant to Executive Order 13608. [05-01-2012]

Treasury CISADA Findings Against Bank of Kunlun

[Print this topic](#)

207. What were the criteria for this finding? How many other institutions were you looking at and why did you decide to take action against Bank of Kunlun?

Based on information made available to the Treasury Department, the Department has found that China's Bank of Kunlun has [knowingly](#) facilitated significant transactions for various Iranian-linked banks designated by the United States under our WMD or terrorism authorities.

Upon finding that Bank of Kunlun was knowingly engaged in these activities that are sanctionable under [the Comprehensive Iran Sanctions, Accountability, and Divestment Act](#) (CISADA), the Secretary of the Treasury has prohibited U.S. banks from opening or maintaining [correspondent accounts](#) or [payable-through accounts](#) in the United States for Bank of Kunlun – effectively cutting off Bank of Kunlun's direct access to the U.S. financial system.

Since CISADA was signed into law in July 2010, Treasury has engaged with over 120 financial institutions and bank regulators in more than 60 countries all over the world to brief them on the financial provisions of CISADA, and, in cases where we had specific concerns, has shared information about those concerns.

This global engagement campaign has proven highly successful, as we have seen the overwhelming majority of financial institutions with which we have engaged change their business practices – even close any correspondent accounts with U.S. designated Iranian banks – to ensure that their access to the U.S. financial system is not put at risk.

The July 31, 2012 action against Bank of Kunlun was in response to its ongoing relationships with U.S.-designated Iranian banks.

Note: The Treasury Department had also made a CISADA finding against Iraq's Elaf Islamic Bank on July 31, 2012. On May 17, 2013, Elaf Islamic Bank was delisted and its name was removed from [the Part 561 List](#). [05-17-2013]

208. How are you defining “significant” transactions and financial services?

In determining whether transactions or financial services are significant, the Secretary of the Treasury may consider a number of factors related to the transactions or services, including, but not limited to: size, number, and frequency; type, complexity and commercial purpose; the level of awareness or involvement by the bank's management; whether the activity or payment illustrates a pattern of practice or is an isolated event; the ultimate economic benefit conferred upon the designated person(s); and whether the transactions involved the use of deceptive financial practices to obscure the identities of the parties involved.

Bank of Kunlun

Bank of Kunlun has provided hundreds of millions of dollars' worth of services to U.S. designated Iranian banks. These financial services include maintaining accounts, transferring payments, and serving as the paying bank for letters of credit opened by U.S. designated Iranian banks. The facilitation of hundreds of millions of U.S. dollars worth of transactions with U.S. designated Iranian banks over the past year is significant.

In 2012, after Treasury designated Bank Tejarat, Bank of Kunlun transferred hundreds of payments totaling approximately \$100 million dollars for accounts it holds for Bank Tejarat and made a payment for an IRGC affiliate pursuant to a letter of credit opened by Bank Tejarat. [05-17-2013]

209. What happens to the correspondent and payable-through accounts held by Bank of Kunlun in the United States?

To our knowledge, Bank of Kunlun does not currently hold [correspondent](#) accounts with U.S. financial institutions.

The July 31, 2012 action prohibits financial institutions in the United States from opening or maintaining correspondent or [payable-through](#) accounts for Bank of Kunlun. [05-17-2013]

210. What are the consequences for a U.S. financial institution that maintains or opens a new correspondent or payable-through account for Bank of Kunlun?

A U.S. financial institution that maintains or opens a [correspondent](#) or [payable-through account](#) for Bank of Kunlun is subject to civil penalties in the amount of up to \$250,000 or twice the value of the transaction, whichever is greater.

Criminal penalties of up to \$1 million can be imposed for willful violations, and individuals who willfully violate the prohibition can face up to 20 years in prison. [05-17-2013]

211. If a foreign financial institution continues to do business with Bank of Kunlun, could that lead to a CISADA finding against the other institution?

Any foreign financial institution that knowingly facilitates significant transactions on behalf of designated Iranian banks – whether directly or indirectly – may face [Comprehensive Iran Sanctions, Accountability, and Divestment Act](#) (CISADA) sanctions. OFAC defines “[knowingly](#)” in this context as meaning the financial institution knew or should have known of the conduct, circumstance, or result. Bank of Kunlun has demonstrated its willingness to move hundreds of millions of dollars on behalf of designated Iranian banks. Accordingly, we would expect heightened due diligence in any dealings with Bank of Kunlun. [05-17-2013]

212. Does this finding affect Bank of Kunlun’s branches or subsidiaries around the world? Does this finding affect any holding companies?

The prohibitions implemented as a result of today’s action apply to Bank of Kunlun and all of its offices, around the world. [05-17-2013]

213. Are United States financial institutions that do not hold correspondent or payable-through accounts for Bank of Kunlun required to block or reject transactions that otherwise involve Bank of Kunlun?

No. U.S. financial institutions are not required to block or reject financial or trade transactions that involve Bank of Kunlun.

That said, we would expect heightened due diligence in any dealings with Bank of Kunlun given its demonstrated willingness to facilitate transactions on behalf of Iranian banks designated by well over a dozen countries worldwide. [05-17-2013]

214. What is the licensing process for U.S. financial institutions that need to conduct transactions in order to close correspondent or payable-through accounts with a foreign financial institution sanctioned pursuant to the Comprehensive Iran Sanctions, Accountability, and Divestment Act (CISADA)?

Treasury regulations provide a 10-day period in which U.S. financial institutions are authorized to engage in the transactions necessary to close an affected account. If a U.S. financial institution that is in the process of closing an affected account seeks to engage in transactions beyond those already authorized, Treasury may issue specific licenses on a case-by-case basis. [05-17-2013]

215. What is the difference, in practical effect, between this and a designation under one of your other authorities, like E.O. 13382?

The July 31, 2012 [Comprehensive Iran Sanctions, Accountability, and Divestment Act](#) (CISADA) finding prohibits the opening or maintaining of [correspondent accounts](#) or [payable-through accounts](#) in the United States for Bank of Kunlun. This action does not require the immediate freezing of any assets that Bank of Kunlun may hold within U.S. jurisdiction. [05-17-2013]

Executive Order 13622 of July 30, 2012, “Authorizing Additional Sanctions With Respect to Iran”

[Print this topic](#)

E.O. 13622 was revoked by E.O. 13716 of January 16, 2016. Please be advised that certain provisions of E.O. 13622 have been incorporated into [E.O. 13846](#) of August 6, 2018, “Reimposing Certain Sanctions With Respect to Iran”. FAQs relating

to E.O. 13846 can be [found here](#). FAQs relating to E.O. 13622 have been archived and can be [found here](#). [08-06-2018] [08-06-2018]

Determination Pursuant to Section 312 of the Iran Threat Reduction and Syria Human Rights Act (TER)

[Print this topic](#)

Section 312 of the [Iran Threat Reduction and Syria Human Rights Act](#) of 2012 (TRA) requires the Secretary of the Treasury, no later than 45 days after the date of the enactment of TRA, to determine whether the National Iranian Oil Company (NIOC) or the National Iranian Tanker Company (NITC) is an agent or affiliate of Iran's Islamic Revolutionary Guard Corps (IRGC), and to report to Congress on these determinations and the reasons for them. On September 24, 2012, the Department of the Treasury made a determination that NIOC is an agent or affiliate of the IRGC. Based on the information currently available, Treasury is not able to determine at this time whether NITC is an agent or affiliate of the IRGC.

233. Isn't the National Iranian Oil Company (NIOC) already subject to sanctions?

Yes. [Executive Order 13622](#) provides for sanctions on foreign financial institutions found to have knowingly conducted or facilitated significant financial transactions with NIOC (except for sales of refined petroleum products to NIOC that fall below the dollar threshold that could trigger sanctions under the [Iran Sanctions Act](#)). Executive Order 13622 also provides authority for the Secretary of the Treasury to block the property and interests in property of persons determined to have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of, NIOC (as well as other specified entities). Note, however, that these sanctions are not applicable to certain transactions related to the Shah Deniz pipeline project, in which NIOC has a minority stake, under Executive Order 13622. In addition, NIOC was already blocked as an entity of the Government of Iran under [E.O. 13599](#) , which was issued pursuant to the [International Emergency Economic Powers Act](#) (IEEPA), as amended, among other authorities. Nevertheless, as described below, the determination that NIOC is an agent or affiliate of the IRGC carries consequences.

234. What is the effect of the National Iranian Oil Company (NIOC) determination? Are there CISADA implications?

As a result of this the [Iran Threat Reduction and Syria Human Rights Act](#) (TRA) section 312 determination, NIOC now is also a person described under section 104(c)(2)(E)(i) of the [Comprehensive Iran Sanctions, Accountability, and Divestment Act](#) of 2010 (CISADA) as an agent or affiliate of the IRGC whose property or interests in property are blocked pursuant to [IEEPA](#) . This means that foreign financial institutions determined to knowingly facilitate significant transactions or provide significant financial services for NIOC are exposed to CISADA sanctions, including prohibitions or the imposition of strict conditions on the opening or maintaining of correspondent or payable-through accounts in the United States.

In addition, section 302 of TRA requires sanctions on foreign persons determined to have knowingly provided certain material support to, or engaged in significant transactions with, the IRGC or its officials, agents, or affiliates whose property or interest in property are blocked. Consequently, foreign persons that knowingly engage in significant transactions with NIOC after the September 24, 2012 determination could be exposed to sanctions.

An "IRGC" identifier will be added to NIOC's entry on the [Specially Designated Nationals and Blocked Persons List](#) available on OFAC's website.

As noted below, the potential application of sanctions under section 104(c)(2)(E)(i) of CISADA and section 302 of TRA is affected by whether the country with primary jurisdiction has received a significant reduction exception from the Secretary of State.

235. What are the implications for petroleum purchase transactions involving NIOC by financial institutions and entities in countries that have received a significant reduction exception from the Secretary of State?

Significant transactions, financial services, or material support involving National Iranian Oil Company (NIOC) for the purchase of Iranian petroleum or petroleum products by a foreign financial institution or entity based in a country that has received a significant reduction exception from the Secretary of State do not carry potential sanctions consequences – under the [Comprehensive Iran Sanctions, Accountability, and Divestment Act](#) (CISADA), sections 302 and 312 of the [Iran Threat Reduction and Syria Human Rights Act](#) (TRA), section 1245 of the [National Defense Authorization Act for Fiscal Year 2012](#) (NDAA), or sections 1 and 2 of [Executive Order 13622](#) . Sections 302 and 312 of TRA authorize the President not to impose sanctions for the purchase of petroleum or petroleum products from Iran if an exception under subsection 1245(d)(4)

(D) of the NDAA applies to the country with primary jurisdiction over the foreign financial institution at the time of the transactions or the provision of services. Notwithstanding the foregoing, any significant transaction for other sanctioned entities (such as Iranian designated banks or other persons described in section 104(c)(2)(E) of CISADA) may result in sanctions, regardless of whether the transaction is for the purchase of petroleum or petroleum products and involves NIOC.

236. Does the determination regarding the National Iranian Tanker Company (NITC) mean that there is no affiliation between NITC and the IRGC?

This statement means only that, based on the currently available information, Treasury is not able to determine at this time that NITC is an agent or affiliate of the IRGC.

237. How does the effect of this determination compare to the effect of section 1(a) of Executive Order 13622 as to transactions with National Iranian Oil Company (NIOC)?

The effect of the determination is similar to the effect of [Executive Order 13622](#) section 1(a), which provides for prohibitions on the opening of and prohibitions or strict conditions on maintaining correspondent accounts or payable-through accounts in the United States for foreign financial institutions determined by the Secretary of the Treasury, in consultation with the Secretary of State, to have knowingly conducted or facilitated significant financial transactions with NIOC. Executive Order 13622 likewise contains an exception that covers transactions with NIOC conducted or facilitated by foreign financial institutions based in NDAA-excepted jurisdictions. A significant difference between these authorities is that the [National Defense Authorization Act](#) (NDAA) exception in the [Iran Threat Reduction and Syria Human Rights Act](#) (TRA) section 312 is limited to transactions or financial services for the purchase of petroleum or petroleum products from Iran.

Section 4 of Executive Order 13628 of October 9, 2012, "Authorizing the Implementation of Certain Sanctions Set Forth in the Iran Threat Reduction and Syria Human Rights Act of 2012 and Additional Sanctions with Respect to Iran"

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E.O. 13628 was amended by E.O. 13716 of January 16, 2016 and revoked by [E.O. 13846](#) of August 6, 2018, "Reimposing Certain Sanctions With Respect to Iran". Please be advised that section 8 of E.O. 13846 continues in effect the sanctions previously contained in section 4 of E.O. 13628 and expands them to cover activity sanctionable under [E.O. 13846](#). FAQs relating to E.O. 13846 can be [found here](#). FAQs relating to Section 4 of E.O. 13628 have been archived and can be [found here](#). [08-06-2018]

Iranian Transactions and Sanctions Regulations and the Statement of Licensing Procedure on Support Of Human Rights-, Humanitarian-, and Democracy-Related Activities With Respect to Iran

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The Office of Foreign Assets Control ("OFAC") issued a final rule in the Federal Register on October 22, 2012, changing the heading of the Iranian Transactions Regulations, 31 C.F.R. part 560 (the "ITR"), to the [Iranian Transactions and Sanctions Regulations](#), 31 C.F.R. part 560 (the "ITSR"), and amending the renamed ITSR to implement Executive Order ("E.O.") [13599](#) (other than section 11) and sections 1245(c) and (d)(1)(B) of the [National Defense Authorization Act for Fiscal Year 2012](#) (the "NDAA"). These new regulations implement the blocking of the Government of Iran and all Iranian financial institutions pursuant to E.O. 13599 and the NDAA.

OFAC is adding numerous new sections to the ITSR, including prohibitions, definitions, interpretations, and licensing provisions. OFAC also is revising many existing sections of the ITSR in order to take account of the new government-wide blocking as well as the blocking of all Iranian financial institutions. Due to the extensive nature of these and other amendments described below, OFAC is reissuing the ITSR in their entirety.

In addition, OFAC is publishing on the Iran section of its Web site a Statement of Licensing Procedure on Support of Human Rights-, Humanitarian-, and Democracy-Related Activities with Respect to Iran. The Statement of Licensing Procedure reflects

procedures established pursuant to the [Iran Threat Reduction and Syria Human Rights Act](#) of 2012 (the "TRA"), which was signed into law by the President on August 10, 2012.

241. What are the major changes that the Iranian Transaction and Sanctions Regulations (ITSR) implement in superseding the Iranian Transaction Regulations (ITR)?

The [ITSR](#) block the property and interests in property of the Government of Iran and all [Iranian financial institutions](#) that come within the possession or control of any U.S. person, including any foreign branch, and prohibit all U.S. persons from dealing with any property interests whatsoever, present, future, or contingent, of persons identified as already blocked pursuant to [E.O. 13599](#) and the [National Defense Authorization Act](#) (NDAA).

OFAC is adding section [560.211](#) to the [ITSR](#) to implement the blocking prohibitions set forth in [E.O. 13599](#) and the [NDAA](#). New sections [560.212](#) through [560.214](#) are being added to set forth certain consequences and requirements that stem from the blocking prohibitions, including, inter alia, the requirement to hold blocked funds in interest-bearing accounts. New paragraphs (e) and (f) are being added to section [560.210](#) to incorporate two exemptions from the blocking prohibitions that are set forth in [E.O. 13599](#). These exemptions concern the official business of the Federal Government and the property and interests in property of the Government of Iran that were blocked pursuant to [Executive Order 12170](#) of November 14, 1979. [10-22-2012]

242. The ITSR includes revisions to the ITR pertaining to the transfer of funds to or from Iran. Accordingly, how may I transfer funds to or from Iran that arise from, and are ordinarily incident and necessary to give effect to, an underlying transaction that is authorized under the ITSR?

The [Iranian Transactions and Sanctions Regulations](#)([ITSR](#)) authorize United States depository institutions to process transfers of funds to or from Iran, or for the direct or indirect benefit of persons in Iran or the Government of Iran , if the transfer arises from, and is ordinarily incident and necessary to give effect to, an underlying transaction that has been authorized by a specific or general license issued pursuant to, or set forth in, the [ITSR](#) and does not involve debiting or crediting an Iranian account. See [31 CFR 560.516\(a\)](#).

In addition, the [ITSR](#) authorize United States registered brokers or dealers in securities to process transfers of funds to or from Iran, or for the direct or indirect benefit of persons in Iran or the Government of Iran, if the transfer arises from, and is ordinarily incident and necessary to give effect to, an underlying transaction that has been authorized by a specific or general license issued pursuant to, or set forth in, the [ITSR](#) and does not involve debiting or crediting an Iranian account. See [31 CFR 560.516\(b\)](#).

The authorizations set forth in section [560.516](#) of the [ITSR](#) do not allow a U.S. person who is authorized to engage in the underlying transaction to deal directly with money service businesses (MSBs) or hawalas, wherever located. However, these authorizations do not preclude United States depository institutions or United States registered brokers or dealers in securities from engaging or dealing with third-country MSBs or hawalas in the processing of the authorized transfers pursuant to section [560.516](#) of the [ITSR](#). [10-22-2012]

243. How can I send personal remittances to or from Iran under the Iranian Transaction and Sanctions Regulations (ITSR)?

The [ITSR](#) authorize the transfer of funds that are noncommercial and personal in nature to or from Iran or for or on behalf of an individual ordinarily resident in Iran, other than an individual whose property and interests in property are blocked pursuant to [§ 560.211](#), subject to certain restrictions and limitations. See [31 CFR 560.550](#). Such transfers must be processed by a United States depository institution or a United States registered broker or dealer in securities and not by any other U.S. person. The personal remittances general license does not permit a U.S. person to deal directly with money service businesses (MSBs) or hawalas, wherever located. However, this general license does not preclude United States depository institutions or United States registered brokers or dealers in securities from engaging or dealing with third-country MSBs or hawalas in the processing of the authorized transfers pursuant to section [560.550](#) of the [ITSR](#).

The hand-carrying of certain noncommercial, personal remittances is also authorized, provided that the individual who is a U.S. person is hand-carrying the funds on his or her behalf, but not on behalf of another person. See [31 CFR 560.550](#). [10-22-2012]

244. What effect will the Iranian Transaction and Sanctions Regulations (ITSR) have on Iranian-Americans and the people of Iran?

The [ITSR](#) include several general licenses that newly authorize, or continue to authorize, activities that are otherwise prohibited by the regulations. Categories of activities affected by these changes include, among other things, visa-related transactions, journalistic activities in Iran, the sale of real property in Iran and the transfer of related proceeds to the United States,

educational activities (including certain exchange programs), participation in conferences, and the exportation and reexportation of medicine and basic medical supplies to Iran. [10-22-2012]

245. What does the Statement of Licensing Procedure on Support of Human Rights-, Humanitarian-, and Democracy-Related Activities with Respect to Iran do?

The Statement of Licensing Procedure reflects procedures established pursuant to section 413 of the [Iran Threat Reduction and Syria Human Rights Act](#) (the TRA). These procedures stipulate that, as of the effective date of the TRA, license determinations for complete requests for authorization under this policy shall be made not later than 90 days after receipt by OFAC, with certain exceptions. The Statement of Licensing Policy applies to applications submitted by the following categories of U.S. persons seeking to engage in certain human rights-, humanitarian-, and democracy-related activities with respect to Iran: (1) entities receiving funds from the Department of State to engage in the proposed activity; (2) the Broadcasting Board of Governors; and (3) other appropriate agencies of the United States Government. The [ITSR](#) also include separate statements of licensing policy related to the sharing of information over the Internet in Iran and the support of democracy and human rights in Iran and academic and cultural exchange programs. [10-22-2012]

Implementation of Section 504 of the Iran Threat Reduction and Syria Human Rights Act of 2012 (the TRA)

[Print this topic](#)

On August 10, 2012, the President signed into law the [Iran Threat Reduction and Syria Human Rights Act](#) of 2012, Public Law 112-158 ("TRA"). Section 504 of the TRA amends section 1245(d)(4)(D) of the [National Defense Authorization Act for Fiscal Year 2012, Public Law 112-81](#) ("NDAA"), which the President signed into law on December 31, 2011. The section 504 amendments to the NDAA took effect February 6, 2013. [Amendments to the Iranian Financial Sanctions Regulations](#), 31 C.F.R. part 561 (the "IFSR") were published on March 15, 2013, to implement sections 503 and 504 of the "TRA" and certain provisions of [Executive Order 13622](#) of July 30, 2012. Although Executive Order 13716 of January 16, 2016 revoked Executive Order 13622, the relevant provisions of Executive Order 13622 were reimposed by Executive Order 13846 of August 6, 2018.

254. What does section 504 of the TRA do?

Pursuant to the restrictions already in place under the [National Defense Authorization Act](#) (NDAA), [foreign financial institutions](#) ("FFIs") face restrictions on, or loss of, [correspondent](#) and [payable-through account](#) access in the United States if they knowingly engage in significant financial transactions with the Central Bank of Iran ("CBI") or a designated Iranian financial institution, unless an NDAA exception, such as the significant reduction exception, applies. The NDAA significant reduction exception applies if the Secretary of State, in consultation with the Secretary of the Treasury and other agencies, has determined that the country with primary jurisdiction over the FFI has significantly reduced its purchases of Iranian crude oil during a specified period of time.

Effective February 6, 2013, section 504 amends the NDAA in several ways. Most importantly, it narrows the NDAA's significant reduction exception to (a) exempt from sanctions only transactions that conduct or facilitate **bilateral trade** in goods or services between the country granted the exception and Iran, and (b) require that funds owed to Iran as a result of the bilateral trade be **credited to an account located in the country granted the exception and not be repatriated to Iran**. In addition, it -

(i) eliminates the distinction between state-owned or -controlled FFIs ([not including foreign central banks](#)) and private FFIs, thereby expanding the scope of sanctionable transactions for state-owned or -controlled FFIs with the CBI or designated Iranian financial institutions; and

(ii) clarifies that countries that have reduced their Iranian crude oil purchases to zero may continue to receive the significant reduction exception.

The sale of agricultural commodities, food, medicine, or medical devices to Iran (the "Humanitarian Exception") is not impacted by section 504 of the TRA.

The purchase or acquisition of petrochemicals from Iran remain sanctionable activities and are not subject to the significant reduction exception. [2-6-2013]

255. Do the section 504 modifications of the TRA restrict any other dealings with Iran?

Yes, the section 504 modifications also narrow the scope of transactions excepted from certain sanctions available under [E.O. 13622](#). Accordingly, [foreign financial institutions](#) (FFIs) in countries that are determined by the Secretary of State to have significantly reduced their purchases of Iranian crude oil pursuant to the [NDAA](#), that knowingly conduct significant financial transactions with the National Iranian Oil Company (“NIOC”), the Naftiran Intertrade Company (“NICO”), or otherwise for the purchase of petroleum or petroleum products from Iran, are only eligible for the significant reduction exception if the FFIs adhere to the bilateral trade restrictions, credit the funds to an account in the country with primary jurisdiction over the FFI, and do not repatriate the funds to Iran.

Example 1: A FFI in a country which has received a significant reduction exception and with primary jurisdiction over the FFI may facilitate a transaction enabling an oil refinery in that country to purchase crude oil from Iran without having exposure to U.S. correspondent account sanctions, so long as the transaction meets section 504’s bilateral trade requirements, the funds are credited to an account in the FFI in the country with primary jurisdiction over the FFI, and the funds are not repatriated to Iran.

Example 2: If, however, a FFI in a country which has received a significant reduction exception facilitates a third country’s crude oil purchase – even a third country with a significant reduction exception – from Iran, the FFI would have exposure to sanctions because the transaction was not solely for the FFI host country’s purchase of crude oil from Iran. [2-6-2013]

256. What transactions are impacted by section 504 of the TRA as it amends section 1245 of the National Defense Authorization Act (NDAA) for Fiscal Year 2012?

Significant financial transactions* knowingly conducted or facilitated by a [foreign financial institution](#) (FFI) with the Central Bank of Iran (CBI) on or after November 5, 2018 or with a designated Iranian financial institution may be subject to sanctions under the [National Defense Authorization Act](#) (NDAA) and section 561.203 of the Iranian Financial Sanctions Regulations (IFSR), 31 C.F.R. Part 561, unless –

- (i) the country that has primary jurisdiction over the FFI conducting or facilitating such significant financial transactions has received a significant reduction exception under section 1245(d)(4)(D) of the NDAA; **and**
- (ii) the significant financial transaction is for bilateral trade only, and any funds owed to Iran as a result of such trade are credited to an account at the FFI in the country that has primary jurisdiction over the FFI and are not repatriated to Iran.

However, any FFI that knowingly facilitates significant transactions or provides significant financial services for persons designated in connection with Iran’s support for international terrorism or the proliferation of weapons of mass destruction pursuant to E.O.s 13224 or 13382 can be sanctioned under section 104(c) of [the Comprehensive Iran Sanctions, Accountability, and Divestment Act](#) of 2010 (“CISADA”) and section [561.201 of the Iranian Financial Sanctions Regulations \(IFSR\)](#), even if those transactions are not sanctionable under section 1245(d) of the NDAA, section [561.203 of the IFSR](#), sections 1244 and 1247 of the Iran Freedom and Counter-Proliferation Act of 2012, and Executive Order 13846 for countries that receive an SRE. [11-05-2018]

* *These do not include sales relating to the Humanitarian Exception.*

257. To which jurisdictions does the significant reduction exception apply (section 504 of the TRA)?

As of February 6, 2013, 20 jurisdictions have been granted a 180-day significant reduction exception.

The following jurisdictions received their 180-day significant reduction exception to [the National Defense Authorization Act](#) (NDAA) sanctions on September 14, 2012: Belgium, the Czech Republic, France, Germany, Greece, Italy, Japan, the Netherlands, Poland, Spain, and the United Kingdom.

The following jurisdictions received their 180-day significant reduction exception to NDAA sanctions on December 7, 2012: China, India, Malaysia, Republic of Korea, Singapore, South Africa, Sri Lanka, Taiwan, and Turkey. [2-6-2013]

258. What is meant by the TRA section 504’s requirement that bilateral trade consist of trade in goods and services between the country with primary jurisdiction over the foreign financial institution (FFI) and Iran?

OFAC interprets bilateral trade between Iran and the country with primary jurisdiction over the [FFI](#) to mean trade in only those goods or services originating in (e.g., produced in or substantially transformed in) –

- (i) the country with primary jurisdiction over the FFI conducting or facilitating the transaction, or
- (ii) Iran (for purposes of the import of Iranian-origin goods or services by the country with primary jurisdiction over the FFI),

and the trade in services cannot include brokering transactions involving goods or services from or to third countries.

Furthermore, the goods or services must be exported and sold directly to either the country with primary jurisdiction over the FFI (in the case of Iranian-origin goods or services), or Iran (in the case of goods or services originating in the country with primary jurisdiction over the FFI).

The Humanitarian Exception is not impacted by section 504's bilateral trade limitations (see [FAQ 265](#)). [2-6-2013]

259. What can a foreign financial institution (FFI) do with the funds resulting from the import of Iranian-origin goods or services once the funds are credited to an account? Can funds be transferred to other accounts?

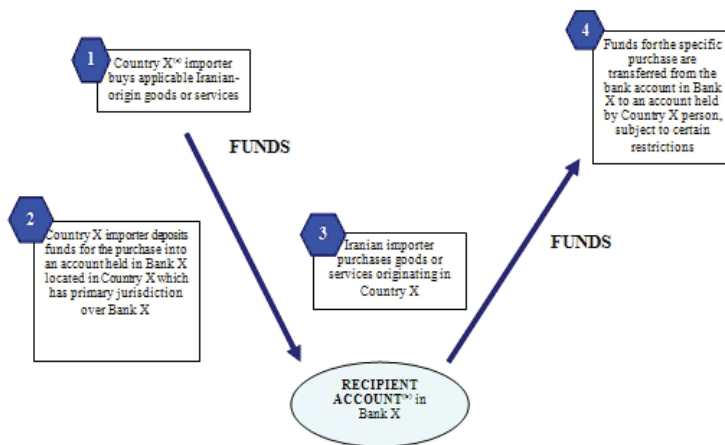
Section 504 of [the TRA](#) requires that, in order for a sanctionable transaction to fall within the bounds of the significant reduction exception, any funds owed to Iran as a result of the bilateral trade transaction must be credited to an "account located in the country with primary jurisdiction over the [FFI]." For purposes of implementing this requirement, OFAC interprets the "account located in the country with primary jurisdiction over the [FFI]" to be an account in the country with primary jurisdiction over the FFI, and at the same FFI that facilitated the transaction for the importation of goods or services from Iran.

Once the funds are deposited in the FFI, they can be -

- (i) used to pay for a purchase by Iran of goods or services originating in the country with primary jurisdiction over the FFI which are exported and sold directly to Iran, or for the Humanitarian Exception (see Figure 1); or
- (ii) transferred to a SPECIAL PURPOSE ACCOUNT (see [FAQ 260](#)) within that same FFI, in the country with primary jurisdiction over the FFI, where the funds may be later debited to purchase goods or services originating in the country with primary jurisdiction over the FFI which are exported and sold directly to Iran, or for the Humanitarian Exception (see Figure 2).

The funds may not be repatriated to Iran. [2-6-2013]

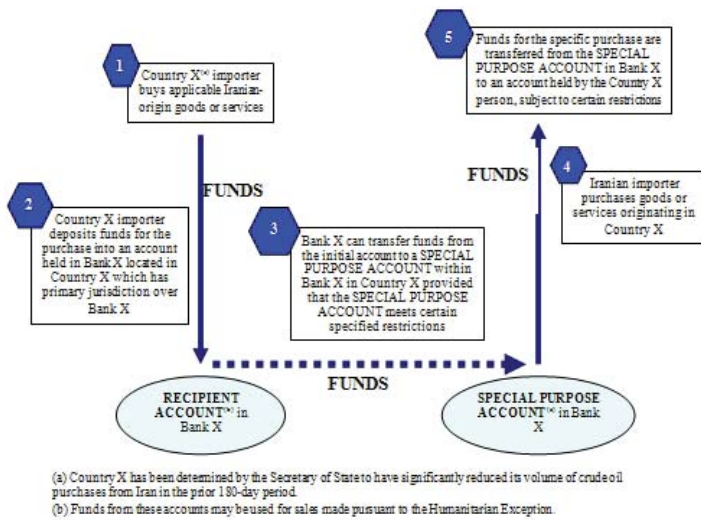
Figure 1: Direct Model
Subject to the NDAA and E.O. 13622 (§1)



(a) Country X has been determined by the Secretary of State to have significantly reduced its volume of crude oil purchases from Iran in the prior 180-day period.

(b) Funds from this account may be used for sales made pursuant to the Humanitarian Exception.

Figure 2: Special Purpose Account Model
Subject to the NDAA and E.O. 13622 (§1)



260. What is a SPECIAL PURPOSE ACCOUNT for purposes of the National Defense Authorization Act's (NDAA) significant reduction exception?

A SPECIAL PURPOSE ACCOUNT is an account set up with conditions and safeguards that require the account to be used only for bilateral trade in goods or services between Iran and the country with primary jurisdiction over the FFI, and for sales made under the Humanitarian Exception (see [FAQ 265](#)). Funds paid as a result of bilateral trade under the NDAA's significant reduction exception may be transferred to a SPECIAL PURPOSE ACCOUNT, so long as the account is at the same FFI that facilitated or conducted the original transaction, in the country with primary jurisdiction over the FFI. [2-6-2013]

261. Are there any circumstances in which funds can be transferred to third-country financial institutions?

Transfers on or after February 6, 2013, of funds deposited in the RECIPIENT ACCOUNT or the SPECIAL PURPOSE ACCOUNT to third-country financial institutions are not covered by the National Defense Authorization Act's (NDAA) significant reduction exception, and create exposure to sanctions for FFIs conducting or facilitating such transfers, unless the transfer is to pay a third-country exporter for sales made pursuant to the Humanitarian Exception (see [FAQ 265](#)). [2-6-2013]

262. Can funds be withdrawn from the RECIPIENT ACCOUNT or a SPECIAL PURPOSE ACCOUNT?

In order for the National Defense Authorization Act's (NDAA) significant reduction exception to apply on or after February 6, 2013, funds withdrawn from the RECIPIENT ACCOUNT or SPECIAL PURPOSE ACCOUNT at the FFI may only be used to pay for bilateral trade or purchases relating to the Humanitarian Exception. Cash withdrawals from the RECIPIENT ACCOUNT or SPECIAL PURPOSE ACCOUNT would be deemed to fall outside of the scope of bilateral trade and would expose the FFI to sanctions. Bank checks written on the account may be used only to pay for bilateral trade or purchases relating to the Humanitarian Exception, and are subject to further restrictions set out in [FAQ 263](#) below. [2-6-2013]

263. Who can receive payments from funds credited to a RECIPIENT ACCOUNT or SPECIAL PURPOSE ACCOUNT?

In order for the National Defense Authorization Act's (NDAA) significant reduction exception to apply on or after February 6, 2013, the person receiving payment (e.g., the manufacturer or service provider) for goods or services being exported to Iran **must be** –

- (i) a citizen, national, or permanent resident of the country with primary jurisdiction over the FFI maintaining the accounts containing the bilateral trade funds; or
- (ii) an entity organized under the laws of the country with primary jurisdiction over the FFI maintaining such accounts.

Furthermore, the person receiving such payment **may not be** -

- (i) the Government of Iran (as defined in [31 CFR Part 561.321](#)) (“GOI”);* or
- (ii) a financial institution that appears on the [List of Foreign Financial Institutions Subject to Part 561](#) , which is maintained on the Office of Foreign Assets Control’s Web site (www.treasury.gov/ofac). [2-6-2013]

**The term “Government of Iran” as defined in 31 CFR Part 561.321 includes: (a) The state and the Government of Iran, as well as any political subdivision, agency, or instrumentality thereof; (b) Any entity owned or controlled directly or indirectly by the foregoing; (c) Any person to the extent that such person is, or has been, or to the extent that there is reasonable cause to believe that such person is, or has been, acting or purporting to act directly or indirectly on behalf of any of the foregoing; and (d) Any person or entity identified by the Secretary of the Treasury to be the Government of Iran under 31 CFR Part 560.*

264. Can funds be remitted to Iran or the Government of Iran (GOI) without exposure to sanctions?

No. If funds from the RECIPIENT ACCOUNT or the SPECIAL PURPOSE ACCOUNT are remitted, directly or indirectly, to Iran, or paid to any person that is the GOI, the FFI would be exposed to sanctions. [2-6-2013]

265. Can the funds be used for sales made under the Humanitarian Exception?

The [National Defense Authorization Act of Fiscal Year 2012](#) (NDAA) generally exempts from sanctions sales made under the Humanitarian Exception (i.e., the sale of agricultural commodities, food, medicine, or medical devices from third countries to Iran). Funds deposited in the RECIPIENT ACCOUNT or the SPECIAL PURPOSE ACCOUNT can be used to pay for sales made pursuant to the Humanitarian Exception. [2-6-2013]

314. Can an exporter of agricultural commodities, food, medicine, or medical devices get paid out of a Central Bank of Iran (CBI) account at a foreign financial institution (FFI) in a country with a significant reduction exception, even though the exporter is located in a third-country? Can the third-country exporter’s bank handle this transaction?

Yes. So long as the transaction does not involve a designated individual or entity, banks on the Part 561 List located on OFAC’s website (<http://www.treasury.gov/ofac/downloads/561list.pdf>), or otherwise proscribed conduct, such transactions are not sanctionable under U.S. law. Furthermore, there is no requirement under U.S. law that agricultural commodities, food, medicine, or medical devices be routed through the country with the significant reduction exception.

Such a payment mechanism is not the exclusive mechanism for the purchase of agricultural commodities, food, medicine, or medical devices under U.S. law. Other options include receiving payment from a third-country account of the CBI or a non-designated Iranian financial institution.

The Department of the Treasury Office of Foreign Assets Control regulations describe the exception for transactions relating to agricultural commodities, food, medicine, or medical devices in [31 CFR § 561.203\(g\)](#) and Note 2 to [51 CFR § 561.203](#). Additional information and clarifying guidance about humanitarian assistance and related exports to the Iranian people can be found at http://www.treasury.gov/resource-center/sanctions/Programs/Documents/hum_exp_iran.pdf . [6-2013]

266. Does the November 8, 2012 designation of National Iranian Oil Company (NIOC) under E.O. 13382 impact the scope of permissible transactions by foreign financial institutions (FFIs) in significantly reducing countries?

Yes. On September 24, 2012, NIOC was identified as an agent or affiliate of Iran’s Islamic Revolutionary Guard Corps (“IRGC”) under section 312 of [the TRA](#) , and designated on November 8, 2012, under E.O. 13382 for providing services and support to the IRGC. Accordingly, [the Comprehensive Iran Sanctions, Accountability, and Divestment Act](#) (CISADA) applies to transactions with NIOC. As a result of these additional sanctions against NIOC, only transactions solely for the purchase of petroleum or petroleum products from NIOC will fall within the scope of the significant reduction exception. A FFI in a significantly reducing country that is found to knowingly conduct or facilitate other types of significant transactions with NIOC (i.e., transactions unrelated to the purchase of petroleum or petroleum products from Iran) would face exposure to CISADA sanctions.

Example 3: If a FFI in a country with a significant reduction exception facilitates a transaction enabling a company in that country to purchase drilling equipment from NIOC, the FFI risks restrictions on, or loss of, [correspondent](#) and [payable-through account](#) access in the United States, because the transaction was not solely for the purchase of petroleum or petroleum products from Iran. [2-6-2013]

267. What are definitions for the following NDAA terms: “significant financial transaction,” “knowingly,” “food, medicine, and medical devices,” “foreign financial institution,” and “country with primary jurisdiction over the FFI,”?

These definitions are set out in [31 CFR Part 561](#). [2-6-2013]

Iran Freedom and Counter-Proliferation Act of 2012 (IFCA)

[Print this topic](#)

Certain statutory provisions of the [Iran Freedom and Counter-Proliferation Act](#) of 2012 (IFCA) were previously implemented through [E.O. 13645](#) of June 3, 2013, which was revoked by E.O. 13716 of January 16, 2016. E.O. 13716, which also carried forward certain IFCA implementation authorities, was revoked by [E.O. 13846](#) of August 6, 2018, "Reimposing Certain Sanctions With Respect to Iran". Please be advised that certain provisions of E.O. 13645, including IFCA implementation authorities, have been incorporated into the New E.O. FAQs relating to E.O. 13846 can be [found here](#). FAQs relating to E.O. 13645 have been archived and can be [found here](#). [08-06-18]

General Questions ([Print](#))

313. What is the Iran Freedom and Counter-Proliferation Act of 2012 (IFCA)?

[IFCA](#) was signed into law on January 2, 2013, as a part of the National Defense Authorization Act for Fiscal Year 2013, and provides for several new sanctions related to Iran. IFCA authorizes broad sanctions on: certain activities related to Iran's energy, shipping, and shipbuilding sectors; the sale, supply, or transfer to or from Iran of precious and certain other metals, graphite, coal, and industrial software; the provision of underwriting services, insurance, or reinsurance to activities and persons targeted by U.S. sanctions against Iran; financial transactions involving sanctioned Iranian individuals and entities; and persons involved in the diversion of goods intended for the Iranian people. Most of the IFCA provisions target conduct occurring on or after July 1, 2013.

The U.S. Department of the Treasury will be issuing regulations to implement certain provisions in IFCA. In addition, the U.S. Department of State expects to adopt an interpretation of IFCA similar to that set forth below. [06-03-13]

289. How will the following Iran Freedom and Counter-Proliferation Act (IFCA) terms be interpreted: "Iran," "knowingly," "significant," and "transfer"?

As a general matter, we intend to rely, where applicable, on definitions of terms previously included in Treasury regulations.

"Iran"

The Iranian Financial Sanctions Regulations ([31 CFR part 561](#)) (IFSR) define "Iran" as the Government of Iran and the territory of Iran and any other territory or marine area, including the exclusive economic zone and continental shelf, over which the Government of Iran claims sovereignty, sovereign rights, or jurisdiction, provided that the Government of Iran exercises partial or total de facto control over the area or derives a benefit from economic activity in the area pursuant to international arrangements. ([31 CFR § 561.329](#))

"knowingly"

The IFSR define "knowingly" with respect to conduct, a circumstance, or a result, to mean that a person has actual knowledge, or should have known, of the conduct, the circumstance, or the result. ([31 CFR § 561.314](#))

"significant"

As a general matter, in determining for purposes of IFCA and relevant Executive orders whether transactions, financial transactions, or financial services are significant, the Department of the Treasury will rely on the interpretation set out in [§561.404](#) of the IFSR. The IFSR provide that the Department of the Treasury may consider the totality of the facts and circumstances set forth a list of broad factors that can play a role in the determination whether transactions, financial services, and financial transactions are significant, including: (a) the size, number, and frequency of the transactions, financial services, or financial transactions; (b) the nature of the transactions, financial services, or financial transactions, including their type, complexity, and commercial purpose; (c) the level of awareness of management and whether the transactions are part of a pattern of conduct; (d) the nexus of the transactions, financial services, and financial transactions and blocked persons; (e) the impact of the transactions, financial services, and financial transactions on statutory objectives; (f) whether the transactions, financial services, and financial transactions involve deceptive practices; (g) whether the transactions solely involve the passive holdings of Central Bank of Iran (CBI) reserves or repayment by the CBI of official development assistance or the transfer of

funds required as a condition of Iran's membership in an international financial institution; and (h) other relevant factors that the Secretary of the Treasury deems relevant. We anticipate adopting a similar approach to interpreting the term "significant" as it applies to goods or services. ([31 C.F.R. §561.404](#))

"transfer"

We anticipate that regulations to be promulgated will define "transfer" to include import, transshipment, export, or reexport, whether direct or indirect. [08-06-18]

290. Are payments or deliveries that are made on or after July 1, 2013, for contracts that existed prior to July 1, 2013, exempted from IFCA provisions?

There is no general exception for payments, sales, deliveries, or transfers arising out of contracts entered into prior to July 1, 2013, on or after which date certain activities become sanctionable under [IFCA](#). The assessment of whether such payments are "significant" or result in the transfer of "significant goods or services" or "significant financial support" will be done on a case-by-case basis in line with the criteria discussed above. [06-03-13]

292. What are the implications of IFCA on the provision of humanitarian goods to the people of Iran?

[IFCA](#) generally excepts from sanctions transactions for the sale of agricultural commodities, food, medicine, or medical devices to Iran, as set out in more detail in Q&As [297](#) and [304](#). [08-06-18]

Sanctions Relating to Iran's Energy, Shipping, and Shipbuilding Sectors ([Print](#))

293. What will the "energy, shipping, and shipbuilding sectors of Iran" mean for the purposes of IFCA?

We anticipate that regulations to be promulgated will define "energy sector of Iran" to include activities involving the exploration, extraction, production, refinement, or liquefaction of petroleum, natural gas, or petroleum products in Iran. (See also discussion of activities involving natural gas in Q&A [297](#).)

We anticipate that regulations to be promulgated will define "shipping sector of Iran" to include activities involving the transportation of goods by seagoing vessels, including oil tankers and cargo vessels, flying the flag of the Islamic Republic of Iran, or owned, controlled, chartered, or operated directly or indirectly by the Government of Iran.

We anticipate that regulations to be promulgated will define "shipbuilding sector of Iran" to include activities involving the construction of seagoing vessels, including oil tankers and cargo vessels, in Iran. [08-06-18]

294. How will I know if someone is part of Iran's energy, shipping, or shipbuilding sectors or is a port operator in Iran?

Persons determined to be part of Iran's energy, shipping, or shipbuilding sectors, or a port operator in Iran for purposes of [IFCA](#) section 1244(c) will be identified as such on the [SDN List](#). Knowingly providing certain significant support to persons determined to be part of Iran's energy, shipping, or shipbuilding sectors, or a port operator in Iran will have exposure to sanctions, unless the transaction is excepted (see also Q&A [297](#)). [06-03-13]

295. What are goods or services used in connection with Iran's energy, shipping, or shipbuilding sectors for purposes of IFCA section 1244(d)(3)?

We anticipate that regulations to be promulgated will define goods and services used in connection with Iran's energy, shipping and shipbuilding sectors to include:

- a. Energy Sector: In the case of Iran's energy sector, goods or services that contribute to,
 - Iran's ability to develop its domestic petroleum resources;
 - The maintenance or expansion of Iran's domestic production of petroleum products; and
 - Iran's ability to import or export petroleum or petroleum products.
- b. Shipping Sector: In the case of Iran's shipping sector,
 - The provision of crude and product tankers to Iran;

- The provision of registry, flagging, or classification services of any kind;
- The supervision of and participation in the repair of ships and their parts;
- The inspection, testing, and certification of marine equipment materials and components;
- The carrying out of surveys, inspections, audits and visits, and the issuance, renewal or endorsement of the relevant certificates and documents of compliance, as they relate to ships and shipping; and
- Any other goods or services relating to the maintenance, supply, bunkering, and docking of vessels flying the flag of the Islamic Republic of Iran, or owned, controlled, chartered, or operated directly or indirectly by, or for or on behalf of the Government of Iran (GOI) or an Iranian person.

c. Shipbuilding Sector: In the case of Iran's shipbuilding sector,

- The building and refit of vessels;
- The provision or refit of items such as (i) steam turbines and their parts for marine propulsions, (ii) marine propulsion engines and parts used solely or principally with them, (iii) other gas turbines for marine propulsion, (iv) ship or boat propellers and blades, and (v) direction finding compasses and other navigational instruments and appliances solely for the maritime industry;
- Other goods used in connection with building and propulsion of vessels; and
- Technical assistance and training relating to, and financing of, the building, maintenance or re-fitting of vessels.

Sections 1244(d)(1) and (2) of [IFCA](#) make sanctionable certain transactions for the sale, supply, or transfer to or from Iran of such goods and services if they are significant goods or services used in connection with Iran's energy, shipping, or shipbuilding sectors. (See Q&A [289](#) above for an interpretation of "significant.") The provision of goods or services identified above could be sanctionable regardless of whether any person involved in the transaction has been determined to be part of Iran's energy, shipping, or shipbuilding sectors. [06-03-13]

296. Will payment for bunkering of third-country ships carrying non-sanctionable goods to or from Iran be subject to sanctions?

If a non-Iranian vessel is transporting non-sanctionable goods to or from Iran, bunkering in a third country will not be subject to sanctions provided that no other sanctionable activity is involved. [06-03-13]

297. Are there any exceptions to the sanctions provisions of section 1244 of IFCA?

The following transactions are excepted from the provisions of section 1244 of [IFCA](#) .

- a. Transactions for the sale of agricultural commodities, food, medicine, or medical devices to Iran or for the provision of humanitarian assistance to the people of Iran.
- b. The export of petroleum or petroleum products from Iran to a country with a significant reduction exception under section 1245(d)(4)(D)(i) of [the National Defense Authorization Act for Fiscal Year 2012](#) (NDAA 2012).
- c. A significant financial transaction conducted or facilitated by a foreign financial institution (FFI), provided that a significant reduction exception under 1245(d)(4)(D)(i) of NDAA 2012 applies to the country with primary jurisdiction over the FFI and the financial transaction is for trade in goods or services (i) between Iran and the country with primary jurisdiction over the FFI and (ii) not otherwise subject to sanctions under the law of the United States, and any funds owed to Iran as a result of the trade are credited to an account located in the country with primary jurisdiction over the FFI. We anticipate the implementation of these trade requirements to be similar to the trade requirements set forth in the Iranian Financial Sanctions Regulations ([IFSR](#)), in particular [31 CFR §561.203\(j\)](#) and [31 CFR §561.203\(k\)](#).
- d. The sale, supply, or transfer of natural gas to or from Iran. [IFCA](#) section 1244, however, does set out sanctions that may apply to FFIs that conduct or facilitate a transaction for the sale, supply, or transfer of natural gas to or from Iran unless the financial transaction is for trade in goods or services (i) between Iran and the country with primary jurisdiction over the FFI and (ii) not otherwise subject to sanctions under the law of the United States, and any funds owed to Iran as a result of the trade are credited to an account located in the country with primary jurisdiction over the FFI. We anticipate the implementation of these trade requirements to be similar to the trade requirements set forth in the [IFSR](#), in particular [31 CFR §561.203\(j\)](#) and [31 CFR §561.203\(k\)](#).

e. Certain activities relating to the pipeline project to supply natural gas from the Shah Deniz gas field in Azerbaijan to Europe and Turkey. [08-06-18]

315. Will routine payments or fees be subject to sanctions if they are made to a person determined to be a port operator in Iran and if the vessel is carrying non-sanctioned goods?

Any company involved in loading or unloading cargo in Iran should exercise great caution to avoid engaging in transactions with entities designated by the United States, including the Tidewater Middle East Co. which was designated for its involvement in Iran's proliferation of weapons of mass destruction. However, to the extent that a shipping company transacts with port operators in Iran that have been identified as such under [IFCA](#) but not otherwise designated, and as long as such payments are limited strictly to routine fees including port dues, docking fees, or cargo handling fees, paid for the loading and unloading of non-sanctioned goods at Iranian ports, we anticipate that such transactions would not be considered significant transactions for the purposes of IFCA. Non-routine and/or large payments or fees that materially exceed standard industry rates could expose a person to sanctions. Furthermore, providing any port operator in Iran with any significant financial, material, technological, or other support could expose a person to sanctions. [08-06-18]

Sanctions Relating to the Sale, Supply, or Transfer of Certain Materials to or from Iran (relating to IFCA) (Print)

[IFCA](#) provides for sanctions involving the sale, supply, or transfer of certain materials to or from Iran.

298. For purposes of IFCA, what materials are considered graphite, raw or semi-finished metals?

For purposes of [IFCA](#), we anticipate that regulations to be promulgated will define graphite, raw or semi-finished metals described in section 1245(d) of IFCA to include steels; aluminum metal and its alloys; base metals of single or complex borides of titanium; beryllium metal and its alloys; boron metal and its alloys; cobalt metal and its alloys; copper infiltrated tungsten metal; copper-beryllium metal; germanium metal and its alloys; graphites; hastelloy; inconel; magnesium metal and its alloys; molybdenum metal and its alloys; neptunium-237 metal and its alloys; nickel metal and its alloys; nickel aluminide metals; niobium metal and its alloys; niobium-titanium filaments; plutonium metal and its alloys; porous nickel metal; silver infiltrated tungsten metal; tantalum metal and its alloys; tellurium metal and its alloys; titanium aluminide metals; titanium metal and its alloys; tungsten metal, tungsten carbide metal, and their alloys; uranium titanium alloy metals; and zirconium metal and its alloys and compounds. [06-03-13]

299. For purposes of IFCA, what are considered precious metals?

For purposes of [IFCA](#), we anticipate that regulations to be promulgated will define the term "precious metals" to include silver (including silver plated with gold or platinum, unwrought or in semi-manufactured forms, or in powder form); gold (including gold plated with platinum, unwrought or in semi-manufactured forms, or in powder form); base metals or silver, clad with gold, not further worked than semi-manufactured; platinum, unwrought or in semi-manufactured forms, or in powder form; iridium; osmium; palladium; rhodium; ruthenium; base metals, silver or gold, clad with platinum, not further worked than semi-manufactured; waste and scrap of precious metal or of metal clad with precious metals, other waste and scrap containing precious metal or precious-metal compounds, of a kind used principally for the recovery of precious metal. [06-03-13]

300. For purposes of sanctions under section 1245, how will I know which sectors are controlled by Iran's Islamic Revolutionary Guard Corps?

Pursuant to delegated authority, the Secretary of State issues periodic reports pursuant to section 1245(e) of IFCA with respect to which sectors of the Iranian economy are controlled directly or indirectly by Iran's Islamic Revolutionary Guard Corps (IRGC). Given the opaque business environment in Iran and the significant role that the IRGC plays in the Iranian economy, OFAC recommends that a person considering business in Iran or with Iranian persons conduct due diligence sufficient to ensure that it is not knowingly engaging in transactions with the IRGC, or its officials, agents, or affiliates. [08-06-18]

301. How will the determination be made as to whether materials are used in a manner that would make them subject to sanctions under section 1245 of IFCA?

A [FFI](#), prior to conducting or facilitating a significant financial transaction for the sale, supply, or transfer to or from Iran of the materials listed in 1245(d) – as described in part in Q&A [298](#) – will need to undertake due diligence to ensure that the transaction does not involve the materials being sold, supplied, or transferred, directly or indirectly, to or from Iran for sanctionable uses under section 1245. Pursuant to delegated authority, the Secretary of State issues periodic reports pursuant to section 1245(e) of IFCA, which contains determinations on which materials identified in section 1245(d) are used by Iran as

a medium for swap or barter, are listed as assets on the national balance sheet of Iran, or are used in connection with the nuclear, military, or ballistic missile programs of Iran. [08-06-18]

302. Are there any exceptions to section 1245 of IFCA?

A person will not be subject to sanctions under section 1245 of [IFCA](#) if a determination is made by the Department of the Treasury or the Department of State, as appropriate, that the person has established and enforced official policies, procedures, and controls to ensure that the person does not sell, supply, or transfer to or from Iran, or facilitate or conduct a significant financial transaction to sell supply, or transfer to or from Iran, materials listed in section 1245 as sanctioned under section 1245. The Department of the Treasury or the Department of State, as appropriate, will make this determination on a case by case basis as part of an investigation or enforcement action by the relevant Department. [06-03-13]

Sanctions Relating to Insurance, Reinsurance, or Underwriting (relating to IFCA) [\(Print\)](#)

303. Which insurance, reinsurance, or underwriting activities are potentially subject to sanctions under IFCA's section 1246(a)(1)?

A number of insurance activities are subject to sanctions under [IFCA](#), including providing insurance, reinsurance, or underwriting services to persons on the [SDN List](#) sanctioned for activities with respect to Iran. [06-03-13]

304. Are there exceptions to insuring, reinsuring, or underwriting sanctioned activities?

Yes. [IFCA](#) includes the following exceptions to insuring, reinsuring, or underwriting sanctioned activities.

- a. Transactions for the sale of agricultural commodities, food, medicine, or medical devices to Iran or for the provision of humanitarian assistance to the people of Iran can be insured, reinsured, or underwritten.
- b. A person that provides insurance, reinsurance, or underwriting services to sanctioned activity, if a determination is made by the Department of the Treasury or the Department of State, as appropriate, that the person has established and enforced official policies, procedures, and controls to ensure that the person does not underwrite or enter into a contract to provide insurance or reinsurance for activities targeted under section 1246 of IFCA. The Department of the Treasury or the Department of State, as appropriate, will make this determination on a case by case basis as part of an investigation or enforcement action by the relevant Department. [06-03-13]

Executive Order 13645 of June 3, 2013, "Authorizing the Implementation of Certain Sanctions Set Forth in the Iran Freedom and Counter-Proliferation Act of 2012 and Additional Sanctions with Respect to Iran"

E.O. 13645 was revoked by E.O. 13716 of January 16, 2016. Please be advised that certain provisions of E.O. 13645 have been incorporated into [E.O. 13846](#) of August 6, 2018, "Reimposing Certain Sanctions With Respect to Iran". FAQs relating to E.O. 13846 can be [found here](#). FAQs relating to E.O. 13645 have been archived and can be [found here](#).

General Licenses (GL) for Agricultural Commodities, Medicine, and Medical Devices in the Iranian Transactions and Sanctions Regulations

[Print this topic](#)

318. Does the GL for medical devices authorize the exportation or reexportation of all medical devices?

No. The GL for medical devices appearing at section [560.530\(a\)\(3\)\(i\)](#) of the Iranian Transactions and Sanctions Regulations (ITSR) authorizes covered persons, as defined in section [560.530\(e\)\(4\)](#), to export or reexport to Iran medical devices as defined in section [560.530\(e\)\(3\)](#) of the ITSR, except for items on the [List of Medical Devices Requiring Specific Authorization](#), which is maintained on OFAC's website. This list will be published in the Federal Register, as will any changes to the list. [12-22-16]

319. Does the GL for medical devices authorize the exportation or reexportation of these items to all entities in Iran?

No. While the GL under section 560.530(a)(3)(i) of the Iranian Transactions and Sanctions Regulations (ITSR) authorizes exports or reexports of certain medical devices to most entities in Iran, it does not authorize exports or reexports to military, intelligence, or law enforcement purchasers or importers, nor does it authorize exports or reexports to persons whose property and interests in property are blocked under any of the programs administered by OFAC, except for persons whose property and interests in property are blocked solely pursuant to [Executive Order 13599](#) and the ITSR. When engaging in activities pursuant to this GL, exporters and reexporters are expected to undertake due diligence regarding all parties to the transactions, just as they would when acting pursuant to a specific license issued by OFAC. [12-22-16]

361. What items and persons are excluded from the agricultural commodities general license in the Iranian Transactions and Sanctions Regulations (ITSR)?

The specified items excluded from the scope of the agricultural commodities general license are: castor beans, castor bean seeds, certified pathogen-free eggs (unfertilized or fertilized), dried egg albumin, live animals (excluding live cattle, shrimp, and shrimp eggs), embryos (excluding cattle embryos), Rosary/Jequirity peas, non-food-grade gelatin powder, peptones and their derivatives, super absorbent polymers, western red cedar, and all fertilizers.

The persons excluded from the scope of the agricultural commodities general license are Iranian military, intelligence, or law enforcement purchasers or importers. In addition, the agricultural commodities general license does not authorize exports or reexports to persons whose property and interests in property are blocked under any of the programs administered by OFAC, except for persons whose property and interests in property are blocked solely pursuant to [Executive Order 13599](#) and the ITSR.

Exports or reexports involving the excluded items or excluded persons discussed above continue to require the level of review afforded by specific licensing and therefore are not authorized by the agricultural commodities general license. [12-22-16]

362. Is the exportation or reexportation of non-U.S.-origin agricultural commodities, medicine, or medical devices by a U.S. person to Iran authorized?

Yes. The definitions of the terms “agricultural commodities,” “medicine,” and “medical device” used in the relevant general licenses in the ITSR include, in the case of items subject to Commerce's [Export Administration Regulations](#)(EAR), items that are designated as EAR99 and, in the case of items not subject to the EAR, items that would be designated as EAR99 if they were located in the United States. For example, under the agricultural commodities general license, a company located in the United States would be authorized to arrange for the exportation from a third country to Iran of agricultural commodities produced in the third country if those commodities would be designated as EAR99 if they were located in the United States, provided that all conditions of the general license are otherwise satisfied. [12-22-16]

363. Is the exportation or reexportation by non-U.S. persons of agricultural commodities, medicine, or medical devices that are subject to the Export Administration Regulations (EAR) to Iran authorized?

Yes. A non-U.S. person may export or reexport agricultural commodities, medicine, or medical devices to Iran under the relevant general licenses in the ITSR, provided that the items are subject to Commerce's [Export Administration Regulations](#)(EAR) and all conditions of the relevant general license are otherwise satisfied. For example, a non-U.S. person would be authorized under the medicine and medical devices general license to arrange for the exportation or reexportation to Iran of EAR99 medicines located in the United States or a third country.

In addition, an entity owned or controlled by a U.S. person and established or maintained outside the United States (a “U.S.-owned or -controlled foreign entity”) may export or reexport agricultural commodities, medicine, and medical devices to Iran under the relevant general licenses in the ITSR (including both items subject to the EAR and items not subject to the EAR), provided that all conditions of the relevant general license are otherwise satisfied. For example, a U.S.-owned or -controlled foreign entity would be authorized under the medicine and medical devices general license to arrange for the reexport to Iran of EAR99 medicines, as well as the export to Iran of medicines not subject to the EAR (e.g., medicines produced outside the U.S. by a non-U.S. person with no controlled U.S. content) that would be designated as EAR99 if they were located in the United States. [12-22-16]

364. Who can apply for a specific license if an export or reexport to Iran is not authorized by general license?

If an export or reexport is not authorized by general license, any U.S. person, or non-U.S. person exporting items subject to Commerce's [Export Administration Regulations](#) EAR and designated as EAR99, wherever located, or U.S.-owned or -controlled foreign entity may apply for a specific license. For example, a U.S.-owned or -controlled foreign entity may apply for a specific license for the export or reexport to Iran of agricultural commodities excluded from the scope of the agricultural commodities general license, such as live animals. [12-22-16]

365. What is authorized with respect to brokerage services related to exports or reexports of agricultural commodities, medicine, or medical devices to Iran?

U.S. persons continue to be authorized to provide brokerage services on behalf of U.S. persons for the sale and exportation or reexportation by U.S. persons of agricultural commodities, medicine, and medical devices to Iran, provided that the sale and exportation or reexportation itself is authorized by either general or specific license. [4-7-2014]

366. Do I still need to come in to OFAC for a specific license to export certain types of agricultural commodities to Iran?

OFAC will no longer issue specific licenses for exports or reexports that are covered by the agricultural commodities general license in the [ITSR](#).

However, a small number of specified agricultural commodities and certain persons are excluded from the agricultural commodities general license and continue to require the level of review afforded by specific licensing. As a result, persons seeking authorization for the exportation or reexportation to Iran of castor beans, castor bean seeds, certified pathogen-free eggs (unfertilized or fertilized), dried egg albumin, live animals (excluding live cattle, shrimp, and shrimp eggs), embryos (excluding cattle embryos), Rosary/Jequirity peas, non-food-grade gelatin powder, peptones and their derivatives, super absorbent polymers, western red cedar, or all fertilizers, or for the exportation or reexportation of any agricultural commodities to Iranian military, intelligence, or law enforcement purchasers or importers, must still apply for a specific license from OFAC.

The agricultural commodities general license in the [ITSR](#) also does not authorize exports or reexports to persons whose property and interests in property are blocked under any of the programs administered by OFAC, except for persons whose property and interests in property are blocked solely pursuant to [Executive Order 13599](#) and the [ITSR](#). [12-22-16]

367. What is the definition of a “bioactive peptide”?

For purposes of the relevant exclusion from the agricultural commodities general license in the Iranian Transactions and Sanctions Regulations ([ITSR](#)), the term “bioactive peptide” means an item that must be less than 50 amino acids in length and bioactive (antioxidant, antiallergic, antimicrobial, antithrombotic, antiatherogenic, hypoglycaemic, anti-inflammatory, antitumor, cytostatic, immunosuppressive properties, or hepatoprotective properties.) [4-7-2014]

Amendments to the General Licenses for the Exportation or Reexportation of Agricultural Commodities, Medicine, and Medical Devices to Iran

[Print this topic](#)

482. What key changes did the December 23, 2016 regulatory amendment to the Iranian Transactions and Sanctions Regulations (ITSR) make relating to the exportation and reexportation of agricultural commodities, medicine, and medical devices to Iran?

The amendment primarily expands the scope of medical devices that can be exported or reexported to Iran without specific authorization. It authorizes the exportation or reexportation to Iran of all items meeting the definition of the term “medical device” as defined in section [560.530\(e\)\(3\)](#) of the [ITSR](#), except for certain excluded persons as well as certain medical devices that are excluded from the authorization and published on the List of Medical Devices Requiring Specific Authorization. The exportation and reexportation of items on the List of Medical Devices Requiring Specific Authorization or to excluded persons requires a specific license from OFAC. The amendment also adds shrimp and shrimp eggs to the list of agricultural commodities that may be exported to Iran without specific authorization, other than to certain excluded persons.

In addition, the amendment authorizes covered persons to provide training, other than to certain excluded persons, necessary and ordinarily incident to the safe and effective use of agricultural commodities, medicine, and medical devices exported or reexported pursuant to section [560.530](#) of the [ITSR](#). It also authorizes the importation into the United States of certain U.S.-origin agricultural commodities, medicine, and medical devices that were previously exported or reexported to Iran pursuant to the authorizations in section [560.530](#) of the [ITSR](#) and that are broken, defective, or non-operational, or are connected to product recalls, adverse events, or other safety concerns. Additionally, the amendment authorizes the exportation or reexportation to Iran, and storage within Iran for future use, of a limited number of replacement parts for certain medical devices previously exported or reexported to Iran pursuant to an OFAC license to replace broken or non-operational components or where it is ordinarily incident and necessary to proper preventative maintenance of the medical device, and the exportation or reexportation of software and services related to the operation, maintenance, and repair of medical devices. [12-22-16]

483. How does an exporter determine which medical devices need to be specifically licensed by OFAC for exportation or reexportation to Iran?

An exporter should refer to the [List of Medical Devices Requiring Specific Authorization](#), which is maintained on OFAC's website, www.treasury.gov/ofac, on the [Iran Sanctions page](#). An exporter must obtain a specific license from OFAC to export or reexport any medical device on that list to Iran. An exporter must also obtain a specific license for exports to excluded persons as defined in section [560.530\(a\)\(3\)\(iv\)](#) of the [ITSR](#). [12-22-16]

484. What types of training activities are considered to be necessary and ordinarily incident to the safe and effective use of medicine and medical devices?

OFAC considers training activities including the dissemination of product information on the intended use of the device; comparisons of other devices and options; and the manufacturer's instructions for use, labeling, warning, contraindications, storage, and maintenance of the medicine or device to be necessary and ordinarily incident to the safe and effective use of medicines and medical devices. Other examples include training health care professionals to use medical devices safely in order to achieve the desired patient outcome, training on procedures for cleaning and inspecting devices regularly to ensure they are functioning correctly, ongoing training and periodic testing to ensure users stay competent, and training on procedures for adverse events or device failure. [12-22-16]

Licenses Authorizing Exports of Agricultural Commodities, Medicine, and Medical Devices

For information regarding licenses authorizing exports of agricultural commodities, medicine, and medical devices to Iran and Sudan pursuant to the Trade Sanctions Reform and Export Enhancement Act of 2000 (TSRA), please see the [following topic](#).

Amendment to the Definition of "Iranian-origin goods" or "goods of Iranian origin" in the Iranian Transactions and Sanctions Regulations (ITSR)

[Print this topic](#)

485. What key changes did the December 23, 2016 regulatory amendment to the Iranian Trade and Sanctions Regulations (ITSR) make to the definition of "Iranian-origin goods" or "goods of Iranian origin"?

OFAC amended section [560.306](#) of the [ITSR](#) to clarify that the terms "goods of Iranian origin" and "Iranian-origin goods" do not include the following categories of goods, provided that such goods were not grown, produced, manufactured, extracted, or processed in Iran: (i) goods exported or reexported to Iran under an authorization issued pursuant to the [ITSR](#) (e.g., a medical device or a personal communications device exported or reexported to Iran pursuant to a general or specific license issued pursuant to the [ITSR](#)) and that subsequently have been reexported from and are located outside of Iran, or (ii) goods transported on a vessel or aircraft that passed through Iranian territorial waters or stopped at a port or place in Iran en route to a destination outside of Iran and that have not otherwise come into contact with Iran. [12-22-16]

486. What is an example of goods otherwise coming into contact with Iran?

Goods have come into contact with Iran, if, for example, they are removed from a port or airport in Iran or are processed through Iranian customs, or if they transit Iran by truck or train en route to a destination outside of Iran. [12-22-16]

487. Are goods that are unloaded from a ship in an Iranian port, put on a truck, and driven out of the boundaries of the port or place of unloading considered to be Iranian-origin goods?

Yes. These goods have otherwise come in contact with Iran and thus do not fall within the carve-out to the definition of Iranian-origin goods or goods of Iranian-origin at section [560.306\(b\)\(2\)](#) of the [ITSR](#). However, if these goods are being exported or reexported to Iran under an authorization issued pursuant to the [ITSR](#) and they subsequently are reexported from and are located outside of Iran, they would fall within the carve-out to the definition of Iranian-origin goods or goods of Iranian-origin at section [560.306\(b\)\(1\)](#) of the [ITSR](#). [12-22-16]

488. Are goods that are unloaded from a ship in an Iranian port, moved within the boundaries of the port, and loaded onto a second ship en route to a destination outside of Iran, without ever leaving the port considered to be Iranian-origin goods?

No, provided that they have not otherwise come in contact with Iran. [12-22-16]

Iranian General License D-1

[Print this topic](#)

On May 30, 2013, the Department of the Treasury, in consultation with the Departments of State and Commerce, issued General License D (“GL D”) authorizing the export and reexport to Iran of certain hardware, software, and services incident to personal communications. On February 7, 2014, the Department of the Treasury, in consultation with the Departments of State and Commerce, issued amended [Iranian General License D-1 \(“GL D-1”\)](#), which clarifies certain aspects of GL D and adds certain new authorizations. Effective February 7, 2014, GL D-1 replaces and supersedes in its entirety GL D.

General Questions ([Print](#))

337. What are key changes made by amended General License D-1?

First, [GL D-1](#) expands the authorization in GL D to permit the exportation, reexportation, or provision, directly or indirectly, to Iran of certain personal communications software, hardware, and related services subject to Commerce’s [Export Administration Regulations, 15 C.F.R. parts 730 through 774 \(“EAR”\)](#) (rather than just the exportation or reexportation from the United States or by a U.S. person of such software, hardware, and services). See GL D-1, paragraphs (a)(2)(i) & (a)(3). For purposes of GL D-1, the term “provision” could include, for example, an in-country transfer of covered software or hardware. The general license now authorizes, for example, a non-U.S. person located outside the United States to export certain hardware and software subject to the EAR to Iran. See [FAQ #341](#).

Second, GL D-1 adds new authorizations for the exportation, reexportation, or provision, directly or indirectly, by a U.S. person located outside the United States to Iran of certain software and hardware not subject to the EAR. See [GL D-1](#), paragraphs (a)(2)(ii) & (a)(3). The general license now authorizes, for example, a U.S. company to export to Iran, from a location outside the United States, certain hardware or software that is not subject to the EAR (including foreign-origin hardware or software containing less than a *de minimis* amount of U.S. controlled content). See [FAQ #342](#).

Third, a new Note has been added to paragraphs (a)(2) and (a)(3) clarifying that the authorization in those paragraphs includes the exportation, reexportation, or provision, directly or indirectly, of the authorized items by an individual leaving the United States for Iran. GL D-1 also adds a new authorization for the importation by an individual into the United States of certain hardware and software previously exported by the individual to Iran pursuant to other provisions of GL D-1 or 31 C.F.R. § 560.540. See [GL D-1](#), paragraph (a)(5). The general license now authorizes, for example, an individual to carry a smartphone that falls within the scope of the GL D-1 authorization while traveling to and from Iran. See [FAQ #343](#).

Finally, to further ensure that the sanctions on Iran do not have an unintended chilling effect on the willingness of companies to make available certain publicly available, no cost personal communications tools to persons in that country, GL D-1 adds a new authorization related to the potential recipients of certain publicly available, no cost services and software. See [GL D-1](#), paragraph (a)(6).

Notwithstanding these changes, nothing in this general license relieves an exporter from compliance with the export license requirements of another Federal agency. [02-07-2014]

338. With respect to GL D-1 authorizations in paragraphs (a)(1) and (a)(2), what services and software are covered?

Qualifying services or software must be “incident to the exchange of personal communications over the Internet.” In addition, qualifying software under paragraph (a)(2) must meet the stated export control-related criteria. Both paragraphs provide an illustrative but not exhaustive list of the types of services that are authorized: “instant messaging, chat and email, social networking, sharing of photos and movies, web browsing, and blogging.” See [FAQ #344](#) and OFAC’s Interpretive Guidance and Statement of Licensing Policy on Internet Freedom in Iran (March 20, 2012), available at http://www.treasury.gov/resource-center/sanctions/Programs/Documents/internet_freedom.pdf.

Qualifying services or software need not be specifically listed in the Annex in order to be authorized by paragraphs (a)(1) or (a)(2), provided that they otherwise meet the requirements of paragraphs (a)(1) or (a)(2). [02-07-2014]

339. With respect to GL D-1 authorization in paragraph (a)(3), do exporters need to make a determination as to whether an export of an item or service listed in the Annex to GL D-1 is “incident to personal communications”?

No. The Annex lists software, hardware, and related services determined to be “incident to personal communications” for purposes of the authorization in paragraph (a)(3) of [GL D-1](#) . [02-07-2014]

340. What should I do if I am unsure whether an item or service is covered by GL D-1?

If you require assistance interpreting the authorizations contained in [GL D-1](#) and how they apply to your situation, please contact OFAC’s Licensing Division online at <http://www.treasury.gov/resource-center/sanctions/Pages/licensing.aspx>, by phone at 202-622-2480, or by email at ofac_feedback@do.treas.gov. [02-07-2014]

341. May a non-U.S. person export, reexport, or provide to Iran hardware and software that is subject to Commerce’s Export Administration Regulations (EAR) pursuant to GL D-1?

Yes, for purposes of the authorities administered by OFAC, amendments made by [GL D-1](#) authorize the exportation, reexportation, or provision of certain hardware and software subject to the [EAR](#) by non-U.S. persons outside the United States. See [GL D-1](#) , paragraphs (a)(2)(i) & (a)(3). For example, a non-U.S. person manufacturer of smartphones that are (a) subject to the EAR because they contain more than a de minimis amount of U.S. controlled content and (b) within the scope of the [GL D-1](#) authorization may export the smartphones from its third-country manufacturing facility directly or indirectly to Iran. See [FAQ #337](#). [02-07-2014]

342. Does GL D-1 authorize U.S. persons located outside the United States to export or reexport to Iran certain specified hardware or software that is not subject to Commerce’s Export Administration Regulations (EAR)?

Yes. Amendments made by [GL D-1](#) authorize the exportation, reexportation, or provision to Iran by U.S. persons located outside of the United States of certain specified hardware and software items that are not subject to the [EAR](#). See [GL D-1](#) , paragraphs (a)(2)(ii) & (a)(3). [GL D-1](#) also extends this authorization to an entity owned or controlled by a U.S. person and established or maintained outside the United States (“a U.S.-owned or -controlled foreign entity”), subject to the conditions set forth in 31 C.F.R. § [560.556](#). See [GL D-1](#) , Note 2 to paragraph (a). Under these amendments, for example, an overseas branch of a U.S. company or a U.S.-owned or -controlled foreign entity may export to Iran, from a location outside the United States, certain hardware or software that is not subject to the EAR (including foreign-origin hardware or software containing less than a de minimis amount of U.S. controlled content) if the hardware or software is within the scope of the [GL D-1](#) authorization. These amendments also authorize the exportation, reexportation, or provision of certain fee-based software that is not subject to the EAR because it is described in section [734.3\(b\)](#) of the EAR. See [FAQ #337](#). Section [734.3\(b\)](#) of the EAR describes “publicly available” software for purposes of those regulations. [02-07-2014]

343. Does GL D-1 authorize the exportation to Iran and importation into the United States of personal communication devices by persons travelling from the United States to Iran and back to the United States?

Yes. As amended, [GL D-1](#) authorizes both the exportation, reexportation, or provision to Iran and the importation into the United States by an individual entering the United States directly or indirectly from Iran, of software authorized by 31 C.F.R. § [560.540](#) paragraph (a)(2) and software and hardware authorized by paragraphs (a)(2) and (a)(3) of [GL D-1](#), provided that the items were previously exported, reexported, or provided by the individual to Iran. See [GL D-1](#) , paragraph (a)(5) and the Note to paragraphs (a)(2) and (a)(3). See [FAQ #337](#). [02-07-2014]

344. How do the authorizations in paragraphs (a)(1), (a)(2), and (a)(6) of GL D-1 compare to the previously existing general license in 31 C.F.R. § 560.540 authorizing certain services and software incident to Internet-based communications?

The general license in § [560.540](#) authorizes the exportation from the United States or by U.S. persons, wherever located, to persons in Iran of no-cost services incident to the exchange of personal communications over the Internet and no-cost software necessary to enable such services. Please also see OFAC’s Interpretive Guidance and Statement of Licensing Policy on Internet Freedom in Iran (March 20, 2012). See http://www.treasury.gov/resource-center/sanctions/Programs/Documents/internet_freedom.pdf. Paragraphs (a)(1) and (a)(2) of [GL D-1](#) go beyond § [560.540](#) by, among other things, authorizing fee-based services and software incident to the exchange of personal communications over the Internet.

In addition, to further ensure that the sanctions on Iran do not have an unintended chilling effect on the willingness of companies to make available certain publicly available, no cost personal communications tools to persons in Iran, pursuant to paragraph (a)(6) of [GL D-1](#), the exportation, reexportation, or provision to the Government of Iran of certain publicly available, no-cost services and software described in § [560.540\(a\)](#) or categories (6) through (11) of the Annex to [GL D-1](#) is authorized. U.S. persons continue generally to be prohibited from exporting goods and services to persons whose property and interests in property are blocked pursuant to [any part of 31 C.F.R. chapter V](#), other than Government of Iran end-users blocked solely

pursuant to [Executive Order 13599](#) . See [GL D-1](#) paragraph (b)(2). Prohibited end-users include Iranian persons whose property and interests in property are blocked pursuant to OFAC authorities relating to WMD proliferation, terrorism, and human rights abuses. In addition, GL D-1 does not authorize any action or activity involving any item (including information) subject to Commerce's [Export Administration Regulations](#) (EAR) that is prohibited by, or otherwise requires a license under, part 774 of the EAR or participation in any transaction involving a person whose export privileges have been denied pursuant to part 764 or 766 of the EAR, without authorization from the Department of Commerce. [02-07-2014]

345. How can U.S. companies arrange for payment from Iran for exports authorized under GLD-1?

In general, the payment requirements under [GL D-1](#) are the same as for all other general licenses under the Iranian Transactions and Sanctions Regulations ("ITSR"). Section 560.516 of the ITSR authorizes U.S. depository institutions to process transfers of funds to or from Iran, or for the direct or indirect benefit of persons in Iran or the Government of Iran, if the transfer arises from, and is ordinarily incident and necessary to give effect to, an underlying transaction that has been authorized by a specific or general license issued pursuant to the ITSR and does not involve debiting or crediting an Iranian account. 31 C.F.R. § 560.516(a). [02-07-2014]

346. What kind of due diligence is required for the exportation of fee-based services, software, or hardware authorized by GL D-1?

Due diligence programs should be tailored to the particular risks encountered by exporters. As a general matter, companies selling fee-based services, software, or hardware authorized by [GL D-1](#) should undertake reasonable, risk-based measures designed to ensure that they do not export their products to persons whose property and interests in property are blocked pursuant to any sanctions program administered by OFAC, regardless of whether the Government of Iran or other end-user appears on OFAC's [list of Specially Designated Nationals and Blocked Persons](#) (or any of [OFAC's other sanctions lists](#)). [02-07-2014]

347. Are there any restrictions as to the use of the Farsi language in authorized advertising or software?

U.S. sanctions on Iran do not impose any restrictions as to the use of the Farsi language. [02-07-2014]

348. May U.S. persons employ agents in Iran to facilitate sales, create or fund a physical sales presence on the ground in Iran, or utilize Iranian commercial marketing services in furtherance of exports authorized under GL D-1?

No. [GL D-1](#) does not authorize the employment of persons in Iran to facilitate sales, the maintenance of a physical sales presence in Iran, or the utilization of Iranian marketing services. However, certain copy-ready advertising materials are exempt from the prohibitions of the [ITSR](#) to the extent they qualify as information or informational materials pursuant to 31 C.F.R. § [560.210\(c\)](#). [02-07-2014]

Specific Software, Hardware, and Services Covered by General License D-1 for Iran

For additional information regarding specific software, hardware, and services in Iran, please see the [following topic](#).

Payments or the Facilitation of Payments to Iranian Civil Aviation Authorities for Overflights of Iran or Landing in Iran

[Print this topic](#)

417. Are payments or the facilitation of payments not involving U.S. persons to Iranian civil aviation authorities for overflights of Iran or landing in Iran by aircraft that are owned by a non-U.S. person and registered outside the United States sanctionable under U.S. law?

No. Provided that the relevant transactions do not involve the U.S. financial system or persons on the Specially Designated Nationals and Blocked Persons List ([SDN List](#)), payments of charges for services rendered by the Government of Iran in connection with the overflight of Iran or landing in Iran of aircraft owned by a non-U.S. person and registered outside the United States are not subject to sanctions under U.S. law. The involvement of persons on the SDN List, including Iranian financial institutions or airlines designated pursuant to [Executive Order 13224](#) or [Executive Order 13382](#) , would create sanctions exposure for participants to such transactions.

U.S. persons and U.S.-owned or -controlled foreign entities cannot participate in transactions related to the payment of

overflight or landing fees to the Government of Iran, nor can such transactions transit the U.S. financial system, unless the transactions fall within the scope of 31 C.F.R. § [560.522](#) or a specific license issued by OFAC and the payments in connection with such authorized transactions are consistent with 31 C.F.R. § [560.516](#). [11-05-2018]

Provision of Routine Goods and Services by non-U.S. persons to Diplomatic Missions of the Government of Iran

[Print this topic](#)

455. Is the provision of routine goods and services by non-U.S. persons to diplomatic missions of the Government of Iran located outside the United States sanctionable under U.S. law?

The provision of goods and services for the conduct of the official business of the diplomatic missions of the Government of Iran located outside the United States or for the personal use of the employees of the missions, including financial services such as the opening of a bank account, by a non-U.S. person would not be sanctionable under U.S. law, provided that such goods and services do not involve persons on OFAC's [List of Specially Designated Nationals and Blocked Persons](#) (other than any political subdivision, agency, or instrumentality of the Government of Iran listed solely pursuant to [Executive Order 13599](#) or any Iranian depository institution listed solely pursuant to [Executive Order 13599](#)) or other activities that would be sanctionable under U.S. law.

Further, the provision of goods and services to the diplomatic missions of the Government of Iran outside the United States cannot involve U.S. persons or U.S.-owned or -controlled foreign entities, or the provision to the Government of Iran of goods, technology, or services subject to the prohibitions of [31 C.F.R. §§ 560.204-205](#), nor can related transactions transit the U.S. financial system, unless the activities and/or transactions are authorized by OFAC. [10-22-2015]

Additional Iran-related Questions From Financial Institutions

[Print this topic](#)

37. My bank operates accounts for individuals living in Iran. OFAC has told us that these accounts cannot be operated. Does this mean that the accounts are blocked?

No, the accounts are restricted. The Iranian sanctions prohibit the export of goods or services to Iran. By operating an account for an individual or company in Iran, the bank would be exporting services to that person or entity in violation of the Iranian Transactions Regulations. The accounts, however, are not blocked. The account holder can close the account and have the funds transferred to his or her account outside the United States. [09-10-02]

38. Are U-Turn payments for Iran still permitted?

No, as of November 10, 2008 U-Turn payments are no longer allowed. [11-10-08]

118. I have a client that is in Iran to visit a relative. Do I need to restrict the account?

No. As long as you are satisfied that the client is not ordinarily resident in IRAN, then the account does not need to be restricted. [07-28-09]

54. I have an account with a W-8 showing an address in Iran. Is the account automatically restricted?

In the absence of information proving to your satisfaction that the account holder is not in Iran, you should consider the account restricted based on the W-8 filing. [06-24-05]

Countering America's Adversaries Through Sanctions Act (CAATSA) Section 105

[Print this topic](#)

533. What are the requirements of CAATSA section 105 related to the imposition of sanctions on the IRGC, and how are those requirements being implemented?

On August 2, 2017, the President signed into law the "Countering America's Adversaries Through Sanctions Act" (Public Law 115-44) ([CAATSA](#)), which, among other things, imposes new sanctions on Iran. Section 105 of CAATSA requires the imposition of sanctions applicable pursuant to the global terrorism [Executive Order 13224](#) on Iran's Islamic Revolutionary Guard Corps (IRGC) and foreign persons that are officials, agents, or affiliates of the IRGC. Consistent with that requirement of

CAATSA, OFAC designated the IRGC on October 13, 2017, pursuant to E.O. 13224 for providing support to the IRGC-Qods Force, which previously had been designated for its support to various terrorist groups. In addition, effective October 31, 2017, OFAC amended the Global Terrorism Sanctions Regulations, [31 C.F.R. part 594](#), to block the property and interests in property of foreign persons that have been identified by OFAC as officials, agents, or affiliates of the IRGC. [10/30/2017]

534. Before October 13, 2017, wasn't the IRGC already subject to sanctions? What's different about applying terrorism-related sanctions to the IRGC and foreign persons that are officials, agents, or affiliates of the IRGC?

Before October 13, 2017, the IRGC was blocked under [Executive Order 13382](#) (relating to WMD proliferation), [13553](#) (relating to Iranian human rights abuses), and [13606](#) (relating to Iranian and Syrian human rights abuses via information technology), and persons who engaged in certain activity involving the IRGC were already subject to secondary sanctions. OFAC's October 13, 2017 action designating the IRGC under [E.O. 13224](#) (relating to counterterrorism) and OFAC's October 31, 2017 action under the Global Terrorism Sanctions Regulations, [31 C.F.R. part 594](#) (GTSR), to block the property and interests in property of foreign persons that have been identified by OFAC as officials, agents, or affiliates of the IRGC carry additional consequences that limit certain activities with respect to the IRGC and foreign persons identified by OFAC as officials, agents, or affiliates of the IRGC. Certain exemptions available under the [International Emergency Economic Powers Act](#) (IEEPA) relating to personal communications, humanitarian donations, information or informational materials, and travel do not apply to transactions with persons designated under E.O. 13224 or otherwise blocked pursuant to the GTSR, which include the IRGC and foreign persons that have been identified by OFAC as officials, agents, or affiliates of the IRGC. [10/30/2017]

535. Is the IRGC now a Foreign Terrorist Organization (FTO)?

No. The Department of State has not designated the IRGC as an FTO. [10/13/2017]

Guidance Related to Humanitarian Assistance with Regard to the November 12, 2017 Earthquake in Iran

[Print this topic](#)

549. In light of the recent earthquake in Iran, how can I help the Iranian people while making sure to abide by U.S. sanctions?

In light of the tragic earthquake in Iran, the Department of the Treasury's Office of Foreign Assets Control (OFAC) would like to highlight some of the ways in which Americans can provide humanitarian assistance to the Iranian people, consistent with the Iran-related sanctions administered by OFAC.

[General License E](#), issued by OFAC in 2013 pursuant to the Iranian Transactions and Sanctions Regulations, [31 C.F.R. part 560 \(ITSR\)](#), authorizes nongovernmental organizations to export services to Iran in support of activities related to humanitarian projects to meet basic human needs in Iran, including the provision of relief services related to natural disasters, the provision of donated health-related services, and the distribution of donated articles (such as food, clothing, and medicine) intended to be used to relieve human suffering in Iran. In addition, nongovernmental organizations are authorized to transfer up to \$500,000 per year in support of these activities, subject to certain conditions, including reporting requirements.

U.S. individuals may raise funds outside of Iran in support of relief services provided by nongovernmental organizations pursuant to [General License E](#), and may make financial donations to such nongovernmental organizations in support of authorized activities. General License E does not, however, authorize U.S. individuals to transfer financial donations directly to Iran or nongovernmental organizations in Iran or to organize disaster relief services in Iran such as fire, rescue, or medical services. U.S. persons interested in doing so should consider working through a nongovernmental organization in order to conduct such activity.

In addition, donations of articles such as food, clothing, and medicine intended to be used to relieve human suffering are exempt from the sanctions on trade between the United States and Iran, as long as the donations are not being sent to the Government of Iran or any Iranian individual or entity on the List of Specially Designated Nationals and Blocked Persons ([SDN List](#)).

Finally, U.S. financial institutions are authorized to process noncommercial, personal remittances to Iran, which may include a personal transfer of funds from the United States to Iran to assist a friend or family member, provided that the transfer complies with the requirements of sections [560.516](#) and [560.550](#) of the ITSR. [11-17-2017]

Frequently Asked Questions Regarding Executive Order of August 6, 2018, “Reimposing Certain Sanctions With Respect to Iran”

[Print this topic](#)

597. What is the purpose of Executive Order (E.O.) of August 6, 2018, “Reimposing Certain Sanctions With Respect to Iran”?

In accordance with his May 8, 2018 decision to cease the United States' participation in the Joint Comprehensive Plan of Action (JCPOA) and to reimpose all of the U.S. sanctions lifted or waived in connection with the JCPOA, the President issued [E.O. 13846](#) on August 6, 2018 to reimpose relevant provisions of E.O. 13574 of May 23, 2011; E.O. 13590 of November 20, 2011; E.O. 13622 of July 30, 2012; and E.O. 13645 of June 3, 2013, that had been revoked by E.O. 13716 of January 16, 2016. Consistent with [guidance issued by the Department of the Treasury on May 8, 2018](#), E.O. 13846 reimposes specified sanctions relating to Iran following relevant wind-down periods, i.e., on or after August 7, 2018 or November 5, 2018, depending on the activity involved. In addition, to provide clarity and consolidate relevant authorities into a single E.O., E.O. 13846 revokes E.O.s 13716 and 13628 and continues in effect sanctions authorities provided for in those E.O.s. E.O. 13846 also broadens the scope of certain provisions contained in those E.O.s, as outlined in [FAQ 601](#) below. [08-06-2018]

598. What does E.O. 13846 do?

[E.O. 13846](#) reimposes relevant blocking sanctions, correspondent and payable-through account sanctions, and menu-based sanctions previously provided for in E.O.s 13574, 13590, 13622, and 13645, which were revoked by E.O. 13716, and continues in effect sanctions authorities provided for in E.O.s 13628 and 13716. As incorporated into E.O. 13846, these measures include implementing authority for and additional tools related to: the [Iran Sanctions Act of 1996, as amended \(ISA\)](#), the [Comprehensive Iran Sanctions, Accountability and Divestment Act of 2010, as amended \(CISADA\)](#), the [Iran Threat Reduction and Syria Human Rights Act of 2012 \(TRA\)](#), and the [Iran Freedom Counter-Proliferation Act of 2012 \(IFCA\)](#) (see [FAQ 605](#)). As a general matter, E.O. 13846 incorporates exceptions to these sanctions, including for transactions for the provision of agricultural commodities, food, medicine, or medical devices to Iran, to the same extent such exceptions applied under the prior E.O.s. E.O. 13846 also broadens the scope of certain provisions contained in those E.O.s, as outlined in [FAQ 601](#) below.

Section 1 of E.O. 13846 authorizes blocking sanctions on persons determined:

- i. On or after August 7, 2018, to have provided material support for, or goods or services in support of, the purchase or acquisition of U.S. bank notes or precious metals by the Government of Iran (GOI) (subsection 1(a)(i));
- ii. On or after November 5, 2018, to have provided material support for, or goods or services in support of, the National Iranian Oil Company (NIOC), the Naftiran Intertrade Company (NICO), or the Central Bank of Iran (CBI) (subsection 1(a)(ii));
- iii. On or after November 5, 2018, to have provided material support for, or goods or services in support of:
 - a. Any Iranian person on the List of Specially Designated Nationals and Blocked Persons (SDN List) (other than an Iranian depository institution whose property and interests in property are blocked solely pursuant to E.O. 13599) (subsection 1(a)(iii)(A)); or
 - b. Any other person on the SDN List whose property and interests in property are blocked pursuant to subsection 1(a) of E.O. 13846 or E.O. 13599 (other than an Iranian depository institution whose property and interests in property are blocked solely pursuant to E.O. 13599) (subsection 1(a)(iii)(B)); or
- iv. Pursuant to the relevant statutory authorities in IFCA, to be:
 - a. Part of Iran's energy, shipping, or shipbuilding sectors (subsection 1(a)(iv)(A));
 - b. A port operator in Iran (subsection 1(a)(iv)(B)); or
 - c. A person that knowingly provides significant support to a person determined to be part of Iran's energy, shipping, or shipbuilding sectors, a port operator in Iran, or an Iranian person included on the SDN List (other than a person described in section 1244(c)(3) of IFCA) (subsection 1(a)(iv)(C)).

Section 2 of E.O. 13846 authorizes correspondent and payable-through account sanctions on foreign financial institutions (FFIs) determined to have knowingly conducted or facilitated any significant financial transaction:

- i. On or after August 7, 2018, for the sale, supply, or transfer to Iran of significant goods or services used in connection with Iran's automotive sector (subsection 2(a)(i));
- ii. On or after November 5, 2018, on behalf of an Iranian person on SDN List (other than an Iranian depository institution whose property and interests in property are blocked solely pursuant to E.O. 13599) or any other person on the SDN List whose

property is blocked pursuant to subsection 1(a) of E.O. 13846 or E.O. 13599 (other than an Iranian depository institution whose property and interests in property are blocked solely pursuant to E.O. 13599) (subsection 2(a)(ii));

iii. On or after November 5, 2018, with NIOC or NICO, except for the sale or provision to NIOC or NICO of the products described in section 5(a)(3)(A)(i) of ISA provided that the fair market value of such products is lower than the applicable dollar threshold specified in that provision (subsection 2(a)(iii));

iv. On or after November 5, 2018, for the purchase, acquisition, sale, transport, or marketing of petroleum or petroleum products from Iran (subsection 2(a)(iv)); and

v. On or after November 5, 2018, for the purchase, acquisition, sale, transport, or marketing of petrochemical products from Iran (subsection 2(a)(v)).

Section 3 of E.O. 13846 authorizes menu-based sanctions on persons determined to:

i. Have knowingly engaged, on or after August 7, 2018, in a significant transaction for the sale, supply, or transfer to Iran of significant goods or services used in connection with Iran's automotive sector (subsection 3(a)(i));

ii. Have knowingly engaged, on or after November 5, 2018, in a significant transaction for the purchase, acquisition, sale, transport, or marketing of petroleum or petroleum products from Iran (subsection 3(a)(ii));

iii. Have knowingly engaged, on or after November 5, 2018, in a significant transaction for the purchase, acquisition, sale, transport, or marketing of petrochemical products from Iran (subsection 3(a)(iii)); or

iv. Be a successor entity to a person determined to meet any of the criteria set out in subsections 3(a)(i)-(a)(iii) of E.O. 13846 (subsection 3(a)(iv)); or

v. Own or control a person determined to meet any of the criteria set out in subsections 3(a)(i)-(a)(iii) of E.O. 13846 and to have had knowledge that the person engaged in the activities referred to in the relevant subsection (subsection 3(a)(v)); or

vi. Be owned or controlled by, or under common ownership or control with, a person determined to meet any of the criteria set out in sections 3(a)(i)-3(a)(iii) of E.O. 13846, and knowingly engaged in the activities referred to in the relevant subsection (subsection 3(a)(vi)).

Section 4 of E.O. 13846 provides authority for the heads of relevant agencies of the U.S. government to implement the menu-based sanctions provided for in section 3.

Section 5 of E.O. 13846 provides authority for the Treasury Department to implement the menu-based sanctions provided for in ISA, CISADA, TRA, IFCA, and section 3 of E.O. 13846

Section 6 of E.O. 13846 authorizes correspondent or payable-through account sanctions or blocking sanctions on FFIs that are determined to have, on or after August 7, 2018: (a) knowingly conducted or facilitated any significant transaction related to the purchase or sale of Iranian rials or a derivative, swap, future, forward, or other similar contract whose value is based on the exchange rate of the Iranian rial (subsection 6(a)(i)); or (b) maintained significant funds or accounts outside the territory of Iran denominated in the Iranian rial (subsection 6(a)(ii)).

Section 7 of E.O. 13846 carries forward sections 2 and 3 of E.O. 13628 and subsection 3(c) of E.O. 13716 (see [FAQ 602](#) below) by providing for blocking sanctions on persons determined to:

i. 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 (subsection 7(a)(i));

ii. 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 7(a)(1) of E.O. 13846 (subsection 7(a)(ii));

iii. Have knowingly, on or after August 10, 2012, transferred or facilitated the transfer of, goods or technologies to Iran, any entity organized under the laws of Iran, or otherwise subject to the jurisdiction of the GOI, or any national of Iran for use in or with respect to Iran, that are likely to be used by the GOI or any of its agencies or instrumentalities, or by any person on behalf of the GOI or any such agencies or instrumentalities, to commit serious human rights abuses against the people of Iran (subsection 7(a)(iii));

iv. Have knowingly, on or after August 10, 2012, provided services, including services relating to hardware, software, or specialized information or professional consulting, engineering, or support services with respect to goods or technologies that have been transferred to Iran and that are likely to be used by the GOI or any of its agencies or instrumentalities, or by any person on behalf of the GOI or any such agencies or instrumentalities, to commit serious human rights abuses against the people of Iran (subsection 7(a)(iv));

v. Have engaged in censorship or other activities with respect to Iran, on or after June 12, 2009, that prohibit, limit, or penalize the exercise of freedom of expression or assembly by citizens of Iran, or that limit access to print or broadcast media, including the facilitation or support of intentional frequency manipulation by the GOI or an entity owned or controlled by the GOI that would jam or restrict an international signal (subsection 7(a)(v));

vi. Have materially assisted or provided other support for activities listed in subsections 7(a)(i)-(a)(v) of E.O. 13846 (subsection 7(a)(vi)); or

vii. 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 section 7 of E.O. 13846 (subsection 7(a)(vii)).

Section 8 of E.O. 13846 continues in effect the sanctions previously contained in section 4 of E.O. 13628, which prohibit an entity owned or controlled by a U.S. person and established or maintained outside the United States (a "U.S.-owned or -controlled foreign entity") from knowingly engaging in any transaction, directly or indirectly, with the GOI or any person subject to the jurisdiction of the GOI, if that transaction would be prohibited by specified authorities if engaged in by a U.S. person or in the United States (see [FAQs 621-623](#) below).

Section 9 of E.O. 13846 provides that it revokes and supersedes E.O.s 13628 and 13716 (see [FAQ 602](#) below).

Sections 10-22 of E.O. 13846 contain exceptions, definitions, and other implementing provisions related to the sanctions in the E.O. [08-06-2018]

599. When does E.O. 13846 become effective?

[E.O. 13846](#) is effective at 12:01 a.m. eastern daylight time (EDT) on August 7, 2018. However, certain sanctions set out in E.O. 13846 apply only to activities that take place on or after November 5, 2018, as set out in [FAQ 598](#) above and in the relevant provisions of E.O. 13846.

E.O. 13846 is being issued to coincide with the end of the 90-day wind down period [which started on May 8, 2018](#). The last day of the 90-day wind-down period is August 6, 2018, and, as announced on May 8, 2018, certain sanctions previously lifted under the JCPOA will be reimposed on August 7, 2018, including sanctions set out in E.O. 13846 (see [FAQ 598](#) above). [08-06-2018]

600. Why does subsection 1(a)(iv) of E.O. 13846 take effect before November 5, 2018?

Subsection 1(a)(iv) authorizes blocking sanctions pursuant to section 1244(c)(1)(A) of IFCA on persons determined to: (A) be part of the energy, shipping, shipbuilding sectors of Iran; (B) operate a port in Iran; or (C) knowingly provide significant support to certain other persons sanctioned pursuant to section 1244(c)(1)(A) of IFCA or an Iranian person on the SDN List. Consistent with the guidance issued by the U.S. Department of the Treasury on May 8, 2018, the relevant sanctions in section 1244(c)(1)(A) of IFCA are waived through November 4, 2018 to provide a wind-down period for activities involving Iran that were consistent with the U.S. sanctions relief provided for under the JCPOA. However, the sanctions provided for in section 1244(c)(1)(A) of IFCA targeting significant support to Iranian persons on the SDN List remained in effect even when the JCPOA sanctions relief was in effect. To the extent activities within the scope of section 1244(c)(1)(A) of IFCA involve persons on the SDN List or otherwise sanctionable conduct, persons engaging in such activities could be exposed to sanctions under subsection 1(a)(iv) of E.O. 13846 prior to November 5, 2018. [08-06-2018]

601. Does E.O. 13846 expand the scope of sanctions that were in effect prior to January 16, 2016 (Implementation Day of the JCPOA)?

Yes. [E.O. 13846](#) broadens the scope of the sanctions that were in effect prior to January 16, 2016 and provides for greater consistency in the administration of Iran-related sanctions provisions. These added measures are as follows:

- i. Subsection 1(a)(iii)(B): Providing new authority for blocking sanctions on persons determined, on or after November 5, 2018, to have provided material support for, or goods and services in support of, persons blocked for:
 - a. Providing material support for, or goods and services in support of, the purchase or acquisition of U.S. bank notes or precious metals by the GOI (i.e., persons designated pursuant to subsection 1(a)(i));
 - b. Providing material support for, or goods and services in support of, NIOC, NICO, or CBI (i.e., persons designated pursuant to subsection 1(a)(ii)); or
 - c. Being part of the energy, shipping, or shipbuilding sectors of Iran or a port operator in Iran or knowingly providing significant support to certain other persons blocked pursuant to section 1244(c)(1)(A) of IFCA or to an Iranian person on the SDN List (i.e., persons blocked pursuant to subsection 1(a)(iv) for meeting the criteria of section 1244(c)(1)(A) of IFCA).
- ii. Subsection 2(a)(ii): Providing new authority for correspondent and payable-through account sanctions on FFIs determined to have, on or after November 5, 2018, knowingly conducted or facilitated any significant financial transaction on behalf of the persons blocked under the new authorities in subsection 1(a)(iii)(B) described above (i.e., any person blocked pursuant to subsections 1(a)(i), 1(a)(ii), or 1(a)(iv) and included on the SDN List).
- iii. Sections 4 and 5: Expanding the menu of sanctions available to impose on persons determined to have, on or after November 5, 2018, knowingly engaged in certain significant transactions relating to petroleum, petroleum products, or petrochemicals from Iran (i.e., persons determined to meet the criteria in subsections 3(a)(ii)-(a)(iii) or to be a derivative thereof pursuant to subsections 3(a)(iv)-(a)(vi)) by authorizing the imposition of:
 - a. Visa restrictions on corporate officers, principals, or controlling shareholders of a sanctioned person (subsection (4)(e));
 - b. Any of the sanctions from the menu set forth in subsections 4(a)-(e) on principal executive officers of a sanctioned person (subsection 4(f));
 - c. Prohibitions on U.S. persons investing in or purchasing significant amounts of equity or debt instruments of a sanctioned

person (subsection 5(a)(v)); or

d. Any of the sanctions from the menu set forth in subsections 5(a)(i)-(a)(vi) on principal executive officers of a sanctioned person (subsection 5(a)(vii)).

iv. Section 8: Expanding the prohibition on U.S.-owned or -controlled foreign entities previously contained in section 4 of E.O. 13628 (see [FAQs 621-623](#)) by prohibiting transactions with persons blocked for:

a. Providing material support for, or goods and services in support of, Iranian persons on the SDN List and certain other designated persons (i.e., persons designated pursuant to subsection 1(a)(iii)); or

b. Being part of the energy, shipping, or shipbuilding sectors of Iran or a port operator in Iran or knowingly providing significant support to certain other persons blocked pursuant to section 1244(c)(1)(A) of IFCA or to an Iranian person on the SDN List (i.e., persons blocked pursuant to subsection 1(a)(iv) for meeting the criteria of section 1244(c)(1)(A) of IFCA). [08-06-2018]

602. Why does E.O. 13846 revoke E.O. 13716 and E.O. 13628?

To provide clarity and consolidate relevant authorities into a single document, [E.O. 13846](#) revokes E.O.s 13716 and 13628, and continues in effect relevant provisions from those two revoked E.O.s. Provisions of E.O. 13846 that carry forward relevant provisions of E.O.s 13628 and 13716 include:

- Section 7, which consolidates into a single section designation authorities targeting corruption or other activities relating to the diversion of goods intended for the people of Iran, the transfer of goods or technologies to Iran that are likely to be used by the GOI or any of its agencies or instrumentalities to commit serious human rights abuses against the people of Iran or the provision of certain services with respect to such goods or technologies, and persons engaged censorship in Iran (these provisions previously appeared in sections 2 and 3 of E.O. 13628 and section 8 of E.O. 13645, which was carried forward by subsection 3(c) of E.O. 13716), and
- Section 8 extends certain prohibitions applicable to U.S. persons under OFAC-administered Iran sanctions to U.S.-owned or -controlled foreign entities and provides for civil penalties on the U.S. parent for any violations of such prohibitions to the same extent that they would apply to a U.S. person for the same conduct, consistent with section 218 of the [TRA](#) (this provision was formerly contained in section 4 of E.O. 13628). [08-06-2018]

603. Do persons who were designated pursuant to E.O. 13628 of October 9, 2012, “Authorizing the Implementation of Certain Sanctions Set Forth in the Iran Threat Reduction and Syria Human Rights Act of 2012 and Additional Sanctions With Respect to Iran,” continue to be subject to sanctions following the issuance of E.O. 13846?

Yes. OFAC is taking action under section 7 of [E.O. 13846](#) to continue in effect the designations of persons who were designated pursuant to E.O. 13628 at the time of the issuance of E.O. 13846. U.S. persons must continue to block the property and interests in property of these individuals and entities, and non-U.S. persons should be aware of the sanctions risk associated with these persons. [08-06-2018]

604. Why do the sanctions set out in E.O.s 13574 and 13590 not appear in E.O. 13846?

The Treasury Department implementation authorities set out in section 1 of E.O. 13574 for “menu-based” sanctions under ISA have been superseded by the implementation authorities for “menu-based” sanctions under a broader range of authorities that include [ISA](#), [CISADA](#), [TRA](#), and [IFCA](#), and section 3 of [E.O. 13846](#). As a result, section 1 of E.O. 13574 is not included verbatim in E.O. 13846.

The sanctions set out in section 1 of E.O. 13590 — relating to development of petroleum resources in Iran and Iran’s domestic production of petrochemical products — were incorporated into subsections 5(a)(5)-(a)(6) of ISA by a statutory amendment set forth in section 201 of the [TRA](#). As a result, the sanctions previously set forth in section 1 of E.O. 13590 are not included in E.O. 13846, but remain in place pursuant to statutory authorities. Implementation authorities for the sanctions in subsections 5(a)(5)-(a)(6) of ISA are delegated to the appropriate agency heads through the Presidential Memorandum of October 9, 2012, or through section 5 of E.O. 13846. [08-06-2018]

605. How does E.O. 13846 relate to various Iran-related statutes?

[E.O. 13846](#) implements provisions of, and provides additional tools related to, [ISA](#), [CISADA](#), [TRA](#), and [IFCA](#) that were contained in the prior E.O.s. These include:

- Invoking the President’s authority under the International Emergency Economic Powers Act (IEEPA) to supplement statutory authorities in IFCA with prohibitions or restrictions on the importation of goods;
- Continuing to implement the statutory requirements of sections 105A and 105B of CISADA, as added by sections 402 and

403 of TRA, by providing authority to block the property and interests in property and suspend the entry into the United States of persons determined to have engaged in the transfer of goods or technologies to Iran that are likely to be used by the GOI or any of its agencies or instrumentalities to commit serious human rights abuses against the people of Iran or the provision of services with respect to such goods or technology after they are transferred to Iran, and persons determined to have engaged in censorship in Iran; and

iii. Continuing to implement the statutory requirements of section 105C of CISADA, as added by section 1249 of IFCA, by providing authority to block the property and interests in property and suspend the entry into the United States of persons determined to have engaged in corruption or other activities relating to the diversion of goods intended for the Iranian people or the misappropriation of proceeds from the sale or resale of such goods. [08-06-2018]

606. What activity will become sanctionable on or after August 7, 2018 under E.O. 13846 or other authorities?

After the 90-day wind-down period ends on August 6, 2018, the following sanctions come into effect, including under provisions of [E.O. 13846](#) and relevant statutory authorities:

- i. Sanctions on the purchase or acquisition of U.S. dollar banknotes by the GOI (see, e.g., subsection 1(a)(i) of E.O. 13846);
- ii. Sanctions on Iran's trade in gold or precious metals (see, e.g., subsection 1(a)(i) of E.O. 13846 and subsection 1245(a)(1)(A) of IFCA);
- iii. Sanctions on the direct or indirect sale, supply, or transfer to or from Iran of graphite, raw, or semi-finished metals such as aluminum and steel, coal, and software for integrating industrial processes (see, e.g., section 5 of E.O. 13846 and subsections 1245(a)(1)(B)-(a)(1)(C) and (c) of IFCA);
- iv. Sanctions on significant transactions related to the purchase or sale of Iranian rials, or the maintenance of significant funds or accounts outside the territory of Iran denominated in the Iranian rial (see, e.g., section 6 of E.O. 13846);
- v. Sanctions on the purchase, subscription to, or facilitation of the issuance of Iranian sovereign debt (see, e.g., section 5 of E.O. 13846 and subsection 213(a) of TRA); and
- vi. Sanctions on Iran's automotive sector (see, e.g., subsections 2(a)(i) and 3(a)(i) of E.O. 13846). [08-06-2018]

607. What activity will become sanctionable on or after November 5, 2018 under E.O. 13846 or other authorities?

After the 180-day wind-down period ends on November 4, 2018, the following sanctions come into effect, including under provisions of [E.O. 13846](#) and relevant statutory authorities:

- i. Sanctions on Iran's port operators, and shipping and shipbuilding sectors, including on the Islamic Republic of Iran Shipping Lines (IRISL), South Shipping Line Iran, or their affiliates (see, e.g., subsection 1(a)(iv) and section 5 of E.O. 13846 and section 1244(c)(1) of IFCA);
- ii. Sanctions on petroleum-related transactions with, among others, NIOC, NICO, and the National Iranian Tanker Company (NITC), including the purchase of petroleum, petroleum products, or petrochemical products from Iran (see, e.g., subsections 1(a)(ii), 1(a)(iv), 2(a)(iii)-(a)(v), and 3(a)(ii)-(a)(iii) and sections 4 and 5 of E.O. 13846);
- iii. Sanctions on transactions by FFIs with the CBI and designated Iranian financial institutions under section 1245 of the National Defense Authorization Act for FY 2012 (NDAA 2012) (see, e.g., section 5 of E.O. 13846, section 1245 of NDAA 2012, and subsection 1247(a) of IFCA);
- iv. Sanctions on the provision of specialized financial messaging services to the CBI and Iranian financial institutions described in subsection 104(c)(2)(E)(ii) of CISADA (see, e.g., section 5 of E.O. 13846, section 220 of TRA, and subsection 1244(c)(1) of IFCA);
- v. Sanctions on the provision of underwriting services, insurance, or reinsurance (see, e.g., section 5 of E.O. 13846, section 5(a)(7) of ISA, subsections 211(a) and 212(a) of TRA, and subsections 1246(a) and 1247(a) of IFCA); and
- vi. Sanctions on Iran's energy sector (see, e.g., subsection 1(a)(iv) and section 5 of E.O. 13846, subsection 5(a) of ISA, section 212(a) of TRA, and sections 1244(c)(1), (d) and (h)(2), 1246(a), and 1247(a) of IFCA). [08-06-2018]

Sanctions Relating to Transactions Involving the Iranian Rial

608. What transactions involving the Iranian rial are sanctionable under E.O. 13846?

Section 6 of [E.O. 13846](#) reimposes the sanctions previously contained in section 1 of E.O. 13645 with respect to transactions involving the Iranian rial. FFIs risk correspondent and payable-through account sanctions and blocking sanctions if they, on or after August 7, 2018, (i) knowingly conduct or facilitate any significant transaction related to the purchase or sale of Iranian rials or a derivative, swap, future, forward, or other similar contract whose value is based on the exchange rate of the Iranian rial, or (ii) maintain significant funds or accounts outside the territory of Iran denominated in the Iranian rial. [08-06-2018]

Sanctions Relating to Iran's Automotive Sector

609. What does E.O. 13846 do with respect to the sanctions on Iran's automotive sector?

[E.O. 13846](#) reimposes the sanctions previously contained in subsections 3(a)(ii) and section 5 of E.O. 13645 by authorizing the imposition of correspondent and payable-through account sanctions (subsection 2(a)(i)) of E.O. 13846) and menu-based sanctions (subsection 3(a)(i) of E.O. 13846) for certain transactions, on or after August 7, 2018, for the sale, supply, or transfer to Iran of significant goods or services used in connection with Iran's automotive sector. [08-06-2018]

610. What is considered Iran's automotive sector for purposes of E.O. 13846?

[E.O. 13846](#) defines the automotive sector of Iran as the manufacturing or assembling in Iran of light and heavy vehicles including passenger cars, trucks, buses, minibuses, pick-up trucks, and motorcycles, as well as original equipment manufacturing and after-market parts manufacturing relating to such vehicles. [08-06-2018]

611. What are goods or services used in connection with Iran's automotive sector for purposes of E.O. 13846?

[E.O. 13846](#) reimposes sanctions on certain transactions on or after August 7, 2018, for the sale, supply, or transfer to Iran of "significant" goods or services used in connection with the automotive sector of Iran. (See [FAQ 289](#) for an interpretation of the term "significant.")

We anticipate that forthcoming regulations will define "goods or services used in connection with the automotive sector of Iran" to include goods or services that contribute to (i) Iran's ability to research, develop, manufacture, and assemble light and heavy vehicles, and (ii) the manufacturing or assembling of original equipment and after-market parts used in Iran's automotive industry. [08-06-2018]

612. Is the sale, supply, or transfer of finished vehicles or "auto kits" to Iran sanctionable under the New E.O.?

[E.O. 13846](#) does not make sanctionable the export of finished vehicles to Iran if no further assembly or manufacturing is required. As such, exporting fully assembled and finished vehicles to Iran for sale would not be sanctionable, so long as the transaction is consistent with U.S. sanctions, including that it does not involve a sanctioned person.

In contrast, "auto kits" (or "knock-down kits") exported to Iran for assembly in Iran would be considered goods or services used in connection with the automotive sector of Iran and the export of such kits to Iran would be sanctionable if the transaction is "significant." (See [FAQ 289](#) for an interpretation of the term "significant.") [08-06-2018]

613. Is the sale, supply, or transfer of goods or services for the maintenance of finished vehicles sanctionable under E.O. 13846?

Goods or services for the maintenance of finished vehicles exported to Iran would generally not be considered "significant goods or services used in connection with the automotive sector of Iran" for the purposes of [E.O. 13846](#), and the provision of such goods or services would generally not be sanctionable. However, the export, sale, or distribution of goods (e.g., auto parts and accessories) or services that would contribute to Iran's ability to manufacture or assemble vehicles, or manufacture original equipment and after-market parts in Iran, could create exposure to sanctions. Persons exporting parts and services to Iran for the maintenance or upkeep of finished automobiles, and FFIs facilitating such exports, should exercise caution to ensure that the parts or services are not diverted for the manufacturing or assembly of vehicles in Iran or the manufacturing of original equipment or after-market parts in Iran, and are used only for maintenance and upkeep. [08-06-2018]

Sanctions on Petroleum-related Transactions

614. What does E.O. 13846 do with respect to Iran's energy, petroleum, and petrochemical sectors?

[E.O. 13846](#) reimposes sanctions previously set out in E.O.s 13622, 13628, and 13645 with respect to the Iranian energy, petroleum, and petrochemical sectors. As such, subsections 1(a)(ii) and (2)(a)(ii) of E.O. 13846 authorize blocking sanctions and correspondent or payable-through account sanctions on persons providing material support for, or goods or services to,

NIOC or NICO. Separately, subsection 2(a)(iii) of E.O. 13846 authorizes the imposition of correspondent or payable-through account sanctions on an FFI determined to have knowingly conducted or facilitated any significant financial transaction with NIOC or NICO (except for sales of refined petroleum products to NIOC or NICO that are below the dollar threshold that could trigger sanctions under section 5(a)(3)(A)(i) of ISA). Subsections 2(a)(iv)-(a)(v) provide authority to impose sanctions on FFIs determined to have knowingly conducted or facilitated a significant transaction for the purchase, acquisition, sale, transport, or marketing of petroleum, petroleum products, or petrochemicals from Iran, with the aim of deterring Iran or any other country or institution from establishing workaround payment mechanisms for the purchase of Iranian oil to circumvent the NDAA 2012 oil sanctions. Subsections 3(a)(ii)-(a)(iii) provide authority to impose menu-based sanctions on persons determined to have engaged in a significant transaction for the purchase, acquisition, sale, transport, or marketing of petroleum or petroleum products from Iran. Furthermore, persons that sell, supply, or transfer to or from Iran significant goods or services used in connection with Iran's energy sector are exposed to menu-based sanctions pursuant to subsection 1244(d) of IFCA and section 5 of E.O. 13846. The existing exception rules under NDAA 2012 apply to these sanctions. Thus, countries that are determined by the Secretary of State to have significantly reduced their purchases of Iranian crude oil will be excepted from these measures as well. (See FAQs [169-182](#) relating to the NDAA 2012 sanctions.)

The provisions in E.O. 13846 reimposing these sanctions come into effect beginning on November 5, 2018. [08-06-2018]

615. Does E.O. 13846 mean that Iran's trade partners should no longer buy petroleum products from Iran? How will this affect exports of Iranian oil?

These measures, which apply to transactions occurring on or after November 5, 2018, establish a key element of the comprehensive Iran sanctions framework by deterring work-around financial transactions involving NIOC or NICO that were not being captured under the sanctions previously implemented against the CBI at the time E.O. 13622 was issued. Iranian trade partners can continue to buy petroleum and petroleum products from Iran without risking sanctions under [E.O. 13846](#) if they receive a significant reduction exception under relevant provisions of the NDAA 2012 for the relevant period. However, E.O. 13846 provides authority to sanction, on or after November 5, 2018, the purchase of petroleum or petroleum products and significant dealings with NIOC or NICO by persons in jurisdictions that do not have a significant reduction exception. In addition, IFCA provides for sanctions on persons determined to be part of the energy sector of Iran, or to sell, supply, or transfer to or from Iran significant goods or services used in connection with the energy sector of Iran, provided the person is not in a jurisdiction that has received a significant reduction exception. (See [FAQs 293-297](#) relating to IFCA.) [08-06-2018]

616. Can countries that receive a significant reduction exception under NDAA 2012 purchase oil through NIOC and NICO without facing sanctions?

All property and interests in property of NIOC and NICO subject to U.S. jurisdiction are already blocked pursuant to [E.O. 13599](#), and U.S. persons are prohibited from all dealings with these entities. [E.O. 13846](#) reestablishes the authority previously contained in E.O. 13622 to sanction FFIs that, on or after November 5, 2018, knowingly conduct or facilitate any significant transaction with NIOC or NICO. Financial institutions in jurisdictions that have received a significant reduction exception are not subject to these sanctions for transactions with NIOC and NICO for the purchase of petroleum or petroleum products from Iran while the exception applies. In addition, IFCA provides for sanctions on persons that knowingly provide 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 an Iranian person on the SDN List (other than non-designated Iranian financial institutions), provided the person is not in a jurisdiction that has received a significant reduction exception. (See [FAQs 293-297](#) relating to IFCA.) [08-06-2018]

617. E.O. 13846 targets transactions between foreign financial institutions and NIOC and NICO. What about a NIOC or NICO subsidiary? Are transactions with those entities also sanctionable under this E.O.?

Yes. As in E.O. 13622, [E.O. 13846](#) defines NIOC and NICO to include any entity owned or controlled by, or operating for or on behalf of, NIOC and NICO. [08-06-2018]

618. Does E.O. 13846 make sanctionable activities related to the pipeline project to supply natural gas from the Shah Deniz gas field in Azerbaijan to Europe and Turkey, given that NICO reportedly has a 10 percent stake in the project?

No. Section 10 of [E.O. 13846](#) maintains the exceptions previously provided for in E.O. 13622 and E.O. 13645, as well as in subsection 603(a) of the TRA and section 1254 of IFCA, for the pipeline project to supply natural gas from the Shah Deniz gas field in Azerbaijan to Europe and Turkey. [08-06-2018]

619. Are barter arrangements or other non-cash trade transactions involving petroleum, petroleum products, or petrochemical products originating from Iran sanctionable under the terms of E.O. 13846?

Yes. To the extent a financial institution is involved, that financial institution could be sanctioned under [E.O. 13846](#) for a barter arrangement, on or after November 5, 2018, related to the purchase or acquisition of petroleum, petroleum products, or petrochemical products from Iran. In addition, barter transactions knowingly conducted with NIOC, NICO, or the CBI also could result in sanctions — regardless of whether a financial institution is involved — to the extent that those transactions constitute material support for, or services to, NIOC, NICO, or the CBI. [08-06-2018]

620. What are the definitions of “petroleum products” and “petrochemical products”?

The term “petroleum products,” as defined in section 16(o) of [E.O. 13846](#), includes unfinished oils, liquefied petroleum gases, pentanes plus, aviation gasoline, motor gasoline, naphtha-type jet fuel, kerosene-type jet fuel, kerosene, distillate fuel oil, residual fuel oil, petrochemical feedstocks, special naphthas, lubricants, waxes, petroleum coke, asphalt, road oil, still gas, and miscellaneous products obtained from the processing of: crude oil (including lease condensate), natural gas, and other hydrocarbon compounds. The term does not include natural gas, liquefied natural gas, biofuels, methanol, and other non-petroleum fuels.

The term “petrochemical products,” as defined in section 16(m) of E.O. 13846, includes any aromatic, olefin, and synthesis gas, and any of their derivatives, including ethylene, propylene, butadiene, benzene, toluene, xylene, ammonia, methanol, and urea. [08-06-2018]

U.S.-owned or -controlled foreign entities

621. What is the prohibition on U.S.-owned or -controlled foreign entities, and how does it work?

Consistent with Section 218 of [TRA](#), section 8 of [E.O. 13846](#) continues in effect the sanctions previously contained in section 4 of E.O. 13628 and expands them to cover activity sanctionable under E.O. 13846 (see [FAQ 601](#)). This provision prohibits a U.S.-owned or -controlled foreign entity from knowingly engaging in any transaction, directly or indirectly, with the GOI, or any person subject to the jurisdiction of the GOI, if that transaction would be prohibited by certain Executive orders prohibiting trade and other dealings with, and investment in, Iran and blocking the GOI and Iranian financial institutions, or any regulation issued pursuant to the foregoing (including the Iranian Transactions and Sanctions Regulations, 31 C.F.R. part 560 (ITSR)), if the transaction were engaged in by a United States person or in the United States. Civil penalties for the U.S.-owned or -controlled foreign entity’s violation of Section 8, attempted violation, conspiracy to violate, or causing of a violation shall apply to the U.S. person that owns or controls such entity to the same extent that they would apply to a U.S. person for the same conduct.

Section 20(c) of E.O. 13846 contains a savings clause that continues in effect under E.O. 13846 regulations, orders, directives, and licenses that were issued pursuant to E.O. 13628 and remained in effect immediately prior to the date of E.O. 13846. Pursuant to this authority, section 560.215 of the ITSR, which implemented section 4 of 13628, and licenses issued pursuant to E.O. 13628 that were valid as of the date of E.O. 13846 remain in effect, subject to their existing terms and conditions. Such terms and conditions include the expiration date of the license. [08-06-2018]

622. Are U.S.-owned or -controlled foreign entities covered under OFAC general licenses and/or permitted to apply for specific licenses from OFAC?

To the extent a transaction is exempt from the prohibitions of the [ITSR](#), [E.O. 13599](#), or section 1 or 15 of [E.O. 13846](#), or is authorized by a general license issued pursuant to these authorities if engaged in by a U.S. person, it would not be prohibited for a U.S.-owned or -controlled foreign entity (as defined above) to engage in the transaction, provided that it satisfies all the conditions and requirements of the exemption or general license. Similarly, if the transaction is one for which a U.S. person might apply for a specific license — for example, under OFAC’s statement of licensing policy for certain targeted educational, cultural, and sports exchange programs that are designed to directly benefit the Iranian people set forth at section 560.545 of the ITSR — a U.S.-owned or -controlled foreign entity or the U.S. person that owns or controls the entity may apply for a specific license for the U.S.-owned or -controlled foreign entity to engage in the transaction. Note: whether a U.S. parent company’s specific license covers transactions by its owned or controlled foreign entity that are otherwise prohibited by section 8 of E.O. 13846 will depend on the terms of that license and the scope of the authorized activities.

Pursuant to subsection 20(c) of E.O. 13846, section 560.556 of the ITSR, which extends general licenses available under the ITSR to U.S.-owned or -controlled foreign entities, remains in effect. [08-06-2018]

623. Is there a wind-down or safe harbor provision for Section 8 of E.O. 13846?

No. Section 8 of [E.O. 13846](#) continues in effect the prohibition previously contained in section 4 of E.O. 13628, which — consistent with subsection 218(d) of the [TRA](#) — provided that civil penalties would not apply if a U.S. person that owns or

controls the foreign entity divested or terminated its business with the U.S.-owned or -controlled foreign entity not later than February 6, 2013. Because the relevant prohibition came into effect more than five years ago and a wind-down period was provided at that time, Section 8 of E.O. 13846 does not include such a wind-down authorization.

Please note, however, that section 560.537 of the ITSR authorizes — through 11:59 p.m. EST on November 4, 2018 — all transactions and activities ordinarily incident and necessary to the wind down of activities that had been authorized under the now-revoked Iran General License H. To the extent a U.S.-owned or -controlled foreign entity or a U.S. person is engaging in wind-down activities pursuant to section 560.537 of the ITSR, those activities should be completed prior to the general license's expiration at 11:59 p.m. EST on November 4, 2018. [08-06-2018]

Sanctions Relating to the Provision of Material Assistance to Certain Persons

624. What are the implications of subsection 1(a)(iii) of E.O. 13846?

Subsection 1(a)(iii) of [E.O. 13846](#) provides authority to block the property and interests in property of persons determined, on or after November 5, 2018, to have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of: (A) Iranian persons included on the [SDN List](#) or (B) any other persons included on the SDN List whose property and interests in property are blocked pursuant to Executive Order 13599 or subsection 1(a) of E.O. 13846 (in both cases excluding Iranian depository institutions whose property and interests in property are blocked solely pursuant to Executive Order 13599). Certain activities relating to the pipeline project to supply natural gas from the Shah Deniz gas field in Azerbaijan to Europe and Turkey are excepted from this provision.

In implementing this provision, the United States Government will take appropriate steps to avoid, among other things, undue impacts on the access of the people of Iran to humanitarian items, telecommunications, and other basic services. [08-06-18]

Frequently Asked Questions Related to the "Snap-back" of Iranian sanctions in November, 2018

630. Is the provision or delivery of goods or services to an Iranian counterparty after November 4, 2018 allowed?

The wind-down period has ended and the United States intends to fully enforce the sanctions that have come back into effect. The provision or delivery of goods or services and/or the extension of additional loans or credits to an Iranian counterparty after November 4, 2018 — even pursuant to written contracts or written agreements entered into prior to May 8, 2018 — may result in the imposition of U.S. sanctions unless such activities are exempt from regulation, authorized by OFAC, or otherwise not sanctionable.

The United States maintains authorizations and exceptions under U.S. sanctions that allow for the sale of agricultural commodities, food, medicine, and medical devices to Iran by U.S. persons and non-U.S. persons. However, these authorizations and exceptions do not apply to transactions involving persons on OFAC's List of Specially Designated Nationals and Blocked Persons (SDN List) that have been designated in connection with Iran's support for international terrorism or proliferation of weapons of mass destruction, including designated Iranian financial institutions or the Islamic Revolutionary Guard Corps (IRGC), or activity that is subject to other sanctions (see [FAQ 637](#)). [11-05-2018]

631. I was not able to receive payment for goods or services fully provided or delivered prior to the end of the wind-down period. How should I proceed?

In the event that a non-U.S., non-Iranian person is owed payment after the conclusion of the wind-down period on August 6, 2018, or November 4, 2018, as applicable, for goods or services fully provided or delivered to an Iranian counterparty prior to August 6, 2018, or November 4, 2018, as applicable, pursuant to a written contract or written agreement entered into prior to May 8, 2018, and such activities were consistent with U.S. sanctions in effect at the time of delivery or provision, the U.S. government would allow the non-U.S., non-Iranian person to receive payment for those goods or services according to the terms of the written contract or written agreement. Similarly, if a non-U.S., non-Iranian person is owed repayment after August 6, 2018, or November 4, 2018, as applicable, for loans or credits extended to an Iranian counterparty prior to the end of the 90-day or 180-day wind-down period, as applicable, provided that such loans or credits were extended pursuant to a written contract or written agreement entered into prior to May 8, 2018, and such activities were consistent with U.S. sanctions in effect at the time the loans or credits were extended, the U.S. government would allow the non-U.S., non-Iranian person to receive repayment of the related debt or obligation according to the terms of the written contract or written agreement. This allowance is designed for non-U.S., non-Iranian parties to be made whole for debts and obligations owed or due to them for goods or services fully provided or delivered or loans or credit extended to an Iranian party prior to the end of the 90-day or 180-day wind-down period, as applicable. Any payments would need to be consistent with U.S. sanctions, including that payments could not involve U.S. persons or the U.S. financial system, unless the transactions are exempt from regulation or authorized by OFAC (see [FAQ 634](#) and [FAQ 636](#)).

The U.S. government would evaluate matters falling outside the above parameters on a case-by-case basis. [11-05-2018]

632. Will the U.S. government provide assurances beyond the guidance described in 631 and 634 that receipt of payment by non-U.S., non-Iranian persons is not sanctionable?

OFAC encourages non-U.S., non-Iranian persons to rely on the guidance provided in FAQs 631 and 634. Non-U.S., non-Iranian persons can seek guidance from OFAC or the State Department, as appropriate, prior to the receipt of payment, if they would like to confirm that the payments would meet the criteria set forth in [FAQ 631](#) and [FAQ 634](#) and would not be subject to U.S. sanctions. [11-05-2018]

633. Under what circumstances are goods or services considered "fully provided or delivered" prior to the expiration of the relevant wind-down period, as referenced in FAQ 631 above?

OFAC looks to the industry standard to determine whether particular goods or services are considered fully provided or delivered prior to the expiration of the relevant wind-down period. As a general matter, goods or services will be considered fully provided or delivered when the party providing or delivering the goods or services has performed all the actions and satisfied all the obligations necessary to be eligible for payment or other agreed-to compensation. With respect to goods exported to or from Iran, at a minimum, title to the goods must have transferred to the relevant party. [08-06-2018]

634. Can I, as a non-U.S., non-Iranian person, receive payments after the relevant wind-down period ends for goods or services that were fully provided or delivered during the relevant wind-down period pursuant to contracts entered into prior to May 8, 2018?

Yes, subject to the conditions set out below and in FAQ 631 above, non-U.S., non-Iranian persons may receive payment after the end of the relevant wind-down period for goods or services fully provided or delivered to an Iranian counterparty prior to expiration of the relevant wind-down period (see FAQ 633 above). In particular, the goods or services must have been fully provided or delivered prior to the end of the applicable wind-down period pursuant to a written contract or written agreement entered into prior to May 8, 2018; the relevant activities must have been consistent with U.S. sanctions in effect at the time of delivery or provision, including that the activities did not involve persons on the SDN List at the time of the transaction; and any payments must be consistent with U.S. sanctions, including that payments can not involve U.S. persons or the U.S. financial system, unless the transactions are exempt from regulation or authorized by OFAC (see [FAQ 631](#) and [FAQ 636](#)). [11-05-2018]

635. Can I, as a U.S. person or U.S.-owned or -controlled foreign entity, receive payments after the relevant wind-down period ends for goods or services that were fully provided or delivered during the relevant wind-down period under an OFAC wind-down authorization and pursuant to a contract entered into prior to May 8, 2018?

The wind-down authorizations allow U.S. persons and U.S.-owned or -controlled foreign entities to receive payments for activities conducted pursuant to such wind-down authorizations only during their validity periods. For example, a U.S.-owned or -controlled foreign entity may receive payment through 11:59 p.m. eastern standard time on November 4, 2018 for Iran-related activities undertaken pursuant to section 560.537 of the Iranian Transactions and Sanctions Regulations (ITSR) (winding down of transactions relating to U.S.-owned or -controlled foreign entities).

Any payment following the end of the relevant wind-down period for activities undertaken pursuant to a wind-down authorization, including from an Iranian counterparty, would require specific authorization from OFAC. OFAC will evaluate such requests for specific licenses on a case-by-case basis.

Any request for a specific license should provide sufficient details for OFAC to evaluate the application, including: whether the relevant transactions complied with U.S. sanctions as in effect at the time of the transactions; whether the activities were performed under a written contract or written agreement entered into prior to May 8, 2018; and why the applicant was unable to receive the payment for which authorization is sought prior to the end of the relevant wind-down period. OFAC will generally deny requests to receive payment for activities that were not authorized under the relevant wind-down authorizations or that were not undertaken pursuant to a written contract or written agreement entered into prior to May 8, 2018.

As required by 31 C.F.R. section 501.801(b), applicants should identify the names of all parties who are concerned with or interested in the proposed transaction. To facilitate OFAC's review, the request should also include a description of the efforts that were undertaken to collect the payment during the relevant wind-down period and be accompanied by supporting documentation, including relevant contracts, invoices, and shipping documents. OFAC encourages applicants to submit applications online (link available [here](#)). [11-05-2018]

636. Can I receive payment for activities undertaken during the wind-down period if the payment involves a person that has been added to the SDN List, including a person that was previously on the List of Persons Blocked Solely Pursuant to E.O. 13599 (the "E.O. 13599 List") but is now designated under another authority?

The United States intends to fully enforce the sanctions that apply to persons that were previously on the E.O. 13599 List but that are now designated under another authority.

U.S. persons and U.S.-owned or -controlled foreign entities generally would require an OFAC authorization to receive any payment involving an SDN, regardless of whether they were previously on the E.O. 13599 List. OFAC will evaluate requests for such authorization on a case-by-case basis, including whether payments are for goods or services fully provided or delivered during the wind-down period pursuant to an OFAC wind-down authorization (see [FAQ 635](#)).

Non-U.S. persons, including foreign financial institutions, could be subject to sanctions for knowingly engaging in certain significant transactions involving an Iranian person on the SDN List – other than a non-designated Iranian financial institution – or a person designated in connection with Iran's support for international terrorism or proliferation of weapons of mass destruction, including a person that was previously on the E.O. 13599 List but is now designated under another authority. Such persons will have a notation of "Additional Sanctions Information – Subject to Secondary Sanctions" in their SDN List entry in addition to the tag for the other sanctions program(s) (e.g., the "[SDGT]" tag, the "[IRAN-HR]" tag, or the "[NPWMD]" tag for persons designated under E.O. 13224, E.O. 13553, or E.O. 13382).

Non-U.S., non-Iranian persons seeking to receive payment for activities undertaken during the wind-down period that involves a person added to the SDN List should seek guidance from OFAC or the State Department, as appropriate (see [FAQ 634](#)). [11-05-2018]

637. Is it sanctionable for non-U.S., non-Iranian persons to engage in transactions related to the provision of humanitarian and consumer goods to Iran?

The United States maintains broad authorizations and exceptions under U.S. sanctions that allow for the sale of agricultural commodities, food, medicine, and medical devices to Iran from the United States or by U.S. persons or U.S.-owned or -controlled foreign entities. U.S. sanctions laws provide similar allowances for sales of food, agricultural commodities, medicine, and medical devices to Iran by non-U.S. persons. Broadly speaking, transactions for the sale of agricultural commodities, food, medicine, or medical devices to Iran are not sanctionable unless they involve persons on the SDN List that have been designated in connection with Iran's support for international terrorism or proliferation of weapons of mass destruction, including designated Iranian financial institutions or the Islamic Revolutionary Guard Corps (IRGC), or activity that is subject to other sanctions. Additional guidance relating to these authorizations and exceptions can be found on the OFAC website [here](#) and [here](#).

Transactions by non-U.S. persons related to the export to Iran of consumer goods that do not fall within these exceptions, but are not expressly targeted by U.S. sanctions, should not involve certain persons on the SDN List, including the Central Bank of Iran or a designated Iranian financial institution, unless an exception under Section 1245(d)(4)(D) of the National Defense Authorization Act of Fiscal Year 2012 (NDAA 2012) applies, or the IRGC. In addition, such transactions should not involve U.S. persons or transit the U.S. financial system, unless the activities and/or transactions are exempt from regulation or authorized by OFAC. [11-05-2018]

638. What happened to the E.O. 13599 List?

The E.O. 13599 List was created to clarify that, regardless of their removal from the SDN List on January 16, 2016, persons that OFAC had previously identified as meeting the definition of the terms "Government of Iran" or "Iranian financial institution" still met those definitions and continued to be persons whose property and interests in property were blocked pursuant to E.O. 13599 and section 560.211 of the ITSR. On November 5, 2018, OFAC moved persons identified on the E.O. 13599 List to the SDN List and removed the E.O. 13599 List from its website.

Beginning on November 5, 2018, significant transactions with persons moved from the E.O. 13599 List to the SDN List, other than non-designated Iranian financial institutions, could be subject to secondary sanctions, unless an exception applies, such as the exception relating to transactions for the sale of agricultural commodities, food, medicine, or medical devices to Iran; or the significant reduction exception under Section 1245(d)(4)(D) of the NDAA 2012. Persons subject to secondary sanctions will have a notation of "Additional Sanctions Information – Subject to Secondary Sanctions" in the SDN List entry. In addition, effective November 5, 2018, OFAC has amended the ITSR to replace references to the E.O. 13599 List with references to the SDN List.

Some persons moved to the SDN List from the E.O. 13599 List also have been designated under additional authorities and, therefore, have received new unique identification numbers (UIDs) when added to the SDN List. Users of OFAC's sanctions list data may wish to reference the [following mapping table](#) to see how these specific records were added back onto the SDN list. [11-05-2018]

639. Why are some persons that had been blocked solely pursuant to E.O. 13599 now designated pursuant to other authorities, such as E.O. 13224 and E.O. 13382?

OFAC designated multiple Iranian financial institutions and other persons previously blocked solely pursuant to E.O. 13599 under E.O. 13224 (relating to counterterrorism), E.O. 13382 (relating to WMD proliferation), and E.O. 13553 (relating to serious human rights abuses by the Government of Iran) on October 16, 2018, and November 5, 2018. These included persons that had been removed from the SDN List on January 16, 2016. As new information became available, OFAC determined that these persons met one or more of the criteria for designation under OFAC's other designation authorities. Relatedly, a number of persons that were previously designated pursuant to E.O. 13382 and were removed from the SDN List on January 16, 2016 were relisted on the SDN List on November 5, 2018 as persons identified as meeting the definitions of the "Government of Iran" or an "Iranian financial institution" pursuant to E.O. 13599. [11-05-2018]

640. What does the November 5, 2018 amendment to the ITSR do?

This regulatory amendment does two things. First, it amends the ITSR to reflect the re-imposition of ITSR-related sanctions lifted under the JCPOA, including sanctions pursuant to certain sections of E.O. 13846 and the relisting on the SDN List of persons included on the E.O. 13599 List. More specifically, this rule reinstates the regulatory provisions implementing the blocking authorities that were previously in sections 5 and 6 of E.O. 13622 and now are in sections 1 and 10 of E.O. 13846. Section 560.211(c) of the ITSR will now implement blocking of the property and interests in property of any person determined by the Secretary of the Treasury, in consultation with the Secretary of State, to have (i) on or after August 7, 2018, materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of, the purchase or acquisition of U.S. bank notes or precious metals by the Government of Iran, or (ii) on or after November 5, 2018, materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of, the National Iranian Oil Company (NIOC), the Naftiran Intertrade Company (NICO), or the Central Bank of Iran. Additionally, this rule removes references to the E.O. 13599 List to reflect OFAC's separate action removing the E.O. 13599 List from its website and relisting on the SDN List the persons that were previously listed on the E.O. 13599 List.

Second, the rule amends an existing general license in the ITSR to allow individual U.S. persons to engage in transactions necessary to sell certain personal property in Iran (which was acquired before becoming a U.S. person or which was inherited from persons in Iran) and to transfer the proceeds of those sales to the United States. Section 560.543 of the ITSR currently authorizes individual U.S. persons to engage in transactions necessary for the sale of real property in Iran and the transfer of related proceeds to the United States, subject to a number of conditions and limitations. Authorized transactions include engaging the services of any persons in Iran necessary for the sale, such as an attorney, funds agent, or real estate broker, provided such person is not a person whose property and interests in property are blocked pursuant to any part of 31 CFR chapter V, other than persons whose property and interests in property are blocked solely pursuant to Executive Order 13599 as the Government of Iran. OFAC is amending section 560.543 of the ITSR to authorize the sale of personal property in Iran and the transfer of related proceeds to the United States, subject to the same conditions and limitations applicable to sales of real property.

Section 560.543 of the ITSR, as amended, does not authorize transactions that would be prohibited by a different sanctions program administered by OFAC, such as transactions with SDNs designated under E.O. 13224 or E.O. 13382 (OFAC's counterterrorism or counterproliferation authorities). [11-05-2018]

641. If a country with primary jurisdiction over a foreign financial institution did not receive a significant reduction exception (SRE) under section 1245(d)(4)(D) of the NDAA 2012, can funds currently held at the foreign financial institution in that country on behalf of the Central Bank of Iran be used to facilitate humanitarian trade with Iran?

Yes. Transactions for the sale of agricultural commodities, food, medicine, or medical devices to Iran involving the Central Bank of Iran are excepted from the relevant sanctions under section 1245(d)(2) of the NDAA 2012 and sections 561.203 and 561.204 of the Iranian Financial Sanctions Regulations (31 C.F.R. Part 561) (IFSR), regardless of whether the country has received an SRE. In addition, funds held on behalf of a non-designated Iranian financial institution at a foreign financial institution generally would not be subject to U.S. secondary sanctions and could be used to facilitate humanitarian trade. [11-05-2018]

642. Is the provision of certain associated services relating to the purchase of petroleum or petroleum products from Iran by persons in a country that has been granted a SRE sanctionable?

Many U.S. sanctions related to Iran include an exception for countries that have received a SRE under section 1245(d)(4)(D) of the NDAA 2012 (see https://www.treasury.gov/resource-center/faqs/Sanctions/Pages/faq_iran.aspx#tra_504 for additional information regarding the implementation of the SRE and sanctionable transactions). To the extent the purchase of petroleum or petroleum products from Iran and the processing of the related financial transactions meet the requirements set out in section 1245(d)(4)(D) of the NDAA 2012, the services used to import the petroleum from Iran including services provided by the shipping sector of Iran and Iranian port operators would not be sanctionable pursuant to the Iran Freedom and Counter-Proliferation Act of 2012 (IFCA), provided that Iranian entities that are involved in such transactions are not designated in connection with Iran's support for international terrorism, or its proliferation of weapons of mass destruction or their means of delivery. (see https://www.treasury.gov/resource-center/faqs/Sanctions/Pages/faq_iran.aspx#ifca for additional information). [11-05-2018]

643. Is payment of Iran-related insurance or reinsurance claims made on or after November 5, 2018 sanctionable if the claim arises from an incident that occurred prior to November 5, 2018?

https://www.treasury.gov/resource-center/faqs/Sanctions/Pages/faq_iran.aspx

Payment of Iran-related insurance or reinsurance claims arising from incidents that occurred prior to November 5, 2018 could create sanctions exposure for non-U.S. persons to the extent such payment involves a person designated in connection with Iran's proliferation of WMD or support for international terrorism, or an Iranian person on the SDN List, other than a non-designated Iranian financial institution, or if the underlying activity involved such persons or was otherwise sanctionable at the time it occurred.

U.S. persons continue to be generally prohibited under the ITSR from exporting goods, services, or technology directly or indirectly to Iran, including participating in the payment of claims to or for the benefit of Iran or any persons blocked under the ITSR, or for the transportation of Iranian-origin oil, unless exempt or specifically authorized by OFAC. In addition, after November 4, 2018, to the extent a claim payment involves a U.S.-owned or -controlled foreign entity, the payment of such claim would be prohibited and would require an authorization from OFAC prior to payment.

See [FAQ 102](#) and [FAQ 103](#) for additional information relating to U.S. person involvement in global insurance policies and [FAQ 303](#) and [FAQ 304](#) for additional information on secondary sanctions, and exceptions to these sanctions, such as the humanitarian exception, relating to insurance, reinsurance, or underwriting activities relating to Iran. [11-05-2018]

644. Is an entity that is owned or controlled by a U.S. person and established or maintained outside the United States (a "U.S.-owned or -controlled foreign entity") required to apply restrictions akin to blocking on the property or interests in property of persons subject to section 560.211 of the ITSR?

Yes. Under section 560.215 of the ITSR, U.S.-owned or -controlled foreign entities are 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 by the ITSR if engaged in by a U.S. person or in the United States. Section 560.211 of the ITSR separately prohibits transferring, paying, exporting, withdrawing, and dealing in any property and interests in property of the Government of Iran, any Iranian financial institution, and any other persons whose property and interests in property are blocked pursuant to the ITSR, unless exempt or authorized by OFAC.

In light of these prohibitions, U.S.-owned or -controlled foreign entities are required to apply restrictions akin to blocking on any property or interests in property of persons subject to section 560.211 of the ITSR to ensure that such property and interests in property are not transferred, paid, exported, withdrawn, or otherwise dealt in. This requirement applies both with respect to a person whose property and interests in property are blocked solely pursuant to the ITSR and a person whose property and interests in property are blocked pursuant to the ITSR and another authority (e.g., when a person is included on the List of Specially Designated Nationals and Blocked Persons with the "[IRAN]" tag, as well as a tag for another sanctions program, such as the terrorism tag ("[SDGT]"), nuclear proliferation tag ("[NPWMD]"), or human rights tag ("[IRAN-TRA]" or "[IRAN-HR]").

Section 560.215(b)(1) of the ITSR deems an entity to be "owned or controlled" by a U.S. person if the U.S. person holds a 50 percent or greater equity interest by vote or value in the entity; holds a majority of seats on the board of directors of the entity; or otherwise controls the actions, policies, or personnel decisions of the entity. [11-05-2018]

645. How will the re-imposition of sanctions on November 5, 2018 impact the provision of specialized financial messaging services to Iranian financial institutions?

Following the re-imposition of U.S. sanctions on November 5, 2018, sanctions that had previously been lifted or waived as part of U.S. commitments under the Joint Comprehensive Plan of Action (JCPOA) will come back into effect in their entirety, including sanctions on the provision of specialized financial messaging services to certain Iranian financial institutions.

As of November 5, 2018, sanctions on the provision of specialized financial messaging services set forth in section 220 of the Iran Threat Reduction and Syria Human Rights Act of 2012 (TRA) snap back in full. This authority provides for sanctions on specialized financial messaging services to the Central Bank of Iran or Iranian financial institutions designated in connection with Iran's support for terrorism or its proliferation of weapons of mass destruction (WMD) and WMD delivery systems, as set out in subsection 104(c)(2)(E)(ii) of the Comprehensive Iran Sanctions, Accountability, and Divestment Act of 2010 (CISADA) (see section 220 of the TRA). Such Iranian financial institutions are listed on the SDN List and carry the "[IFSR]" tag.

Furthermore, knowingly providing significant financial, material, technological, or other support to Iranian persons on the SDN List, other than Iranian financial institutions blocked solely pursuant to E.O. 13599 and listed on the SDN List with only the "[IRAN]" tag, is sanctionable for persons in countries that have not received a significant reduction exception (see subsection 1244(c)(1) of IFCA).

To avoid potential sanctions exposure, providers of specialized financial messaging services should discontinue the provision of such services to the Central Bank of Iran and any Iranian financial institutions designated in connection with Iran's WMD proliferation, support for terrorism, or human rights abuses. The Central Bank of Iran and such designated Iranian financial institutions will have "Subject to Secondary Sanctions" listed in the "Identifications" feature in their entry on the SDN List.

Given that the U.S. government will continue to apply maximum financial pressure on the Iranian regime, including potential additional designations of Iranian financial institutions, the SDN List should be consulted regularly to determine which Iranian financial institutions have been designated. [11-05-2018]

Frequently Asked Questions Regarding Executive Order (E.O.) "Imposing Sanctions with Respect to the Iron, Steel, Aluminum, and Copper Sectors of Iran" of May 8, 2019

666. What does the Executive Order Imposing Sanctions with Respect to the Iron, Steel, Aluminum, and Copper Sectors of Iran of May 8, 2019 do?

The [Executive Order](#) of May 8, 2019 authorizes sanctions with respect to the iron, steel, aluminum, and copper sectors of Iran.

Section 1 of the E.O. of May 8, 2019 authorizes blocking sanctions on any person determined by the Secretary of the Treasury, in consultation with the Secretary of State:

(i) to be operating in the iron, steel, aluminum, or copper sector of Iran, or to be a person that owns, controls, or operates an entity that is part of the iron, steel, aluminum, or copper sector of Iran;

(ii) to have knowingly engaged, on or after the effective date of the order, in a significant 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;

(iii) to have knowingly engaged, on or after the effective date of the order, in a significant transaction for the purchase, acquisition, sale, transport, or marketing of iron, iron products, aluminum, aluminum products, steel, steel products, copper, or copper products from Iran;

(iv) to have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of any person whose property and interests in property are blocked pursuant to section 1; or

(v) 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 section 1.

Section 2 of the E.O. of May 8, 2019 authorizes correspondent and payable-through account sanctions on foreign financial institutions (FFIs) determined to have knowingly conducted or facilitated any significant financial transaction:

(i) 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;

(ii) 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

(iii) for or on behalf of any person whose property and interests in property are blocked pursuant to the order.

Sections 3-13 of the E.O. of May 8, 2019 contain exceptions, definitions, and other implementing provisions related to the sanctions. [05-08-2019]

667. When does Executive Order Imposing Sanctions with Respect to the Iron, Steel, Aluminum, and Copper Sectors of Iran become effective?

The [E.O. of May 8, 2019](#) became effective upon signing. [05-08-2019]

668. Is there a wind-down period?

Yes. Persons engaged in transactions that could be sanctioned under the [Executive Order Imposing Sanctions with Respect to the Iron, Steel, Aluminum, and Copper Sectors of Iran of May 8, 2019](#) will have a 90-day period to wind down those transactions without exposure to sanctions under the E.O. of May 8, 2019. Those persons should take the necessary steps to wind down transactions by the end of the 90-day wind-down period to avoid exposure to sanctions. Entering into new business that would be sanctionable under the E.O. of May 8, 2019 (the effective date of the E.O.) will not be considered wind-down activity and could be sanctioned even during the wind-down period. [05-08-2019]

669. Does the Executive Order Imposing Sanctions with Respect to the Iron, Steel, Aluminum, and Copper Sectors of Iran expand upon existing sanctions relating to trade with Iran in certain raw and semi-finished metals, such as aluminum and steel?

Yes. The [E.O. of May 8, 2019](#) expands upon existing sanctions under section 1245 of IFCA on the sale, supply, or transfer, directly or indirectly, to or from Iran of certain materials, including raw and semi-finished metals such as aluminum and steel, as described in subsections 1245(a)(1)(B) or (C) of IFCA.

In addition, the E.O. of May 8, 2019 explicitly targets the iron and copper sectors of Iran. [05-08-2019]

670. Are there exceptions to the sanctions imposed under E.O. of May 8, 2019?

Yes. The sanctions authorized under the [E.O. of May 8, 2019](#) do not apply to transactions for the conduct of the official business of the United States Government or the United Nations (including its specialized agencies, programmes, funds, and related organizations) by employees, grantees, or contractors thereof. [05-08-2019]

671. What is the definition of significant?

The Department of the Treasury anticipates adopting the interpretation of "significant" set out in 31 C.F.R. § 561.404. See existing OFAC Iran [FAQ 289](#). [05-08-2019]

[Return to the OFAC FAQ Index](#)

U.S. DEPARTMENT OF THE TREASURY

Resource Center

Publication of Updates to OFAC's Specially Designated Nationals and Blocked Persons List and 13599 List Removals

11/5/2018

OFFICE OF FOREIGN ASSETS CONTROL

Sanctions List Updates:

The following individuals have been added to OFAC's SDN List:

BAHADORI, Masoud; nationality Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Passport T12828814 (Iran); Managing Director, Petro Suisse Intertrade Company (individual) [IRAN].

BATENI, Naser; DOB 16 Dec 1962; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male (individual) [IRAN].

BAZARGAN, Farzad; DOB 03 Jun 1956; Additional Sanctions Information - Subject to Secondary Sanctions; Passport D14855558 (Iran); alt. Passport Y21130717 (Iran); Managing Director, Hong Kong Intertrade Company (individual) [IRAN].

BEHZAD, Morteza Ahmadali (a.k.a. BEHZAD, Morteza; a.k.a. BEHZADI, Morteza); DOB 1959; alt. DOB 1960; POB Yazd, Iran; nationality Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male; National ID No. 4432151609 (Iran) (individual) [NPWMD] [IFSR] (Linked To: PISHRO SYSTEMS RESEARCH COMPANY).

CAMBIS, Dimitris (a.k.a. KAMPIS, Dimitrios Alexandros; a.k.a. "KLIMT, Gustav"); DOB 14 Oct 1963; Additional Sanctions Information - Subject to Secondary Sanctions (individual) [IRAN].

CHAGHAZARDY, Mohammad Kazem (a.k.a. CHAGHAZARDI, Mahammadkazem; a.k.a. CHAGHAZARDY, MohammadKazem); DOB 21 Jan 1962; nationality Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male (individual) [NPWMD] [IFSR] (Linked To: BANK SEPAH).

DAJMAR, Mohammad Hossein; DOB 19 Feb 1956; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male (individual) [IRAN].

ESLAMI, Mansour; DOB 21 Jan 1965; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male; Passport H37045909 (Iran) (individual) [IRAN].

GHALEBANI, Ahmad (a.k.a. GHALEHBANI, Ahmad; a.k.a. QALEHBANI, Ahmad); DOB 01 Jan 1953 to 31 Dec 1954; Additional Sanctions Information - Subject to Secondary Sanctions; Passport H20676140 (Iran); Managing Director, National Iranian Oil Company; Director, Hong Kong Intertrade Company; Director, Petro Suisse Intertrade Company (individual) [IRAN].

JASHNSAZ, Seifollah (a.k.a. JASHN SAZ, Seifollah; a.k.a. JASHNSAZ, Seyfollah); DOB 22 Mar 1958; POB Behbahan, Iran; nationality Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Passport R17589399 (Iran); alt. Passport T23700825 (Iran); Chairman & Director, Naftiran Intertrade Co. (NICO) Sarl; Chairman & Director, Naft Iran Intertrade Company Ltd.; Director, Hong Kong Intertrade Company; Chairman of the Board of Directors, Iranian Oil Company (U.K.) Limited; Chairman & Director, Petro Suisse Intertrade Company (individual) [IRAN].

KHALILI, Jamshid; DOB 23 Sep 1957; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male; Passport Y28308325 (Iran) (individual) [IRAN].

KHOSROWTAJ, Mojtaba; DOB 09 Nov 1952; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male; Passport D9016371 (Iran) (individual) [IRAN].

MOHADDES, Seyed Mahmoud; DOB 07 Jun 1957; citizen Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Managing Director, Iranian Oil Company (U.K.) Ltd. (individual) [IRAN].

MOINIE, Mohammad; DOB 04 Jan 1956; POB Brojerd, Iran; citizen United Kingdom; Additional Sanctions Information - Subject to Secondary Sanctions; Passport 301762718 (United Kingdom); Commercial Director, Naftiran Intertrade Company Sarl (individual) [IRAN].

NIKOUSOKHAN, Mahmud; DOB 01 Jan 1961 to 31 Dec 1962; nationality Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Passport U14624657 (Iran); Finance Director, National Iranian Oil Company; Director, Hong Kong Intertrade Company; Director, Petro Suisse Intertrade Company (individual) [IRAN].

PARSAEI, Reza; DOB 09 Aug 1963; citizen Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Director, NIOC International Affairs (London) Ltd. (individual) [IRAN].

POURANSARI, Hashem; nationality Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Passport B19488852 (Iran); Managing Director, Asia Energy General Trading (individual) [IRAN].

REZVANIYANZADEH, Mohammed Reza (a.k.a. REZVANIYANZADE, Mohammad Reza; a.k.a. REZVANIYANZADEH, Mohammad Reza; a.k.a. REZVANIYANZADEH, Mohammadreza); DOB 11 Dec 1969; POB Ardestan, Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male; Passport G10506469 (Iran) expires 12 Dec 2022 (individual) [IRAN] (Linked To: ATOMIC ENERGY ORGANIZATION OF IRAN).

SAEEDI, Mohammed; DOB 22 Nov 1962; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male; Passport W40899252 (Iran) (individual) [IRAN].

SAFDARI, Seyed Jaber (a.k.a. SAFDARI, Sayyed Jaber; a.k.a. SAFDARI, Seyyed Jaber); DOB 1968 to 1969; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male (individual) [IRAN] (Linked To: ADVANCED TECHNOLOGIES COMPANY OF IRAN).

SEYYEDI, Seyed Nasser Mohammad; DOB 21 Apr 1963; citizen Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Passport B14354139 (Iran); alt. Passport L18507193 (Iran); alt. Passport X95321252 (Iran); Managing Director, Sima General Trading (individual) [IRAN].

SURI, Muhammad; DOB 01 Jan 1946 to 31 Dec 1946; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male (individual) [IRAN].

TABATABAEI, Seyyed Mohammad Ali Khatibi; DOB 27 Sep 1955; citizen Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Director, NIOC International Affairs (London) Ltd.; Director of International Affairs, NIOC (individual) [IRAN].

YAZDAN JOO, Mohammad Ali; DOB 03 Jun 1962; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male (individual) [IRAN].

YOUSEFPOUR, Ali; DOB 01 Jan 1955 to 31 Dec 1955; Additional Sanctions Information - Subject to Secondary Sanctions; Gender Male (individual) [IRAN].

ZIRACCHIAN ZADEH, Mahmoud; DOB 24 Jul 1959; citizen Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Director, Iranian Oil Company (U.K.) Ltd. (individual) [IRAN].

The following entities have been added to OFAC's SDN List:

A.S.P. BUILDERS, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

AA ENERGY FZCO, United Arab Emirates; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

ADVANCED TECHNOLOGIES COMPANY OF IRAN (f.k.a. GHANI SAZI ENRICHMENT; f.k.a. IRANIAN ENRICHMENT COMPANY; a.k.a. "ADVANCED TECHNOLOGIES"; a.k.a. "ADVANCED TECHNOLOGIES COMPANY"; a.k.a. "ADVANCED TECHNOLOGIES HOLDING COMPANY"; a.k.a. "IATC"), Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: ATOMIC ENERGY ORGANIZATION OF IRAN).

AEOI BASIJ RESISTANCE CENTER (a.k.a. BASIJ RESISTANCE CENTER OF THE AEOI), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: ATOMIC ENERGY ORGANIZATION OF IRAN).

AGRICULTURAL, MEDICAL, AND INDUSTRIAL RESEARCH CENTER (a.k.a. KARAJ NUCLEAR RESEARCH CENTER FOR AGRICULTURE AND MEDICINE; f.k.a. NUCLEAR RESEARCH CENTER FOR AGRICULTURE AND MEDICINE; a.k.a. "AMIRC"; f.k.a. "NRCAM"), Karaj, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NUCLEAR SCIENCE AND TECHNOLOGY RESEARCH INSTITUTE).

AMIN INVESTMENT BANK (a.k.a. AMINIB), No. 51 Ghobadiyan Street, Valiasr Street, Tehran 1968917173, Iran; Website <http://www.aminib.com> [IRAN].

ARASH SHIPPING ENTERPRISES LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone (357)(22660766); Fax (357)(22678777) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ARIAN BANK, House 103, Shir Ali Khan Street, Charahi Torabaz Khan, District 10, Kabul, Afghanistan; Sherpoor, Hajj and religious affairs directorate Square, Etisalat Street, Kabul, Afghanistan; Opposite of Attorney General, Hanzala Mosque Road, Shahre now, Kabul, Afghanistan; PO Box 5810, Afghanistan; Ferdawsi Street (old telecommunication street), Between Alley 12 & 14, Herat, Afghanistan; SWIFT/BIC AFABAFKA; Website www.arian-bank.com.af; Additional Sanctions Information - Subject to Secondary Sanctions; All Offices Worldwide [SDGT] [IFSR] (Linked To: BANK MELLI IRAN).

ARJAN ELECTRICITY AND ENERGY GENERATION MANAGEMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

ARMAN RESOURCES EQUIP AND SUPPORT MANAGEMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

ARTA SHIPPING ENTERPRISES LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone (357)(22660766); Fax (357)(22678777) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ASAN SHIPPING ENTERPRISE LIMITED, 85 St. John Street, Valletta VLT 1165, Malta; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone (356)(21241817); Fax (356)(25990640) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ASCOTEC HOLDING GMBH (f.k.a. AHWAZ STEEL COMMERCIAL & TECHNICAL SERVICE GMBH ASCOTEC; f.k.a. AHWAZ STEEL COMMERCIAL AND TECHNICAL SERVICE GMBH ASCOTEC; a.k.a. ASCOTEC GMBH), Tersteegen Strasse 10, Dusseldorf 40474, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Registration ID HRB 26136 (Germany); all offices worldwide [IRAN].

ASCOTEC JAPAN K.K., 8th Floor, Shiba East Building, 2-3-9 Shiba, Minato-ku, Tokyo 105-0014, Japan; Additional Sanctions Information - Subject to Secondary Sanctions; all offices worldwide [IRAN].

ASCOTEC MINERAL & MACHINERY GMBH (a.k.a. ASCOTEC MINERAL AND MACHINERY GMBH; f.k.a. BREYELLER KALTBAND GMBH), Tersteegenstr. 10, Dusseldorf 40474, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Registration ID HRB 55668 (Germany); all offices worldwide [IRAN].

ASCOTEC SCIENCE & TECHNOLOGY GMBH (a.k.a. ASCOTEC SCIENCE AND TECHNOLOGY GMBH), Tersteegenstrasse 10, Dusseldorf D 40474, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Registration ID HRB 58745 (Germany); all offices worldwide [IRAN].

ASCOTEC STEEL TRADING GMBH (a.k.a. ASCOTEC STEEL), Tersteegenstr. 10, Dusseldorf 40474, Germany; Georg-Glock-Str. 3, Dusseldorf 40474, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Registration ID HRB 48319 (Germany); all offices worldwide [IRAN].

ASIA ENERGY GENERAL TRADING (LLC), Suite 703, Twin Tower, Baniyas Street, Deira, Dubai, United Arab Emirates; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

ATIEH SAZAN DAY, No. 12, Taheri Street, Africa Blvd, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [SDGT] [IFSR] (Linked To: DAY BANK).

ATLANTIC SHIPPING & TRANS (a.k.a. ATLANTIC SHIPPING AND TRANS; a.k.a. ATLANTIC SHIPPING AND TRANSPORTATION LIMITED), East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ATLAS KIAN QESHM (a.k.a. ATLAS SHIPPING; a.k.a. ATLAS SHIPPING COMPANY), No. 44, East Atefi Ave., Nelsonmandella Blvd., Tehran, Iran; Website <http://nitcshipping.com>; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ATOMIC ENERGY ORGANIZATION OF IRAN (a.k.a. AEOI), North kargar street, P.O. Box 14155-1339, Tehran, Iran; Website <http://www.aeoi.org.ir>; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

ATOMIC FUEL DEVELOPMENT ENGINEERING COMPANY (a.k.a. ENERGY NOVIN INDUSTRIAL DEVELOPMENT; a.k.a. MATSA COMPANY; a.k.a. "ENID"; a.k.a. "MATSA"), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: ATOMIC ENERGY ORGANIZATION OF IRAN).

AYANDEH BANK, Ayandeh Bank Bldg. Floor 1, 15 Shahid Ahmadian St. (15th St.) Ahmad Ghasir (Bucharest) Ave, Tehran, Iran; SWIFT/BIC AYBKIRTH; Additional Sanctions Information - Subject to Secondary Sanctions; All Offices Worldwide [IRAN-TRA] (Linked To: ISLAMIC REPUBLIC OF IRAN BROADCASTING).

AZAR INVESTMENT, Iran [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

AZAR PAD QESHM (a.k.a. AZARPAD QESHM; a.k.a. AZARPAD QESHM CO; a.k.a. "APCO"), East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; No. 303, Mahtab Building, Pardis Cross Road, Golden City, Qeshm, Iran; No. 44, East Atefi St., Africa Blvd., Tehran, Iran; Website <http://nitcshipping.com>; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

AZERBAIJAN CONSTRUCTION, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

BAGHMISHEH RESIDENTIAL DEVELOPMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

BANCO INTERNACIONAL DE DESARROLLO, C.A. (a.k.a. "BID"), Urb. El Rosal, Av. Francisco de Miranda Edificio Dozsa - Piso 8, C.P. 1060, Caracas, Venezuela; SWIFT/BIC IDUNVECA; Website www.bid.com.ve; Additional Sanctions Information - Subject to Secondary Sanctions [SDGT] [IFSR] (Linked To: EXPORT DEVELOPMENT BANK OF IRAN).

BANDAR IMAM PETROCHEMICAL COMPANY, North Kargar Street, Tehran, Iran; Mahshahr, Bandar Imam, Khuzestan Province, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

BANK KARGOSHAEE, 587 Mohammadiye Square, Mowlavi Street, Tehran, Iran; Mohamadiyeh Square, Tehran 11986, Iran; Additional Sanctions Information - Subject to Secondary Sanctions; All Offices Worldwide [SDGT] [IFSR] (Linked To: BANK MELLI IRAN).

BANK KESHAVARZI IRAN (a.k.a. AGRICULTURAL BANK OF IRAN; a.k.a. BANK KESHAVARZI), PO Box 14155-6395, 129 Patrice Lumumba St, Jalal-al-Ahmad Expressway, Tehran 14454, Iran; all offices worldwide [IRAN].

BANK MARKAZI JOMHOURI ISLAMI IRAN (a.k.a. BANK MARKAZI IRAN; a.k.a. CENTRAL BANK OF IRAN; a.k.a. CENTRAL BANK OF THE ISLAMIC REPUBLIC OF IRAN), PO Box 15875/7177, 144 Mirdamad Blvd, Tehran, Iran; 213 Ferdowsi Avenue, Tehran 11365, Iran; Additional Sanctions

Information - Subject to Secondary Sanctions [IRAN].

BANK MASKAN (a.k.a. HOUSING BANK (OF IRAN)), PO Box 11365/5699, No 247 3rd Floor Fedowski Ave, Cross Sarhang Sakhaei St, Tehran, Iran; all offices worldwide [IRAN].

BANK MELLI IRAN (a.k.a. BANK MELLI; a.k.a. MELLI BANK; a.k.a. NATIONAL BANK OF IRAN; a.k.a. "BMI"), Ferdowsi Avenue - PO Box 11365-171, Tehran, Iran; 43 Avenue Montaigne, Paris 75008, France; Room 704-6, Wheelock Hse, 20 Pedder St, Hong Kong; Bank Melli Iran Bldg, 111 St 24, 929 Arasat, Baghdad, Iraq; PO Box 2643, Ruwi, 112, Muscat, Oman; PO Box 2656, Liva Street, Abu Dhabi, United Arab Emirates; PO Box 248, Hamad Bin Abdulla St, Fujairah, United Arab Emirates; PO Box 1888, Clock Tower, Industrial Rd, Al Ain Club Bldg, Al Ain, Abu Dhabi, United Arab Emirates; PO Box 1894, Baniyas St, Deira, Dubai, United Arab Emirates; PO Box 5270, Oman Street Al Nakheel, Ras Al-Khaimah, United Arab Emirates; PO Box 459, Al Borj St, Sharjah, United Arab Emirates; PO Box 3093, Ahmed Seddiqui Bldg, Khalid Bin El-Walid St, Bur-Dubai, Dubai, United Arab Emirates; PO Box 1894, Al Wasl Rd, Jumeirah, Dubai, United Arab Emirates; Postfach 112 129, Holzbruecke 2, 20421, Hamburg, Germany; 23 Nobel Avenue, Baku, Azerbaijan; Bank Melli Iran Building, Ferdowsi Avenue, Tehran 11365-144, Iran; No. 136 Mirdamad Boulevard, Opposite Al-ghadir Mosque, Tehran, Iran; Al Ashar Estiqlal Street - Hal Al Zohor, Basra, Iraq; 98a Kensington High Street, London W8 4SG, United Kingdom; 767 5th Ave, 44th Fl, New York, NY 10153, United States; PO Box 1420, New York, NY 10153, United States; Website www.bmi.ir; Additional Sanctions Information - Subject to Secondary Sanctions; All Offices Worldwide [IRAN] [SDGT] [IFSR] (Linked To: ISLAMIC REVOLUTIONARY GUARD CORPS (IRGC)-QODS FORCE).

BANK OF INDUSTRY AND MINE (a.k.a. BANK OF INDUSTRY & MINE; a.k.a. BANK SANAD VA MADAN; a.k.a. "BIM"), 1655 Vali-E-Asr After Chamran Crossroad, Tehran, Iran; PO Box 15875-4456, Firouzeh Tower, No 2917 Vali-Asr Ave (after Chamran Crossroads), Tehran 1965643511, Iran; SWIFT/BIC BOIMIRTH; Website www.bim.ir; Additional Sanctions Information - Subject to Secondary Sanctions; Registration Number 38705 (Iran); All Offices Worldwide [IRAN] [NPWMD] [IFSR] (Linked To: BANK SEPAH).

BANK REFAH KARGARAN (a.k.a. BANK REFAH; a.k.a. WORKERS' WELFARE BANK (OF IRAN)), No. 40 North Shiraz Street, Mollasadra Ave, Vanak Sq, Tehran 19917, Iran; all offices worldwide [IRAN].

BANK SEPAH INTERNATIONAL PLC, 5/7 Eastcheap, EC3M 1JT, London, United Kingdom; SWIFT/BIC SEPBGB2L; Website www.banksepah.co.uk; alt. Website www.banksepah.com; Additional Sanctions Information - Subject to Secondary Sanctions [NPWMD] [IFSR] (Linked To: BANK SEPAH).

BANK SEPAH, Negin Sepah Building, Head Office of Bank Sepah, Nowrouz Street, Africa Hwy, Argentina Square, Tehran, Iran; 6th Floor, Negin Sepah Building, Nowrouz St., Africa Hwy., Argentina Sq., Tehran 1519662840, Iran; Imam Khomeini Square - PO Box 11364, Tehran, Iran; Hafenstrasse 54, D-60327, Frankfurt am Main, Germany; PO Box 110261, Frankfurt am Main, Hessen 60037, Germany; 20 Rue Auguste Vacquerie, Paris 75016, France; Via Barberini 50, Rome 00187, Italy; SWIFT/BIC SEPBIRTH; Website www.banksepah.ir; alt. Website www.banksepah.de; Additional Sanctions Information - Subject to Secondary Sanctions; Registration Number 4293; All Offices Worldwide [IRAN] [NPWMD] [IFSR] (Linked To: MINISTRY OF DEFENSE FOR ARMED FORCES LOGISTICS).

BANK TEJARAT (a.k.a. TEJARAT BANK), 152 Taleghani Avenue, Tehran, Iran; No. 247, Taleghani Avenue, Tehran, Iran; PO Box 11365-3139, 130 Taleghani Avenue, Tehran, Iran; PO Box 1598617818, Tehran, Iran; PO Box 71345, Karim Khan Zand Blv, Nouri Ave, Opposite Eram Hotel, Shiraz, Iran; 124-126 Rue de Provence, (Angle 76 bd Haussmann), Paris 75008, France; PO Box 734001, Rudaki Ave 88, Dushanbe 734001, Tajikistan; Office C208, Beijing Lufthansa Center No 50, Liangmaqiao Rd, Chaoyang District, Beijing 100016, China; PO Box 119871, 4th Floor, c/o Persia International Bank PLC, The Gate Bldg, Dubai, United Arab Emirates; Esfahan Region Management Bldg, Sheikh Bahayee Ave & Abuzar St Junction, Esfahan, Iran; SWIFT/BIC BTEJIRTH; Website www.tejaratbank.ir; Additional Sanctions Information - Subject to Secondary Sanctions; Registration Number 38027; alt. Registration Number 8828215; All Offices Worldwide [IRAN] [SDGT] [NPWMD] [IFSR] (Linked To: MAHAN AIR; Linked To: BANK SEPAH).

BANK TORGVOY KAPITAL ZAO (a.k.a. BANK TORGVOY KAPITAL; a.k.a. BANK TORGVOY KAPITAL; a.k.a. TRADE CAPITAL BANK; a.k.a. "TC BANK"; a.k.a. "TK BANK"), 65A Timiriyezova, Minsk 220035, Belarus; SWIFT/BIC BBTBY2X; Website www.tcbank.by; Additional Sanctions Information - Subject to Secondary Sanctions; Registration Number 807000163 (Belarus) [IRAN] [SDGT] [NPWMD] [IFSR] (Linked To: BANK TEJARAT).

BANK-E SHAHR, Sepahod Gharani, Corner of Khosro St., No. 147, Tehran, Iran [IRAN].

BEHSAZ KASHANE TEHRAN CONSTRUCTION CO. (a.k.a. BEHSAZ KASHANEH CO.), No. 40, East Street Journal, North Shiraz Street, Sadra Avenue, Tehran, Iran; Website http://www.behsazco.ir; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

BEHSAZAN PARS EQUIPMENT DEVELOPMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

BEHSHAHR INDUSTRIAL DEVELOPMENT CORP., Number 8, 24 Alley, Past Motahari Street, Ghaem Magham Farahani Street, Tehran, Iran; Website www.bidc.ir; Additional Sanctions Information - Subject to Secondary Sanctions; Registration Number 14393 (Iran) [SDGT] [IFSR] (Linked To: TOSE-E MELLI GROUP INVESTMENT COMPANY).

BELIZE SHIP AND LOGISTIC LIMITED (a.k.a. BELIZE SHIP & LOGISTIC LTD; a.k.a. BELIZE SHIP AND LOGISTIC LTD), East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

BELIZE SHIPPING LINE SERVICE LIMITED (a.k.a. BELIZE SHIPPING LINE SERV LTD), East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

BIIS MARITIME LIMITED, 147/1, St. Lucia Street, Valletta VLT1185, Malta; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. C31530 (Malta) [IRAN].

BIMEH IRAN INSURANCE COMPANY (U.K.) LIMITED (a.k.a. BIUK), 4/5 Fenchurch Buildings, London EC3M 5HN, United Kingdom; Additional Sanctions Information - Subject to Secondary Sanctions; UK Company Number 01223433 (United Kingdom); all offices worldwide [IRAN].

BLUE TANKER SHIPPING SA, Care of Sambouk Shipping FCZ, Office 101, 1st Floor, FITCO Building No 3, Inside Fujairah Port, PO Box 50044, Fujairah, United Arab Emirates; Majuro MH, Marshall Islands; Liberia; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

BMIIC INTERNATIONAL GENERAL TRADING L.L.C., 705 International Business Tower, PO Box 181878, Dubai, United Arab Emirates; Additional Sanctions Information - Subject to Secondary Sanctions [SDGT] [IFSR] (Linked To: TOSE-E MELLI GROUP INVESTMENT COMPANY).

BOU ALI SINA PETROCHEMICAL COMPANY (a.k.a. BUALI SINA PETROCHEMICAL COMPANY), No. 17, 1st Floor, Daman Afshar St., Vanak Sq., Vali-e-Asr Ave, Tehran 19697, Iran; Petrochemical Special Economic Zone (PETZONE), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

BREYELLER STAHL TECHNOLOGY GMBH & CO. KG (a.k.a. BREYELLER STAHL TECHNOLOGY GMBH AND CO. KG; f.k.a. ROETZEL-STAHL GMBH & CO. KG; f.k.a. ROETZEL-STAHL GMBH AND CO. KG), Josefstrasse 82, Nettetal 41334, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Registration ID HRA 4528 (Germany); all offices worldwide [IRAN].

BUALI INVESTMENT COMPANY, No. 13, 11th (Shahab) Street, Gandy Blvd, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [SDGT] [IFSR] (Linked To: DAY BANK).

BUSHEHR SHIPPING COMPANY LIMITED, 143/1 Tower Road, Sliema, Malta; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. C 37422 (Malta) [IRAN].

CASPIAN MARITIME LIMITED, Fortuna Court, Block B, 284 Archbishop Makarios II Avenue, Limassol 3105, Cyprus; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone (357)(25800000); Fax (357)(25588055) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

CEMENT INDUSTRY INVESTMENT AND DEVELOPMENT COMPANY, Number 20, W. Nahid Street, Africa Blvd, Tehran, Iran; Website www.cidco.ir; Additional Sanctions Information - Subject to Secondary Sanctions; Registration Number 218006 (Iran) [SDGT] [IFSR] (Linked To: TOSE-E MELLI GROUP INVESTMENT COMPANY).

COMMERCIAL PARS OIL CO., 9th Floor, No. 346, Mirdamad Avenue, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

CREDIT INSTITUTION FOR DEVELOPMENT, 53 Saanee, Jahan-e Koodak, Crossroads Africa St., Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

CYLINDER SYSTEM L.T.D. (a.k.a. CILINDER SISTEM D.O.O.; a.k.a. CILINDER SISTEM D.O.O. ZA PROIZVODNJU I USLUGE), Dr. Mile Budaka 1, Slavonski Brod 35000, Croatia; 1 Mile Budaka, Slavonski Brod 35000, Croatia; Website http://www.csc-sb.hr; Additional Sanctions Information - Subject to Secondary Sanctions; Registration ID 050038884 (Croatia); Tax ID No. 27694384517 (Croatia) [IRAN].

DAMAVAND ELECTRICITY AND POWER ENGINEERING, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

DAMAVAND POWER GENERATION COMPANY, No. 6, Boostan Alley, Attar Street, N. Kurdistan Highway, Tehran, Iran; Website www.damavandpg.co.ir; Additional Sanctions Information - Subject to Secondary Sanctions [SDGT] [IFSR] (Linked To: DAY BANK).

DANA INTEGRATED SYSTEM FOR ELECTRONIC INTERACTIONS CO. (a.k.a. SAMANEHAYE YEKPARCHEH TAMOLAT ELECTRONIC DANA), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

DANESH SHIPPING COMPANY LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DARYA CAPITAL ADMINISTRATION GMBH, Schottweg 5, Hamburg 22087, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. HRB 96253 [IRAN].

DARYANAVARD KISH (a.k.a. DARYANAVARD KISH SHIPPING COMPANY; a.k.a. DARYANAVARD KISH SHIPPING COMPANY LTD.), Unit7, No. 3, Noor Alley, Nelsonmandella Blvd., Tehran, Iran; Kish Islands, Iran; Website http://nitcshipping.com; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DAVAR SHIPPING CO LTD, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone (357)(22660766); Fax (357)(22678777) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DAY BANK (a.k.a. DEY BANK), 45 Vali Asr Ave, Parvin St, Tehran 1966835611, Iran; SWIFT/BIC DAYBIRTH; Additional Sanctions Information - Subject to Secondary Sanctions; All Offices Worldwide [IRAN] [SDGT] [IFSR] (Linked To: MARTYRS FOUNDATION).

DAY BANK BROKERAGE COMPANY, No. 58, 2nd, 3rd, and 4th floors, 14th street, Khaled Istanbuli Street, Tehran, Iran; Website www.daybankbroker.com; Additional Sanctions Information - Subject to Secondary Sanctions [SDGT] [IFSR] (Linked To: DAY BANK).

DAY E-COMMERCE, No. 66, Mansour Alley, Next to Tehran Grand Hotel, Motahari Street, Tehran, Iran; Website www.dec.ir; Additional Sanctions Information - Subject to Secondary Sanctions [SDGT] [IFSR] (Linked To: DAY BANK).

DAY EXCHANGE COMPANY, No. 239, First Floor of Day Insurance Building, Mirdamad Blvd, Tehran, Iran; Website www.dayexchange.ir; Additional Sanctions Information - Subject to Secondary Sanctions [SDGT] [IFSR] (Linked To: DAY BANK).

DAY INVESTMENT (a.k.a. SARMA YE GOZARI DAY), Iran [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

DAY IRANIAN FINANCIAL AND ACCOUNTING SERVICES COMPANY, No. 4, 4th Floor, Farid Afshar Street, Shahid Dastgerdi Street, Tehran, Iran; Website <http://fsday.ir>; Additional Sanctions Information - Subject to Secondary Sanctions [SDGT] [IFSR] (Linked To: DAY BANK).

DAY LEASING COMPANY, No. 5, Shahid Dademan Street, N. Gol Afshan, W. Ivanak, Shahrak Qarb, Tehran, Iran; Website <https://leasingday.ir>; Additional Sanctions Information - Subject to Secondary Sanctions [SDGT] [IFSR] (Linked To: DAY BANK).

DENA TANKERS FZE, Free Zone, P.O. Box 5232, Fujairah, United Arab Emirates; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DIAMOND TRANSPORTATION LIMITED, East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DIMOND TRANSPORTATION LIMITED, East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

EDBI EXCHANGE BROKERAGE (a.k.a. EDBI EXCHANGE COMPANY), Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [SDGT] [IFSR] (Linked To: EXPORT DEVELOPMENT BANK OF IRAN).

EDBI STOCK BROKERAGE, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [SDGT] [IFSR] (Linked To: EXPORT DEVELOPMENT BANK OF IRAN).

EGHTESAD NOVIN BANK (a.k.a. BANK-E EGHTESAD NOVIN; a.k.a. EN BANK PJSC), Vali Asr Street, Above Vanak Circle, across Niayesh, Esfandiari Blvd., No. 24, Tehran, Iran; SWIFT/BIC BEGNIRTH [IRAN].

EIGHTH OCEAN GMBH & CO. KG (a.k.a. EIGHTH OCEAN GMBH AND CO. KG), Schottweg 5, Hamburg 22087, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. HRA 102533 [IRAN].

ELEVENTH OCEAN ADMINISTRATION GMBH, Schottweg 5, Hamburg 22087, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. HRB94632 [IRAN].

ELEVENTH OCEAN GMBH & CO. KG (a.k.a. ELEVENTH OCEAN GMBH AND CO. KG), Schottweg 5, Hamburg 22087, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. HRA 102544 [IRAN].

EMPIRE MARITIME SERVICES LIMITED, East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ESAIL SHIPPING LIMITED (a.k.a. E-SAIL SHIPPING COMPANY LTD; f.k.a. SANTEX LINES), Building 1088, Suite 1501, Pudong South Road (Shanghai Zhong Rong Plaza), Shanghai 200122, China; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. 1429927 (Hong Kong) [IRAN].

EUROPAISCH-IRANISCHE HANDELSBANK AG (a.k.a. EUROPÄISCH-IRANISCHE HANDELSBANK AKTIENGESELLSCHAFT; a.k.a. EUROPAISCH-IRANISCHE HANDELSBANK AKTIENGESELLSCHAFT), Depenau 2, Hamburg 20095, Germany; Postfach 101304, Hamburg 20008, Germany; PO Box 97415-1836, Sanaee Avenue, Kish, Iran; 28 Tandis St, Nelson Mandela Blvd. (Ex North Africa Blvd.), Tehran 19156-33383, Iran; SWIFT/BIC EIHBDH; alt. SWIFT/BIC EIHIRTH; Website www.eihbank.de; Additional Sanctions Information - Subject to Secondary Sanctions; Registration Number HRB 14604 (Germany); All Offices Worldwide [IRAN] [NPWMD] [IFSR] (Linked To: BANK OF INDUSTRY AND MINE).

EUROPE TRANSPORTATION LIMITED, East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

EXECUTION OF IMAM KHOMEINI'S ORDER (a.k.a. EIKO; a.k.a. SETAD; a.k.a. SETAD EJRAEI EMAM; a.k.a. SETAD-E EJRAEI-E FARMAN-E HAZRAT-E EMAM; a.k.a. SETAD-E FARMAN-EJRAEI-YE EMAM), Khaled Stamboli St., Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

EXPORT DEVELOPMENT BANK OF IRAN (a.k.a. BANK TOSEE SADERAT IRAN; a.k.a. BANK TOSEH SADERAT IRAN; a.k.a. BANK TOSEYEH SADERAT IRAN; a.k.a. BANK TOWSEEH SADERAT IRAN; a.k.a. IRANIAN EXPORT DEVELOPMENT BANK; a.k.a. "EDBI"), No. 26, Tosee Tower (Export Development Building), Corner of 15th Street, Ahmad Qasir Avenue, Argentina Square, Tehran 1513815111, Iran; Website www.edbi.ir; Additional Sanctions Information - Subject to Secondary Sanctions; Registration Number 86936 (Iran) [IRAN] [SDGT] [IFSR] (Linked To: MB BANK).

FANAVARAN ETEMAAD RAAHBAR CO., Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

FARADARYAY-E NIK-E GHESHM INVESTMENT (a.k.a. NIK QESHM FARA DARYA INVESTMENT COMPANY), Opposite Kimia Hotel 2, Sam & Zal Street, Qeshm, Hormozgan 7951189799, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

FARS SARPANAH, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

FIFTEENTH OCEAN GMBH & CO. KG (a.k.a. FIFTEENTH OCEAN GMBH AND CO. KG), Schottweg 5, Hamburg 22087, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. HRA 104175 [IRAN].

FIRST EAST EXPORT BANK PLC (a.k.a. FEE BANK MALAYSIA), Unit Level 10(B1), Main Office Tower, Financial Park, Jalan Merdeka, 87000 Labuan F.T., Wilayah Persekutuan, Malaysia; SWIFT/BIC FEEBMYKA; Additional Sanctions Information - Subject to Secondary Sanctions; All Offices Worldwide [SDGT] [IFSR] (Linked To: BANK MELLAT).

FIRST ISLAMIC INVESTMENT BANK LIMITED (a.k.a. "FIIB"), 19A-3A-3A, Level 31, Business Suite, UOA Centre, No. 19 Jalan, Pinang, Kuala Lumpur 50450, Malaysia; Financial Park Labuan Complex Unit 13 (C), Main Office Tower Jalan Merdeka, Labuan 87000, Malaysia; Website www.fiib.com.my; Additional Sanctions Information - Subject to Secondary Sanctions [NPWMD] [IFSR].

FIRST OCEAN ADMINISTRATION GMBH, Schottweg 5, Hamburg 22087, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. HRB94311 [IRAN].

FIRST OCEAN GMBH & CO KG (a.k.a. FIRST OCEAN GMBH AND CO KG), Schottweg 5, Hamburg 22087, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. HRA 102601 [IRAN].

FOURTEENTH OCEAN GMBH & CO. KG (a.k.a. FOURTEENTH OCEAN GMBH AND CO. KG), Schottweg 5, Hamburg 22087, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. HRA 104174 [IRAN].

FOURTH OCEAN GMBH & CO KG (a.k.a. FOURTH OCEAN GMBH AND CO KG), Schottweg 5, Hamburg 22087, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. HRA102600 [IRAN].

FUTURE AGE SHIPPING LIMITED (a.k.a. FUTURE AGE SHIPPING LTD.), East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

FUTURE BANK B.S.C. (a.k.a. FUTURE BANK; a.k.a. FUTUREBANK), Building 2577, Road 2833, Block Al-Seef 428, PO Box 785, Manama, Bahrain; Website www.futurebank.com.bh; Additional Sanctions Information - Subject to Secondary Sanctions; All Offices Worldwide [IRAN] [SDGT] [IFSR] (Linked To: BANK MELLI IRAN).

GARBIN NAVIGATION LTD, Care of Sambouk Shipping FCZ, Office 101, 1st Floor, FITCO Building No 3, Inside Fujairah Port, PO Box 50044, Fujairah, United Arab Emirates; 80 Broad Street, Monrovia, Liberia; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

GHADIR ABU MUSA HAMOON, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

GHADIR CASPIAN GILAN ENERGY, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

GHADIR CASPIAN STEEL TRADING, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

GHADIR ELECTRICITY AND ENERGY INVESTMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

GHADIR ETEZAD INVESTMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

GHADIR INDUSTRIAL TRADING, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

GHADIR INTERNATIONAL TRADING AND DEVELOPMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

GHADIR INVESTMENT AND INDUSTRY DEVELOPMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

GHADIR INVESTMENT COMPANY, 341 West Mirdamad Boulevard, Tehran, Iran; P.O. Box 19696, Tehran, Iran; Website <http://www.ghadir-invest.com>; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

GHADIR KANI ARIYA, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

GHADIR KHUZESTAN CONSTRUCTION INDUSTRY DEVELOPMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

GHADIR LAMORD ENERGY, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

GHADIR MANAGEMENT AND COMMERCIAL SERVICES, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

GHADIR MAZANDARAN ELECTRICITY AND ENERGY GENERATION, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

GHADIR MEHRIZ SOLAR ENERGY, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

GHADIR OXIN ELECTRICITY GENERATION DEVELOPMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

GHADIR PAYMAN COUNSELING ENGINEERS, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

GHADIR PETRO ARMAN KISH, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

GHADIR PISHRO ELECTRICITY GENERATION, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

GHADIR QOM SOLAR ENERGY GENERATION DEVELOPMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

GHADIR REAL-TIME SYSTEMS DEVELOPMENT (a.k.a. GHADIR TOSE-E SAAMANEHAYE BEHENGAAAM; a.k.a. "ISEEMA"), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

GHADIR SOLAR ELECTRICITY AND ENERGY, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

GHADIR TEHRAN ELECTRICITY AND ENERGY GENERATION DEVELOPMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

GHAED BASSIR PETROCHEMICAL PRODUCTS COMPANY (a.k.a. GHAED BASSIR), No. 15, Palizvani (7th) Street, Gandhi (South) Avenue, Tehran 1517655711, Iran; Km 10 of Khomayen Road, Golpayegan, Iran; Website <http://www.gbpc.net>; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

GHAERZOLHASANEH RESALAT BANK, Beside the No. 1 Baghestan Alley, Saadat Abad Ave., Kaj Sq., Tehran, Iran; All offices worldwide [IRAN].

GHAVAMIN BANK (a.k.a. BANK QAVAMIN; f.k.a. GHAVAMIN FINANCIAL & CREDIT INS.; a.k.a. QAVAMIN BANK; a.k.a. QAVVAMIN BANK), Ghavamin Tower, Argentina Sq., Tehran, Iran; Website www.ghbi.ir; Additional Sanctions Information - Subject to Secondary Sanctions; Registration Number 397957 (Iran) [IRAN] [IRAN-HR] (Linked To: LAW ENFORCEMENT FORCES OF THE ISLAMIC REPUBLIC OF IRAN).

GHEHSHM SHIPPING LINES MARINE AND ENGINEERING SERVICES CO (a.k.a. IMSENGCO; a.k.a. IRISL MARINE SERVICES; a.k.a. IRISL MARINE SERVICES AND ENGINEERING COMPANY), Iran shahr Street 221, Karimkhan Zand Avenue, Tehran, Iran; Website www.imsengco.com; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

GILAN ELECTRICITY GENERATION MANAGEMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

GILAN ELECTRICITY TRANSMISSION DEVELOPMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

GLOBAL AGE LIMITED, East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

GLOBAL UNITED SHIPPING LIMITED (a.k.a. GLOBAL UNITED SHIPPING LTD-BZE), East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

GOLDEN ENTERPRISE SHIPPING LIMITED (a.k.a. GOLDEN ENTERPRISE SHIPPING LTD), East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

GOLDEN RESOURCES TRADING COMPANY L.L.C. (a.k.a. "GRTC"), 9th Floor, Office No. 905, Khalid Al Attar Tower 1, Sheikh Zayed Road, After Crown Plaza Hotel, Al Wasl Area, Dubai, United Arab Emirates; Postal Box 34489, Dubai, United Arab Emirates; Postal Box 14358, Dubai, United Arab Emirates; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

GRACE BAY SHIPPING INC, Care of Sambouk Shipping FCZ, 1st Floor, FITCO Building No 3, Inside Fujairah Port, PO Box 50044, Fujairah, United Arab Emirates; Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro MH96960, Marshall Islands; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

HADI SHIPPING COMPANY LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HAFEZ DARYA ARYA SHIPPING COMPANY (a.k.a. HAFEZ DARYA ARYA SHIPPING LINE; a.k.a. HAFEZ-E DARYAY-E ARIA SHIPPING LINES; f.k.a. HAFIZ DARYA SHIPPING COMPANY; f.k.a. HAFIZ-E-DARYA SHIPPING LINES; a.k.a. HDAS CO.; f.k.a. HDAS LINES; a.k.a. HDASCO; a.k.a. HDASCO SHIPPING COMPANY; f.k.a. HDS LINES; f.k.a. HDLS; f.k.a. HDLSINES CO.), Asseman Tower, Pasdaran Street, Tehran, Iran; No 60, Pasdaran Avenue, 7th Neyestan Street, Ehteshamiyeh Square, Tehran, Iran; Website www.hdasco.com; Additional Sanctions Information - Subject to Secondary Sanctions; Registration Number 341417 (Iran) [IRAN].

HAMOON SEPAHAN COMMERCIAL TRADING, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

HAMOON SEPAHAN INVESTMENT, Iran [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

HAMOON SEPAHAN MANAGEMENT SERVICES, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

HARAZ SHIPPING COMPANY LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HATEF SHIPPING COMPANY LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HEKMAT IRANIAN BANK (a.k.a. BANK-E HEKMAT IRANIAN), Argentine Circle, beginning of Africa St., Corner of 37th St., (Dara Cul-de-sac), No.26, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

HERCULES INTERNATIONAL SHIP, Care of Sambouk Shipping FCZ, Office 101, 1st Floor, FITCO Building No 3, Inside Fujairah Port, PO Box 50044, Fujairah, United Arab Emirates; 80 Broad Street, Monrovia, Liberia; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

HERMIS SHIPPING SA, Care of Sambouk Shipping FCZ, Office 101, 1st Floor, FITCO Building No 3, Inside Fujairah Port, PO Box 50044, Fujairah, United Arab Emirates; Panama City, Panama; Monrovia, Liberia; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

HIRMAND SHIPPING COMPANY LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HODA SHIPPING COMPANY LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HOMA SHIPPING COMPANY LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HONAR SHIPPING COMPANY LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HONG KONG INTERTRADE COMPANY, Hong Kong; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

HOOPAD DARYA SHIPPING AGENCY SERVICES (a.k.a. HOOPAD DARYA SHIPPING AGENCY COMPANY; f.k.a. SOUTH WAY SHIPPING AGENCY), No. 101, Shabnam Alley, Ghaem Magham Street, Tehran, Iran; Hoopad Darya Shipping Agency Building, B.I.K. Port Complex, Bandar Imam Khomeini, Iran; Hoopad Darya Shipping Agency Building, Imam Khomeini Blvd, Bandar Abbas, Iran; Flat No. 2, 2nd Floor, SSL Building, Coastal Blvd, Between City Hall and Post Office, Khorramshahr, Iran; Opposite to City Post Office, No. 2 Telecommunications Center, Bandar Assaluyeh, Iran; PO Box 1589673134, Tehran, Iran; Website www.hdsac.net; Additional Sanctions Information - Subject to Secondary Sanctions; Registration Number 349706 (Iran) [IRAN].

HORMOGAN ELECTRICITY AND POWER GENERATION, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

HORMOZ OIL REFINING COMPANY, Next to the Current Bandar Abbas Refinery, Bandar Abbas City, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

HTTS HANSEATIC TRADE TRUST & SHIPPING GMBH (a.k.a. HTTS HANSEATIC TRADE TRUST AND SHIPPING GMBH), Schottweg 5-7, Hamburg 22087, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. HRB 109492 [IRAN].

IHAG HOLDING AG (a.k.a. IHAG), Koenigsallee 60 D, Dusseldorf 40212, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Registration ID HRB 48032 (Germany); all offices worldwide [IRAN].

IHAG TRADING GMBH, Koenigsallee 60 D, Dusseldorf 40212, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Registration ID HRB 37918 (Germany); all offices worldwide [IRAN].

IMPIRE SHIPPING COMPANY (a.k.a. IMPIRE SHIPPING; a.k.a. IMPIRE SHIPPING LIMITED), Greece; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

INDUSTRIAL DEVELOPMENT AND RENOVATION ORGANIZATION OF IRAN (a.k.a. IDRO; a.k.a. IRAN DEVELOPMENT & RENOVATION ORGANIZATION COMPANY; a.k.a. IRAN DEVELOPMENT AND RENOVATION ORGANIZATION COMPANY; a.k.a. SAWZEMANE GOSTARESH VA NOWSAZI SANAYE IRAN), Vali Asr Building, Jam e Jam Street, Vali Asr Avenue, Tehran 15815-3377, Iran; Additional Sanctions Information - Subject to Secondary Sanctions; all offices worldwide [IRAN].

INTERNATIONAL EXPERTISE GROUP LIMITED (a.k.a. INTERNATIONAL EXPERTISE GROUP; a.k.a. INTERNATIONAL EXPERTISE GROUP LTD.), East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

INTERNATIONAL TANKER LIMITED (a.k.a. "INTERNATIONAL TANKER LTD"), East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

INTERSEAS SHIPYARD LTD, East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

INTRA CHEM TRADING GMBH (a.k.a. INTRA-CHEM TRADING CO. (GMBH)), Schottweg 3, Hamburg 22087, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Registration ID HRB48416 (Germany); all offices worldwide [IRAN].

IRAN & SHARGH COMPANY (a.k.a. IRAN AND EAST COMPANY; a.k.a. IRAN AND SHARGH COMPANY; a.k.a. IRANOSHARGH COMPANY; a.k.a. SHERKAT-E IRAN VA SHARGH), 827, North of Seyedkhandan Bridge, Shariati Street, P.O. Box 13185-1445, Tehran 16616, Iran; No. 41, Next to 23rd Alley, South Gandhi St., Vanak Square, Tehran 15179, Iran; Website <http://www.iranoshargh.com>; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

IRAN & SHARGH LEASING COMPANY (a.k.a. IRAN AND EAST LEASING COMPANY; a.k.a. IRAN AND SHARGH LEASING COMPANY; a.k.a. SHERKAT-E LIZING-E IRAN VA SHARGH), 1st Floor, No. 33, Shahid Atefi Alley, Opposite Mellat Park, Vali-e-Asr Street, Tehran 1967933759, Iran; Website <http://www.isleasingco.com>; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

IRAN AIR (a.k.a. HAVAPEYMAI MELLI IRAN; a.k.a. IRAN AIR PJSC; a.k.a. IRANAIR; a.k.a. IRANAIR CARGO; a.k.a. THE AIRLINE OF THE ISLAMIC REPUBLIC OF IRAN; a.k.a. "HOMA"), Iran Air Building, Mehrabad Airport, Tehran, Iran; Postal Box 13185-775, Tehran, Iran; Central Airlines Department of the Islamic Republic of Iran, Tehran Karaj Special Road, Beginning of Mehrabad International Airport, Tehran, Iran; Website www.iranair.com; alt. Website www.iranair.co.ir; Additional Sanctions Information - Subject to Secondary Sanctions; National ID No. 10100354259 (Iran); Registration Number 8132 [IRAN].

IRAN FOREIGN INVESTMENT COMPANY (a.k.a. IFIC), No. 4, Saba Blvd., Africa Blvd., Tehran 19177, Iran; P.O. Box 19395-6947, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions; all offices worldwide [IRAN].

IRAN INSURANCE COMPANY (a.k.a. BIMEH IRAN), 107 Dr Fatemi Avenue, Tehran 14155/6363, Iran; Abdolaziz-Al-Masaeed Building, Sheikh Maktoum St., Deira, P.O. Box 2004, Dubai, United Arab Emirates; P.O. Box 1867, Al Ain, Abu Dhabi, United Arab Emirates; P.O. Box 3281, Abu Dhabi, United Arab Emirates; P.O. Box 1666, Sharjah, United Arab Emirates; P.O. Box 849, Ras-Al-Khaimah, United Arab Emirates; P.O. Box 417, Muscat 113, Oman; P.O. Box 676, Salalah 211, Oman; P.O. Box 995, Manama, Bahrain; Al-Lami Center, Ali-Bin-Abi Taleb St. Sharafia, P.O. Box 11210, Jeddah 21453, Saudi Arabia; Al Alia Center, Salaheddine Rd., Al Malaz, P.O. Box 21944, Riyadh 11485, Saudi Arabia; Al Rajhi Bldg., 3rd Floor, Suite 23, Dhahran St., P.O. Box 1305, Dammam 31431, Saudi Arabia; Additional Sanctions Information - Subject to Secondary Sanctions; all offices worldwide [IRAN].

IRAN MERINE SERVICES, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

IRAN NUCLEAR REGULATORY AUTHORITY (a.k.a. "INRA"), Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: ATOMIC ENERGY ORGANIZATION OF IRAN).

IRAN PETROCHEMICAL COMMERCIAL COMPANY (a.k.a. PETROCHEMICAL COMMERCIAL COMPANY; a.k.a. SHERKATE BASARGANI PETROCHEMIE (SAHAMI KHASS); a.k.a. SHERKATE BAZARGANI PETROCHEMIE; a.k.a. "IPCC"; a.k.a. "PCC"), No. 1339, Vali Nejad Alley, Vali-e-Asr St., Vanak Sq., Tehran, Iran; INONU CAD. SUMER Sok., Zitas Blokleri C.2 Bloc D.H, Kozyatagi, Kadikoy, Istanbul, Turkey; Topcu Ibrahim Sokak No: 13 D: 7 Icerenkoy-Kadikoy, Istanbul, Turkey; 99-A, Maker Tower F, 9th Floor, Cuffe Parade, Colaba, Mumbai 400 005, India; No. 1014, Doosan We've Pavilion, 58, Soosong-Dong, Jongno-Gu, Seoul, Korea, South; Office No. 707, No. 10, Chao Waidajie, Chao Tang District, Beijing 100020, China; Additional Sanctions Information - Subject to Secondary Sanctions; all offices worldwide [IRAN].

IRAN ZAMIN BANK (a.k.a. BANK-E IRAN ZAMIN), Seyyed Jamal-aldin Asadabadi St., Corner of 68th St., No. 472, Tehran, Iran [IRAN].

IRANIAN MINES AND MINING INDUSTRIES DEVELOPMENT AND RENOVATION ORGANIZATION (a.k.a. IMIDRO; a.k.a. IRAN MINING INDUSTRIES DEVELOPMENT AND RENOVATION ORGANIZATION; a.k.a. IRANIAN MINES AND MINERAL INDUSTRIES DEVELOPMENT AND RENOVATION), No. 39, Sepahbod Gharani Avenue, Ferdousi Square, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions; all offices worldwide [IRAN].

IRANIAN NOVIN INDUSTRY DEVELOPMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

IRANIAN OIL COMPANY (U.K.) LIMITED (a.k.a. IOC UK LTD), Riverside House, Riverside Drive, Aberdeen AB11 7LH, United Kingdom; Additional Sanctions Information - Subject to Secondary Sanctions; UK Company Number 01019769 (United Kingdom); all offices worldwide [IRAN].

IRANIAN TITANIUM DEVELOPMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

IRANO HIND SHIPPING COMPANY LTD (a.k.a. IRAN AND INDIA SHIPPING COMPANY; a.k.a. IRAN AND INDIA SHIPPING LINES), 18 Sedaghat St, Opposite Park Millat, Vali-e-Asr Ave, PO Box 15875-4647, Tehran, Iran; Website www.iranohind.com; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

IRANO MISR SHIPPING COMPANY (a.k.a. IRAN AND EGYPT SHIPPING COMPANY; a.k.a. IRAN AND EGYPT SHIPPING LINES; a.k.a. IRANO - MISR SHIPPING CO; a.k.a. IRANO MISR; f.k.a. NEFERTITI SHIPPING AND MARITIME SERVICES), Building 6, Al Horreya Street, 1st Floor, El Attarin Area, 1016, Alexandria, Egypt; PO Box 1016, Alexandria, Egypt; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

IRAN'S NUCLEAR POWER PLANT CONSTRUCTION MANAGEMENT COMPANY (a.k.a. "MASNA"); Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: ATOMIC ENERGY ORGANIZATION OF IRAN).

IRAN-VENEZUELA BI-NATIONAL BANK (a.k.a. "IVBB"), IVBB Headquarters, 30th Alley, No. 96, Khaled Eslamboli Street, (Vozara), PO Box 15175-598, Tehran 15119-57111, Iran; Website <http://en.ivbb.ir/>; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] [SDGT] [IFSR] (Linked To: EXPORT DEVELOPMENT BANK OF IRAN).

IRASCO S.R.L. (a.k.a. IRASCO ITALY), Via Di Francia 3, Genoa 16149, Italy; Additional Sanctions Information - Subject to Secondary Sanctions; Registration ID GE 348075 (Italy); all offices worldwide [IRAN].

IRISL EUROPE GMBH, Schottweg 5, Hamburg 22087, Germany; Website www.irisl-europe.de; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. HRB 81573 [IRAN].

IRISL MARITIME TRAINING INSTITUTE (a.k.a. IRISL MTI), No. 63, East Tajarloo Ave, Tajarloo Square, Shiyan, Tehran, Iran; Reiesali Delvari Ave, Bushehr 7514618787, Iran; Farhang Ave, Khazar's Building, Anzali 4314695613, Iran; Website www.irmti.ir; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

IRISL MULTIMODAL TRANSPORT CO., No. 25 Sanaei Street, Karim Khan Zand Street, Shahid Arabi Line, Tehran, Iran; Website www.irislmtc.com; Additional Sanctions Information - Subject to Secondary Sanctions; Registration Number 230766 [IRAN].

IRITAL SHIPPING LINES COMPANY (a.k.a. IR-ITAL; a.k.a. IRITAL SHIPPING S.R.L.), Via Gerolamo Morone 6, Milano 20121, Italy; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. GE0426505 (Italy) [IRAN].

ISI MARITIME LIMITED, 147/1, St. Lucia Street, Valletta, Malta; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. C 28940 (Malta) [IRAN].

ISIM ATR LIMITED, 147/1, St. Lucia Street, Valletta, Malta; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. C34477 (Malta) [IRAN].

ISIM SININ LIMITED, 147/1, St. Lucia Street, Valletta, Malta; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. C37437 (Malta) [IRAN].

ISIM TAJ MAHAL LIMITED, 147/1, St. Lucia Street, Valletta, Malta; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. C 41660 (Malta) [IRAN].

ISLAMIC REGIONAL COOPERATION BANK (a.k.a. BANK-E TAAWON MANTAGHEEY-E ESLAMI; a.k.a. REGIONAL COOPERATION OF THE ISLAMIC BANK FOR DEVELOPMENT & INVESTMENT), Building No. 59, District 929, Street No. 17, Arsat Al-Hindia, Al Masbah, Baghdad, Iraq; Tohid Street, Before Tohid Circle, No. 33, Upper Level of Eghtesad-e Novin Bank, Tehran 1419913464, Iran; SWIFT/BIC RCDFIQBA [IRAN].

ISLAMIC REPUBLIC OF IRAN - CHINA SHIPPING LINES, China; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

ISLAMIC REPUBLIC OF IRAN - MIDDLE EAST SHIPPING LINES COMPANY, Next to CB hotel, Sharaf Building, Office No. 202, Dubai, United Arab Emirates; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

ISLAMIC REPUBLIC OF IRAN SHIPPING LINES (a.k.a. IRISL), Asseman Tower, Pasdaran Street, Tehran, Iran; P.O. Box 19395-177, Tehran, Iran; P.O. Box 1957614114, Tehran, Iran; No 523, Al Seman Tower Building, No 8: Narenjestan, Laveltani Street, Sayya Shirazi Square, Pasdaran Street, Tehran 1957617114, Iran; Website www.irisl.net; IFCA Determination - Involved in the Shipping Sector; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. 11670 (Iran); All Offices Worldwide [IRAN] [IFCA].

ISLAMIC REPUBLIC OF IRAN SHIPPING LINES INVESTMENT (a.k.a. ISLAMIC REPUBLIC OF IRAN SHIPPING LINES INVESTMENT COMPANY), Sky Tower, No. 523, Pasdaran Ave, Farmanieh Ave, Farmanieh, District 1, Tehran 1939513111, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

JABBER IBN HAYAN (a.k.a. JABER IBN HAYAN; a.k.a. JABER IBN HAYAN LABORATORY; a.k.a. JABER IBN HAYAN RESEARCH LABORATORY; a.k.a. JABR IBN HAYAN MULTIPURPOSE LABORATORY; a.k.a. "JHL"), Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: ATOMIC ENERGY ORGANIZATION OF IRAN).

JUPITER SEAWAYS SHIPPING, Care of Sambouk Shipping FCZ, Office 101, 1st Floor, FITCO Building No 3, Inside Fujairah Port, PO Box 50044, Fujairah, United Arab Emirates; 80 Broad Street, Monrovia, Liberia; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

KAFOLATBANK (a.k.a. CJSC KAFOLATBANK), Apartment 4/1, Academics Rajabovs Street, Dushanbe, Tajikistan; SWIFT/BIC KACJTJ22; All offices worldwide [IRAN].

KALA LIMITED (a.k.a. KALA NAFT LONDON LTD), NIOC House, 4 Victoria Street, Westminster, London SW1H 0NE, United Kingdom; Additional Sanctions Information - Subject to Secondary Sanctions; UK Company Number 01517853 (United Kingdom); all offices worldwide [IRAN].

KALA PENSION TRUST LIMITED, C/O Kala Limited, N.I.O.C. House, 4 Victoria Street, London SW1H 0NE, United Kingdom; Additional Sanctions Information - Subject to Secondary Sanctions; UK Company Number 01573317 (United Kingdom); all offices worldwide [IRAN].

KALAN KISH SHIPPING CO (a.k.a. KALAN KISH SHIPPING LINES), Unit 5, 9th Street 2, Ahmad Ghasir Avenue, PO Box 19635-1114, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

KARAFARIN BANK (a.k.a. BANK-E KARAFARIN), Zafar St. No. 315, Between Vali Asr and Jordan, Tehran, Iran; SWIFT/BIC KBIDIRTH [IRAN].

KARAMAAD SYSTEMS MANAGEMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

KASB INTERNATIONAL LLC (a.k.a. FIRST FURAT TRADING LLC), 10th Floor, Citi Bank Building, Oud Metha Road, Oud Metha, Dubai, United Arab Emirates; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone Number: (971) (4) (3248000) [IRAN].

KERMAN SHIPPING COMPANY LIMITED, 143/1 Tower Road, Sliema, Malta; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. C 37423 (Malta) [IRAN].

KHAVARMIANEH BANK (a.k.a. MIDDLE EAST BANK), No. 22, Second Floor Sabouchi St., Shahid Beheshti Ave., Tehran, Iran; SWIFT/BIC KHMIIRTH; Additional Sanctions Information - Subject to Secondary Sanctions; All offices worldwide [IRAN].

KHAYBAR COMPANY (a.k.a. KHAYBARCO; a.k.a. KHEYBAR COMPANY; a.k.a. SHERKAT SAHAMI KHASS KHAYBAR), No 97, Ghaem Magham Farahani Ave, Tehran 1589653313, Iran; PO Box 15815-1966, Tehran, Iran; Website www.khaybarco.ir; Additional Sanctions Information - Subject to Secondary Sanctions; Chamber of Commerce Number 11047591 (Iran); Registration Number 63383 (Iran) [IRAN].

KHAZAR SEA SHIPPING LINES (a.k.a. DARYA-YE KHAZAR SHIPPING LINES), Shahid Mostafa Khomeini Street, Ghazian Street, PO Box 43145/1711-324, Bandar Azali 4315671145, Iran; Mostafa Khomeini St. Ghazian, PO BOX 4315671145, Anzali Free Zone, Iran; Website www.khazarshipping.ir; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

KISH ASIA NAVAK, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

KISH INTERNATIONAL BANK (a.k.a. KISH INTERNATIONAL BANK OFFSHORE COMPANY PJS), NBO-9, Andisheh Blvd, Sanayi Street, Kish Island, Iran; Additional Sanctions Information - Subject to Secondary Sanctions; All offices worldwide [IRAN].

KISH ROOYA-E ZENDEGI, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

KONING MARINE CORP, Care of Sambouk Shipping FCZ, Office 101, 1st Floor, FITCO Building No 3, Inside Fujairah Port, PO Box 50044, Fujairah, United Arab Emirates; 80 Broad Street, Monrovia, Liberia; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

KURDISTAN CEMENT (a.k.a. SIMAN-E KURDISTAN), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

LONDON IRINVEST SHIP COMPANY (a.k.a. IRINVESTSHIP LIMITED), 10 Greycoat Place, London SW1P 1SB, United Kingdom; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. 04110179 (United Kingdom) [IRAN].

MACHINE SAZI ARAK CO. LTD. (a.k.a. MACHINE SAZI ARAK COMPANY P J S C; a.k.a. MACHINE SAZI ARAK SSA; a.k.a. MASHIN SAZI ARAK; a.k.a. "MSA"), P.O. Box 148, Arak 351138, Iran; Arak, Km 4 Tehran Road, Arak, Markazi Province, Iran; No. 1, Northern Kargar Street, Tehran 14136, Iran; Additional Sanctions Information - Subject to Secondary Sanctions; all offices worldwide [IRAN].

MAHAB GHODSS CONSULTING ENGINEERING COMPANY (a.k.a. MAHAB GHODSS CONSULTING ENGINEERING CO.; a.k.a. MAHAB GHODSS CONSULTING ENGINEERS SSK; a.k.a. MAHAB QODS ENGINEERING CONSULTING CO.), No. 17, Dastgerdy Avenue, Takharestan Alley, 19395-6875, Tehran 1918781185, Iran; 16 Takharestan Alley, Dastgerdy Avenue, P.O. Box 19395-6875, Tehran 19187 81185, Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Registration ID 48962 (Iran) issued 1983; all offices worldwide [IRAN].

MAPNA KHUZESTAN ELECTRICITY GENERATION, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

MARANER HOLDINGS LIMITED, Flat 1, 143, Tower Road, Sliema SLM1604, Malta; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. C33482 (Malta) [IRAN].

MARBLE SHIPPING LTD, 143/1 Tower Road, Sliema, Malta; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. C 41949 (Malta) [IRAN].

MARINE INFORMATION TECHNOLOGY DEVELOPMENT COMPANY (a.k.a. MARINE INFORMATION TECHNOLOGY DEVELOPMENT CORPORATION; a.k.a. MARINE TECHNOLOGY AND INFORMATION TECHNOLOGY DEVELOPMENT; a.k.a. MITDCO; a.k.a. "MITD"), 5th Floor, No. 523, Aseman Tower, Pasdaran St., Tehran, Iran; Website www.mitdco.com; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

MARJAN PETROCHEMICAL COMPANY (a.k.a. MARJAN METHANOL COMPANY), Ground Floor, No. 39, Meftah/Garmsar West Alley, Shiraz (South) Street, Molla Sadra Avenue, Tehran, Iran; Post Office Box 19935-561, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

MB BANK (f.k.a. BANK MELLI IRAN ZAO; a.k.a. JOINT STOCK COMPANY 'MIR BUSINESS BANK'; a.k.a. JSC 'MB BANK'; a.k.a. MB BANK, AO; a.k.a. MIR BIZNES BANK; a.k.a. MIR BIZNES BANK, AO; a.k.a. MIR BUSINESS BANK; a.k.a. MIR BUSINESS BANK ZAO), 9/1 ul Mashkova, Moscow 105062, Russia; SWIFT/BIC MRBRRUMM; Website www.mbrbu.com; Additional Sanctions Information - Subject to Secondary Sanctions; All Offices Worldwide [SDGT] [IFSR] (Linked To: BANK MELLI IRAN).

MCS ENGINEERING (a.k.a. EFFICIENT PROVIDER SERVICES GMBH), Karlstrasse 21, Dinslaken, Nordrhein-Westfalen 46535, Germany; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

MCS INTERNATIONAL GMBH (a.k.a. MANNESMAN CYLINDER SYSTEMS; a.k.a. MCS TECHNOLOGIES GMBH), Karlstrasse 23-25, Dinslaken, Nordrhein-Westfalen 46535, Germany; Website http://www.mcs-tch.com; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

MEHR IRAN CREDIT UNION BANK (a.k.a. BANK-E GHARZOLHASANEH MEHR IRAN; a.k.a. GHARZOLHASANEH MEHR IRAN BANK), Taleghani St., No.204, Before the intersection of Mofateh, across from the former U.S. embassy, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

MEHRAN SHIPPING COMPANY LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

MELLAT BANK CLOSED JOINT-STOCK COMPANY (f.k.a. BANK MELLAT YEREVAN; a.k.a. MELLAT BANK ARMENIA; f.k.a. MELLAT BANK SB CJSC), PO Box 24, Amiryani Street 6, 0010, Yerevan, Armenia; 5 Tumanyan St, 0001, Yerevan, Armenia; SWIFT/BIC BKMTAM22; Website www.mellatbank.am; Additional Sanctions Information - Subject to Secondary Sanctions; All Offices Worldwide [SDGT] [IFSR] (Linked To: BANK MELLAT).

MELLAT INSURANCE COMPANY, No. 48, Haghani Street, Vanak Square, Before Jahan-Kodak Cross, Tehran 1517973913, Iran; No. 40, Shahid Haghani Express Way, Vanak Square, Tehran, Iran; No. 9, Niloufar Street, Sharabyani Avenue, Taavon Boulevard, Shahr-e-Ziba, Tehran, Iran; 72 Hillview Court, Woking, Surrey GU22 7QW, United Kingdom; No. 697 Saeedi Alley, Crossroads College, Enghelab St., Tehran, Iran; Website http://www.mellatinsurance.com; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

MELLI BANK PLC, 98a Kensington High Street, London W8 4SG, United Kingdom; 4 Moorgate, EC2R 6AL, London, United Kingdom; 18F Kam Sang Building, 257 Des Voeux Road Central, Hong Kong; 4th Floor, 20 West Nahid Street, Africa Blvd, Tehran, Iran; SWIFT/BIC MELIGB2L; alt. SWIFT/BIC MELIHKHH; Website www.mellibank.com; Additional Sanctions Information - Subject to Secondary Sanctions; All Offices Worldwide [SDGT] [IFSR] (Linked To: BANK MELLI IRAN).

MELLI INTERNATIONAL BUILDING & INDUSTRY COMPANY, Number 89, Shahid Khodami Street, After Kurdistan Bridge, Vanak Square, Iran; Website www.mibic.ir; Additional Sanctions Information - Subject to Secondary Sanctions; Registration Number 85579000 (Iran) [SDGT] [IFSR] (Linked To: TOSE-E MELLI GROUP INVESTMENT COMPANY).

MERSAD SHIPPING COMPANY LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

MESBAH ENERGY COMPANY (a.k.a. MESBAH ENERGY), Science & Technology Park, Shahid Ghoddousi Blvd, Arak, Iran; Tehran, Iran; Website www.isotope.ir; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: ATOMIC ENERGY ORGANIZATION OF IRAN).

METAL & MINERAL TRADE S.A.R.L. (a.k.a. METAL & MINERAL TRADE (MMT); a.k.a. METAL AND MINERAL TRADE (MMT); a.k.a. METAL AND MINERAL TRADE S.A.R.L.; a.k.a. MMT LUXEMBURG; a.k.a. MMT SARL), 11b, Boulevard Joseph II L-1840, Luxembourg; Additional Sanctions Information - Subject to Secondary Sanctions; Registration ID B 59411 (Luxembourg); all offices worldwide [IRAN].

MINAB SHIPPING COMPANY LIMITED (f.k.a. MIGHAT SHIPPING COMPANY LIMITED), Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

MINES AND METALS ENGINEERING GMBH (a.k.a. "M.M.E."), Georg-Glock-Str. 3, Dusseldorf 40474, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Registration ID HRB 34095 (Germany); all offices worldwide [IRAN].

MIRACLE TRANSPORTATION LIMITED (a.k.a. MIRACLE TRANSPORTATION LTD), East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

MOALLEM INSURANCE CO., No. 35, Haghani Blvd, Vanak Sq., Tehran 1517973511, Iran; Website www.mic-ir.com; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

MOBIN PETROCHEMICAL COMPANY, South Pars Special Economic Energy Zone, Postal Box: 75391-418, Assaluyeh, Bushehr, Iran; PO Box, Mashhad, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

MODABER (a.k.a. MODABER INVESTMENT COMPANY; a.k.a. TADBIR INDUSTRIAL HOLDING COMPANY); Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

MOMENT INVESTMENT LIMITED (a.k.a. MOMENT INVESTMENT LTD), East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

MOMTAZ ELECTRIC, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

MONSOON SHIPPING LTD, Care of Sambouk Shipping FCZ, Office 101, 1st Floor, FITCO Building No 3, Inside Fujairah Port, PO Box 50044, Fujairah, United Arab Emirates; Valletta, Malta; Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro MH96960, Marshall Islands; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

MOSAKHAR DARYA SHIPPING CO (a.k.a. MOSAKHKHAR-E DARYA SHIPPING), Unit 5, 9th Street 2, Ahmad Ghasir Avenue, PO Box 19635-1114, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

MOTOJEN AUTO INDUSTRY COMPANY (a.k.a. KHODRO SANAT MOROJEN), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

MOTOJEN, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

MSP KALA NAFT CO. TEHRAN (a.k.a. KALA NAFT CO SSK; a.k.a. KALA NAFT COMPANY LTD; a.k.a. KALA NAFT TEHRAN; a.k.a. KALA NAFT TEHRAN COMPANY; a.k.a. KALAYEH NAFT CO; a.k.a. M.S.P.-KALA; a.k.a. MANUFACTURING SUPPORT & PROCUREMENT CO.-KALA NAFT; a.k.a. MANUFACTURING SUPPORT AND PROCUREMENT (M.S.P.) KALA NAFT CO. TEHRAN; a.k.a. MANUFACTURING, SUPPORT AND

PROCUREMENT KALA NAFT COMPANYY; a.k.a. MSP KALA NAFT TEHRAN COMPANYY; a.k.a. MSP KALANAFT; a.k.a. MSP-KALANAFT COMPANYY; a.k.a. SHERKAT SAHAMI KHAASS KALA NAFT; a.k.a. SHERKAT SAHAMI KHAASS POSHTIBANI VA TEHIYEH KALAYE NAFT TEHRAN; a.k.a. SHERKATE POSHTIBANI SAKHT VA TAHEIH KALAIIE NAFTE TEHRAN), 242 Sepahbod Gharani Street, Karim Khan Zand Bridge, Corner Kalantari Street, 8th Floor, P.O. Box 15815-1775/15815-3446, Tehran 15988, Iran; Building No. 226, Corner of Shahid Kalantari Street, Sepahbod Gharani Avenue, Karimkhan Avenue, Tehran 1598844815, Iran; No. 242, Shahid Kalantari St., Near Karimkhan Bridge, Sepahbod Gharani Avenue, Tehran, Iran; Head Office Tehran, Sepahbod Gharani Ave., P.O. Box 15815/1775 15815/3446, Tehran, Iran; P.O. Box 2965, Sharjah, United Arab Emirates; 333 7th Ave SW #1102, Calgary, AB T2P 2Z1, Canada; Chekhov St., 24.2 , AP 57, Moscow, Russia; Room No. 704 - No. 10 Chao Waidajie Chao Yang District , Beijing 10020, China; Sanaee Ave., P.O. Box 79417-76349, N.I.O.C., Kish, Iran; 10th Floor, Sadaf Tower, Kish Island, Iran; Additional Sanctions Information - Subject to Secondary Sanctions; all offices worldwide [IRAN].

N.I.T.C. REPRESENTATIVE OFFICE (a.k.a. NATIONAL IRANIAN TANKER COMPANY), Droogdokweg 71, Rotterdam 3089 JN, Netherlands; Email Address nitcrdam@tiscali.net; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone +31 010-4951863; Telephone +31 10-4360037; Fax +31 10-4364096 [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

NAFTIRAN INTERTRADE CO. (NICO) LIMITED (a.k.a. NAFT IRAN INTERTRADE COMPANY LTD; a.k.a. NAFTIRAN INTERTRADE COMPANY (NICO); a.k.a. NAFTIRAN INTERTRADE COMPANY LTD; a.k.a. NICO), 41, 1st Floor, International House, The Parade, St Helier JE2 3QQ, Jersey; Petro Pars Building, Saadat Abad Ave, No 35, Farhang Blvd, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions; all offices worldwide [IRAN] (Linked To: NIOC INTERNATIONAL AFFAIRS (LONDON) LIMITED).

NAFTIRAN INTERTRADE CO. (NICO) SARL (a.k.a. NICO), 6, Avenue de la Tour-Haldimand, Pully, VD 1009, Switzerland; Additional Sanctions Information - Subject to Secondary Sanctions; all offices worldwide [IRAN].

NAFTIRAN TRADING SERVICES CO. (NTS) LIMITED, 47 Queen Anne Street, London W1G 9JG, United Kingdom; 6th Floor NIOC Ho, 4 Victoria St, London SW1H 0NE, United Kingdom; Additional Sanctions Information - Subject to Secondary Sanctions; UK Company Number 02600121 (United Kingdom); all offices worldwide [IRAN].

NARENJESTAN HOTEL AND BUILDING DEVELOPMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

NARI SHIPPING AND CHARTERING GMBH & CO. KG (a.k.a. NARI SHIPPING AND CHARTERING GMBH AND CO. KG), Schottweg 5, Hamburg 22087, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. HRA102485 [IRAN].

NATIONAL INDUSTRIES AND MINING DEVELOPMENT COMPANY, Number 55, Pardis Street, N. Shirazi Street, Molla-Sadra Street, Vanak Square, Tehran, Iran; Website www.nimidco.com; Additional Sanctions Information - Subject to Secondary Sanctions; Registration Number 323908 (Iran) [SDGT] [IFSR] (Linked To: TOSE-E MELLI GROUP INVESTMENT COMPANY).

NATIONAL IRANIAN OIL COMPANY (a.k.a. NIOC), Hafez Crossing, Taleghani Avenue, P.O. Box 1863 and 2501, Tehran, Iran; National Iranian Oil Company Building, Taleghani Avenue, Hafez Street, Tehran, Iran; Website www.nioc.ir; Additional Sanctions Information - Subject to Secondary Sanctions; all offices worldwide [IRAN] [IFCA].

NATIONAL IRANIAN OIL COMPANY PTE LTD, 7 Temasek Boulevard #07-02, Suntec Tower One 038987, Singapore; Additional Sanctions Information - Subject to Secondary Sanctions; Registration ID 199004388C (Singapore); all offices worldwide [IRAN].

NATIONAL IRANIAN TANKER COMPANY (a.k.a. NITC), NITC Building, 67-88, Shahid Atefi Street, Africa Avenue, Tehran, Iran; Website www.nitc.co.ir; Email Address info@nitc.co.ir; alt. Email Address administrator@nitc.co.ir; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone (98)(21)(66153220); Telephone (98)(21)(23803202); Telephone (98)(21)(23803303); Telephone (98)(21)(66153224); Telephone (98)(21)(23802230); Telephone (98)(9121115315); Telephone (98)(9128091642); Telephone (98)(9127389031); Fax (98)(21)(22224537); Fax (98)(21)(23803318); Fax (98)(21)(22013392); Fax (98)(21)(22058763) [IRAN] [IFCA].

NATIONAL IRANIAN TANKER COMPANY LLC (a.k.a. NATIONAL IRANIAN TANKER COMPANY LLC SHARJAH BRANCH; a.k.a. NITC SHARJAH), Al Wahda Street, Street No. 4, Sharjah, United Arab Emirates; P.O. Box 3267, Sharjah, United Arab Emirates; Website http://nitcsharjah.com/index.html; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone +97165030600; Telephone + 97165749996; Telephone +971506262258; Fax +97165394666; Fax +97165746661 [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

NATIONAL PETROCHEMICAL COMPANY (a.k.a. "NPC"), No. 104, North Sheikh Bahaei Blvd., Molla Sadra Ave., Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions; all offices worldwide [IRAN].

NATIONWIDE SHIPPING LTD, East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

NEGIN KISH INTERNATIONAL SAHEL AND FARASAHDEL DEVELOPMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

NEW AGE SHIPPING LIMITED (a.k.a. NEW AGE SHIPPING LTD-BZE), East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

NEYRIZ STEEL, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

NICO ENGINEERING LIMITED, 41, 1st Floor, International House, The Parade, St. Helier JE2 3QQ, Jersey; Additional Sanctions Information - Subject to Secondary Sanctions; Registration ID 75797 (Jersey); all offices worldwide [IRAN].

NINTH OCEAN GMBH & CO. KG (a.k.a. NINTH OCEAN GMBH AND CO. KG), Schottweg 5, Hamburg 22097, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. HRA 102565 [IRAN].

NIOC INTERNATIONAL AFFAIRS (LONDON) LIMITED, NIOC House, 4 Victoria Street, London SW1H 0NE, United Kingdom; Additional Sanctions Information - Subject to Secondary Sanctions; UK Company Number 02772297 (United Kingdom); all offices worldwide [IRAN].

NOOR ENERGY (MALAYSIA) LTD., Labuan, Malaysia; Additional Sanctions Information - Subject to Secondary Sanctions; Company Number LL08318 [IRAN].

NOURI PETROCHEMICAL COMPANY (a.k.a. BORZUYEH PETROCHEMICAL COMPANY; a.k.a. NOURI PETROCHEMICAL COMPLEX), Pars Special Economic Energy Zone, Assaluyeh Port, Bushehr, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

NOVIN ENERGY COMPANY (a.k.a. ENERGY NOVIN COMPANY; a.k.a. ENERGY NOVIN CORPORATION; a.k.a. NOVIN ENERGY; a.k.a. NOVIN ENERGY CORPORATION), Tehran, Iran; 1st Shaghayegh Bld., North Kargar St., Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: ATOMIC ENERGY ORGANIZATION OF IRAN).

NOVIN PARS MINERAL EXPLORATION AND MINING ENGINEERING COMPANY (a.k.a. NOVIN KHARA; a.k.a. NOVIN KHARA MINERAL MINING EXTRACTION COMPANY; a.k.a. NOVIN PARS MINERAL EXPLORATION AND MINING COMPANY; a.k.a. NOVIN PARS MINERAL MINING COMPANY; a.k.a. "ASKAM"; a.k.a. "ESKAM"; a.k.a. "MINERAL MINING EXTRACTION COMPANY"; a.k.a. "SKAM"), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: ATOMIC ENERGY ORGANIZATION OF IRAN).

NPC INTERNATIONAL LIMITED (a.k.a. N P C INTERNATIONAL LTD; a.k.a. NPC INTERNATIONAL COMPANY), 5th Floor NIOC House, 4 Victoria Street, London SW1H 0NE, United Kingdom; Additional Sanctions Information - Subject to Secondary Sanctions; UK Company Number 02696754 (United Kingdom); all offices worldwide [IRAN].

NUCLEAR INDUSTRY EXPLORATION AND RAW MATERIALS PRODUCTION COMPANY (a.k.a. EXPLORATION AND NUCLEAR RAW MATERIAL PRODUCTION COMPANY; a.k.a. EXPLORATION AND NUCLEAR RAW MATERIALS PRODUCTION COMPANY; a.k.a. "EMKA"), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: TAMAS COMPANY).

NUCLEAR POWER PRODUCTION AND DEVELOPMENT COMPANY OF IRAN (a.k.a. NUCLEAR POWER PRODUCTION AND DEVELOPMENT HOLDING COMPANY; a.k.a. "NPPD"), No. 8, Tandis St., Africa Ave., Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: ATOMIC ENERGY ORGANIZATION OF IRAN).

NUCLEAR SCIENCE AND TECHNOLOGY RESEARCH INSTITUTE (a.k.a. NUCLEAR SCIENCES AND TECHNOLOGIES RESEARCH INSTITUTE; a.k.a. "NSTR"), North Kargar Street, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: ATOMIC ENERGY ORGANIZATION OF IRAN).

OCEAN CAPITAL ADMINISTRATION GMBH, Schottweg 5, Hamburg 22087, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. HRA 92501 [IRAN].

OFOQ SAZEH PAYAH, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

OGHYANOUS KHOROSHAN KISH (a.k.a. KHOROSHAN MARITIME COMPANY; a.k.a. OGHYANOUS-E KHOROSHAN-E KISH SHIPPING LINES), Unit 5, 9th Street 2, Ahmad Ghasir Avenue, PO Box 19635-1114, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

OIL INDUSTRY INVESTMENT COMPANY (a.k.a. "O.I.I.C."), No. 83, Sepahbod Gharani Street, Tehran, Iran; Website <http://www.oic-ir.com>; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

OMID BONYAN DAY INSURANCE SERVICES, Vozara Street, Tehran, Iran; Website <http://omiddayins.ir>; Additional Sanctions Information - Subject to Secondary Sanctions [SDGT] [IFSR] (Linked To: DAY BANK).

OMID REY CIVIL & CONSTRUCTION COMPANY (a.k.a. OMID DEVELOPMENT AND CONSTRUCTION; a.k.a. OMID REY CIVIL AND CONSTRUCTION COMPANY; a.k.a. OMID REY RENOVATION AND DEVELOPMENT CO.); Website <http://www.omidrey.com>; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

OMRAN VA MASKAN ABAD DAY COMPANY, No. 52, Shariati Street, Shahid Mousavi Street, Tehran, Iran; Website www.omaday.ir; Additional Sanctions Information - Subject to Secondary Sanctions [SDGT] [IFSR] (Linked To: DAY BANK).

ONE CLASS PROPERTIES (PTY) LTD. (a.k.a. ONE CLASS INCORPORATED), Cape Town, South Africa; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

ONE VISION INVESTMENTS 5 (PTY) LTD. (a.k.a. ONE VISION 5), 3rd Floor, Tygervalley Chambers, Bellville, Cape Town 7530, South Africa; Canal Walk, P.O. Box 17, Century City, Milnerton 7446, South Africa; Additional Sanctions Information - Subject to Secondary Sanctions; Registration ID 2002/022757/07 (South Africa) [IRAN].

ONERBANK ZAO (a.k.a. EFTEKHAR BANK; a.k.a. HONOR BANK; a.k.a. HONORBANK; a.k.a. HONORBANK ZAO; a.k.a. ONER BANK; a.k.a. ONERBANK; a.k.a. ONER-BANK), Ulitsa Klary Tsetkin 51, Minsk 220004, Belarus; SWIFT/BIC HNRBBY2X; Registration ID 807000227 (Belarus) issued 16 Oct 2009; all offices worldwide [IRAN].

P.C.C. (SINGAPORE) PRIVATE LIMITED (a.k.a. P.C.C. SINGAPORE BRANCH; a.k.a. PCC SINGAPORE PTE LTD), 78 Shenton Way, #08-02 079120, Singapore; 78 Shenton Way, 26-02A Lippo Centre 079120, Singapore; Additional Sanctions Information - Subject to Secondary Sanctions; Registration ID 199708410K (Singapore); all offices worldwide [IRAN].

PACIFIC OCEAN SHIPPING LIMITED, East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

PACIFIC SHIPPING AND TRANSPORTATION LIMITED (a.k.a. PACIFIC SHIPPING & TRANS; a.k.a. PACIFIC SHIPPING AND TRANS), East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

PALM SERVICE LIMITED (a.k.a. "PALM SERVICE LTD"), East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

PARDIS INVESTMENT COMPANY (a.k.a. SHERKAT-E SARMAYE GOZARI-E PARDIS), Iran; Unit D4 and C4, 4th Floor, Building 29 Africa, Corner of 25th Street, Africa Boulevard, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

PARS GHAE'EM GOSTAR, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

PARS INTERNATIONAL INDUSTRY DEVELOPMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

PARS ISOTOPE COMPANY, No. 88, West 23rd St. Azadegan Blvd. South Sheykh Bahaie Ave., Tehran, Iran; Website <http://www.parsisotope.com>; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: ATOMIC ENERGY ORGANIZATION OF IRAN).

PARS MCS (a.k.a. PARS MCS CO.; a.k.a. PARS MCS COMPANY), 2nd Floor, No. 4, Sasan Dead End, Afriqa Avenue, After Esfandiar, Crossroads, Tehran, Iran; No. 5 Sasan Alley, Atefi Sharghi St., Afrigha Boulevard, Tehran, Iran; Oshorjan Industrial Zone, Zob-e Ahan Highway, Isafahan, Iran; Website <http://www.parsmcs.com>; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

PARS NICKEL KARAN KABIR, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

PARS OIL AND GAS COMPANY (a.k.a. POGC), No. 133, Side of Parvin Etesami Alley, opposite Sazman Ab - Dr. Fatemi Avenue, Tehran, Iran; No. 1 Parvin Etesami Street, Fatemi Avenue, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

PARS OIL CO. (a.k.a. PARS OIL; a.k.a. SHERKAT NAFT PARS SAHAMI AAM), Iran; No. 346, Pars Oil Company Building, Modarres Highway, East Mirdamad Boulevard, Tehran 1549944511, Iran; Postal Box 14155-1473, Tehran 159944511, Iran; Website <http://www.parsoilco.com>; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

PARS PAIDAR SANAT NOVIN, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

PARS PETROCHEMICAL COMPANY, Pars Special Economic Energy Zone, PO Box 163-75391, Assaluyeh, Bushehr, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

PARS PETROCHEMICAL SHIPPING COMPANY, 1st Floor, No. 19, Shenasa Street, Vali E Asr Avenue, Tehran, Iran; Website www.parsshipping.com; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

PARS SAZEH ENGINEERING AND CONSTRUCTION, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

PARSIAN OIL AND GAS DEVELOPMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

PARSIAN RAIL TRANSPORT DEVELOPMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

PASARGAD BANK (a.k.a. BANK-E PASARGAD), Valiasr St., Mirdamad St., No. 430, Tehran, Iran; SWIFT/BIC BKBPIRTH [IRAN].

PAYANDEH JAAM ELECTRICITY ENERGY, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

PAYVAR ANDISH, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

PERSIA HORMOZ SHIP REPAIR YARD COMPANY PJS (a.k.a. PERSIA HORMOZ SHIP REPAIRS; a.k.a. PERSIA HORMOZ SHIPYARD), 37 Km, West Bandar Abbas Road, Bandar Abbas 791453859, Iran; Website www.persiahormoz.com; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

PERSIA INTERNATIONAL BANK PLC, 6 Lothbury, EC2R 7HH, London, United Kingdom; PO Box 119871, No 209, 2nd Floor, Tower II, Al Fattan Currency House, Dubai International Financial Centre, Dubai, United Arab Emirates; SWIFT/BIC PIBPGB2L; Website www.persiabank.co.uk; Additional Sanctions Information - Subject to Secondary Sanctions; Registration Number 4218020 (United Kingdom); All Offices Worldwide [SDGT] [IFSR] (Linked To: BANK MELLAT).

PERSIA OIL & GAS INDUSTRY DEVELOPMENT CO. (a.k.a. PERSIA OIL AND GAS INDUSTRY DEVELOPMENT CO.; a.k.a. TOSE SANAT-E NAFT VA GAS PERSIA), 7th Floor, No. 346, Mirdamad Avenue, Tehran, Iran; Ground Floor, No. 14, Saba Street, Africa Boulevard, Tehran, Iran; Website <http://www.pogidc.com>; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

PERSIAN GULF SABZ KARAFARINAN (a.k.a. PERSIAN GULF KHATAR-PAZIR INVESTMENT COMPANY), No. 17, Fifth Floor, 17th Alley, Vozara Street, Tehran, Iran; Website www.persiangulfvc.com; Additional Sanctions Information - Subject to Secondary Sanctions [SDGT] [IFSR] (Linked To: TOSE-E MELLI GROUP INVESTMENT COMPANY).

PERSIAN GULF SHIPPING LINES LTD (a.k.a. KHALIJ-E FARS (PERSIAN GULF) SHIPPING LINES; a.k.a. "PGSL"), Strovolos Center, Flat No. 204, Floor No. 2, Strovolou 77, Nicosia 2018, Cyprus; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. C334268 (Cyprus) [IRAN].

PETRO ENERGY INTERTRADE COMPANY, Dubai, United Arab Emirates; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

PETRO ROYAL FZE, United Arab Emirates; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

PETRO SUISSE INTERTRADE COMPANY SA, 6 Avenue de la Tour-Haldimand, Pully 1009, Switzerland; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

PETROCHEMICAL COMMERCIAL COMPANY (U.K.) LIMITED (a.k.a. PCC (UK); a.k.a. PCC UK; a.k.a. PCC UK LTD), 4 Victoria Street, London SW1H 0NE, United Kingdom; Additional Sanctions Information - Subject to Secondary Sanctions; UK Company Number 02647333 (United Kingdom); all offices worldwide [IRAN].

PETROCHEMICAL COMMERCIAL COMPANY FZE (a.k.a. PCC FZE), 1703, 17th Floor, Dubai World Trade Center Tower, Sheikh Zayed Road, Dubai, United Arab Emirates; Office No. 99-A, Maker Tower "F" 9th Floor Cutte Pavade, Colabe, Mumbai 700005, India; Additional Sanctions Information - Subject to Secondary Sanctions; all offices worldwide [IRAN].

PETROCHEMICAL COMMERCIAL COMPANY INTERNATIONAL (a.k.a. PETROCHEMICAL COMMERCIAL COMPANY INTERNATIONAL LIMITED; a.k.a. PETROCHEMICAL COMMERCIAL COMPANY INTERNATIONAL LTD; a.k.a. PETROCHEMICAL TRADING COMPANY LIMITED; a.k.a. "PCCI"), 41, 1st Floor, International House, The Parade, St. Helier JE2 3QQ, Jersey; Ave. 54, Yimpash Business Center, No. 506, 507, Ashkhabad 744036, Turkmenistan; P.O. Box 261539, Jebel Ali, Dubai, United Arab Emirates; No. 21 End of 9th St, Gandhi Ave, Tehran, Iran; 21, Africa Boulevard, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Registration ID 77283 (Jersey); all offices worldwide [IRAN].

PETROIRAN DEVELOPMENT COMPANY (PEDCO) LIMITED (a.k.a. PETRO IRAN DEVELOPMENT COMPANY; a.k.a. "PEDCO"), 41, 1st Floor, International House, The Parade, St. Helier JE2 3QQ, Jersey; National Iranian Oil Company - PEDCO, P.O. Box 2965, Al Bathaa Tower, 9th Floor, Apt. 905, Al Buhaira Corniche, Sharjah, United Arab Emirates; P.O. Box 15875-6731, Tehran, Iran; No. 22, 7th Lane, Khalid Eslamboli Street, Shahid Beheshti Avenue, Tehran, Iran; No. 102, Next to Shahid Amir Soheil Tabrizian Alley, Shahid Dastgerdi (Ex Zafar) Street, Shariati Street, Tehran 19199/45111, Iran; Kish Harbour, Bazargan Ferdos Warehouses, Kish Island, Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Registration ID 67493 (Jersey); all offices worldwide [IRAN].

PETROPARS INTERNATIONAL FZE (a.k.a. PPI FZE), P.O. Box 72146, Dubai, United Arab Emirates; Additional Sanctions Information - Subject to Secondary Sanctions; all offices worldwide [IRAN].

PETROPARS LTD. (a.k.a. PETROPARS LIMITED; a.k.a. "PPL"), No. 35, Farhang Blvd., Saadat Abad, Tehran, Iran; Calle La Guairita, Centro Profesional Eurobuilding, Piso 8, Oficina 8E, Chuao, Caracas 1060, Venezuela; P.O. Box 3136, Road Town, Tortola, Virgin Islands, British; Additional Sanctions Information - Subject to Secondary Sanctions; all offices worldwide [IRAN].

PETROPARS UK LIMITED, 47 Queen Anne Street, London W1G 9JG, United Kingdom; Additional Sanctions Information - Subject to Secondary Sanctions; UK Company Number 03503060 (United Kingdom); all offices worldwide [IRAN].

POLINEX GENERAL TRADING LLC, Health Care City, Umm Hurair Rd., Oud Mehta Offices, Block A, 4th Floor 420, Dubai, United Arab Emirates; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

POLYNAR COMPANY, No. 58, St. 14, Qanbarzadeh Avenue, Resalat Highway, Tehran, Iran; Website <http://www.polynar.com>; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

POST BANK OF IRAN (a.k.a. POSTBANK), 237 Motahari Avenue, Tehran 1587618118, Iran; Kouh-e Nour Street, Shahid Motahari Avenue, Tehran 1587618111, Iran; SWIFT/BIC PBIRIRTH; Website www.postbank.ir; Additional Sanctions Information - Subject to Secondary Sanctions; All Offices Worldwide [IRAN] [NPWMD] [IFSR] (Linked To: BANK SEPAH).

POUYA TAMIN KISH (a.k.a. POUYA TAMIN KISH CO.; a.k.a. POUYA TAMIN KISH OIL & GAS CO; a.k.a. POUYA TAMIN KISH OIL AND GAS CO; a.k.a. "PTK"), Block EX6, In front of IRAN Blvd., Kish Island, Iran; Website <http://nitcshipping.com>; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

POUYAN TABAAN ENERGY, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

POWER PLANT EQUIPMENT MANUFACTURING COMPANY (a.k.a. SATNA COMPANY; a.k.a. "POWERPLANT EQUIPMENT MANUFACTURING COMPANY"; a.k.a. "SATNA"), Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: ATOMIC ENERGY ORGANIZATION OF IRAN).

PROTON PETROCHEMICALS SHIPPING LIMITED (a.k.a. PROTON SHIPPING CO; a.k.a. "PSC"), Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

QOM ENERGY GENERATION GOSTAR, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

RAAHBAR COMPUTER RESOURCES MANAGEMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

RAAHBAR INFORMATICS SERVICES (a.k.a. RAAHBAR KHADAMAT INFORMATIC), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

RAAHBAR SARIR INTEGRATED TRACKING SYSTEMS INC, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

RADIATION APPLICATIONS DEVELOPMENT COMPANY (a.k.a. RADIATION APPLICATIONS DEVELOPMENT HOLDING COMPANY; a.k.a. "RAD"; a.k.a. "RADIATION APPLICATIONS"), Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: ATOMIC ENERGY ORGANIZATION OF IRAN).

RAHBARAN OMID DARYA SHIP MANAGEMENT CO. (a.k.a. RAHBARAN-E OMID-E DARYA SHIP MANAGEMENT; a.k.a. ROD SHIP MANAGEMENT CO.; a.k.a. RODSM; f.k.a. SOROUGH SARZAMIN ASATIR SHIP MANAGEMENT CO.; f.k.a. SOROUGH SARZAMIN ASATIR SSA; f.k.a. SSA SHIP MANAGEMENT CO.), Unit 5, 9th Street 2, Ahmad Ghasir Avenue, PO Box 19635-1114, Tehran, Iran; No. 5, Shabnam Alley, Ghaem Magham Farahani Street, Shahid Motahari Avenue, Tehran, Iran; Website www.rodsmc.com; Additional Sanctions Information - Subject to Secondary Sanctions; Registration Number 341563 (Iran) [IRAN].

RAILCOM RAAHBAR CO., Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

RASTIN KHADAMAT PARSIAN COMPANY (a.k.a. PARSIAN TECHNOLOGY SUPPORT COMPANY), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: ATOMIC ENERGY ORGANIZATION OF IRAN).

REY INVESTMENT COMPANY, 2nd and 3rd Floors, No. 14, Saba Boulevard, After Esfandiari Crossroad, Africa Boulevard, Tehran 1918973657, Iran; Website <http://www.rey-co.com>; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

REY NIRU ENGINEERING COMPANY (a.k.a. REY NIROO ENGINEERING COMPANY); Website <http://www.reyniroo.com>; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

REYCO GMBH. (a.k.a. REYCO GMBH GERMANY), Karlstrasse 19, Dinslaken, Nordrhein-Westfalen 46535, Germany; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

RISHMAK PRODUCTIVE & EXPORTS COMPANY (a.k.a. RISHMAK COMPANY; a.k.a. RISHMAK EXPORT AND MANUFACTURING P.J.S.; a.k.a. RISHMAK PRODUCTION AND EXPORT COMPANY; a.k.a. RISHMAK PRODUCTIVE AND EXPORTS COMPANY; a.k.a. SHERKAT-E TOLID VA SADERAT-E RISHMAK), Rishmak Cross Rd., 3rd Km. of Amir Kabir Road, Shiraz 71365, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

ROYAL ARYA CO. (a.k.a. ARIA ROYAL CONSTRUCTION COMPANY), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

ROYAY-E ROZ KISH INVESTMENT COMPANY, No. 132, First Floor, Unit 1, South Dibagi Street, Ekhtiyariyeh, Tehran, Iran; Website www.daybankinvest.com; Additional Sanctions Information - Subject to Secondary Sanctions [SDGT] [IFSR] (Linked To: DAY BANK).

SADAF PETROCHEMICAL ASSALUYEH COMPANY (a.k.a. SADAF ASALUYEH CO.; a.k.a. SADAF CHEMICAL ASSALUYEH COMPANY; a.k.a. SADAF PETROCHEMICAL ASSALUYEH INVESTMENT SERVICE), Assaluyeh, Iran; South Pars Special Economy/Energy Zone, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

SAFIRAN PAYAM DARYA SHIPPING COMPANY (a.k.a. "SAPID"), Asseman Tower, Pasdaran Street, Tehran, Iran; Website www.sapidshpg.com; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

SAKHTEMAN INTERNATIONAL DEVELOPMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

SAMAN BANK (a.k.a. BANK-E SAMAN), Vali Asr. St. No. 3, Before Vey Park intersection, corner of Tarakesh Dooz St. , Tehran, Iran; SWIFT/BIC SABCIRTH [IRAN].

SAMAN SHIPPING COMPANY LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SAMBOUK SHIPPING FZC, FITCO Building No. 3, Office 101, 1st Floor, P.O. Box 50044, Fujairah, United Arab Emirates; Office 1202, Crystal Plaza, PO Box 50044, Buhaira Corniche, Sharjah, United Arab Emirates; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

SARMAYEH BANK (a.k.a. BANK-E SARMAYEH), Sepahod Gharani No. 24, Corner of Arak St., Tehran, Iran [IRAN].

SARV SHIPPING COMPANY LIMITED, 198 Old Bakery Street, Valletta VLT 1455, Malta; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone (356)(21241232) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SEPAHAN CEMENT (a.k.a. SIMAN SEPAHAN), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

SEPAHAN CEMENT CONCRETE PRODUCTS (a.k.a. FARAVARDEHAYE BOTONI SIMAN SEPAHAN), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

SEPAHAN CEMENT INVESTMENT (a.k.a. SARMA YE GOZARI SIMAN SEPAHAN), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

SEPAHAN CEMENT PAKAT-SAZI SHAFAGH (a.k.a. PAKAT SAZI SHAFAGH SIMAN SEPAHAN), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

SEPAHAN CEMENT RAHNAVAR D PRODUCTS TRANSPORTATION (a.k.a. HAML VA NAGHL KALAHAYE RAHNAVAR D SIMAN SEPAHAN), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

SEPEHR IRANIAN INSURANCE SERVICES, Iran [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

SEPEHR MASHAHD CEMENT TRANSPORTATION (a.k.a. HAML VA NAGHL SEPEHR SIMAN MASHHAD), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

SEPID SHIPPING COMPANY LIMITED, 198 Old Bakery Street, Valletta VLT 1455, Malta; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone (356)(21241232) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SHAHID TONGGOOYAN PETROCHEMICAL COMPANY (a.k.a. SHAHID TONGGUYAN PETROCHEMICAL COMPANY), Petrochemical Special Economic Zone (PETZONE), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

SHARQ CEMENT (a.k.a. SIMAN-E SHARGH), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

SHARQ CEMENT INDUSTRIAL LIMESTONE (a.k.a. AHAK-E SANATI SIMAN SHARGH), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

SHARQ CEMENT MANUFACTURERS (a.k.a. FARAVARDEHAYE SIMAN SHARGH), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

SHARQ COALMINES (a.k.a. MA'ADEN-E ZOGHAL SANG SHARGH), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

SHARQ WHITE CEMENT (a.k.a. SIMAN'E SEFID SHARGH), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

SHAZAND PETROCHEMICAL COMPANY (a.k.a. AR.P.C.; a.k.a. ARAK PETROCHEMICAL COMPANY; a.k.a. SHAZAND PETROCHEMICAL CORPORATION), No. 68, Taban St., Vali Asr Ave., Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

SHIPPING COMPUTER SERVICES COMPANY (a.k.a. SCSCO), No. 37, Asseman Shahid Sayyad Shirazeesq, Pasdaran Ave, PO Box 1587553-1351, Tehran, Iran; Website www.scsc0.net; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

SHIPPING WELFARE SERVICES INSTITUTE (a.k.a. IRISL CLUB; a.k.a. ISLAMIC REPUBLIC OF IRAN SHIPPING LINES COMFORT SERVICES; a.k.a. MARITIME WELFARE SERVICES INSTITUTE), Number 63, East Shahid Tajrlu Street, Shahid Tajrlu Square, Shian, Iran; Website www.irislclub.com; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

SHIRAZ PARS FARAYAND OIL REFINERY, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

SHOMAL CEMENT COMPANY, No. 269, Shahid Beheshti Street, Tehran, Iran; Website www.shomalcement.com; Additional Sanctions Information - Subject to Secondary Sanctions [SDGT] [IFSR] (Linked To: CEMENT INDUSTRY INVESTMENT AND DEVELOPMENT COMPANY).

SIMA GENERAL TRADING CO FZE (a.k.a. SIMA GENERAL TRADING & INDUSTRIALS FOR BUILDING MATERIAL CO FZE), Office No. 703 Office Tower, Twin Tower, Baniyas Rd., Deira, P.O. Box 49754, Dubai, United Arab Emirates; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

SIMA SHIPPING COMPANY LIMITED, 198 Old Bakery Street, Valletta VLT 1455, Malta; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone (356)(21241232) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SINA SHIPPING COMPANY LIMITED, 198 Old Bakery Street, Valletta VLT 1455, Malta; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone (356)(21241232) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SOUTH ALUMINUM, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

SOUTH IRAN DARYABAN KISH, Kish, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

SOUTH SHIPPING LINES - IRAN LINE (a.k.a. KASHTIRANI-E JONOU B KHAT-E IRAN), No 119 Shabnam Alley, Ghaem Magham Street, Tehran, Iran; Website www.ssil.net; IFCA Determination - Involved in the Shipping Sector; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] [IFCA].

SPEED TRANSPORTATION LIMITED, East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SPRING SHIPPING LIMITED, East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

STAR SHIP MANAGEMENT LIMITED (a.k.a. STAR SHIP MANAGEMENT LTD-BZE), East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SWISS MANAGEMENT SERVICES SARL, 28C, Route de Denges, Lonay 1027, Switzerland; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

SYNERGY GENERAL TRADING FZE, Sharjah - Saif Zone, Sharjah Airport International Free Zone, United Arab Emirates; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

TABRIZ PETROCHEMICAL COMPANY, Off Km 8, Azarshahr Road, Kojuvar Road, Tabriz, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

TADBIR BROKERAGE COMPANY (a.k.a. SHERKAT-E KARGOZARI-E TADBIRGARAN-E FARDA; a.k.a. TADBIRGARAN FARDA BROKERAGE COMPANY; a.k.a. TADBIRGARAN-E FARDA BROKERAGE COMPANY; a.k.a. TADBIRGARANE FARDA MERCANTILE EXCHANGE CO.), Unit C2, 2nd Floor, Building No. 29, Corner of 25th Street, After Jahan Koudak, Cross Road Africa Street, Tehran 15179, Iran; Website <http://www.tadbirbroker.com>; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

TADBIR CONSTRUCTION DEVELOPMENT COMPANY (a.k.a. GORUH-E TOSE-E SAKHTEMAN-E TADBIR; a.k.a. TADBIR BUILDING EXPANSION GROUP; a.k.a. TADBIR HOUSING DEVELOPMENT GROUP), Block 1, Mehr Passage, 4th Street, Iran Zamin Boulevard, Shahrak Qods, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

TADBIR ECONOMIC DEVELOPMENT GROUP (a.k.a. TADBIR GROUP), 16 Avenue Bucharest, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

TADBIR ENERGY DEVELOPMENT GROUP CO., 6th Floor, Mirdamad Avenue, No. 346, Tehran, Iran; Website <http://www.tadbirenergy.com>; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

TADBIR INVESTMENT COMPANY, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

TAKHTEH SHAHID BA HONAR, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

TAMAS COMPANY (a.k.a. NUCLEAR FUEL AND RAW MATERIALS PRODUCTION COMPANY; a.k.a. RAW MATERIALS AND NUCLEAR FUEL PRODUCTION COMPANY; a.k.a. "TAMAS"), Shahid Chamran Building, North Kargar Street, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: ATOMIC ENERGY ORGANIZATION OF IRAN).

TARABAR-GOROUS TRUST TRANSPORTATION (a.k.a. HAML VA NAGHL ETEMAAD TARABARGROUS), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

TARGET TRANSPORTATION LIMITED, East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

TAT BANK (a.k.a. BANK-E TAT), Shahid Ahmad Ghasir (Bocharest), Shahid Ahmadian (15th) St., No. 1, Tehran, Iran; No. 1 Ahmadian Street, Bokharest Avenue, Tehran, Iran; SWIFT/BIC TATBIRTH [IRAN].

TC SHIPPING COMPANY LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Subject to Secondary Sanctions; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

TEJARAT GOSTAR FARDAD, No. 13, First Floor, Unit 1, Shahab (11th) Street, Gandy Street, Tehran, Iran; No. 1/2, 2nd Floor, Yavari Alley, Across from Niyavaran Commercial Complex, Niyaravan, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [SDGT] [IFSR] (Linked To: DAY BANK).

TEJARAT PAYDAR PAYMAN DEVELOPMENT, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

THE NUCLEAR REACTORS FUEL COMPANY (a.k.a. "SOOREH"; a.k.a. "SUREH"), End of North Kargar Street, Shahid Abtahi Street, (20th), #61, Tehran, Iran; Esfahan Complex Khaliqe Fars Blvd., 20 km southeast of Esfahan, P.O. Box: 81465-1957, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: ATOMIC ENERGY ORGANIZATION OF IRAN).

TISA KISH, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

TOSE-E DIDAR IRANIAN HOLDING COMPANY, No. 1, Moqaddas Alley, Shahid Ahmad Qasir (Bukharest) Street, Tehran, Iran; Website <https://tdday.ir>; Additional Sanctions Information - Subject to Secondary Sanctions [SDGT] [IFSR] (Linked To: DAY BANK).

TOSE-E DONYA SHAHR KOHAN COMPANY, No. 52, 4th Floor, Mousavivand Street, Shariati Street, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [SDGT] [IFSR] (Linked To: DAY BANK).

TOSEE EQTESAD AYANDEHSAZAN COMPANY (a.k.a. TEACO; a.k.a. TOSEE EGHTEHAD AYANDEHSAZAN COMPANY), 39 Gandhi Avenue, Tehran 1517883115, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

TOSE-E MELLI GROUP INVESTMENT COMPANY (f.k.a. BANK MELLI IRAN INVESTMENT COMPANY; a.k.a. IRAN MELLI BANK INVESTMENT COMPANY; a.k.a. NATIONAL DEVELOPMENT AND INVESTMENT GROUP; a.k.a. TOSEE MELLI GROUP INVESTMENT COMPANY; a.k.a. TOSE-E MELLI GROUP INVESTMENT COMPANY PUBLIC SHAREHOLDING COMPANY; a.k.a. "TMGIC"), 2 Nader Alley, After Dr Vali e Asr Avenue, Tehran 15116, Iran; PO Box 15875-3898, Iran; Building 89, Khoddami Street, Vanak, Tehran 53158753898, Iran; Number 89, Shahid Khodami Street, After Kurdistan Bridge, Vanak Square, Iran; Vank Square, Shahid Khademi Street, after Kurdistan Bridge, No. 89, Tehran 1958698856, Iran; Website www.bmiic.ir; alt. Website www.en.tmgic.ir; Additional Sanctions Information - Subject to Secondary Sanctions; National ID No. 10101339590 (Iran); Registration Number 89584 (Iran) [SDGT] [IFSR] (Linked To: BANK MELLI IRAN).

TOSE-E MELLI INVESTMENT COMPANY (a.k.a. NATIONAL DEVELOPMENT INVESTMENT COMPANY; a.k.a. TOSEE MELLI INVESTMENT COMPANY), No. 1 St.North Didar.Blv Haghani, Tehran, Iran; Number 89, Shahid Khodami Street, After Kurdistan Bridge, Vanak Square, Tehran, Iran; Website www.tmico.ir; Additional Sanctions Information - Subject to Secondary Sanctions; Registration Number 208669 (Iran) [SDGT] [IFSR] (Linked To: TOSE-E MELLI GROUP INVESTMENT COMPANY).

TOSEE TAAVON BANK (a.k.a. BANK-E TOSE'E TA'AVON; a.k.a. COOPERATIVE DEVELOPMENT BANK), Mirdamad Blvd., North East Corner of Mirdamad Bridge, No. 271, Tehran, Iran [IRAN].

TOURISM BANK (a.k.a. BANK-E GARDESHGARI), Vali Asr St., above Vey Park, Shahid Fiazi St., No. 51, first floor, Tehran, Iran [IRAN].

TWELFTH OCEAN ADMINISTRATION GMBH, Schottweg 5, Hamburg 22087, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. HRB94573 [IRAN].

TWELFTH OCEAN GMBH & CO. KG (a.k.a. TWELFTH OCEAN GMBH AND CO. KG), Schottweg 5, Hamburg 22087, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. HRA 102506 [IRAN].

UNIVERSAL SHIPPING AND TRANSPORTATION LIMITED (a.k.a. UNIVERSAL SHIPPING & TRANS; a.k.a. UNIVERSAL SHIPPING AND TRANS), East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

UNIVERSE SHIPPING LIMITED, East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

URANIUM PROCESSING AND NUCLEAR FUEL COMPANY (a.k.a. FATSA COMPANY; a.k.a. URANIUM PROCESSING AND NUCLEAR FUEL COMPANY OF IRAN; a.k.a. URANIUM PROCESSING AND NUCLEAR FUEL PRODUCTION COMPANY; a.k.a. "FATSA"), Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: ATOMIC ENERGY ORGANIZATION OF IRAN).

VALFAJR SHIPPING COMPANY PJS (a.k.a. VALFAJR 8 SHIPPING CO.; a.k.a. VALFAJR SHIPPING CO.; a.k.a. VALFAJR SHIPPING LINES), Corner of Shabnam Alley 119, Tehran, Iran; No 101, Ghaem Magham Farhani Street, Tehran, Iran; No. 11, Abshar Alley, Corner of Azodi Street, PO Box 15875-4155, Tehran 1581674347, Iran; Valfajr Blvd, Bushehr, Iran; Website www.valfajr.ir; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

VASEPARI SEPEHR PARS, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

WEST SUN TRADE GMBH (a.k.a. WEST SUN TRADE), Winterhuder Weg 8, Hamburg 22085, Germany; Arak Machine Mfg. Bldg., 2nd Floor, opp. of College Economy, Northern Kargar Ave., Tehran 14136, Iran; Mundsburger Damm 16, Hamburg 22087, Germany; Additional Sanctions Information - Subject to Secondary Sanctions; Registration ID HRB 45757 (Germany); all offices worldwide [IRAN].

WITSHIPPING MARITIME PTE LTD (a.k.a. HARDSEA AGENCIES; f.k.a. SINOSE MARITIME), Hoe Chiang Road 10, #15-02a, Central Business District 089315, Singapore; Additional Sanctions Information - Subject to Secondary Sanctions; Trade License No. 201131193Z (Singapore) [IRAN].

WORLDFAST INTERNATIONAL LIMITED (a.k.a. WORLDFAST INTERNATIONAL LTD), East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

WORLDWIDE SHIPPING & TRANSPORTATION LIMITED (a.k.a. WORLDWIDE SHIPPING & TRANS; a.k.a. WORLDWIDE SHIPPING AND TRANS; a.k.a. WORLDWIDE SHIPPING AND TRANSPORTATION LIMITED), East Shahid Atefi Street 35, Africa Boulevard, PO Box 19395-4833, Tehran, Iran; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ZARIN PERSIA INVESTMENT, Iran [IRAN] (Linked To: GHADIR INVESTMENT COMPANY).

ZARIN RAFSANJAN CEMENT COMPANY (a.k.a. RAFSANJAN CEMENT COMPANY; a.k.a. ZARRIN RAFSANJAN CEMENT COMPANY), 2nd Floor, No. 67, North Sindokht Street, West Dr. Fatemi Avenue, Tehran 1411953943, Iran; Website <http://www.zarrincement.com>; Additional Sanctions Information - Subject to Secondary Sanctions [IRAN].

The following vessels have been added to OFAC's SDN List:

AAJ Crew/Supply Vessel Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 8984484 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

ABBA General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9051624 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

ABTIN 1 Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9379636 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

ABYAN Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9349667 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

ALVAN General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9165798 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

AMBER (f.k.a. FREEDOM; f.k.a. HARAZ) (51M 597) Crude Oil Tanker 317,356DWT 163,660GRT Panama flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9357406; MMSI 677049700 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

AMINA Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9305192 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

ANDIA Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9193197 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

APAMA (f.k.a. ABELIA; f.k.a. ASTARA; f.k.a. JUPITER) (9HDS9) Crude/Oil Products Tanker 99,087DWT 56,068GRT Iran flag; Former Vessel Flag Tuvalu; alt. Former Vessel Flag Malta; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9187631; MMSI 256845000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ARDAVAN Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9465863 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

AREZOO General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9165786 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

ARGO I (f.k.a. AMOL; a.k.a. ARGO 1; f.k.a. CASTOR; f.k.a. CHRISTINA; f.k.a. SILVER CLOUD) (T2EM4) Crude/Oil Products Tanker 99,094DWT 56,068GRT Panama flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9187667; MMSI 256843000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ARIES Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9369722 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

ARK (f.k.a. ABADEH; f.k.a. CRYSTAL; f.k.a. SUNDIAL) (9HDQ9) Crude/Oil Products Tanker 99,030DWT 56,068GRT Panama flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9187655; MMSI 256842000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ARNICA (f.k.a. ALERT; f.k.a. ASTANEH; f.k.a. NEPTUNE; f.k.a. SEAPRIDE) (T2ES4) Crude/Oil Products Tanker 99,144DWT 56,068GRT Iran flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9187643; MMSI 572467210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ARSHAM Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9386500 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

ARTABAZ Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9283007 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

ARTAM Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9284154 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

ARTARIA Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9226944 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

ARTAVAND Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9193214 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

ARTAVIL (f.k.a. ABADAN; f.k.a. ALPHA; f.k.a. SHONA) (T2EU4) Crude/Oil Products Tanker 99,144DWT 56,068GRT Iran flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag None Identified; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9187629; MMSI 572469210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ARTENOS Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9283021 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

ARTIN Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9305221 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

ARTMAN Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9405930 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

ARVIN Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9193202 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

ARZIN Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9284142 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

ATLANTIC (f.k.a. SEAGULL) Crude Oil Tanker Liberia flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9107655 (vessel) [IRAN].

AURA (f.k.a. OCEAN PERFORMER) Crude Oil Tanker Mongolia flag; Former Vessel Flag Liberia; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9013749 (vessel) [IRAN].

AVANG Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9465746 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

AYNAZ Tug Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9683570 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

AYSAN General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9165803 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

AZARGOUN Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9283019 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

BADR (EQJU) Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 8407345 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

BAHJAT Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9405954 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

BANEH (EQKF) Landing Craft 640DWT 478GRT Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 8508462; MMSI 422141000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

BASHT Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9346536 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

BASKAR Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9405942 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

BATIS Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9465760 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

BAVAND Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9387798 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

BEHDAD General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9051636 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

BEHDOKHT Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9405978 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

BEHNAVAZ Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9346548 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

BEHSHAD General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9167289 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

BEHTA Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9349590 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

BELEMA LIGHT CRUDE (f.k.a. MAHARLIKA; f.k.a. NOOR) (9HES9) Crude Oil Tanker 298,732DWT 156,809GRT Panama flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9079066; MMSI 256882000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

BICAS (f.k.a. GLAROS) Crude Oil Tanker Liberia flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9077850 (vessel) [IRAN].

BRELYAN Passenger Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Other Vessel Type Roll-on Roll-off; Vessel Registration Identification IMO 9138056 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

BRIGHT (f.k.a. ZAP) Crude Oil Tanker Mongolia flag; Former Vessel Flag Liberia; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9005235 (vessel) [IRAN].

CANREACH (f.k.a. HAMOUN) Container Ship Hong Kong flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9820271 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

CARIBO (f.k.a. NEREYDA) Crude Oil Tanker Panama flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9011246 (vessel) [IRAN].

CASPIA Chemical/Products Tanker Panama flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9125126 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

DAN (f.k.a. JUSTICE) Crude Oil Tanker Panama flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9357729 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DANIEL (f.k.a. DEMOS) (5IM656) Crude Oil Tanker Panama flag (NITC); Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9569683 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DARYABAR Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9369710 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

DEEP SEA (f.k.a. DARAB) (9HEE9) Crude Oil Tanker 296,803DWT 160,576GRT Panama flag; Former Vessel Flag Malta; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9218492; MMSI 256862000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DELICE Chemical/Products Tanker Panama flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9125138 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

DELNAVAZ Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9387803 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

DELRUBA Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9305207 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

DERYA Crude Oil Tanker Panama flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9569700 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DESTINY (f.k.a. ULYSSES 1) Crude Oil Tanker Panama flag; Former Vessel Flag Liberia; alt. Former Vessel Flag Mongolia; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9177155 (vessel) [IRAN].

DEVON (f.k.a. DELVAR) (9HEF9) Crude Oil Tanker 299,500DWT 160,576GRT None Identified flag; Former Vessel Flag Malta; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9218454; MMSI 256864000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DEVREZ Chemical/Products Tanker Panama flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9120994 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

DIAMOND II (f.k.a. DAMAVAND) (9HEG9) Crude Oil Tanker 297,013DWT 160,576GRT Panama flag; Former Vessel Flag Malta; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9218478; MMSI 256865000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DINO I (f.k.a. INFINITY) (5IM411) Crude Oil Tanker Panama flag (NITC); Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9569671 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DIONA Crude Oil Tanker Panama flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9569695 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DORE (f.k.a. COMPANION; f.k.a. DAL LAKE; f.k.a. DAVAR) (5IM 593) Crude Oil Tanker 317,850DWT 164,241GRT Panama flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9357717; MMSI 677049300 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DORENA (f.k.a. SKYLINE) (5IM632) Crude Oil Tanker Panama flag (NITC); Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9569669 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DORITA General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 8605234 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

DOVER (f.k.a. DAYLAM) (9HEU9) Crude Oil Tanker 299,500DWT 160,576GRT Panama flag; Former Vessel Flag Malta; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9218466; MMSI 256872000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DOWNY (f.k.a. DENA) (9HED9) Crude Oil Tanker 296,894DWT 160,576GRT Panama flag; Former Vessel Flag Malta; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9218480; MMSI 256861000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DREAM II (f.k.a. DANESH; f.k.a. DECESIVE; f.k.a. LEADERSHIP) (5IM 592) Crude Oil Tanker 319,988DWT 164,241GRT Panama flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9356593; MMSI 677049200 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DUNE Crude Oil Tanker Panama flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9569712 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ELYANA General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9165827 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

FANREACH (f.k.a. BARZIN) Container Ship Hong Kong flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9820269 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

FAXON Chemical/Products Tanker Panama flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9283758 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

FELICITY (f.k.a. LEYCOTHEA; f.k.a. ORIENTAL) Crude Oil Tanker Panama flag; Former Vessel Flag Panama; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9183934 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

FIROUZEH Passenger Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9103099 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

FOREST (f.k.a. FAEZ; f.k.a. FIANGA; f.k.a. MAESTRO; f.k.a. SATEEN) (T2DM4) Chemical/Products Tanker 35,124DWT 25,214GRT Panama flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9283760; MMSI 572438210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

FORTUNE (f.k.a. IRAN FAZEL) (9BAC) Chemical/Products Tanker 35,155DWT 25,214GRT Panama flag; Former Vessel Flag Iran; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9283746; MMSI 422303000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

GANJ Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9305219 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

GILDA General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9367982 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

GOLAFRUZ Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9323833 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

GOLBON Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9283033 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

GOLSAN General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9165815 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

GOLSAR Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9193185 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

GOODREACH (f.k.a. RADIN) Container Ship Hong Kong flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9820257 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

HALTI (f.k.a. HORIZON; f.k.a. HORMOZ; f.k.a. SCORPIAN) (9HEK9) Crude Oil Tanker 299,261DWT 160,930GRT Panama flag; Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9212890; MMSI 256870000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HAMD Bunkering Tanker Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9036052 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

HAMGAM Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9226956 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

HAPPINESS I (f.k.a. HAPPINESS; f.k.a. HENGAM; f.k.a. LOYAL; f.k.a. TULAR) (T2ER4) Crude Oil Tanker 299,214DWT 160,930GRT Panama flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9212905; MMSI 256875000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HASNA (f.k.a. HARSIN; f.k.a. MARINA; f.k.a. VALOR) (5IM600) Crude Oil Tanker 299,229DWT 160,930GRT Panama flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9212917; MMSI 677050000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HEDY (f.k.a. HUWAYZEH) (9HEJ9) Crude Oil Tanker 299,242DWT 160,930GRT Panama flag; Former Vessel Flag Malta; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9212888; MMSI 256869000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HELM (f.k.a. HIRMAND; f.k.a. HONESTY; f.k.a. MILLIONAIRE) (T2DZ4) Crude Oil Tanker 317,356DWT 163,660GRT Panama flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9357391; MMSI 572450210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HENNA (f.k.a. HALISTIC; f.k.a. HAMOON; f.k.a. LENA; f.k.a. TAMAR) (T2EQ4) Crude Oil Tanker 299,242DWT 160,930GRT Panama flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9212929; MMSI 572465210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HERBY (f.k.a. EXPLORER; f.k.a. HODA; f.k.a. HYDRA; f.k.a. PRECIOUS) (T2EH4) Crude Oil Tanker 317,356DWT 163,660GRT Panama flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9362059; MMSI 572458210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HERO II (f.k.a. HADI; f.k.a. PIONEER; f.k.a. ZEUS) (T2EJ4) Crude Oil Tanker 317,355DWT 163,650GRT Panama flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tuvalu; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9362073; MMSI 572459210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HILDA I (f.k.a. COURAGE; f.k.a. HOMA) (5IM 596) Crude Oil Tanker 317,367DWT 163,660GRT Panama flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9357389; MMSI 677049600 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HORMUZ 2 Passenger Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 7904580 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

HORSE (f.k.a. DOVE; f.k.a. HONAR; f.k.a. JANUS; f.k.a. VICTORY) (T2EA4) Crude Oil Tanker 317,367DWT 163,660GRT Panama flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9362061; MMSI 209511000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HUGE (f.k.a. GLORY; f.k.a. HATEF; f.k.a. MAJESTIC) (T2EG4) Crude Oil Tanker 317,367DWT 163,660GRT Panama flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9357183; MMSI 212256000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HUMANITY (f.k.a. OCEAN NYMPH) Crude Oil Tanker Panama flag; Former Vessel Flag Panama; alt. Former Vessel Flag Mongolia; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9180281 (vessel) [IRAN].

HYUNDAI MIPO 2655 (a.k.a. YARD NO.2655 HYUNDAI M.D.) Products Tanker Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9820312 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

HYUNDAI MIPO 2656 (a.k.a. YARD NO.2656 HYUNDAI M.D.) Products Tanker Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9820324 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

HYUNDAI MIPO 2657 (a.k.a. YARD NO.2657 HYUNDAI M.D.) Tanker Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9820336 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

IMICO NEKA 455 (a.k.a. YARD NO. 455 IRAN MARINE) Shuttle Tanker 63,000DWT 40,800GRT Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9404546 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

IMICO NEKA 456 (a.k.a. YARD NO. 456 IRAN MARINE) Shuttle Tanker 63,000DWT 40,800GRT Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9404558 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

IMICO NEKA 457 (a.k.a. YARD NO. 457 IRAN MARINE) Shuttle Tanker 63,000DWT 40,800GRT Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9404560 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

IRAN CHARAK Bunkering Tanker Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 8322076 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

IRAN FAHIM Chemical/Products Tanker 34,900DWT 26,561GRT Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9286140 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

IRAN FALAGH Chemical/Products Tanker 34,900DWT 25,000GRT Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9286152 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

IRAN HORMUZ 12 (a.k.a. IRAN HORMOZ 12) Passenger Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Other Vessel Type Roll-on Roll-off; Vessel Registration Identification IMO 9005596 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

IRAN HORMUZ 14 (a.k.a. IRAN HORMOZ 14) Passenger Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Other Vessel Type Roll-on Roll-off; Vessel Registration Identification IMO 9020778 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

IRAN HORMUZ 22 Passenger Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Other Vessel Type Landing Craft; Vessel Registration Identification IMO 8314275 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

IRAN HORMUZ 25 (a.k.a. HAYAN) Roll-on Roll-off Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Other Vessel Type General Cargo; Vessel Registration Identification IMO 8422072 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

IRAN PARAK Bunkering Tanker Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 8322064 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

IRAN SHAHED General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9184691 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

IRAN SHALAK Bunkering Tanker Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 8319940 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

IRAN SHALAMCHEH (a.k.a. IR.SHALAMCHE; a.k.a. SEPEHR SAM) General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 8820925 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

IRAN YOUSHAH Bunkering Tanker Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 8319952 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

JAIRAN General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9167291 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

KADOS General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9137258 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

KASHAN Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9270696 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

KASMA General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 8721351 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

KHURAN Products Tanker Togo flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9032666 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

KIAZAND Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9465758 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

MAHNAM Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9213387 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

MARIA III (f.k.a. SUNRISE) LPG Tanker Panama flag (NITC); Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9615092 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

MARIVAN (EQKH) Bunkering Tanker 640DWT 478GRT Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 8517243; MMSI 422143000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

MENA Crude/Oil Products Tanker Togo flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 8909472 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

MIAMI PRIDE Bulk Carrier Togo flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9274941 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

NAINITAL (f.k.a. MIDSEA; f.k.a. MOTION; f.k.a. NAJM) (T2DR4) Crude Oil Tanker 298,731DWT 156,809GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9079092; MMSI 572442210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

NARDIS General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9137246 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

NASHA (f.k.a. NATIVE LAND; f.k.a. NESA; f.k.a. OCEANIC; f.k.a. TRUTH) (T2DP4) Crude Oil Tanker 298,732DWT 156,809GRT Panama flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9079107; MMSI 572440210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

NAVARZ (f.k.a. ELITE; f.k.a. NAPOLI; f.k.a. NOAH; f.k.a. VOYAGER) (T2DQ4) Crude Oil Tanker 298,731DWT 156,809GRT Panama flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9079078; MMSI 572441210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

NEGAR General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9165839 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

NEGEEN Passenger Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9071519 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

NESHAT General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9167277 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

NOOR 1 Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9506320 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

NYOS (f.k.a. BRAUNY; f.k.a. MARIGOLD; f.k.a. NABI) (T2DS4) Crude Oil Tanker 298,731DWT 156,809GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9079080; MMSI 572443210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

OURA Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9387815 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

PARAND General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9118551 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

PARIN General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9076478 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

PARISAN Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9465851 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

PARMIS General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9245316 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

PARNIA General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9167265 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

PARSHAD Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9387786 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

PARSHAN General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9051648 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

PATRIS General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9137210 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

PERARIN Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9209350 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

ROSHAK Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9405966 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

SABITI (f.k.a. LANTANA; f.k.a. SANANDAJ; f.k.a. SPOTLESS) (5IM591) Crude Oil Tanker 159,681DWT 81,479GRT Panama flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9172040; MMSI 677049100 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SABRINA General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 8215742 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

SALINA (f.k.a. BLACKSTONE; f.k.a. SARV; f.k.a. SPLENDOR) (9HNZ9) Crude Oil Tanker 163,870DWT 85,462GRT Panama flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Seychelles; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9357377; MMSI 249257000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SANA (f.k.a. BAIKAL; f.k.a. BLOSSOM; f.k.a. SIMA; f.k.a. SUCCESS) (T2DY4) Crude Oil Tanker 164,154DWT 85,462GRT Panama flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9357353; MMSI 572449210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SANCHI (f.k.a. GARDENIA; f.k.a. SEAHORSE; f.k.a. SEPID) (T2EF4) Crude Oil Tanker 164,154DWT 85,462GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9356608; MMSI 572455210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SANIA General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9367994 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

SARDASHT (EQKG) Landing Craft 640DWT 478GRT Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 8517231; MMSI 422142000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SARINA General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 8203608 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

SARIR General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9368003 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

SARVIN Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9209348 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

SAVIZ General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9167253 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

SEA CLIFF (f.k.a. SMOOTH; a.k.a. YARD NO. 1225 SHANGHAI WAIGAOQIAO) Crude Oil Tanker 318,000DWT 165,000GRT Panama flag; Former Vessel Flag Malta; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9569657 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SEA STAR III (f.k.a. CARNATION; f.k.a. SAFE; a.k.a. SEASTAR III; f.k.a. SUNSHINE; a.k.a. YARD NO. 1220 SHANGHAI WAIGAOQIAO) Crude Oil Tanker 318,000DWT 165,000GRT Panama flag; Former Vessel Flag Tuvalu; alt. Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9569205 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SERENA (f.k.a. SALALEH; f.k.a. SONGBIRD; a.k.a. YARD NO. 1224 SHANGHAI WAIGAOQIAO) Crude Oil Tanker 318,000DWT 165,000GRT Panama flag; Former Vessel Flag Malta; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9569645 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SHABDIS Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9349588 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

SHABGOUN Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9346524 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

SHAHR E KORD Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9270684 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

SHAHRAZ Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9349576 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

SHAMIM Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9270658 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

SHAYAN 1 Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9420356 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

SHIBA Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9270646 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

SILVIA I (f.k.a. MAGNOLIA; f.k.a. SABRINA; f.k.a. SARVESTAN) (5IM590) Crude Oil Tanker 159,711DWT 81,479GRT Panama flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9172052; MMSI 677049000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SINOPA (f.k.a. DAISY; f.k.a. SUPERIOR; f.k.a. SUSANGIRD) (5IM584) Crude Oil Tanker 159,681DWT 81,479GRT Panama flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9172038; MMSI 677048400 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SNOW (f.k.a. DOJRAN; f.k.a. RAINBOW; f.k.a. SOUVENIR; a.k.a. YARD NO. 1221 SHANGHAI WAIGAOQIAO) Crude Oil Tanker 318,000DWT 165,000GRT Panama flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9569619 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SOBHAN Bunkering Tanker Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9036935 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

SOL (f.k.a. CAMELLIA; f.k.a. SAVEH; f.k.a. SWALLOW) (5IM 594) Crude Oil Tanker 159,758DWT 81,479GRT Panama flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9171462; MMSI 677049400 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SOMIA General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9368015 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

SONIA I (f.k.a. AZALEA; f.k.a. SINA; f.k.a. SUNEAST) (9HNY9) Crude Oil Tanker 164,154DWT 85,462GRT Panama flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag None Identified; alt. Former Vessel Flag Seychelles; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9357365; MMSI 249256000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

8/5/2019

Publication of Updates to OFAC's Specially Designated Nationals and Blocked Persons List and 13599 List Removals

STARKE I (f.k.a. CLOVE; f.k.a. SEMNAN; f.k.a. SPARROW) (51M 595) Crude Oil Tanker 159,681DWT 81,479GRT Panama flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9171450; MMSI 677049500 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

STARLA (f.k.a. ATLANTIS) (51M316) Crude Oil Tanker Panama flag (NITC); Former Vessel Flag Tanzania; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9569621 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

STREAM (f.k.a. FORTUN; f.k.a. SONATA; a.k.a. YARD NO. 1222 SHANGHAI WAIGAOQIAO) Crude Oil Tanker 318,000DWT 165,000GRT Panama flag; Former Vessel Flag Malta; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9569633 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

TABAN 1 Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9420368 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

TABUK Crude/Oil Products Tanker Togo flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 8917467 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

TARADIS General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9245304 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

TENREACH (f.k.a. RAYEN) Container Ship Hong Kong flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9820245 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

TERMEH Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9213399 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

TOLOU (EQOD) Crew/Supply Vessel 250DWT 178GRT Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 8318178 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

TOUSKA Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9328900 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

VALFAJR2 (EQOX) Tug 650DWT 419GRT Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 8400103 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

VIANA General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9010723 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

VISTA General Cargo Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9010711 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

WARTA Bulk Carrier Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9465849 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

YAGHOUB (EQOE) Platform Supply Ship 950DWT 1,019GRT Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 8316168; MMSI 422150000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

YANGZHOU DAYANG DY905 (a.k.a. YARD NO. DY905 YANGZHOU D.) LPG Tanker 11,750DWT 8,750GRT Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9575424 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

YARAN Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9420370 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

YOUNES (EQYY) Platform Supply Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 8212465 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

YOUSEF (EQOG) Offshore Tug/Supply Ship 1,050DWT 584GRT Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 8316106; MMSI 422144000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ZARDIS Container Ship Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Vessel Registration Identification IMO 9349679 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

ZOMOROUD Passenger Iran flag; Additional Sanctions Information - Subject to Secondary Sanctions; Other Vessel Type Roll-on Roll-off; Vessel Registration Identification IMO 9138044 (vessel) [IRAN] (Linked To: ISLAMIC REPUBLIC OF IRAN SHIPPING LINES).

The following aircraft have been added to OFAC's SDN List:

EP-CFD; Aircraft Manufacture Date 19 Feb 1993; Aircraft Model F28; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 11442; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-CFE; Aircraft Manufacture Date 06 Oct 1992; Aircraft Model F28; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 11422; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-CFH; Aircraft Manufacture Date 24 Feb 1993; Aircraft Model F28; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 11443; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-CFI; Aircraft Manufacture Date 22 Jan 1996; Aircraft Model F28; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 11511; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-CFJ; Aircraft Manufacture Date 09 Jan 1996; Aircraft Model F28; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 11516; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-CFK; Aircraft Manufacture Date 18 Feb 1996; Aircraft Model F28; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 11518; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-CFL; Aircraft Manufacture Date 28 Jun 1991; Aircraft Model F28; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 11343; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-CFM; Aircraft Manufacture Date 27 Apr 1992; Aircraft Model F28; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 11394; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-CFO; Aircraft Manufacture Date 03 Apr 1992; Aircraft Model F28; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 11389; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-CFP; Aircraft Manufacture Date 24 Jul 1992; Aircraft Model F28; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 11409; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-CFQ; Aircraft Manufacture Date 02 Dec 1992; Aircraft Model F28; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 11429; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-CFR; Aircraft Manufacture Date 31 Mar 1992; Aircraft Model F28; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 11383; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IAB; Aircraft Manufacture Date 22 Apr 1976; Aircraft Model B747; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 20999; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IAC; Aircraft Manufacture Date 16 May 1977; Aircraft Model B747; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 21093; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IAD; Aircraft Manufacture Date 26 Apr 1979; Aircraft Model B747; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 21758; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IAG; Aircraft Manufacture Date 21 Jul 1976; Aircraft Model B747; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 21217; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IAH; Aircraft Manufacture Date 22 Dec 1976; Aircraft Model B747; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 21218; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IAI; Aircraft Manufacture Date 01 Dec 1981; Aircraft Model B747; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 22670; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IBA; Aircraft Manufacture Date 21 Dec 1993; Aircraft Model A300; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 723; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IBB; Aircraft Manufacture Date 18 Jan 1994; Aircraft Model A300; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 727; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IBC; Aircraft Manufacture Date 11 Mar 1992; Aircraft Model A300; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 632; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IBD; Aircraft Manufacture Date Apr 1993; Aircraft Model A300; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 696; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IBG; Aircraft Manufacture Date 09 Aug 1984; Aircraft Model A300; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 299; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IBI; Aircraft Manufacture Date 09 Jun 1981; Aircraft Model A300; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 151; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IBJ; Aircraft Manufacture Date 18 May 1983; Aircraft Model A300; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 256; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IBK; Aircraft Manufacture Date 19 Feb 1993; Aircraft Model A310; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 671; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IBL; Aircraft Manufacture Date 02 May 1987; Aircraft Model A310; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 436; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IBN; Aircraft Manufacture Date 16 Apr 1985; Aircraft Model A310; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 375; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IBP; Aircraft Manufacture Date 06 Jan 1986; Aircraft Model A310; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 370; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IBQ; Aircraft Manufacture Date 20 Jan 1986; Aircraft Model A310; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 389; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IBS; Aircraft Manufacture Date 13 Feb 1980; Aircraft Model A300; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 80; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IBT; Aircraft Manufacture Date 09 Mar 1982; Aircraft Model A300; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 185; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IBZ; Aircraft Manufacture Date 13 Dec 1982; Aircraft Model A300; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 226; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-ICD; Aircraft Manufacture Date 15 Sep 1988; Aircraft Model B747; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 24134; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-ICE; Aircraft Manufacture Date 11 Mar 1981; Aircraft Model A300; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 139; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-ICF; Aircraft Manufacture Date 14 Dec 1981; Aircraft Model A300; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 173; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IDA; Aircraft Manufacture Date 12 Jun 1990; Aircraft Model F28; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 11292; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IDD; Aircraft Manufacture Date 31 Oct 1990; Aircraft Model F28; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 11294; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IDF; Aircraft Manufacture Date 07 Nov 1990; Aircraft Model F28; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 11298; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IDG; Aircraft Manufacture Date 30 Jan 1991; Aircraft Model F28; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 11302; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IEB; Aircraft Manufacture Date 26 Jan 1996; Aircraft Model A320; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 575; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IEC; Aircraft Manufacture Date 18 Jun 1998; Aircraft Model A320; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 857; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IED; Aircraft Manufacture Date 18 Jun 1992; Aircraft Model A320; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 345; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IEE; Aircraft Manufacture Date 14 Feb 1992; Aircraft Model A320; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 303; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IEF; Aircraft Manufacture Date 05 Mar 1992; Aircraft Model A320; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 312; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IEG; Aircraft Manufacture Date 06 Jun 2003; Aircraft Model A320; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 2054; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IFA; Aircraft Manufacture Date 16 Nov 2016; Aircraft Model A321; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 7418; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IJA; Aircraft Manufacture Date 02 Jun 2014; Aircraft Model A330; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 1540; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IJB; Aircraft Manufacture Date 05 Nov 2014; Aircraft Model A330; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 1586; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IRR; Aircraft Manufacture Date 24 Jun 1974; Aircraft Model B727; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 20946; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IRS; Aircraft Manufacture Date 12 Sep 1974; Aircraft Model B727; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 20947; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-IRT; Aircraft Manufacture Date 03 Mar 1975; Aircraft Model B727; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 21078; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-ITA; Aircraft Manufacture Date 05 Jan 2017; Aircraft Model ATR-72; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 1386; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-ITB; Aircraft Manufacture Date 17 Jan 2017; Aircraft Model ATR-72; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 1389; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-ITC; Aircraft Manufacture Date 11 Jan 2017; Aircraft Model ATR-72; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 1390; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-ITD; Aircraft Manufacture Date 28 Dec 2016; Aircraft Model ATR-72; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 1391; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-ITE; Aircraft Manufacture Date 27 Jul 2017; Aircraft Model ATR-72; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 1424; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-ITF; Aircraft Manufacture Date 04 Sep 2017; Aircraft Model ATR-72; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 1431; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-ITG; Aircraft Manufacture Date 20 Dec 2017; Aircraft Model ATR-72; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 1477; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-ITH; Aircraft Manufacture Date 11 Dec 2017; Aircraft Model ATR-72; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 1478; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-ITI; Aircraft Manufacture Date 22 Mar 2018; Aircraft Model ATR-72; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 1489; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-ITJ; Aircraft Manufacture Date 06 Apr 2018; Aircraft Model ATR-72; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 1494; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-ITK; Aircraft Manufacture Date 19 Jun 2018; Aircraft Model ATR-72; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 1503; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-ITL; Aircraft Manufacture Date 24 May 2018; Aircraft Model ATR-72; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 1504; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

EP-ITM; Aircraft Manufacture Date 03 Jul 2018; Aircraft Model ATR-72; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 1510; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

UR-BXI; Aircraft Manufacture Date Jun 1993; Aircraft Model DC-9; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 53170; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

UR-CBD; Aircraft Manufacture Date Mar 1989; Aircraft Model DC-9; Aircraft Operator Iran Air; Aircraft Manufacturer's Serial Number (MSN) 49510; Additional Sanctions Information - Subject to Secondary Sanctions (aircraft) [IRAN] (Linked To: IRAN AIR).

The following changes have been made to OFAC's SDN List:

TIDEWATER MIDDLE EAST CO. (a.k.a. FARAZ ROYAL QESHM LLC; a.k.a. TIDE WATER COMPANY; a.k.a. TIDE WATER MIDDLE EAST MARINE SERVICE; a.k.a. TIDEWATER CO. (MIDDLE EAST MARINE SERVICES)), No. 80, Tidewater Building, Vozara Street, Next to Saie Park, Tehran, Iran; Website www.tidewaterco.com; Email Address info@tidewaterco.com; alt. Email Address info@tidewaterco.ir; IFC A Determination - Port Operator; Additional Sanctions Information - Subject to Secondary Sanctions; Business Registration Document # 18745 (Iran); Telephone: 982188553321; Alt. Telephone: 982188554432; Fax: 982188717367; Alt. Fax: 982188708761; Alt. Fax: 982188708911 [SDGT] [NPWMD] [IRGC] [IFSR]. -to- TIDEWATER MIDDLE EAST CO. (a.k.a. FARAZ ROYAL QESHM LLC; a.k.a. TIDE WATER COMPANY; a.k.a. TIDE WATER MIDDLE EAST MARINE SERVICE; a.k.a. TIDEWATER CO. (MIDDLE EAST MARINE SERVICES)), No. 80, Tidewater Building, Vozara Street, Next to Saie Park, Tehran, Iran; Website www.tidewaterco.com; Email Address info@tidewaterco.com; alt. Email Address info@tidewaterco.ir; IFC A Determination - Port Operator; Additional Sanctions Information - Subject to Secondary Sanctions; Business Registration Document # 18745 (Iran); Telephone: 982188553321; Alt. Telephone: 982188554432; Fax: 982188717367; Alt. Fax: 982188708761; Alt. Fax: 982188708911 [SDGT] [NPWMD] [IRGC] [IFSR] [IFCA].

The following deletions have been made to OFAC's Executive Order 13599 List:

BANK MARKAZI JOMHOURI ISLAMI IRAN (a.k.a. BANK MARKAZI IRAN; a.k.a. CENTRAL BANK OF IRAN; a.k.a. CENTRAL BANK OF THE ISLAMIC REPUBLIC OF IRAN), PO Box 15875/7177, 144 Mirdamad Blvd, Tehran, Iran; 213 Ferdowsi Avenue, Tehran 11365, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

CENTRAL BANK OF THE ISLAMIC REPUBLIC OF IRAN (a.k.a. BANK MARKAZI IRAN; a.k.a. BANK MARKAZI JOMHOURI ISLAMIRAN; a.k.a. CENTRAL BANK OF IRAN), PO Box 15875/7177, 144 Mirdamad Blvd, Tehran, Iran; 213 Ferdowsi Avenue, Tehran 11365, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

BANK MARKAZI IRAN (a.k.a. BANK MARKAZI JOMHOURI ISLAMIRAN; a.k.a. CENTRAL BANK OF IRAN; a.k.a. CENTRAL BANK OF THE ISLAMIC REPUBLIC OF IRAN), PO Box 15875/7177, 144 Mirdamad Blvd, Tehran, Iran; 213 Ferdowsi Avenue, Tehran 11365, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

CENTRAL BANK OF IRAN (a.k.a. BANK MARKAZI IRAN; a.k.a. BANK MARKAZI JOMHOURI ISLAMIRAN; a.k.a. CENTRAL BANK OF THE ISLAMIC REPUBLIC OF IRAN), PO Box 15875/7177, 144 Mirdamad Blvd, Tehran, Iran; 213 Ferdowsi Avenue, Tehran 11365, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

BANK MASKAN (a.k.a. HOUSING BANK (OF IRAN)), PO Box 11365/5699, No 247 3rd Floor Fedowski Ave, Cross Sarhang Sakhaei St, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

HOUSING BANK (OF IRAN) (a.k.a. BANK MASKAN), PO Box 11365/5699, No 247 3rd Floor Fedowski Ave, Cross Sarhang Sakhaei St, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

BANK REFAH KARGARAN (a.k.a. BANK REFAH; a.k.a. WORKERS' WELFARE BANK (OF IRAN)), No. 40 North Shiraz Street, Mollasadra Ave, Vanak Sq, Tehran 19917, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

WORKERS' WELFARE BANK (OF IRAN) (a.k.a. BANK REFAH; a.k.a. BANK REFAH KARGARAN), No. 40 North Shiraz Street, Mollasadra Ave, Vanak Sq, Tehran 19917, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

BANK REFAH (a.k.a. BANK REFAH KARGARAN; a.k.a. WORKERS' WELFARE BANK (OF IRAN)), No. 40 North Shiraz Street, Mollasadra Ave, Vanak Sq, Tehran 19917, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

BANK OF INDUSTRY AND MINE (OF IRAN) (a.k.a. BANK SANAD VA MADAN; a.k.a. "BIM"), PO Box 15875-4456, Firouzeh Tower, No 1655 Vali-Asr Ave after Chamran Crossroads, Tehran 1965643511, Iran; No 1655, Firouzeh Building, Mahmoudiye Street, Valiasr Ave, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

BANK SANAD VA MADAN (a.k.a. BANK OF INDUSTRY AND MINE (OF IRAN); a.k.a. "BIM"), PO Box 15875-4456, Firouzeh Tower, No 1655 Vali-Asr Ave after Chamran Crossroads, Tehran 1965643511, Iran; No 1655, Firouzeh Building, Mahmoudiye Street, Valiasr Ave, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

"BIM" (a.k.a. BANK OF INDUSTRY AND MINE (OF IRAN); a.k.a. BANK SANAD VA MADAN), PO Box 15875-4456, Firouzeh Tower, No 1655 Vali-Asr Ave after Chamran Crossroads, Tehran 1965643511, Iran; No 1655, Firouzeh Building, Mahmoudiye Street, Valiasr Ave, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

BANK KESHAVARZI IRAN (a.k.a. AGRICULTURAL BANK OF IRAN; a.k.a. BANK KESHAVARZI), PO Box 14155-6395, 129 Patrice Lumumba St, Jalal-al-Ahmad Expressway, Tehran 14454, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

AGRICULTURAL BANK OF IRAN (a.k.a. BANK KESHAVARZI; a.k.a. BANK KESHAVARZI IRAN), PO Box 14155-6395, 129 Patrice Lumumba St, Jalal-al-Ahmad Expressway, Tehran 14454, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

BANK KESHAVARZI (a.k.a. AGRICULTURAL BANK OF IRAN; a.k.a. BANK KESHAVARZI IRAN), PO Box 14155-6395, 129 Patrice Lumumba St, Jalal-al-Ahmad Expressway, Tehran 14454, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S.

Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

BANK TEJARAT, PO Box 11365-5416, 152 Taleghani Avenue, Tehran 15994, Iran; 130, Zandi Alley, Taleghani Avenue, No 152, Ostad Nejat Ollahi Cross, Tehran 14567, Iran; 124-126 Rue de Provence, Angle 76 bd Haussman, Paris 75008, France; PO Box 734001, Rudaki Ave 88, Dushanbe 734001, Tajikistan; Office C208, Beijing Lufthansa Center No 50, Liangmaqiao Rd, Chaoyang District, Beijing 100016, China; c/o Europaisch-Iranische Handelsbank AG, Depenau 2, D-20095, Hamburg, Germany; SWIFT/BIC BTEJIRTH; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

EUROPAISCH-IRANISCHE HANDELSBANK AG (f.k.a. DEUTSCH-IRANISCHE HANDELSBANK AG; a.k.a. EUROPAEISCH-IRANISCHE HANDELSBANK; a.k.a. EUROPAESCH-IRANISCHE HANDELSBANK AKTIENGESELLSCHAFT; a.k.a. GERMAN-IRANIAN TRADE BANK), Hamburg Head Office, Depenau 2, D-20095 Hamburg, P.O. Box 101304, D-20008 Hamburg, Hamburg, Germany; Kish Branch, Sanaee Avenue, PO Box 79415/148, Kish Island 79415, Iran; Tehran Branch, No. 1655/1, Valiasr Avenue, PO Box 19656 43 511, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

DEUTSCH-IRANISCHE HANDELSBANK AG (a.k.a. EUROPAEISCH-IRANISCHE HANDELSBANK; a.k.a. EUROPAESCH-IRANISCHE HANDELSBANK AKTIENGESELLSCHAFT; a.k.a. EUROPAISCH-IRANISCHE HANDELSBANK AG; a.k.a. GERMAN-IRANIAN TRADE BANK), Hamburg Head Office, Depenau 2, D-20095 Hamburg, P.O. Box 101304, D-20008 Hamburg, Hamburg, Germany; Kish Branch, Sanaee Avenue, PO Box 79415/148, Kish Island 79415, Iran; Tehran Branch, No. 1655/1, Valiasr Avenue, PO Box 19656 43 511, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

EUROPAESCH-IRANISCHE HANDELSBANK AKTIENGESELLSCHAFT (f.k.a. DEUTSCH-IRANISCHE HANDELSBANK AG; a.k.a. EUROPAEISCH-IRANISCHE HANDELSBANK; a.k.a. EUROPAISCH-IRANISCHE HANDELSBANK AG; a.k.a. GERMAN-IRANIAN TRADE BANK), Hamburg Head Office, Depenau 2, D-20095 Hamburg, P.O. Box 101304, D-20008 Hamburg, Hamburg, Germany; Kish Branch, Sanaee Avenue, PO Box 79415/148, Kish Island 79415, Iran; Tehran Branch, No. 1655/1, Valiasr Avenue, PO Box 19656 43 511, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

EUROPAEISCH-IRANISCHE HANDELSBANK (f.k.a. DEUTSCH-IRANISCHE HANDELSBANK AG; a.k.a. EUROPAESCH-IRANISCHE HANDELSBANK AKTIENGESELLSCHAFT; a.k.a. EUROPAISCH-IRANISCHE HANDELSBANK AG; a.k.a. GERMAN-IRANIAN TRADE BANK), Hamburg Head Office, Depenau 2, D-20095 Hamburg, P.O. Box 101304, D-20008 Hamburg, Hamburg, Germany; Kish Branch, Sanaee Avenue, PO Box 79415/148, Kish Island 79415, Iran; Tehran Branch, No. 1655/1, Valiasr Avenue, PO Box 19656 43 511, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

GERMAN-IRANIAN TRADE BANK (f.k.a. DEUTSCH-IRANISCHE HANDELSBANK AG; a.k.a. EUROPAEISCH-IRANISCHE HANDELSBANK; a.k.a. EUROPAESCH-IRANISCHE HANDELSBANK AKTIENGESELLSCHAFT; a.k.a. EUROPAISCH-IRANISCHE HANDELSBANK AG), Hamburg Head Office, Depenau 2, D-20095 Hamburg, P.O. Box 101304, D-20008 Hamburg, Hamburg, Germany; Kish Branch, Sanaee Avenue, PO Box 79415/148, Kish Island 79415, Iran; Tehran Branch, No. 1655/1, Valiasr Avenue, PO Box 19656 43 511, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

BANK SEPAH, Imam Khomeini Square, Tehran 1136953412, Iran; 64 Rue de Miromesnil, Paris 75008, France; Hafenstrasse 54, D-60327, Frankfurt am Main, Germany; Via Barberini 50, Rome, RM 00187, Italy; 17 Place Vendome, Paris 75008, France; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

BANK MELLI IRAN (a.k.a. BANK MELLI; a.k.a. NATIONAL BANK OF IRAN), PO Box 11365-171, Ferdowsi Avenue, Tehran, Iran; 43 Avenue Montaigne, Paris 75008, France; Room 704-6, Wheelock Hse, 20 Pedder St, Central, Hong Kong; Bank Melli Iran Bldg, 111 St 24, 929 Arasat, Baghdad, Iraq; PO Box 2643, Ruwi, Muscat 112, Oman; PO Box 2656, Liva Street, Abu Dhabi, United Arab Emirates; PO Box 248, Hamad Bin Abdulla St, Fujairah, United Arab Emirates; PO Box 1888, Clock Tower, Industrial Rd, Al Ain Club Bldg, Al Ain, Abu Dhabi, United Arab Emirates; PO Box 1894, Baniyas St, Deira, Dubai City, United Arab Emirates; PO Box 5270, Oman Street Al Nakheel, Ras Al-Khaimah, United Arab Emirates; PO Box 459, Al Borj St, Sharjah, United Arab Emirates; PO Box 3093, Ahmed Seddiqui Bldg, Khalid Bin El-Walid St, Bur-Dubai, Dubai City 3093, United Arab Emirates; PO Box 1894, Al Wasl Rd, Jumeirah, Dubai, United Arab Emirates; Postfach 112 129, Holzbruecke 2, D-20459, Hamburg, Germany; Nobel Ave. 14, Baku, Azerbaijan; Unit 1703-4, 17th Floor, Hong Kong Club Building, 3 A Chater Road Central, Hong Kong; Esteghlal St., Opposite to Otbeh Ibn Ghazvan Hall, Basrah, Iraq; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

BANK MELLI (a.k.a. BANK MELLI IRAN; a.k.a. NATIONAL BANK OF IRAN), PO Box 11365-171, Ferdowsi Avenue, Tehran, Iran; 43 Avenue Montaigne, Paris 75008, France; Room 704-6, Wheelock Hse, 20 Pedder St, Central, Hong Kong; Bank Melli Iran Bldg, 111 St 24, 929 Arasat, Baghdad, Iraq; PO Box 2643, Ruwi, Muscat 112, Oman; PO Box 2656, Liva Street, Abu Dhabi, United Arab Emirates; PO Box 248, Hamad Bin Abdulla St, Fujairah, United Arab Emirates; PO Box 1888, Clock Tower, Industrial Rd, Al Ain Club Bldg, Al Ain, Abu Dhabi, United Arab Emirates; PO

Box 1894, Baniyas St, Deira, Dubai City, United Arab Emirates; PO Box 5270, Oman Street Al Nakheel, Ras Al-Khaimah, United Arab Emirates; PO Box 459, Al Borj St, Sharjah, United Arab Emirates; PO Box 3093, Ahmed Seddiqui Bldg, Khalid Bin El-Walid St, Bur-Dubai, Dubai City 3093, United Arab Emirates; PO Box 1894, Al Wasl Rd, Jumeirah, Dubai, United Arab Emirates; Postfach 112 129, Holzbruecke 2, D-20459, Hamburg, Germany; Nobel Ave. 14, Baku, Azerbaijan; Unit 1703-4, 17th Floor, Hong Kong Club Building, 3 A Chater Road Central, Hong Kong; Esteghlal St., Opposite to Otbeh Ibn Ghazvan Hall, Basrah, Iraq; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

NATIONAL BANK OF IRAN (a.k.a. BANK MELLI; a.k.a. BANK MELLI IRAN), PO Box 11365-171, Ferdowsi Avenue, Tehran, Iran; 43 Avenue Montaigne, Paris 75008, France; Room 704-6, Wheelock Hse, 20 Pedder St, Central, Hong Kong; Bank Melli Iran Bldg, 111 St 24, 929 Arasat, Baghdad, Iraq; PO Box 2643, Ruwi, Muscat 112, Oman; PO Box 2656, Liva Street, Abu Dhabi, United Arab Emirates; PO Box 248, Hamad Bin Abdulla St, Fujairah, United Arab Emirates; PO Box 1888, Clock Tower, Industrial Rd, Al Ain Club Bldg, Al Ain, Abu Dhabi, United Arab Emirates; PO Box 1894, Baniyas St, Deira, Dubai City, United Arab Emirates; PO Box 5270, Oman Street Al Nakheel, Ras Al-Khaimah, United Arab Emirates; PO Box 459, Al Borj St, Sharjah, United Arab Emirates; PO Box 3093, Ahmed Seddiqui Bldg, Khalid Bin El-Walid St, Bur-Dubai, Dubai City 3093, United Arab Emirates; PO Box 1894, Al Wasl Rd, Jumeirah, Dubai, United Arab Emirates; Postfach 112 129, Holzbruecke 2, D-20459, Hamburg, Germany; Nobel Ave. 14, Baku, Azerbaijan; Unit 1703-4, 17th Floor, Hong Kong Club Building, 3 A Chater Road Central, Hong Kong; Esteghlal St., Opposite to Otbeh Ibn Ghazvan Hall, Basrah, Iraq; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

FUTURE BANK B.S.C. (a.k.a. BANK-E AL-MOSTAGHBAL; a.k.a. FUTURE BANK), P.O. Box 785, City Centre Building, Government Avenue, Manama, Bahrain; Block 304, City Centre Building, Building 199, Government Avenue, Road 383, Manama, Bahrain; Free Trade Zone, Sanaati-e Kish, Vilay-e Ferdos 2, Corner of Klinik-e Khanevadeh, No 1/5 and 3/5, Kish, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Business Registration Document # 54514-1 (Bahrain) expires 09 Jun 2009; Trade License No. 13388 (Bahrain); All branches worldwide [IRAN].

BANK-E AL-MOSTAGHBAL (a.k.a. FUTURE BANK; a.k.a. FUTURE BANK B.S.C.), P.O. Box 785, City Centre Building, Government Avenue, Manama, Bahrain; Block 304, City Centre Building, Building 199, Government Avenue, Road 383, Manama, Bahrain; Free Trade Zone, Sanaati-e Kish, Vilay-e Ferdos 2, Corner of Klinik-e Khanevadeh, No 1/5 and 3/5, Kish, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Business Registration Document # 54514-1 (Bahrain) expires 09 Jun 2009; Trade License No. 13388 (Bahrain); All branches worldwide [IRAN].

FUTURE BANK (a.k.a. BANK-E AL-MOSTAGHBAL; a.k.a. FUTURE BANK B.S.C.), P.O. Box 785, City Centre Building, Government Avenue, Manama, Bahrain; Block 304, City Centre Building, Building 199, Government Avenue, Road 383, Manama, Bahrain; Free Trade Zone, Sanaati-e Kish, Vilay-e Ferdos 2, Corner of Klinik-e Khanevadeh, No 1/5 and 3/5, Kish, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Business Registration Document # 54514-1 (Bahrain) expires 09 Jun 2009; Trade License No. 13388 (Bahrain); All branches worldwide [IRAN].

EXPORT DEVELOPMENT BANK OF IRAN (a.k.a. BANK TOSEH SADERAT IRAN; a.k.a. BANK TOWSEEH SADERAT IRAN; a.k.a. BANK TOWSEH SADERAT IRAN; a.k.a. EDBI), Tose'e Tower, Corner of 15th St., Ahmed Qasir Ave., Argentine Square, Tehran, Iran; No. 129, 21's Khaled Eslamboli, No. 1 Building, Tehran, Iran; Export Development Building, Next to the 15th Alley, Bokharest Street, Argentina Square, Tehran, Iran; No. 26, Tosee Tower, Arzhantine Square, P.O. Box 15875-5964, Tehran 15139, Iran; No. 4, Gandhi Ave., Tehran 1516747913, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 86936 (Iran) issued 10 Jul 1991; all offices worldwide [IRAN].

EDBI (a.k.a. BANK TOSEH SADERAT IRAN; a.k.a. BANK TOWSEEH SADERAT IRAN; a.k.a. BANK TOWSEH SADERAT IRAN; a.k.a. EXPORT DEVELOPMENT BANK OF IRAN), Tose'e Tower, Corner of 15th St., Ahmed Qasir Ave., Argentine Square, Tehran, Iran; No. 129, 21's Khaled Eslamboli, No. 1 Building, Tehran, Iran; Export Development Building, Next to the 15th Alley, Bokharest Street, Argentina Square, Tehran, Iran; No. 26, Tosee Tower, Arzhantine Square, P.O. Box 15875-5964, Tehran 15139, Iran; No. 4, Gandhi Ave., Tehran 1516747913, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 86936 (Iran) issued 10 Jul 1991; all offices worldwide [IRAN].

BANK TOSEH SADERAT IRAN (a.k.a. BANK TOWSEEH SADERAT IRAN; a.k.a. BANK TOWSEH SADERAT IRAN; a.k.a. EDBI; a.k.a. EXPORT DEVELOPMENT BANK OF IRAN), Tose'e Tower, Corner of 15th St., Ahmed Qasir Ave., Argentine Square, Tehran, Iran; No. 129, 21's Khaled Eslamboli, No. 1 Building, Tehran, Iran; Export Development Building, Next to the 15th Alley, Bokharest Street, Argentina Square, Tehran, Iran; No. 26, Tosee Tower, Arzhantine Square, P.O. Box 15875-5964, Tehran 15139, Iran; No. 4, Gandhi Ave., Tehran 1516747913, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 86936 (Iran) issued 10 Jul 1991; all offices worldwide [IRAN].

BANK TOWSEEH SADERAT IRAN (a.k.a. BANK TOSEH SADERAT IRAN; a.k.a. BANK TOWSEH SADERAT IRAN; a.k.a. EDBI; a.k.a. EXPORT DEVELOPMENT BANK OF IRAN), Tose'e Tower, Corner of 15th St., Ahmed Qasir Ave., Argentine Square, Tehran, Iran; No. 129, 21's Khaled Eslamboli, No. 1 Building, Tehran, Iran; Export Development Building, Next to the 15th Alley, Bokharest Street, Argentina Square, Tehran, Iran; No. 26, Tosee Tower, Arzhantine Square, P.O. Box 15875-5964, Tehran 15139, Iran; No. 4, Gandhi Ave., Tehran 1516747913, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 86936 (Iran) issued 10 Jul 1991; all offices worldwide [IRAN].

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NATIONAL IRANIAN OIL COMPANY (a.k.a. NIOC), Hafez Crossing, Taleghani Avenue, P.O. Box 1863 and 2501, Tehran, Iran; National Iranian Oil Company Building, Taleghani Avenue, Hafez Street, Tehran, Iran; Website www.nioc.ir; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

NIOC (a.k.a. NATIONAL IRANIAN OIL COMPANY), Hafez Crossing, Taleghani Avenue, P.O. Box 1863 and 2501, Tehran, Iran; National Iranian Oil Company Building, Taleghani Avenue, Hafez Street, Tehran, Iran; Website www.nioc.ir; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

NAFTIRAN INTERTRADE CO. (NICO) LIMITED (a.k.a. NAFT IRAN INTERTRADE COMPANY LTD; a.k.a. NAFTIRAN INTERTRADE COMPANY (NICO); a.k.a. NAFTIRAN INTERTRADE COMPANY LTD; a.k.a. NICO), 41, 1st Floor, International House, The Parade, St Helier JE2 3QQ, Jersey; Petro Pars Building, Saadat Abad Ave, No 35, Farhang Blvd, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN] (Linked To: NIOC INTERNATIONAL AFFAIRS (LONDON) LIMITED).

NICO (a.k.a. NAFT IRAN INTERTRADE COMPANY LTD; a.k.a. NAFTIRAN INTERTRADE CO. (NICO) LIMITED; a.k.a. NAFTIRAN INTERTRADE COMPANY (NICO); a.k.a. NAFTIRAN INTERTRADE COMPANY LTD), 41, 1st Floor, International House, The Parade, St Helier JE2 3QQ, Jersey; Petro Pars Building, Saadat Abad Ave, No 35, Farhang Blvd, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN] (Linked To: NIOC INTERNATIONAL AFFAIRS (LONDON) LIMITED).

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NAFTIRAN INTERTRADE COMPANY (NICO) (a.k.a. NAFT IRAN INTERTRADE COMPANY LTD; a.k.a. NAFTIRAN INTERTRADE CO. (NICO) LIMITED; a.k.a. NAFTIRAN INTERTRADE COMPANY LTD; a.k.a. NICO), 41, 1st Floor, International House, The Parade, St Helier JE2 3QQ, Jersey; Petro Pars Building, Saadat Abad Ave, No 35, Farhang Blvd, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN] (Linked To: NIOC INTERNATIONAL AFFAIRS (LONDON) LIMITED).

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NAFTIRAN INTERTRADE CO. (NICO) SARL (a.k.a. NICO), 6, Avenue de la Tour-Haldimand, Pully, VD 1009, Switzerland; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

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BANK TORGOVOY KAPITAL ZAO (a.k.a. TC BANK; a.k.a. TK BANK; a.k.a. TK BANK ZAO; a.k.a. TORGOVOY KAPITAL (TK BANK); a.k.a. TRADE CAPITAL BANK; a.k.a. TRADE CAPITAL BANK (TC BANK); a.k.a. ZAO BANK TORGOVOY KAPITAL), 3 Kozlova Street, Minsk 220005, Belarus; SWIFT/BIC BBTBY2X; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 30 (Belarus); all offices worldwide [IRAN].

ZAO BANK TORGOVOY KAPITAL (a.k.a. BANK TORGOVOY KAPITAL ZAO; a.k.a. TC BANK; a.k.a. TK BANK; a.k.a. TK BANK ZAO; a.k.a. TORGOVOY KAPITAL (TK BANK); a.k.a. TRADE CAPITAL BANK; a.k.a. TRADE CAPITAL BANK (TC BANK)), 3 Kozlova Street, Minsk 220005, Belarus;

SWIFT/BIC BBTBY2X; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 30 (Belarus); all offices worldwide [IRAN].

TRADE CAPITAL BANK (a.k.a. BANK TORGOVOY KAPITAL ZAO; a.k.a. TC BANK; a.k.a. TK BANK; a.k.a. TK BANK ZAO; a.k.a. TORGOVOY KAPITAL (TK BANK); a.k.a. TRADE CAPITAL BANK (TC BANK); a.k.a. ZAO BANK TORGOVOY KAPITAL), 3 Kozlova Street, Minsk 220005, Belarus; SWIFT/BIC BBTBY2X; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 30 (Belarus); all offices worldwide [IRAN].

TRADE CAPITAL BANK (TC BANK) (a.k.a. BANK TORGOVOY KAPITAL ZAO; a.k.a. TC BANK; a.k.a. TK BANK; a.k.a. TK BANK ZAO; a.k.a. TORGOVOY KAPITAL (TK BANK); a.k.a. TRADE CAPITAL BANK; a.k.a. ZAO BANK TORGOVOY KAPITAL), 3 Kozlova Street, Minsk 220005, Belarus; SWIFT/BIC BBTBY2X; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 30 (Belarus); all offices worldwide [IRAN].

TK BANK ZAO (a.k.a. BANK TORGOVOY KAPITAL ZAO; a.k.a. TC BANK; a.k.a. TK BANK; a.k.a. TORGOVOY KAPITAL (TK BANK); a.k.a. TRADE CAPITAL BANK; a.k.a. TRADE CAPITAL BANK (TC BANK); a.k.a. ZAO BANK TORGOVOY KAPITAL), 3 Kozlova Street, Minsk 220005, Belarus; SWIFT/BIC BBTBY2X; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 30 (Belarus); all offices worldwide [IRAN].

TORGOVOY KAPITAL (TK BANK) (a.k.a. BANK TORGOVOY KAPITAL ZAO; a.k.a. TC BANK; a.k.a. TK BANK; a.k.a. TK BANK ZAO; a.k.a. TRADE CAPITAL BANK; a.k.a. TRADE CAPITAL BANK (TC BANK); a.k.a. ZAO BANK TORGOVOY KAPITAL), 3 Kozlova Street, Minsk 220005, Belarus; SWIFT/BIC BBTBY2X; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 30 (Belarus); all offices worldwide [IRAN].

TC BANK (a.k.a. BANK TORGOVOY KAPITAL ZAO; a.k.a. TK BANK; a.k.a. TK BANK ZAO; a.k.a. TORGOVOY KAPITAL (TK BANK); a.k.a. TRADE CAPITAL BANK; a.k.a. TRADE CAPITAL BANK (TC BANK); a.k.a. ZAO BANK TORGOVOY KAPITAL), 3 Kozlova Street, Minsk 220005, Belarus; SWIFT/BIC BBTBY2X; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 30 (Belarus); all offices worldwide [IRAN].

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IRANIAN MINES AND MINING INDUSTRIES DEVELOPMENT AND RENOVATION ORGANIZATION (a.k.a. IMIDRO; a.k.a. IRAN MINING INDUSTRIES DEVELOPMENT AND RENOVATION ORGANIZATION; a.k.a. IRANIAN MINES AND MINERAL INDUSTRIES DEVELOPMENT AND RENOVATION), No. 39, Sepahbod Gharani Avenue, Ferdousi Square, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

IMIDRO (a.k.a. IRAN MINING INDUSTRIES DEVELOPMENT AND RENOVATION ORGANIZATION; a.k.a. IRANIAN MINES AND MINERAL INDUSTRIES DEVELOPMENT AND RENOVATION; a.k.a. IRANIAN MINES AND MINING INDUSTRIES DEVELOPMENT AND RENOVATION ORGANIZATION), No. 39, Sepahbod Gharani Avenue, Ferdousi Square, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

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ASCOTEC HOLDING GMBH (f.k.a. AHWAZ STEEL COMMERCIAL & TECHNICAL SERVICE GMBH ASCOTEC; f.k.a. AHWAZ STEEL COMMERCIAL AND TECHNICAL SERVICE GMBH ASCOTEC; a.k.a. ASCOTEC GMBH), Tersteegen Strasse 10, Dusseldorf 40474, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID HRB 26136 (Germany); all offices worldwide [IRAN].

ASCOTEC GMBH (f.k.a. AHWAZ STEEL COMMERCIAL & TECHNICAL SERVICE GMBH ASCOTEC; f.k.a. AHWAZ STEEL COMMERCIAL AND TECHNICAL SERVICE GMBH ASCOTEC; a.k.a. ASCOTEC HOLDING GMBH), Tersteegen Strasse 10, Dusseldorf 40474, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID HRB 26136 (Germany); all offices worldwide [IRAN].

AHWAZ STEEL COMMERCIAL & TECHNICAL SERVICE GMBH ASCOTEC (f.k.a. AHWAZ STEEL COMMERCIAL AND TECHNICAL SERVICE GMBH ASCOTEC; a.k.a. ASCOTEC GMBH; a.k.a. ASCOTEC HOLDING GMBH), Tersteegen Strasse 10, Dusseldorf 40474, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID HRB 26136 (Germany); all offices worldwide [IRAN].

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ASCOTEC JAPAN K.K., 8th Floor, Shiba East Building, 2-3-9 Shiba, Minato-ku, Tokyo 105-0014, Japan; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

METAL & MINERAL TRADE S.A.R.L. (a.k.a. METAL & MINERAL TRADE (MMT); a.k.a. METAL AND MINERAL TRADE (MMT); a.k.a. METAL AND MINERAL TRADE S.A.R.L.; a.k.a. MMT LUXEMBURG; a.k.a. MMT SARL), 11b, Boulevard Joseph II L-1840, Luxembourg; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID B 59411 (Luxembourg); all offices worldwide [IRAN].

METAL & MINERAL TRADE (MMT) (a.k.a. METAL & MINERAL TRADE S.A.R.L.; a.k.a. METAL AND MINERAL TRADE (MMT); a.k.a. METAL AND MINERAL TRADE S.A.R.L.; a.k.a. MMT LUXEMBURG; a.k.a. MMT SARL), 11b, Boulevard Joseph II L-1840, Luxembourg; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID B 59411 (Luxembourg); all offices worldwide [IRAN].

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MMT SARL (a.k.a. METAL & MINERAL TRADE (MMT); a.k.a. METAL & MINERAL TRADE S.A.R.L.; a.k.a. METAL AND MINERAL TRADE (MMT); a.k.a. METAL AND MINERAL TRADE S.A.R.L.; a.k.a. MMT LUXEMBURG), 11b, Boulevard Joseph II L-1840, Luxembourg; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID B 59411 (Luxembourg); all offices worldwide [IRAN].

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METAL AND MINERAL TRADE (MMT) (a.k.a. METAL & MINERAL TRADE (MMT); a.k.a. METAL & MINERAL TRADE S.A.R.L.; a.k.a. METAL AND MINERAL TRADE S.A.R.L.; a.k.a. MMT LUXEMBURG; a.k.a. MMT SARL), 11b, Boulevard Joseph II L-1840, Luxembourg; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID B 59411 (Luxembourg); all offices worldwide [IRAN].

IRASCO S.R.L. (a.k.a. IRASCO ITALY), Via Di Francia 3, Genoa 16149, Italy; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID GE 348075 (Italy); all offices worldwide [IRAN].

IRASCO ITALY (a.k.a. IRASCO S.R.L.), Via Di Francia 3, Genoa 16149, Italy; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID GE 348075 (Italy); all offices worldwide [IRAN].

MINES AND METALS ENGINEERING GMBH (a.k.a. "M.M.E."), Georg-Glock-Str. 3, Dusseldorf 40474, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this

Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID HRB 34095 (Germany); all offices worldwide [IRAN].

"M.M.E." (a.k.a. MINES AND METALS ENGINEERING GMBH), Georg-Glock-Str. 3, Dusseldorf 40474, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID HRB 34095 (Germany); all offices worldwide [IRAN].

ASCOTEC STEEL TRADING GMBH (a.k.a. ASCOTEC STEEL), Tersteegenstr. 10, Dusseldorf 40474, Germany; Georg-Glock-Str. 3, Dusseldorf 40474, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID HRB 48319 (Germany); all offices worldwide [IRAN].

ASCOTEC STEEL (a.k.a. ASCOTEC STEEL TRADING GMBH), Tersteegenstr. 10, Dusseldorf 40474, Germany; Georg-Glock-Str. 3, Dusseldorf 40474, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID HRB 48319 (Germany); all offices worldwide [IRAN].

ASCOTEC MINERAL & MACHINERY GMBH (a.k.a. ASCOTEC MINERAL AND MACHINERY GMBH; f.k.a. BREYELLER KALTBAND GMBH), Tersteegenstr. 10, Dusseldorf 40474, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID HRB 55668 (Germany); all offices worldwide [IRAN].

BREYELLER KALTBAND GMBH (a.k.a. ASCOTEC MINERAL & MACHINERY GMBH; a.k.a. ASCOTEC MINERAL AND MACHINERY GMBH), Tersteegenstr. 10, Dusseldorf 40474, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID HRB 55668 (Germany); all offices worldwide [IRAN].

ASCOTEC MINERAL AND MACHINERY GMBH (a.k.a. ASCOTEC MINERAL & MACHINERY GMBH; f.k.a. BREYELLER KALTBAND GMBH), Tersteegenstr. 10, Dusseldorf 40474, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID HRB 55668 (Germany); all offices worldwide [IRAN].

ASCOTEC SCIENCE & TECHNOLOGY GMBH (a.k.a. ASCOTEC SCIENCE AND TECHNOLOGY GMBH), Tersteegenstrasse 10, Dusseldorf D 40474, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID HRB 58745 (Germany); all offices worldwide [IRAN].

ASCOTEC SCIENCE AND TECHNOLOGY GMBH (a.k.a. ASCOTEC SCIENCE & TECHNOLOGY GMBH), Tersteegenstrasse 10, Dusseldorf D 40474, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID HRB 58745 (Germany); all offices worldwide [IRAN].

BREYELLER STAHL TECHNOLOGY GMBH & CO. KG (a.k.a. BREYELLER STAHL TECHNOLOGY GMBH AND CO. KG; f.k.a. ROETZEL-STAHL GMBH & CO. KG; f.k.a. ROETZEL-STAHL GMBH AND CO. KG), Josefstrasse 82, Nettetal 41334, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID HRA 4528 (Germany); all offices worldwide [IRAN].

ROETZEL-STAHL GMBH & CO. KG (a.k.a. BREYELLER STAHL TECHNOLOGY GMBH & CO. KG; a.k.a. BREYELLER STAHL TECHNOLOGY GMBH AND CO. KG; f.k.a. ROETZEL-STAHL GMBH AND CO. KG), Josefstrasse 82, Nettetal 41334, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID HRA 4528 (Germany); all offices worldwide [IRAN].

BREYELLER STAHL TECHNOLOGY GMBH AND CO. KG (a.k.a. BREYELLER STAHL TECHNOLOGY GMBH & CO. KG; f.k.a. ROETZEL-STAHL GMBH & CO. KG; f.k.a. ROETZEL-STAHL GMBH AND CO. KG), Josefstrasse 82, Nettetal 41334, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID HRA 4528 (Germany); all offices worldwide [IRAN].

ROETZEL-STAHL GMBH AND CO. KG (a.k.a. BREYELLER STAHL TECHNOLOGY GMBH & CO. KG; a.k.a. BREYELLER STAHL TECHNOLOGY GMBH AND CO. KG; f.k.a. ROETZEL-STAHL GMBH & CO. KG), Josefstrasse 82, Nettetal 41334, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID HRA 4528 (Germany); all offices worldwide [IRAN].

NATIONAL PETROCHEMICAL COMPANY (a.k.a. "NPC"), No. 104, North Sheikh Bahaei Blvd., Molla Sadra Ave., Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

"NPC" (a.k.a. NATIONAL PETROCHEMICAL COMPANY), No. 104, North Sheikh Bahaei Blvd., Molla Sadra Ave., Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

IRAN PETROCHEMICAL COMMERCIAL COMPANY (a.k.a. PETROCHEMICAL COMMERCIAL COMPANY; a.k.a. SHERKATE BASARGANI PETROCHEMIE (SAHAMI KHASS); a.k.a. SHERKATE BAZARGANI PETROCHEMIE; a.k.a. "IPCC"; a.k.a. "PCC"), No. 1339, Vali Nejad Alley, Vali-e-Asr St., Vanak Sq., Tehran, Iran; INONU CAD. SUMER Sok., Zitas Blokleri C.2 Bloc D.H, Kozyatagi, Kadikoy, Istanbul, Turkey; Topcu Ibrahim Sokak No: 13 D: 7 Icerenkoy-Kadikoy, Istanbul, Turkey; 99-A, Maker Tower F, 9th Floor, Cuffe Parade, Colabe, Mumbai 400 005, India; No. 1014, Doosan We've Pavilion, 58, Soosong-Dong, Jongno-Gu, Seoul, Korea, South; Office No. 707, No. 10, Chao Waidajie, Chao Tang District, Beijing 100020, China; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

SHERKATE BAZARGANI PETROCHEMIE (a.k.a. IRAN PETROCHEMICAL COMMERCIAL COMPANY; a.k.a. PETROCHEMICAL COMMERCIAL COMPANY; a.k.a. SHERKATE BASARGANI PETROCHEMIE (SAHAMI KHASS); a.k.a. "IPCC"; a.k.a. "PCC"), No. 1339, Vali Nejad Alley, Vali-e-Asr St., Vanak Sq., Tehran, Iran; INONU CAD. SUMER Sok., Zitas Blokleri C.2 Bloc D.H, Kozyatagi, Kadikoy, Istanbul, Turkey; Topcu Ibrahim Sokak No: 13 D: 7 Icerenkoy-Kadikoy, Istanbul, Turkey; 99-A, Maker Tower F, 9th Floor, Cuffe Parade, Colabe, Mumbai 400 005, India; No. 1014, Doosan We've Pavilion, 58, Soosong-Dong, Jongno-Gu, Seoul, Korea, South; Office No. 707, No. 10, Chao Waidajie, Chao Tang District, Beijing 100020, China; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

SHERKATE BASARGANI PETROCHEMIE (SAHAMI KHASS) (a.k.a. IRAN PETROCHEMICAL COMMERCIAL COMPANY; a.k.a. PETROCHEMICAL COMMERCIAL COMPANY; a.k.a. SHERKATE BAZARGANI PETROCHEMIE; a.k.a. "IPCC"; a.k.a. "PCC"), No. 1339, Vali Nejad Alley, Vali-e-Asr St., Vanak Sq., Tehran, Iran; INONU CAD. SUMER Sok., Zitas Blokleri C.2 Bloc D.H, Kozyatagi, Kadikoy, Istanbul, Turkey; Topcu Ibrahim Sokak No: 13 D: 7 Icerenkoy-Kadikoy, Istanbul, Turkey; 99-A, Maker Tower F, 9th Floor, Cuffe Parade, Colabe, Mumbai 400 005, India; No. 1014, Doosan We've Pavilion, 58, Soosong-Dong, Jongno-Gu, Seoul, Korea, South; Office No. 707, No. 10, Chao Waidajie, Chao Tang District, Beijing 100020, China; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

PETROCHEMICAL COMMERCIAL COMPANY (a.k.a. IRAN PETROCHEMICAL COMMERCIAL COMPANY; a.k.a. SHERKATE BASARGANI PETROCHEMIE (SAHAMI KHASS); a.k.a. SHERKATE BAZARGANI PETROCHEMIE; a.k.a. "IPCC"; a.k.a. "PCC"), No. 1339, Vali Nejad Alley, Vali-e-Asr St., Vanak Sq., Tehran, Iran; INONU CAD. SUMER Sok., Zitas Blokleri C.2 Bloc D.H, Kozyatagi, Kadikoy, Istanbul, Turkey; Topcu Ibrahim Sokak No: 13 D: 7 Icerenkoy-Kadikoy, Istanbul, Turkey; 99-A, Maker Tower F, 9th Floor, Cuffe Parade, Colabe, Mumbai 400 005, India; No. 1014, Doosan We've Pavilion, 58, Soosong-Dong, Jongno-Gu, Seoul, Korea, South; Office No. 707, No. 10, Chao Waidajie, Chao Tang District, Beijing 100020, China; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

"IPCC" (a.k.a. IRAN PETROCHEMICAL COMMERCIAL COMPANY; a.k.a. PETROCHEMICAL COMMERCIAL COMPANY; a.k.a. SHERKATE BASARGANI PETROCHEMIE (SAHAMI KHASS); a.k.a. SHERKATE BAZARGANI PETROCHEMIE; a.k.a. "PCC"), No. 1339, Vali Nejad Alley, Vali-e-Asr St., Vanak Sq., Tehran, Iran; INONU CAD. SUMER Sok., Zitas Blokleri C.2 Bloc D.H, Kozyatagi, Kadikoy, Istanbul, Turkey; Topcu Ibrahim Sokak No: 13 D: 7 Icerenkoy-Kadikoy, Istanbul, Turkey; 99-A, Maker Tower F, 9th Floor, Cuffe Parade, Colabe, Mumbai 400 005, India; No. 1014, Doosan We've Pavilion, 58, Soosong-Dong, Jongno-Gu, Seoul, Korea, South; Office No. 707, No. 10, Chao Waidajie, Chao Tang District, Beijing 100020, China; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

"PCC" (a.k.a. IRAN PETROCHEMICAL COMMERCIAL COMPANY; a.k.a. PETROCHEMICAL COMMERCIAL COMPANY; a.k.a. SHERKATE BASARGANI PETROCHEMIE (SAHAMI KHASS); a.k.a. SHERKATE BAZARGANI PETROCHEMIE; a.k.a. "IPCC"), No. 1339, Vali Nejad Alley, Vali-e-Asr St., Vanak Sq., Tehran, Iran; INONU CAD. SUMER Sok., Zitas Blokleri C.2 Bloc D.H, Kozyatagi, Kadikoy, Istanbul, Turkey; Topcu Ibrahim Sokak No: 13 D: 7 Icerenkoy-Kadikoy, Istanbul, Turkey; 99-A, Maker Tower F, 9th Floor, Cuffe Parade, Colabe, Mumbai 400 005, India; No. 1014, Doosan We've Pavilion, 58, Soosong-Dong, Jongno-Gu, Seoul, Korea, South; Office No. 707, No. 10, Chao Waidajie, Chao Tang District, Beijing 100020, China; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

NPC INTERNATIONAL LIMITED (a.k.a. N P C INTERNATIONAL LTD; a.k.a. NPC INTERNATIONAL COMPANY), 5th Floor NIOC House, 4 Victoria Street, London SW1H 0NE, United Kingdom; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; UK Company Number 02696754 (United Kingdom); all offices worldwide [IRAN].

NPC INTERNATIONAL COMPANY (a.k.a. N P C INTERNATIONAL LTD; a.k.a. NPC INTERNATIONAL LIMITED), 5th Floor NIOC House, 4 Victoria Street, London SW1H 0NE, United Kingdom; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S.

Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; UK Company Number 02696754 (United Kingdom); all offices worldwide [IRAN].

N P C INTERNATIONAL LTD (a.k.a. NPC INTERNATIONAL COMPANY; a.k.a. NPC INTERNATIONAL LIMITED), 5th Floor NIOC House, 4 Victoria Street, London SW1H 0NE, United Kingdom; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; UK Company Number 02696754 (United Kingdom); all offices worldwide [IRAN].

INTRA CHEM TRADING GMBH (a.k.a. INTRA-CHEM TRADING CO. (GMBH)), Schottweg 3, Hamburg 22087, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID HRB48416 (Germany); all offices worldwide [IRAN].

INTRA-CHEM TRADING CO. (GMBH) (a.k.a. INTRA CHEM TRADING GMBH), Schottweg 3, Hamburg 22087, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID HRB48416 (Germany); all offices worldwide [IRAN].

PETROCHEMICAL COMMERCIAL COMPANY INTERNATIONAL (a.k.a. PETROCHEMICAL COMMERCIAL COMPANY INTERNATIONAL LIMITED; a.k.a. PETROCHEMICAL COMMERCIAL COMPANY INTERNATIONAL LTD; a.k.a. PETROCHEMICAL TRADING COMPANY LIMITED; a.k.a. "PCCI"), 41, 1st Floor, International House, The Parade, St. Helier JE2 3QQ, Jersey; Ave. 54, Yimpash Business Center, No. 506, 507, Ashkhabad 744036, Turkmenistan; P.O. Box 261539, Jebel Ali, Dubai, United Arab Emirates; No. 21 End of 9th St, Gandhi Ave, Tehran, Iran; 21, Africa Boulevard, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 77283 (Jersey); all offices worldwide [IRAN].

PETROCHEMICAL COMMERCIAL COMPANY INTERNATIONAL LTD (a.k.a. PETROCHEMICAL COMMERCIAL COMPANY INTERNATIONAL; a.k.a. PETROCHEMICAL COMMERCIAL COMPANY INTERNATIONAL LIMITED; a.k.a. PETROCHEMICAL TRADING COMPANY LIMITED; a.k.a. "PCCI"), 41, 1st Floor, International House, The Parade, St. Helier JE2 3QQ, Jersey; Ave. 54, Yimpash Business Center, No. 506, 507, Ashkhabad 744036, Turkmenistan; P.O. Box 261539, Jebel Ali, Dubai, United Arab Emirates; No. 21 End of 9th St, Gandhi Ave, Tehran, Iran; 21, Africa Boulevard, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 77283 (Jersey); all offices worldwide [IRAN].

PETROCHEMICAL TRADING COMPANY LIMITED (a.k.a. PETROCHEMICAL COMMERCIAL COMPANY INTERNATIONAL; a.k.a. PETROCHEMICAL COMMERCIAL COMPANY INTERNATIONAL LIMITED; a.k.a. PETROCHEMICAL COMMERCIAL COMPANY INTERNATIONAL LTD; a.k.a. "PCCI"), 41, 1st Floor, International House, The Parade, St. Helier JE2 3QQ, Jersey; Ave. 54, Yimpash Business Center, No. 506, 507, Ashkhabad 744036, Turkmenistan; P.O. Box 261539, Jebel Ali, Dubai, United Arab Emirates; No. 21 End of 9th St, Gandhi Ave, Tehran, Iran; 21, Africa Boulevard, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 77283 (Jersey); all offices worldwide [IRAN].

"PCCI" (a.k.a. PETROCHEMICAL COMMERCIAL COMPANY INTERNATIONAL; a.k.a. PETROCHEMICAL COMMERCIAL COMPANY INTERNATIONAL LIMITED; a.k.a. PETROCHEMICAL COMMERCIAL COMPANY INTERNATIONAL LTD; a.k.a. PETROCHEMICAL TRADING COMPANY LIMITED), 41, 1st Floor, International House, The Parade, St. Helier JE2 3QQ, Jersey; Ave. 54, Yimpash Business Center, No. 506, 507, Ashkhabad 744036, Turkmenistan; P.O. Box 261539, Jebel Ali, Dubai, United Arab Emirates; No. 21 End of 9th St, Gandhi Ave, Tehran, Iran; 21, Africa Boulevard, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 77283 (Jersey); all offices worldwide [IRAN].

PETROCHEMICAL COMMERCIAL COMPANY INTERNATIONAL LIMITED (a.k.a. PETROCHEMICAL COMMERCIAL COMPANY INTERNATIONAL; a.k.a. PETROCHEMICAL COMMERCIAL COMPANY INTERNATIONAL LTD; a.k.a. PETROCHEMICAL TRADING COMPANY LIMITED; a.k.a. "PCCI"), 41, 1st Floor, International House, The Parade, St. Helier JE2 3QQ, Jersey; Ave. 54, Yimpash Business Center, No. 506, 507, Ashkhabad 744036, Turkmenistan; P.O. Box 261539, Jebel Ali, Dubai, United Arab Emirates; No. 21 End of 9th St, Gandhi Ave, Tehran, Iran; 21, Africa Boulevard, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 77283 (Jersey); all offices worldwide [IRAN].

P.C.C. (SINGAPORE) PRIVATE LIMITED (a.k.a. P.C.C. SINGAPORE BRANCH; a.k.a. PCC SINGAPORE PTE LTD), 78 Shenton Way, #08-02 079120, Singapore; 78 Shenton Way, 26-02A Lippo Centre 079120, Singapore; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 199708410K (Singapore); all offices worldwide [IRAN].

PCC SINGAPORE PTE LTD (a.k.a. P.C.C. (SINGAPORE) PRIVATE LIMITED; a.k.a. P.C.C. SINGAPORE BRANCH), 78 Shenton Way, #08-02 079120, Singapore; 78 Shenton Way, 26-02A Lippo Centre 079120, Singapore; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 199708410K (Singapore); all offices worldwide [IRAN].

P.C.C. SINGAPORE BRANCH (a.k.a. P.C.C. (SINGAPORE) PRIVATE LIMITED; a.k.a. PCC SINGAPORE PTE LTD), 78 Shenton Way, #08-02 079120, Singapore; 78 Shenton Way, 26-02A Lippo Centre 079120, Singapore; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 199708410K (Singapore); all offices worldwide [IRAN].

PETROCHEMICAL COMMERCIAL COMPANY FZE (a.k.a. PCC FZE), 1703, 17th Floor, Dubai World Trade Center Tower, Sheikh Zayed Road, Dubai, United Arab Emirates; Office No. 99-A, Maker Tower "F" 9th Floor Cutte Pavade, Colabe, Mumbai 700005, India; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

PCC FZE (a.k.a. PETROCHEMICAL COMMERCIAL COMPANY FZE), 1703, 17th Floor, Dubai World Trade Center Tower, Sheikh Zayed Road, Dubai, United Arab Emirates; Office No. 99-A, Maker Tower "F" 9th Floor Cutte Pavade, Colabe, Mumbai 700005, India; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

PETROCHEMICAL COMMERCIAL COMPANY (U.K.) LIMITED (a.k.a. PCC (UK); a.k.a. PCC UK; a.k.a. PCC UK LTD), 4 Victoria Street, London SW1H 0NE, United Kingdom; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; UK Company Number 02647333 (United Kingdom); all offices worldwide [IRAN].

PCC (UK) (a.k.a. PCC UK; a.k.a. PCC UK LTD; a.k.a. PETROCHEMICAL COMMERCIAL COMPANY (U.K.) LIMITED), 4 Victoria Street, London SW1H 0NE, United Kingdom; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; UK Company Number 02647333 (United Kingdom); all offices worldwide [IRAN].

PCC UK (a.k.a. PCC (UK); a.k.a. PCC UK LTD; a.k.a. PETROCHEMICAL COMMERCIAL COMPANY (U.K.) LIMITED), 4 Victoria Street, London SW1H 0NE, United Kingdom; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; UK Company Number 02647333 (United Kingdom); all offices worldwide [IRAN].

PCC UK LTD (a.k.a. PCC (UK); a.k.a. PCC UK; a.k.a. PETROCHEMICAL COMMERCIAL COMPANY (U.K.) LIMITED), 4 Victoria Street, London SW1H 0NE, United Kingdom; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; UK Company Number 02647333 (United Kingdom); all offices worldwide [IRAN].

IRAN FOREIGN INVESTMENT COMPANY (a.k.a. IFIC), No. 4, Saba Blvd., Africa Blvd., Tehran 19177, Iran; P.O. Box 19395-6947, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

IFIC (a.k.a. IRAN FOREIGN INVESTMENT COMPANY), No. 4, Saba Blvd., Africa Blvd., Tehran 19177, Iran; P.O. Box 19395-6947, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

IFIC HOLDING AG (a.k.a. IHAG), Koenigsallee 60 D, Dusseldorf 40212, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID HRB 48032 (Germany); all offices worldwide [IRAN].

IHAG (a.k.a. IFIC HOLDING AG), Koenigsallee 60 D, Dusseldorf 40212, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID HRB 48032 (Germany); all offices worldwide [IRAN].

IHAG TRADING GMBH, Koenigsallee 60 D, Dusseldorf 40212, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID HRB 37918 (Germany); all offices worldwide [IRAN].

NATIONAL IRANIAN OIL COMPANY PTE LTD, 7 Temasek Boulevard #07-02, Suntec Tower One 038987, Singapore; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 199004388C (Singapore); all offices worldwide [IRAN].

IRAN INSURANCE COMPANY (a.k.a. BIMEH IRAN), 107 Dr Fatemi Avenue, Tehran 14155/6363, Iran; Abdolaziz-Al-Masaeed Building, Sheikh Maktoom St., Deira, P.O. Box 2004, Dubai, United Arab Emirates; P.O. Box 1867, Al Ain, Abu Dhabi, United Arab Emirates; P.O. Box 3281, Abu Dhabi, United Arab Emirates; P.O. Box 1666, Sharjah, United Arab Emirates; P.O. Box 849, Ras-Al-Khaimah, United Arab Emirates; P.O. Box 417, Muscat 113, Oman; P.O. Box 676, Salalah 211, Oman; P.O. Box 995, Manama, Bahrain; Al-Lami Center, Ali-Bin-Abi Taleb St. Sharafia, P.O. Box 11210, Jeddah 21453, Saudi Arabia; Al Alia Center, Salaheddine Rd., Al Malaz, P.O. Box 21944, Riyadh 11485, Saudi Arabia; Al Rajhi Bldg., 3rd Floor, Suite 23, Dhahran St., P.O. Box 1305, Dammam 31431, Saudi Arabia; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

BIMEH IRAN (a.k.a. IRAN INSURANCE COMPANY), 107 Dr Fatemi Avenue, Tehran 14155/6363, Iran; Abdolaziz-Al-Masaeed Building, Sheikh Maktoom St., Deira, P.O. Box 2004, Dubai, United Arab Emirates; P.O. Box 1867, Al Ain, Abu Dhabi, United Arab Emirates; P.O. Box 3281, Abu Dhabi, United Arab Emirates; P.O. Box 1666, Sharjah, United Arab Emirates; P.O. Box 849, Ras-Al-Khaimah, United Arab Emirates; P.O. Box 417, Muscat 113, Oman; P.O. Box 676, Salalah 211, Oman; P.O. Box 995, Manama, Bahrain; Al-Lami Center, Ali-Bin-Abi Taleb St. Sharafia, P.O. Box 11210, Jeddah 21453, Saudi Arabia; Al Alia Center, Salaheddine Rd., Al Malaz, P.O. Box 21944, Riyadh 11485, Saudi Arabia; Al Rajhi Bldg., 3rd Floor, Suite 23, Dhahran St., P.O. Box 1305, Dammam 31431, Saudi Arabia; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

BIMEH IRAN INSURANCE COMPANY (U.K.) LIMITED (a.k.a. BIUK), 4/5 Fenchurch Buildings, London EC3M 5HN, United Kingdom; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; UK Company Number 01223433 (United Kingdom); all offices worldwide [IRAN].

BIUK (a.k.a. BIMEH IRAN INSURANCE COMPANY (U.K.) LIMITED), 4/5 Fenchurch Buildings, London EC3M 5HN, United Kingdom; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; UK Company Number 01223433 (United Kingdom); all offices worldwide [IRAN].

PETROPARS LTD. (a.k.a. PETROPARS LIMITED; a.k.a. "PPL"), No. 35, Farhang Blvd., Saadat Abad, Tehran, Iran; Calle La Guairita, Centro Profesional Eurobuilding, Piso 8, Oficina 8E, Chuao, Caracas 1060, Venezuela; P.O. Box 3136, Road Town, Tortola, Virgin Islands, British; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

PETROPARS LIMITED (a.k.a. PETROPARS LTD.; a.k.a. "PPL"), No. 35, Farhang Blvd., Saadat Abad, Tehran, Iran; Calle La Guairita, Centro Profesional Eurobuilding, Piso 8, Oficina 8E, Chuao, Caracas 1060, Venezuela; P.O. Box 3136, Road Town, Tortola, Virgin Islands, British; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

"PPL" (a.k.a. PETROPARS LIMITED; a.k.a. PETROPARS LTD.), No. 35, Farhang Blvd., Saadat Abad, Tehran, Iran; Calle La Guairita, Centro Profesional Eurobuilding, Piso 8, Oficina 8E, Chuao, Caracas 1060, Venezuela; P.O. Box 3136, Road Town, Tortola, Virgin Islands, British; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

PETROPARS INTERNATIONAL FZE (a.k.a. PPI FZE), P.O. Box 72146, Dubai, United Arab Emirates; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

PPI FZE (a.k.a. PETROPARS INTERNATIONAL FZE), P.O. Box 72146, Dubai, United Arab Emirates; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

PETROPARS UK LIMITED, 47 Queen Anne Street, London W1G 9JG, United Kingdom; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; UK Company Number 03503060 (United Kingdom); all offices worldwide [IRAN].

KALA LIMITED (a.k.a. KALA NAFT LONDON LTD), NIOC House, 4 Victoria Street, Westminster, London SW1H 0NE, United Kingdom; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; UK Company Number 01517853 (United Kingdom); all offices worldwide [IRAN].

KALA NAFT LONDON LTD (a.k.a. KALA LIMITED), NIOC House, 4 Victoria Street, Westminster, London SW1H 0NE, United Kingdom; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; UK Company Number 01517853 (United Kingdom); all offices worldwide [IRAN].

KALA PENSION TRUST LIMITED, C/O Kala Limited, N.I.O.C. House, 4 Victoria Street, London SW1H 0NE, United Kingdom; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in

Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; UK Company Number 01573317 (United Kingdom); all offices worldwide [IRAN].

IRANIAN OIL COMPANY (U.K.) LIMITED (a.k.a. IOC UK LTD), Riverside House, Riverside Drive, Aberdeen AB11 7LH, United Kingdom; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; UK Company Number 01019769 (United Kingdom); all offices worldwide [IRAN].

IOC UK LTD (a.k.a. IRANIAN OIL COMPANY (U.K.) LIMITED), Riverside House, Riverside Drive, Aberdeen AB11 7LH, United Kingdom; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; UK Company Number 01019769 (United Kingdom); all offices worldwide [IRAN].

NIOC INTERNATIONAL AFFAIRS (LONDON) LIMITED, NIOC House, 4 Victoria Street, London SW1H 0NE, United Kingdom; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; UK Company Number 02772297 (United Kingdom); all offices worldwide [IRAN].

NAFTIRAN TRADING SERVICES CO. (NTS) LIMITED, 47 Queen Anne Street, London W1G 9JG, United Kingdom; 6th Floor NIOC Ho, 4 Victoria St, London SW1H 0NE, United Kingdom; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; UK Company Number 02600121 (United Kingdom); all offices worldwide [IRAN].

PETROIRAN DEVELOPMENT COMPANY (PEDCO) LIMITED (a.k.a. PETRO IRAN DEVELOPMENT COMPANY; a.k.a. "PEDCO"), 41, 1st Floor, International House, The Parade, St. Helier JE2 3QQ, Jersey; National Iranian Oil Company - PEDCO, P.O. Box 2965, Al Bathaa Tower, 9th Floor, Apt. 905, Al Buhaira Corniche, Sharjah, United Arab Emirates; P.O. Box 15875-6731, Tehran, Iran; No. 22, 7th Lane, Khalid Eslamboli Street, Shahid Beheshti Avenue, Tehran, Iran; No. 102, Next to Shahid Amir Soheil Tabrizian Alley, Shahid Dastgerdi (Ex Zafar) Street, Shariati Street, Tehran 19199/45111, Iran; Kish Harbour, Bazargan Ferdos Warehouses, Kish Island, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 67493 (Jersey); all offices worldwide [IRAN].

"PEDCO" (a.k.a. PETRO IRAN DEVELOPMENT COMPANY; a.k.a. PETROIRAN DEVELOPMENT COMPANY (PEDCO) LIMITED), 41, 1st Floor, International House, The Parade, St. Helier JE2 3QQ, Jersey; National Iranian Oil Company - PEDCO, P.O. Box 2965, Al Bathaa Tower, 9th Floor, Apt. 905, Al Buhaira Corniche, Sharjah, United Arab Emirates; P.O. Box 15875-6731, Tehran, Iran; No. 22, 7th Lane, Khalid Eslamboli Street, Shahid Beheshti Avenue, Tehran, Iran; No. 102, Next to Shahid Amir Soheil Tabrizian Alley, Shahid Dastgerdi (Ex Zafar) Street, Shariati Street, Tehran 19199/45111, Iran; Kish Harbour, Bazargan Ferdos Warehouses, Kish Island, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 67493 (Jersey); all offices worldwide [IRAN].

PETRO IRAN DEVELOPMENT COMPANY (a.k.a. PETROIRAN DEVELOPMENT COMPANY (PEDCO) LIMITED; a.k.a. "PEDCO"), 41, 1st Floor, International House, The Parade, St. Helier JE2 3QQ, Jersey; National Iranian Oil Company - PEDCO, P.O. Box 2965, Al Bathaa Tower, 9th Floor, Apt. 905, Al Buhaira Corniche, Sharjah, United Arab Emirates; P.O. Box 15875-6731, Tehran, Iran; No. 22, 7th Lane, Khalid Eslamboli Street, Shahid Beheshti Avenue, Tehran, Iran; No. 102, Next to Shahid Amir Soheil Tabrizian Alley, Shahid Dastgerdi (Ex Zafar) Street, Shariati Street, Tehran 19199/45111, Iran; Kish Harbour, Bazargan Ferdos Warehouses, Kish Island, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 67493 (Jersey); all offices worldwide [IRAN].

NICO ENGINEERING LIMITED, 41, 1st Floor, International House, The Parade, St. Helier JE2 3QQ, Jersey; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 75797 (Jersey); all offices worldwide [IRAN].

INDUSTRIAL DEVELOPMENT AND RENOVATION ORGANIZATION OF IRAN (a.k.a. IDRO; a.k.a. IRAN DEVELOPMENT & RENOVATION ORGANIZATION COMPANY; a.k.a. IRAN DEVELOPMENT AND RENOVATION ORGANIZATION COMPANY; a.k.a. SAWZEMANE GOSTARESH VA NOWSAZI SANAYE IRAN), Vali Asr Building, Jam e Jam Street, Vali Asr Avenue, Tehran 15815-3377, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

IRAN DEVELOPMENT & RENOVATION ORGANIZATION COMPANY (a.k.a. IDRO; a.k.a. INDUSTRIAL DEVELOPMENT AND RENOVATION ORGANIZATION OF IRAN; a.k.a. IRAN DEVELOPMENT AND RENOVATION ORGANIZATION COMPANY; a.k.a. SAWZEMANE GOSTARESH VA NOWSAZI SANAYE IRAN), Vali Asr Building, Jam e Jam Street, Vali Asr Avenue, Tehran 15815-3377, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

IDRO (a.k.a. INDUSTRIAL DEVELOPMENT AND RENOVATION ORGANIZATION OF IRAN; a.k.a. IRAN DEVELOPMENT & RENOVATION ORGANIZATION COMPANY; a.k.a. IRAN DEVELOPMENT AND RENOVATION ORGANIZATION COMPANY; a.k.a. SAWZEMANE GOSTARESH VA NOWSAZI SANAYE IRAN), Vali Asr Building, Jam e Jam Street, Vali Asr Avenue, Tehran 15815-3377, Iran; Additional Sanctions Information - Not on

the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

SAWZEMANE GOSTARESH VA NOWSAZI SANAYE IRAN (a.k.a. IDRO; a.k.a. INDUSTRIAL DEVELOPMENT AND RENOVATION ORGANIZATION OF IRAN; a.k.a. IRAN DEVELOPMENT & RENOVATION ORGANIZATION COMPANY; a.k.a. IRAN DEVELOPMENT AND RENOVATION ORGANIZATION COMPANY), Vali Asr Building, Jam e Jam Street, Vali Asr Avenue, Tehran 15815-3377, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

IRAN DEVELOPMENT AND RENOVATION ORGANIZATION COMPANY (a.k.a. IDRO; a.k.a. INDUSTRIAL DEVELOPMENT AND RENOVATION ORGANIZATION OF IRAN; a.k.a. IRAN DEVELOPMENT & RENOVATION ORGANIZATION COMPANY; a.k.a. SAWZEMANE GOSTARESH VA NOWSAZI SANAYE IRAN), Vali Asr Building, Jam e Jam Street, Vali Asr Avenue, Tehran 15815-3377, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

MACHINE SAZI ARAK CO. LTD. (a.k.a. MACHINE SAZI ARAK COMPANY P J S C; a.k.a. MACHINE SAZI ARAK SSA; a.k.a. MASHIN SAZI ARAK; a.k.a. "MSA"), P.O. Box 148, Arak 351138, Iran; Arak, Km 4 Tehran Road, Arak, Markazi Province, Iran; No. 1, Northern Kargar Street, Tehran 14136, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

"MSA" (a.k.a. MACHINE SAZI ARAK CO. LTD.; a.k.a. MACHINE SAZI ARAK COMPANY P J S C; a.k.a. MACHINE SAZI ARAK SSA; a.k.a. MASHIN SAZI ARAK), P.O. Box 148, Arak 351138, Iran; Arak, Km 4 Tehran Road, Arak, Markazi Province, Iran; No. 1, Northern Kargar Street, Tehran 14136, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

MASHIN SAZI ARAK (a.k.a. MACHINE SAZI ARAK CO. LTD.; a.k.a. MACHINE SAZI ARAK COMPANY P J S C; a.k.a. MACHINE SAZI ARAK SSA; a.k.a. "MSA"), P.O. Box 148, Arak 351138, Iran; Arak, Km 4 Tehran Road, Arak, Markazi Province, Iran; No. 1, Northern Kargar Street, Tehran 14136, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

MACHINE SAZI ARAK SSA (a.k.a. MACHINE SAZI ARAK CO. LTD.; a.k.a. MACHINE SAZI ARAK COMPANY P J S C; a.k.a. MASHIN SAZI ARAK; a.k.a. "MSA"), P.O. Box 148, Arak 351138, Iran; Arak, Km 4 Tehran Road, Arak, Markazi Province, Iran; No. 1, Northern Kargar Street, Tehran 14136, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

MACHINE SAZI ARAK COMPANY P J S C (a.k.a. MACHINE SAZI ARAK CO. LTD.; a.k.a. MACHINE SAZI ARAK SSA; a.k.a. MASHIN SAZI ARAK; a.k.a. "MSA"), P.O. Box 148, Arak 351138, Iran; Arak, Km 4 Tehran Road, Arak, Markazi Province, Iran; No. 1, Northern Kargar Street, Tehran 14136, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

WEST SUN TRADE GMBH (a.k.a. WEST SUN TRADE), Winterhuder Weg 8, Hamburg 22085, Germany; Arak Machine Mfg. Bldg., 2nd Floor, opp. of College Economy, Northern Kargar Ave., Tehran 14136, Iran; Mundsburger Damm 16, Hamburg 22087, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID HRB 45757 (Germany); all offices worldwide [IRAN].

WEST SUN TRADE (a.k.a. WEST SUN TRADE GMBH), Winterhuder Weg 8, Hamburg 22085, Germany; Arak Machine Mfg. Bldg., 2nd Floor, opp. of College Economy, Northern Kargar Ave., Tehran 14136, Iran; Mundsburger Damm 16, Hamburg 22087, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID HRB 45757 (Germany); all offices worldwide [IRAN].

POST BANK OF IRAN (a.k.a. SHERKAT-E DOLATI-E POST BANK; a.k.a. "PBI"), 237 Motahari Avenue, Tehran 1587618118, Iran; Motahari Street, No. 237, Past Darya-e Noor, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SHERKAT-E DOLATI-E POST BANK (a.k.a. POST BANK OF IRAN; a.k.a. "PBI"), 237 Motahari Avenue, Tehran 1587618118, Iran; Motahari Street, No. 237, Past Darya-e Noor, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

"PBI" (a.k.a. POST BANK OF IRAN; a.k.a. SHERKAT-E DOLATI-E POST BANK), 237 Motahari Avenue, Tehran 1587618118, Iran; Motahari Street, No. 237, Past Darya-e Noor, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons

Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

ONERBANK ZAO (a.k.a. EFTEKHAR BANK; a.k.a. HONOR BANK; a.k.a. HONORBANK; a.k.a. HONORBANK ZAO; a.k.a. ONER BANK; a.k.a. ONERBANK; a.k.a. ONERBANK), Ulitsa Klary Tsetkin 51, Minsk 220004, Belarus; SWIFT/BIC HNRBBY2X; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 807000227 (Belarus) issued 16 Oct 2009; all offices worldwide [IRAN].

ONER-BANK (a.k.a. EFTEKHAR BANK; a.k.a. HONOR BANK; a.k.a. HONORBANK; a.k.a. HONORBANK ZAO; a.k.a. ONER BANK; a.k.a. ONERBANK; a.k.a. ONERBANK ZAO), Ulitsa Klary Tsetkin 51, Minsk 220004, Belarus; SWIFT/BIC HNRBBY2X; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 807000227 (Belarus) issued 16 Oct 2009; all offices worldwide [IRAN].

HONORBANK (a.k.a. EFTEKHAR BANK; a.k.a. HONOR BANK; a.k.a. HONORBANK ZAO; a.k.a. ONER BANK; a.k.a. ONERBANK; a.k.a. ONERBANK; a.k.a. ONERBANK ZAO), Ulitsa Klary Tsetkin 51, Minsk 220004, Belarus; SWIFT/BIC HNRBBY2X; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 807000227 (Belarus) issued 16 Oct 2009; all offices worldwide [IRAN].

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EFTEKHAR BANK (a.k.a. HONOR BANK; a.k.a. HONORBANK; a.k.a. HONORBANK ZAO; a.k.a. ONER BANK; a.k.a. ONERBANK; a.k.a. ONERBANK; a.k.a. ONERBANK ZAO), Ulitsa Klary Tsetkin 51, Minsk 220004, Belarus; SWIFT/BIC HNRBBY2X; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 807000227 (Belarus) issued 16 Oct 2009; all offices worldwide [IRAN].

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MSP KALA NAFT CO. TEHRAN (a.k.a. KALA NAFT CO SSK; a.k.a. KALA NAFT COMPANY LTD; a.k.a. KALA NAFT TEHRAN; a.k.a. KALA NAFT TEHRAN COMPANY; a.k.a. KALAYEH NAFT CO; a.k.a. M.S.P.-KALA; a.k.a. MANUFACTURING SUPPORT & PROCUREMENT CO.-KALA NAFT; a.k.a. MANUFACTURING SUPPORT AND PROCUREMENT (M.S.P.) KALA NAFT CO. TEHRAN; a.k.a. MANUFACTURING, SUPPORT AND PROCUREMENT KALA NAFT COMPANY; a.k.a. MSP KALA NAFT TEHRAN COMPANY; a.k.a. MSP KALANAFT; a.k.a. MSP-KALANAFT COMPANY; a.k.a. SHERKAT SAHAMI KHAASS KALA NAFT; a.k.a. SHERKAT SAHAMI KHAASS POSHTIBANI VA TEHIYEH KALAYE NAFT TEHRAN; a.k.a. SHERKATE POSHTIBANI SAKHT VA TAHEIH KALAIE NAFTE TEHRAN), 242 Sepahbod Gharani Street, Karim Khan Zand Bridge, Corner Kalantari Street, 8th Floor, P.O. Box 15815-1775/15815-3446, Tehran 15988, Iran; Building No. 226, Corner of Shahid Kalantari Street, Sepahbod Gharani Avenue, Karimkhan Avenue, Tehran 1598844815, Iran; No. 242, Shahid Kalantari St., Near Karimkhan Bridge, Sepahbod Gharani Avenue, Tehran, Iran; Head Office Tehran, Sepahbod Gharani Ave., P.O. Box 15815/1775 15815/3446, Tehran, Iran; P.O. Box 2965, Sharjah, United Arab Emirates; 333 7th Ave SW #1102, Calgary, AB T2P 2Z1, Canada; Chekhov St., 24.2 , AP 57, Moscow, Russia; Room No. 704 - No. 10 Chao Waidajie Chao Yang District , Beijing 10020, China; Sanaee Ave., P.O. Box 79417-76349, N.I.O.C., Kish, Iran; 10th Floor, Sadaf Tower, Kish Island, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

MANUFACTURING SUPPORT & PROCUREMENT CO.-KALA NAFT (a.k.a. KALA NAFT CO SSK; a.k.a. KALA NAFT COMPANY LTD; a.k.a. KALA NAFT TEHRAN; a.k.a. KALA NAFT TEHRAN COMPANY; a.k.a. KALAYEH NAFT CO; a.k.a. M.S.P.-KALA; a.k.a. MANUFACTURING SUPPORT AND PROCUREMENT (M.S.P.) KALA NAFT CO. TEHRAN; a.k.a. MANUFACTURING, SUPPORT AND PROCUREMENT KALA NAFT COMPANY; a.k.a. MSP KALA NAFT CO. TEHRAN; a.k.a. MSP KALA NAFT TEHRAN COMPANY; a.k.a. MSP KALANAFT; a.k.a. MSP-KALANAFT COMPANY; a.k.a. SHERKAT SAHAMI KHAASS KALA NAFT; a.k.a. SHERKAT SAHAMI KHAASS POSHTIBANI VA TEHIYEH KALAYE NAFT TEHRAN; a.k.a. SHERKATE POSHTIBANI SAKHT VA TAHEIH KALAIE NAFTE TEHRAN), 242 Sepahbod Gharani Street, Karim Khan Zand Bridge, Corner Kalantari Street, 8th Floor, P.O. Box 15815-1775/15815-3446, Tehran 15988, Iran; Building No. 226, Corner of Shahid Kalantari Street, Sepahbod Gharani Avenue,

Karimkhan Avenue, Tehran 1598844815, Iran; No. 242, Shahid Kalantari St., Near Karimkhan Bridge, Sepahbod Gharani Avenue, Tehran, Iran; Head Office Tehran, Sepahbod Gharani Ave., P.O. Box 15815/1775 15815/3446, Tehran, Iran; P.O. Box 2965, Sharjah, United Arab Emirates; 333 7th Ave SW #1102, Calgary, AB T2P 2Z1, Canada; Chekhov St., 24.2, AP 57, Moscow, Russia; Room No. 704 - No. 10 Chao Waidajie Chao Yang District, Beijing 10020, China; Sanaee Ave., P.O. Box 79417-76349, N.I.O.C., Kish, Iran; 10th Floor, Sadaf Tower, Kish Island, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

M.S.P.-KALA (a.k.a. KALA NAFT CO SSK; a.k.a. KALA NAFT COMPANY LTD; a.k.a. KALA NAFT TEHRAN; a.k.a. KALA NAFT TEHRAN COMPANY; a.k.a. KALAYEH NAFT CO; a.k.a. MANUFACTURING SUPPORT & PROCUREMENT CO.-KALA NAFT; a.k.a. MANUFACTURING SUPPORT AND PROCUREMENT (M.S.P.) KALA NAFT CO. TEHRAN; a.k.a. MANUFACTURING, SUPPORT AND PROCUREMENT KALA NAFT COMPANY; a.k.a. MSP KALA NAFT CO. TEHRAN; a.k.a. MSP KALA NAFT TEHRAN COMPANY; a.k.a. MSP KALANAFT; a.k.a. MSP-KALANAFT COMPANY; a.k.a. SHERKAT SAHAMI KHAASS KALA NAFT; a.k.a. SHERKAT SAHAMI KHAASS POSHTIBANI VA TEHIYEH KALAYE NAFT TEHRAN; a.k.a. SHERKATE POSHTIBANI SAKHT VA TAHEIH KALAIE NAFTE TEHRAN), 242 Sepahbod Gharani Street, Karim Khan Zand Bridge, Corner Kalantari Street, 8th Floor, P.O. Box 15815-1775/15815-3446, Tehran 15988, Iran; Building No. 226, Corner of Shahid Kalantari Street, Sepahbod Gharani Avenue, Karimkhan Avenue, Tehran 1598844815, Iran; No. 242, Shahid Kalantari St., Near Karimkhan Bridge, Sepahbod Gharani Avenue, Tehran, Iran; Head Office Tehran, Sepahbod Gharani Ave., P.O. Box 15815/1775 15815/3446, Tehran, Iran; P.O. Box 2965, Sharjah, United Arab Emirates; 333 7th Ave SW #1102, Calgary, AB T2P 2Z1, Canada; Chekhov St., 24.2, AP 57, Moscow, Russia; Room No. 704 - No. 10 Chao Waidajie Chao Yang District, Beijing 10020, China; Sanaee Ave., P.O. Box 79417-76349, N.I.O.C., Kish, Iran; 10th Floor, Sadaf Tower, Kish Island, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

KALA NAFT CO SSK (a.k.a. KALA NAFT COMPANY LTD; a.k.a. KALA NAFT TEHRAN; a.k.a. KALA NAFT TEHRAN COMPANY; a.k.a. KALAYEH NAFT CO; a.k.a. M.S.P.-KALA; a.k.a. MANUFACTURING SUPPORT & PROCUREMENT CO.-KALA NAFT; a.k.a. MANUFACTURING SUPPORT AND PROCUREMENT (M.S.P.) KALA NAFT CO. TEHRAN; a.k.a. MANUFACTURING, SUPPORT AND PROCUREMENT KALA NAFT COMPANY; a.k.a. MSP KALA NAFT CO. TEHRAN; a.k.a. MSP KALA NAFT TEHRAN COMPANY; a.k.a. MSP KALANAFT; a.k.a. MSP-KALANAFT COMPANY; a.k.a. SHERKAT SAHAMI KHAASS KALA NAFT; a.k.a. SHERKAT SAHAMI KHAASS POSHTIBANI VA TEHIYEH KALAYE NAFT TEHRAN; a.k.a. SHERKATE POSHTIBANI SAKHT VA TAHEIH KALAIE NAFTE TEHRAN), 242 Sepahbod Gharani Street, Karim Khan Zand Bridge, Corner Kalantari Street, 8th Floor, P.O. Box 15815-1775/15815-3446, Tehran 15988, Iran; Building No. 226, Corner of Shahid Kalantari Street, Sepahbod Gharani Avenue, Karimkhan Avenue, Tehran 1598844815, Iran; No. 242, Shahid Kalantari St., Near Karimkhan Bridge, Sepahbod Gharani Avenue, Tehran, Iran; Head Office Tehran, Sepahbod Gharani Ave., P.O. Box 15815/1775 15815/3446, Tehran, Iran; P.O. Box 2965, Sharjah, United Arab Emirates; 333 7th Ave SW #1102, Calgary, AB T2P 2Z1, Canada; Chekhov St., 24.2, AP 57, Moscow, Russia; Room No. 704 - No. 10 Chao Waidajie Chao Yang District, Beijing 10020, China; Sanaee Ave., P.O. Box 79417-76349, N.I.O.C., Kish, Iran; 10th Floor, Sadaf Tower, Kish Island, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

KALA NAFT COMPANY LTD (a.k.a. KALA NAFT CO SSK; a.k.a. KALA NAFT TEHRAN; a.k.a. KALA NAFT TEHRAN COMPANY; a.k.a. KALAYEH NAFT CO; a.k.a. M.S.P.-KALA; a.k.a. MANUFACTURING SUPPORT & PROCUREMENT CO.-KALA NAFT; a.k.a. MANUFACTURING SUPPORT AND PROCUREMENT (M.S.P.) KALA NAFT CO. TEHRAN; a.k.a. MANUFACTURING, SUPPORT AND PROCUREMENT KALA NAFT COMPANY; a.k.a. MSP KALA NAFT CO. TEHRAN; a.k.a. MSP KALA NAFT TEHRAN COMPANY; a.k.a. MSP KALANAFT; a.k.a. MSP-KALANAFT COMPANY; a.k.a. SHERKAT SAHAMI KHAASS KALA NAFT; a.k.a. SHERKAT SAHAMI KHAASS POSHTIBANI VA TEHIYEH KALAYE NAFT TEHRAN; a.k.a. SHERKATE POSHTIBANI SAKHT VA TAHEIH KALAIE NAFTE TEHRAN), 242 Sepahbod Gharani Street, Karim Khan Zand Bridge, Corner Kalantari Street, 8th Floor, P.O. Box 15815-1775/15815-3446, Tehran 15988, Iran; Building No. 226, Corner of Shahid Kalantari Street, Sepahbod Gharani Avenue, Karimkhan Avenue, Tehran 1598844815, Iran; No. 242, Shahid Kalantari St., Near Karimkhan Bridge, Sepahbod Gharani Avenue, Tehran, Iran; Head Office Tehran, Sepahbod Gharani Ave., P.O. Box 15815/1775 15815/3446, Tehran, Iran; P.O. Box 2965, Sharjah, United Arab Emirates; 333 7th Ave SW #1102, Calgary, AB T2P 2Z1, Canada; Chekhov St., 24.2, AP 57, Moscow, Russia; Room No. 704 - No. 10 Chao Waidajie Chao Yang District, Beijing 10020, China; Sanaee Ave., P.O. Box 79417-76349, N.I.O.C., Kish, Iran; 10th Floor, Sadaf Tower, Kish Island, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

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SHERKATE POSHTIBANI SAKHT VA TAHEIH KALAIE NAFTE TEHRAN), 242 Sepahbod Gharani Street, Karim Khan Zand Bridge, Corner Kalantari Street, 8th Floor, P.O. Box 15815-1775/15815-3446, Tehran 15988, Iran; Building No. 226, Corner of Shahid Kalantari Street, Sepahbod Gharani Avenue, Karimkhan Avenue, Tehran 1598844815, Iran; No. 242, Shahid Kalantari St., Near Karimkhan Bridge, Sepahbod Gharani Avenue, Tehran, Iran; Head Office Tehran, Sepahbod Gharani Ave., P.O. Box 15815/1775 15815/3446, Tehran, Iran; P.O. Box 2965, Sharjah, United Arab Emirates; 333 7th Ave SW #1102, Calgary, AB T2P 2Z1, Canada; Chekhov St., 24.2 , AP 57, Moscow, Russia; Room No. 704 - No. 10 Chao Waidajie Chao Yang District , Beijing 10020, China; Sanaee Ave., P.O. Box 79417-76349, N.I.O.C., Kish, Iran; 10th Floor, Sadaf Tower, Kish Island, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

SHERKATE POSHTIBANI SAKHT VA TAHEIH KALAIE NAFTE TEHRAN (a.k.a. KALA NAFT CO SSK; a.k.a. KALA NAFT COMPANY LTD; a.k.a. KALA NAFT TEHRAN; a.k.a. KALA NAFT TEHRAN COMPANY; a.k.a. KALAYEH NAFT CO; a.k.a. M.S.P.-KALA; a.k.a. MANUFACTURING SUPPORT & PROCUREMENT CO.-KALA NAFT; a.k.a. MANUFACTURING SUPPORT AND PROCUREMENT (M.S.P.) KALA NAFT CO. TEHRAN; a.k.a. MANUFACTURING, SUPPORT AND PROCUREMENT KALA NAFT COMPANY; a.k.a. MSP KALA NAFT CO. TEHRAN; a.k.a. MSP KALA NAFT TEHRAN COMPANY; a.k.a. MSP KALANAFT; a.k.a. MSP-KALANAFT COMPANY; a.k.a. SHERKAT SAHAMI KHASS KALA NAFT; a.k.a. SHERKAT SAHAMI KHASS POSHTIBANI VA TEHIYEH KALAYE NAFT TEHRAN), 242 Sepahbod Gharani Street, Karim Khan Zand Bridge, Corner Kalantari Street, 8th Floor, P.O. Box 15815-1775/15815-3446, Tehran 15988, Iran; Building No. 226, Corner of Shahid Kalantari Street, Sepahbod Gharani Avenue, Karimkhan Avenue, Tehran 1598844815, Iran; No. 242, Shahid Kalantari St., Near Karimkhan Bridge, Sepahbod Gharani Avenue, Tehran, Iran; Head Office Tehran, Sepahbod Gharani Ave., P.O. Box 15815/1775 15815/3446, Tehran, Iran; P.O. Box 2965, Sharjah, United Arab Emirates; 333 7th Ave SW #1102, Calgary, AB T2P 2Z1, Canada; Chekhov St., 24.2 , AP 57, Moscow, Russia; Room No. 704 - No. 10 Chao Waidajie Chao Yang District , Beijing 10020, China; Sanaee Ave., P.O. Box 79417-76349, N.I.O.C., Kish, Iran; 10th Floor, Sadaf Tower, Kish Island, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

MSP KALANAFT (a.k.a. KALA NAFT CO SSK; a.k.a. KALA NAFT COMPANY LTD; a.k.a. KALA NAFT TEHRAN; a.k.a. KALA NAFT TEHRAN COMPANY; a.k.a. KALAYEH NAFT CO; a.k.a. M.S.P.-KALA; a.k.a. MANUFACTURING SUPPORT & PROCUREMENT CO.-KALA NAFT; a.k.a. MANUFACTURING SUPPORT AND PROCUREMENT (M.S.P.) KALA NAFT CO. TEHRAN; a.k.a. MANUFACTURING, SUPPORT AND PROCUREMENT KALA NAFT COMPANY; a.k.a. MSP KALA NAFT CO. TEHRAN; a.k.a. MSP KALA NAFT TEHRAN COMPANY; a.k.a. MSP-KALANAFT COMPANY; a.k.a. SHERKAT SAHAMI KHASS KALA NAFT; a.k.a. SHERKAT SAHAMI KHASS POSHTIBANI VA TEHIYEH KALAYE NAFT TEHRAN; a.k.a. SHERKATE POSHTIBANI SAKHT VA TAHEIH KALAIE NAFTE TEHRAN), 242 Sepahbod Gharani Street, Karim Khan Zand Bridge, Corner Kalantari Street, 8th Floor, P.O. Box 15815-1775/15815-3446, Tehran 15988, Iran; Building No. 226, Corner of Shahid Kalantari Street, Sepahbod Gharani Avenue, Karimkhan Avenue, Tehran 1598844815, Iran; No. 242, Shahid Kalantari St., Near Karimkhan Bridge, Sepahbod Gharani Avenue, Tehran, Iran; Head Office Tehran, Sepahbod Gharani Ave., P.O. Box 15815/1775 15815/3446, Tehran, Iran; P.O. Box 2965, Sharjah, United Arab Emirates; 333 7th Ave SW #1102, Calgary, AB T2P 2Z1, Canada; Chekhov St., 24.2 , AP 57, Moscow, Russia; Room No. 704 - No. 10 Chao Waidajie Chao Yang District , Beijing 10020, China; Sanaee Ave., P.O. Box 79417-76349, N.I.O.C., Kish, Iran; 10th Floor, Sadaf Tower, Kish Island, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

KALA NAFT TEHRAN COMPANY (a.k.a. KALA NAFT CO SSK; a.k.a. KALA NAFT COMPANY LTD; a.k.a. KALA NAFT TEHRAN; a.k.a. KALAYEH NAFT CO; a.k.a. M.S.P.-KALA; a.k.a. MANUFACTURING SUPPORT & PROCUREMENT CO.-KALA NAFT; a.k.a. MANUFACTURING SUPPORT AND PROCUREMENT (M.S.P.) KALA NAFT CO. TEHRAN; a.k.a. MANUFACTURING, SUPPORT AND PROCUREMENT KALA NAFT COMPANY; a.k.a. MSP KALA NAFT CO. TEHRAN; a.k.a. MSP KALA NAFT TEHRAN COMPANY; a.k.a. MSP KALANAFT; a.k.a. MSP-KALANAFT COMPANY; a.k.a. SHERKAT SAHAMI KHASS KALA NAFT; a.k.a. SHERKAT SAHAMI KHASS POSHTIBANI VA TEHIYEH KALAYE NAFT TEHRAN; a.k.a. SHERKATE POSHTIBANI SAKHT VA TAHEIH KALAIE NAFTE TEHRAN), 242 Sepahbod Gharani Street, Karim Khan Zand Bridge, Corner Kalantari Street, 8th Floor, P.O. Box 15815-1775/15815-3446, Tehran 15988, Iran; Building No. 226, Corner of Shahid Kalantari Street, Sepahbod Gharani Avenue, Karimkhan Avenue, Tehran 1598844815, Iran; No. 242, Shahid Kalantari St., Near Karimkhan Bridge, Sepahbod Gharani Avenue, Tehran, Iran; Head Office Tehran, Sepahbod Gharani Ave., P.O. Box 15815/1775 15815/3446, Tehran, Iran; P.O. Box 2965, Sharjah, United Arab Emirates; 333 7th Ave SW #1102, Calgary, AB T2P 2Z1, Canada; Chekhov St., 24.2 , AP 57, Moscow, Russia; Room No. 704 - No. 10 Chao Waidajie Chao Yang District , Beijing 10020, China; Sanaee Ave., P.O. Box 79417-76349, N.I.O.C., Kish, Iran; 10th Floor, Sadaf Tower, Kish Island, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

SHERKAT SAHAMI KHASS POSHTIBANI VA TEHIYEH KALAYE NAFT TEHRAN (a.k.a. KALA NAFT CO SSK; a.k.a. KALA NAFT COMPANY LTD; a.k.a. KALA NAFT TEHRAN; a.k.a. KALA NAFT TEHRAN COMPANY; a.k.a. KALAYEH NAFT CO; a.k.a. M.S.P.-KALA; a.k.a. MANUFACTURING SUPPORT & PROCUREMENT CO.-KALA NAFT; a.k.a. MANUFACTURING SUPPORT AND PROCUREMENT (M.S.P.) KALA NAFT CO. TEHRAN; a.k.a. MANUFACTURING, SUPPORT AND PROCUREMENT KALA NAFT COMPANY; a.k.a. MSP KALA NAFT CO. TEHRAN; a.k.a. MSP KALA NAFT TEHRAN COMPANY; a.k.a. MSP KALANAFT; a.k.a. MSP-KALANAFT COMPANY; a.k.a. SHERKAT SAHAMI KHASS KALA NAFT; a.k.a. SHERKATE POSHTIBANI SAKHT VA TAHEIH KALAIE NAFTE TEHRAN), 242 Sepahbod Gharani Street, Karim Khan Zand Bridge, Corner Kalantari Street, 8th Floor, P.O. Box 15815-1775/15815-3446, Tehran 15988, Iran; Building No. 226, Corner of Shahid Kalantari Street, Sepahbod Gharani Avenue, Karimkhan Avenue, Tehran 1598844815, Iran; No. 242, Shahid Kalantari St., Near Karimkhan Bridge, Sepahbod Gharani Avenue, Tehran, Iran; Head Office Tehran, Sepahbod Gharani Ave., P.O. Box 15815/1775 15815/3446, Tehran, Iran; P.O. Box 2965, Sharjah, United Arab Emirates; 333 7th Ave SW #1102, Calgary, AB T2P 2Z1, Canada; Chekhov St., 24.2 , AP 57, Moscow, Russia; Room No. 704 - No. 10 Chao Waidajie Chao Yang District , Beijing 10020, China; Sanaee Ave., P.O. Box 79417-76349, N.I.O.C., Kish, Iran; 10th Floor, Sadaf Tower, Kish Island, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

KALAYEH NAFT CO (a.k.a. KALA NAFT CO SSK; a.k.a. KALA NAFT COMPANY LTD; a.k.a. KALA NAFT TEHRAN; a.k.a. KALA NAFT TEHRAN COMPANY; a.k.a. M.S.P.-KALA; a.k.a. MANUFACTURING SUPPORT & PROCUREMENT CO.-KALA NAFT; a.k.a. MANUFACTURING SUPPORT AND PROCUREMENT (M.S.P.) KALA NAFT CO. TEHRAN; a.k.a. MANUFACTURING, SUPPORT AND PROCUREMENT KALA NAFT COMPANY;

a.k.a. MSP KALA NAFT CO. TEHRAN; a.k.a. MSP KALA NAFT TEHRAN COMPANY; a.k.a. MSP KALANAFT; a.k.a. MSP-KALANAFT COMPANY; a.k.a. SHERKAT SAHAMI KHAASS KALA NAFT; a.k.a. SHERKAT SAHAMI KHAASS POSHTIBANI VA TEHIYEH KALAYE NAFT TEHRAN; a.k.a. SHERKATE POSHTIBANI SAKHT VA TAHEIH KALAIE NAFTE TEHRAN), 242 Sepahbod Gharani Street, Karim Khan Zand Bridge, Corner Kalantari Street, 8th Floor, P.O. Box 15815-1775/15815-3446, Tehran 15988, Iran; Building No. 226, Corner of Shahid Kalantari Street, Sepahbod Gharani Avenue, Karimkhan Avenue, Tehran 1598844815, Iran; No. 242, Shahid Kalantari St., Near Karimkhan Bridge, Sepahbod Gharani Avenue, Tehran, Iran; Head Office Tehran, Sepahbod Gharani Ave., P.O. Box 15815/1775 15815/3446, Tehran, Iran; P.O. Box 2965, Sharjah, United Arab Emirates; 333 7th Ave SW #1102, Calgary, AB T2P 2Z1, Canada; Chekhov St., 24.2 , AP 57, Moscow, Russia; Room No. 704 - No. 10 Chao Waidajie Chao Yang District , Beijing 10020, China; Sanaee Ave., P.O. Box 79417-76349, N.I.O.C., Kish, Iran; 10th Floor, Sadaf Tower, Kish Island, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

MANUFACTURING SUPPORT AND PROCUREMENT (M.S.P.) KALA NAFT CO. TEHRAN (a.k.a. KALA NAFT CO SSK; a.k.a. KALA NAFT COMPANY LTD; a.k.a. KALA NAFT TEHRAN; a.k.a. KALA NAFT TEHRAN COMPANY; a.k.a. KALAYEH NAFT CO; a.k.a. M.S.P.-KALA; a.k.a. MANUFACTURING SUPPORT & PROCUREMENT CO.-KALA NAFT; a.k.a. MANUFACTURING, SUPPORT AND PROCUREMENT KALA NAFT COMPANY; a.k.a. MSP KALA NAFT CO. TEHRAN; a.k.a. MSP KALA NAFT TEHRAN COMPANY; a.k.a. MSP KALANAFT; a.k.a. MSP-KALANAFT COMPANY; a.k.a. SHERKAT SAHAMI KHAASS KALA NAFT; a.k.a. SHERKAT SAHAMI KHAASS POSHTIBANI VA TEHIYEH KALAYE NAFT TEHRAN; a.k.a. SHERKATE POSHTIBANI SAKHT VA TAHEIH KALAIE NAFTE TEHRAN), 242 Sepahbod Gharani Street, Karim Khan Zand Bridge, Corner Kalantari Street, 8th Floor, P.O. Box 15815-1775/15815-3446, Tehran 15988, Iran; Building No. 226, Corner of Shahid Kalantari Street, Sepahbod Gharani Avenue, Karimkhan Avenue, Tehran 1598844815, Iran; No. 242, Shahid Kalantari St., Near Karimkhan Bridge, Sepahbod Gharani Avenue, Tehran, Iran; Head Office Tehran, Sepahbod Gharani Ave., P.O. Box 15815/1775 15815/3446, Tehran, Iran; P.O. Box 2965, Sharjah, United Arab Emirates; 333 7th Ave SW #1102, Calgary, AB T2P 2Z1, Canada; Chekhov St., 24.2 , AP 57, Moscow, Russia; Room No. 704 - No. 10 Chao Waidajie Chao Yang District , Beijing 10020, China; Sanaee Ave., P.O. Box 79417-76349, N.I.O.C., Kish, Iran; 10th Floor, Sadaf Tower, Kish Island, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

MSP KALA NAFT TEHRAN COMPANY (a.k.a. KALA NAFT CO SSK; a.k.a. KALA NAFT COMPANY LTD; a.k.a. KALA NAFT TEHRAN; a.k.a. KALA NAFT TEHRAN COMPANY; a.k.a. KALAYEH NAFT CO; a.k.a. M.S.P.-KALA; a.k.a. MANUFACTURING SUPPORT & PROCUREMENT CO.-KALA NAFT; a.k.a. MANUFACTURING SUPPORT AND PROCUREMENT (M.S.P.) KALA NAFT CO. TEHRAN; a.k.a. MANUFACTURING, SUPPORT AND PROCUREMENT KALA NAFT COMPANY; a.k.a. MSP KALA NAFT CO. TEHRAN; a.k.a. MSP KALA NAFT TEHRAN COMPANY; a.k.a. MSP KALANAFT; a.k.a. MSP-KALANAFT COMPANY; a.k.a. SHERKAT SAHAMI KHAASS KALA NAFT; a.k.a. SHERKAT SAHAMI KHAASS POSHTIBANI VA TEHIYEH KALAYE NAFT TEHRAN; a.k.a. SHERKATE POSHTIBANI SAKHT VA TAHEIH KALAIE NAFTE TEHRAN), 242 Sepahbod Gharani Street, Karim Khan Zand Bridge, Corner Kalantari Street, 8th Floor, P.O. Box 15815-1775/15815-3446, Tehran 15988, Iran; Building No. 226, Corner of Shahid Kalantari Street, Sepahbod Gharani Avenue, Karimkhan Avenue, Tehran 1598844815, Iran; No. 242, Shahid Kalantari St., Near Karimkhan Bridge, Sepahbod Gharani Avenue, Tehran, Iran; Head Office Tehran, Sepahbod Gharani Ave., P.O. Box 15815/1775 15815/3446, Tehran, Iran; P.O. Box 2965, Sharjah, United Arab Emirates; 333 7th Ave SW #1102, Calgary, AB T2P 2Z1, Canada; Chekhov St., 24.2 , AP 57, Moscow, Russia; Room No. 704 - No. 10 Chao Waidajie Chao Yang District , Beijing 10020, China; Sanaee Ave., P.O. Box 79417-76349, N.I.O.C., Kish, Iran; 10th Floor, Sadaf Tower, Kish Island, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

MANUFACTURING, SUPPORT AND PROCUREMENT KALA NAFT COMPANY (a.k.a. KALA NAFT CO SSK; a.k.a. KALA NAFT COMPANY LTD; a.k.a. KALA NAFT TEHRAN; a.k.a. KALA NAFT TEHRAN COMPANY; a.k.a. KALAYEH NAFT CO; a.k.a. M.S.P.-KALA; a.k.a. MANUFACTURING SUPPORT & PROCUREMENT CO.-KALA NAFT; a.k.a. MANUFACTURING SUPPORT AND PROCUREMENT (M.S.P.) KALA NAFT CO. TEHRAN; a.k.a. MSP KALA NAFT CO. TEHRAN; a.k.a. MSP KALA NAFT TEHRAN COMPANY; a.k.a. MSP KALANAFT; a.k.a. MSP-KALANAFT COMPANY; a.k.a. SHERKAT SAHAMI KHAASS KALA NAFT; a.k.a. SHERKAT SAHAMI KHAASS POSHTIBANI VA TEHIYEH KALAYE NAFT TEHRAN; a.k.a. SHERKATE POSHTIBANI SAKHT VA TAHEIH KALAIE NAFTE TEHRAN), 242 Sepahbod Gharani Street, Karim Khan Zand Bridge, Corner Kalantari Street, 8th Floor, P.O. Box 15815-1775/15815-3446, Tehran 15988, Iran; Building No. 226, Corner of Shahid Kalantari Street, Sepahbod Gharani Avenue, Karimkhan Avenue, Tehran 1598844815, Iran; No. 242, Shahid Kalantari St., Near Karimkhan Bridge, Sepahbod Gharani Avenue, Tehran, Iran; Head Office Tehran, Sepahbod Gharani Ave., P.O. Box 15815/1775 15815/3446, Tehran, Iran; P.O. Box 2965, Sharjah, United Arab Emirates; 333 7th Ave SW #1102, Calgary, AB T2P 2Z1, Canada; Chekhov St., 24.2 , AP 57, Moscow, Russia; Room No. 704 - No. 10 Chao Waidajie Chao Yang District , Beijing 10020, China; Sanaee Ave., P.O. Box 79417-76349, N.I.O.C., Kish, Iran; 10th Floor, Sadaf Tower, Kish Island, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

MSP-KALANAFT COMPANY (a.k.a. KALA NAFT CO SSK; a.k.a. KALA NAFT COMPANY LTD; a.k.a. KALA NAFT TEHRAN; a.k.a. KALA NAFT TEHRAN COMPANY; a.k.a. KALAYEH NAFT CO; a.k.a. M.S.P.-KALA; a.k.a. MANUFACTURING SUPPORT & PROCUREMENT CO.-KALA NAFT; a.k.a. MANUFACTURING SUPPORT AND PROCUREMENT (M.S.P.) KALA NAFT CO. TEHRAN; a.k.a. MANUFACTURING, SUPPORT AND PROCUREMENT KALA NAFT COMPANY; a.k.a. MSP KALA NAFT CO. TEHRAN; a.k.a. MSP KALA NAFT TEHRAN COMPANY; a.k.a. MSP KALANAFT; a.k.a. SHERKAT SAHAMI KHAASS KALA NAFT; a.k.a. SHERKAT SAHAMI KHAASS POSHTIBANI VA TEHIYEH KALAYE NAFT TEHRAN; a.k.a. SHERKATE POSHTIBANI SAKHT VA TAHEIH KALAIE NAFTE TEHRAN), 242 Sepahbod Gharani Street, Karim Khan Zand Bridge, Corner Kalantari Street, 8th Floor, P.O. Box 15815-1775/15815-3446, Tehran 15988, Iran; Building No. 226, Corner of Shahid Kalantari Street, Sepahbod Gharani Avenue, Karimkhan Avenue, Tehran 1598844815, Iran; No. 242, Shahid Kalantari St., Near Karimkhan Bridge, Sepahbod Gharani Avenue, Tehran, Iran; Head Office Tehran, Sepahbod Gharani Ave., P.O. Box 15815/1775 15815/3446, Tehran, Iran; P.O. Box 2965, Sharjah, United Arab Emirates; 333 7th Ave SW #1102, Calgary, AB T2P 2Z1, Canada; Chekhov St., 24.2 , AP 57, Moscow, Russia; Room No. 704 - No. 10 Chao Waidajie Chao Yang District , Beijing 10020, China; Sanaee Ave., P.O. Box 79417-76349, N.I.O.C., Kish, Iran; 10th Floor, Sadaf Tower, Kish Island, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; all offices worldwide [IRAN].

MAHAB GHODSS CONSULTING ENGINEERING COMPANY (a.k.a. MAHAB GHODSS CONSULTING ENGINEERING CO.; a.k.a. MAHAB GHODSS CONSULTING ENGINEERS SSK; a.k.a. MAHAB QODS ENGINEERING CONSULTING CO.), No. 17, Dastgerdy Avenue, Takharestan Alley, 19395-6875, Tehran 1918781185, Iran; 16 Takharestan Alley, Dastgerdy Avenue, P.O. Box 19395-6875, Tehran 19187 81185, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 48962 (Iran) issued 1983; all offices worldwide [IRAN].

MAHAB GHODSS CONSULTING ENGINEERS SSK (a.k.a. MAHAB GHODSS CONSULTING ENGINEERING CO.; a.k.a. MAHAB GHODSS CONSULTING ENGINEERING COMPANY; a.k.a. MAHAB QODS ENGINEERING CONSULTING CO.), No. 17, Dastgerdy Avenue, Takharestan Alley, 19395-6875, Tehran 1918781185, Iran; 16 Takharestan Alley, Dastgerdy Avenue, P.O. Box 19395-6875, Tehran 19187 81185, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 48962 (Iran) issued 1983; all offices worldwide [IRAN].

MAHAB GHODSS CONSULTING ENGINEERING CO. (a.k.a. MAHAB GHODSS CONSULTING ENGINEERING COMPANY; a.k.a. MAHAB GHODSS CONSULTING ENGINEERS SSK; a.k.a. MAHAB QODS ENGINEERING CONSULTING CO.), No. 17, Dastgerdy Avenue, Takharestan Alley, 19395-6875, Tehran 1918781185, Iran; 16 Takharestan Alley, Dastgerdy Avenue, P.O. Box 19395-6875, Tehran 19187 81185, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 48962 (Iran) issued 1983; all offices worldwide [IRAN].

MAHAB QODS ENGINEERING CONSULTING CO. (a.k.a. MAHAB GHODSS CONSULTING ENGINEERING CO.; a.k.a. MAHAB GHODSS CONSULTING ENGINEERING COMPANY; a.k.a. MAHAB GHODSS CONSULTING ENGINEERS SSK), No. 17, Dastgerdy Avenue, Takharestan Alley, 19395-6875, Tehran 1918781185, Iran; 16 Takharestan Alley, Dastgerdy Avenue, P.O. Box 19395-6875, Tehran 19187 81185, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 48962 (Iran) issued 1983; all offices worldwide [IRAN].

PARS OIL AND GAS COMPANY (a.k.a. POGC), No. 133, Side of Parvin Etesami Alley, opposite Sazman Ab - Dr. Fatemi Avenue, Tehran, Iran; No. 1 Parvin Etesami Street, Fatemi Avenue, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

POGC (a.k.a. PARS OIL AND GAS COMPANY), No. 133, Side of Parvin Etesami Alley, opposite Sazman Ab - Dr. Fatemi Avenue, Tehran, Iran; No. 1 Parvin Etesami Street, Fatemi Avenue, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

EGHTESAD NOVIN BANK (a.k.a. BANK-E EGHTESAD NOVIN; a.k.a. EN BANK PJSC), Vali Asr Street, Above Vanak Circle, across Niayesh, Esfandiari Blvd., No. 24, Tehran, Iran; SWIFT/BIC BEGNIRTH; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

BANK-E EGHTESAD NOVIN (a.k.a. EGHTESAD NOVIN BANK; a.k.a. EN BANK PJSC), Vali Asr Street, Above Vanak Circle, across Niayesh, Esfandiari Blvd., No. 24, Tehran, Iran; SWIFT/BIC BEGNIRTH; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

EN BANK PJSC (a.k.a. BANK-E EGHTESAD NOVIN; a.k.a. EGHTESAD NOVIN BANK), Vali Asr Street, Above Vanak Circle, across Niayesh, Esfandiari Blvd., No. 24, Tehran, Iran; SWIFT/BIC BEGNIRTH; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

PASARGAD BANK (a.k.a. BANK-E PASARGAD), Valiasr St., Mirdamad St., No. 430, Tehran, Iran; SWIFT/BIC BKBPIRTH; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

BANK-E PASARGAD (a.k.a. PASARGAD BANK), Valiasr St., Mirdamad St., No. 430, Tehran, Iran; SWIFT/BIC BKBPIRTH; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

KARAFARIN BANK (a.k.a. BANK-E KARAFARIN), Zafar St. No. 315, Between Vali Asr and Jordan, Tehran, Iran; SWIFT/BIC KBIDIRTH; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

BANK-E KARAFARIN (a.k.a. KARAFARIN BANK), Zafar St. No. 315, Between Vali Asr and Jordan, Tehran, Iran; SWIFT/BIC KBIDIRTH; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SAMAN BANK (a.k.a. BANK-E SAMAN), Vali Asr. St. No. 3, Before Vey Park intersection, corner of Tarakesh Dooz St. , Tehran, Iran; SWIFT/BIC SABCIRTH; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

BANK-E SAMAN (a.k.a. SAMAN BANK), Vali Asr. St. No. 3, Before Vey Park intersection, corner of Tarakesh Dooz St. , Tehran, Iran; SWIFT/BIC SABCIRTH; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SARMAYEH BANK (a.k.a. BANK-E SARMAYEH), Sepahod Gharani No. 24, Corner of Arak St., Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

BANK-E SARMAYEH (a.k.a. SARMAYEH BANK), Sepahod Gharani No. 24, Corner of Arak St., Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

TAT BANK (a.k.a. BANK-E TAT), Shahid Ahmad Ghasir (Bocharest), Shahid Ahmadian (15th) St., No. 1, Tehran, Iran; No. 1 Ahmadian Street, Bokharest Avenue, Tehran, Iran; SWIFT/BIC TATBIRTH; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

BANK-E TAT (a.k.a. TAT BANK), Shahid Ahmad Ghasir (Bocharest), Shahid Ahmadian (15th) St., No. 1, Tehran, Iran; No. 1 Ahmadian Street, Bokharest Avenue, Tehran, Iran; SWIFT/BIC TATBIRTH; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

BANK-E SHAHR, Sepahod Gharani, Corner of Khosro St., No. 147, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

DEY BANK (a.k.a. BANK-E DEY), Bokharest St., 1st St., No. 13, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

BANK-E DEY (a.k.a. DEY BANK), Bokharest St., 1st St., No. 13, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

HEKMAT IRANIAN BANK (a.k.a. BANK-E HEKMAT IRANIAN), Argentine Circle, beginning of Africa St., Corner of 37th St., (Dara Cul-de-sac), No.26, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

BANK-E HEKMAT IRANIAN (a.k.a. HEKMAT IRANIAN BANK), Argentine Circle, beginning of Africa St., Corner of 37th St., (Dara Cul-de-sac), No.26, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

TOURISM BANK (a.k.a. BANK-E GARDESHGARI), Vali Asr St., above Vey Park, Shahid Fiazi St., No. 51, first floor, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

BANK-E GARDESHGARI (a.k.a. TOURISM BANK), Vali Asr St., above Vey Park, Shahid Fiazi St., No. 51, first floor, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

IRAN ZAMIN BANK (a.k.a. BANK-E IRAN ZAMIN), Seyyed Jamal-oldin Asadabadi St., Corner of 68th St., No. 472, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

BANK-E IRAN ZAMIN (a.k.a. IRAN ZAMIN BANK), Seyyed Jamal-oldin Asadabadi St., Corner of 68th St., No. 472, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

MEHR IRAN CREDIT UNION BANK (a.k.a. BANK-E GHARZOLHASANEH MEHR IRAN; a.k.a. GHARZOLHASANEH MEHR IRAN BANK), Taleghani St., No.204, Before the intersection of Mofateh, across from the former U.S. embassy, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

BANK-E GHARZOLHASANEH MEHR IRAN (a.k.a. GHARZOLHASANEH MEHR IRAN BANK; a.k.a. MEHR IRAN CREDIT UNION BANK), Taleghani St., No.204, Before the intersection of Mofateh, across from the former U.S. embassy, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

GHARZOLHASANEH MEHR IRAN BANK (a.k.a. BANK-E GHARZOLHASANEH MEHR IRAN; a.k.a. MEHR IRAN CREDIT UNION BANK), Taleghani St., No.204, Before the intersection of Mofateh, across from the former U.S. embassy, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

JOINT IRAN-VENEZUELA BANK (a.k.a. BANK MOSHTAREK-E IRAN VENEZUELA; a.k.a. IRANIAN-VENEZUELAN BI-NATIONAL BANK), Ahmad Ghasir St. (Bokharest), Corner of 15th St., Tose Tower, No.44-46, Tehran 1013830711, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

BANK MOSHTAREK-E IRAN VENEZUELA (a.k.a. IRANIAN-VENEZUELAN BI-NATIONAL BANK; a.k.a. JOINT IRAN-VENEZUELA BANK), Ahmad Ghasir St. (Bokharest), Corner of 15th St., Tose Tower, No.44-46, Tehran 1013830711, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

IRANIAN-VENEZUELAN BI-NATIONAL BANK (a.k.a. BANK MOSHTAREK-E IRAN VENEZUELA; a.k.a. JOINT IRAN-VENEZUELA BANK), Ahmad Ghasir St. (Bokharest), Corner of 15th St., Tose Tower, No.44-46, Tehran 1013830711, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

TOSEE TAAVON BANK (a.k.a. BANK-E TOSE'E TA'AVON; a.k.a. COOPERATIVE DEVELOPMENT BANK), Mirdamad Blvd., North East Corner of Mirdamad Bridge, No. 271, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

BANK-E TOSE'E TA'AVON (a.k.a. COOPERATIVE DEVELOPMENT BANK; a.k.a. TOSEE TAAVON BANK), Mirdamad Blvd., North East Corner of Mirdamad Bridge, No. 271, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

COOPERATIVE DEVELOPMENT BANK (a.k.a. BANK-E TOSE'E TA'AVON; a.k.a. TOSEE TAAVON BANK), Mirdamad Blvd., North East Corner of Mirdamad Bridge, No. 271, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

ISLAMIC REGIONAL COOPERATION BANK (a.k.a. BANK-E TAAWON MANTAGHEEY-E ESLAMI; a.k.a. REGIONAL COOPERATION OF THE ISLAMIC BANK FOR DEVELOPMENT & INVESTMENT), Building No. 59, District 929, Street No. 17, Arsat Al-Hindia, Al Masbah, Baghdad, Iraq; Tohid Street, Before Tohid Circle, No. 33, Upper Level of Eghtesad-e Novin Bank, Tehran 1419913464, Iran; SWIFT/BIC RCDFIQBA; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

BANK-E TAAWON MANTAGHEEY-E ESLAMI (a.k.a. ISLAMIC REGIONAL COOPERATION BANK; a.k.a. REGIONAL COOPERATION OF THE ISLAMIC BANK FOR DEVELOPMENT & INVESTMENT), Building No. 59, District 929, Street No. 17, Arsat Al-Hindia, Al Masbah, Baghdad, Iraq; Tohid Street, Before Tohid Circle, No. 33, Upper Level of Eghtesad-e Novin Bank, Tehran 1419913464, Iran; SWIFT/BIC RCDFIQBA; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

REGIONAL COOPERATION OF THE ISLAMIC BANK FOR DEVELOPMENT & INVESTMENT (a.k.a. BANK-E TAAWON MANTAGHEEY-E ESLAMI; a.k.a. ISLAMIC REGIONAL COOPERATION BANK), Building No. 59, District 929, Street No. 17, Arsat Al-Hindia, Al Masbah, Baghdad, Iraq; Tohid Street, Before Tohid Circle, No. 33, Upper Level of Eghtesad-e Novin Bank, Tehran 1419913464, Iran; SWIFT/BIC RCDFIQBA; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

CREDIT INSTITUTION FOR DEVELOPMENT, 53 Saanee, Jahan-e Koodak, Crossroads Africa St., Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SHONA (f.k.a. ABADAN; f.k.a. ALPHA) (T2EU4) Crude/Oil Products Tanker 99,144DWT 56,068GRT Tanzania flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag None Identified; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9187629; MMSI 572469210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ABADAN (f.k.a. ALPHA; a.k.a. SHONA) (T2EU4) Crude/Oil Products Tanker 99,144DWT 56,068GRT Tanzania flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag None Identified; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9187629; MMSI 572469210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ALPHA (f.k.a. ABADAN; a.k.a. SHONA) (T2EU4) Crude/Oil Products Tanker 99,144DWT 56,068GRT Tanzania flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag None Identified; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9187629; MMSI 572469210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SUNDIAL (f.k.a. ABADEH; f.k.a. CRYSTAL) (9HDQ9) Crude/Oil Products Tanker 99,030DWT 56,068GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9187655; MMSI 256842000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ABADEH (f.k.a. CRYSTAL; a.k.a. SUNDIAL) (9HDQ9) Crude/Oil Products Tanker 99,030DWT 56,068GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9187655; MMSI 256842000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

CRYSTAL (f.k.a. ABADEH; a.k.a. SUNDIAL) (9HDQ9) Crude/Oil Products Tanker 99,030DWT 56,068GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9187655; MMSI 256842000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SILVER CLOUD (f.k.a. AMOL; f.k.a. CASTOR; f.k.a. CHRISTINA) (T2EM4) Crude/Oil Products Tanker 99,094DWT 56,068GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9187667; MMSI 256843000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

AMOL (f.k.a. CASTOR; f.k.a. CHRISTINA; a.k.a. SILVER CLOUD) (T2EM4) Crude/Oil Products Tanker 99,094DWT 56,068GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9187667; MMSI 256843000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

CASTOR (f.k.a. AMOL; f.k.a. CHRISTINA; a.k.a. SILVER CLOUD) (T2EM4) Crude/Oil Products Tanker 99,094DWT 56,068GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9187667; MMSI 256843000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

CHRISTINA (f.k.a. AMOL; f.k.a. CASTOR; a.k.a. SILVER CLOUD) (T2EM4) Crude/Oil Products Tanker 99,094DWT 56,068GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9187667; MMSI 256843000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ALERT (f.k.a. ASTANEH; f.k.a. NEPTUNE; f.k.a. SEAPRIDE) (T2ES4) Crude/Oil Products Tanker 99,144DWT 56,068GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9187643; MMSI 572467210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ASTANEH (a.k.a. ALERT; f.k.a. NEPTUNE; f.k.a. SEAPRIDE) (T2ES4) Crude/Oil Products Tanker 99,144DWT 56,068GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not

Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9187643; MMSI 572467210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

NEPTUNE (a.k.a. ALERT; f.k.a. ASTANEH; f.k.a. SEAPRIDE) (T2ES4) Crude/Oil Products Tanker 99,144DWT 56,068GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9187643; MMSI 572467210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SEAPRIDE (a.k.a. ALERT; f.k.a. ASTANEH; f.k.a. NEPTUNE) (T2ES4) Crude/Oil Products Tanker 99,144DWT 56,068GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9187643; MMSI 572467210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ABELIA (f.k.a. ASTARA; f.k.a. JUPITER) (9HDS9) Crude/Oil Products Tanker 99,087DWT 56,068GRT None Identified flag; Former Vessel Flag Tuvalu; alt. Former Vessel Flag Malta; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9187631; MMSI 256845000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ASTARA (a.k.a. ABELIA; f.k.a. JUPITER) (9HDS9) Crude/Oil Products Tanker 99,087DWT 56,068GRT None Identified flag; Former Vessel Flag Tuvalu; alt. Former Vessel Flag Malta; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9187631; MMSI 256845000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

JUPITER (a.k.a. ABELIA; f.k.a. ASTARA) (9HDS9) Crude/Oil Products Tanker 99,087DWT 56,068GRT None Identified flag; Former Vessel Flag Tuvalu; alt. Former Vessel Flag Malta; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9187631; MMSI 256845000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

BANEH (EQKF) Landing Craft 640DWT 478GRT Iran flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 8508462; MMSI 422141000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DAMAVAND (9HEG9) Crude Oil Tanker 297,013DWT 160,576GRT None Identified flag; Former Vessel Flag Malta; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9218478; MMSI 256865000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DECESIVE (f.k.a. DANESH; f.k.a. LEADERSHIP) (5IM 592) Crude Oil Tanker 319,988DWT 164,241GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9356593; MMSI 677049200 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DANESH (a.k.a. DECESIVE; f.k.a. LEADERSHIP) (5IM 592) Crude Oil Tanker 319,988DWT 164,241GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9356593; MMSI 677049200 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

LEADERSHIP (f.k.a. DANESH; a.k.a. DECESIVE) (5IM 592) Crude Oil Tanker 319,988DWT 164,241GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9356593; MMSI 677049200 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DARAB (9HEE9) Crude Oil Tanker 296,803DWT 160,576GRT None Identified flag; Former Vessel Flag Malta; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9218492; MMSI 256862000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DAL LAKE (f.k.a. COMPANION; f.k.a. DAVAR) (5IM 593) Crude Oil Tanker 317,850DWT 164,241GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357717; MMSI 677049300 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DAVAR (f.k.a. COMPANION; a.k.a. DAL LAKE) (5IM 593) Crude Oil Tanker 317,850DWT 164,241GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357717; MMSI 677049300 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

COMPANION (a.k.a. DAL LAKE; f.k.a. DAVAR) (5IM 593) Crude Oil Tanker 317,850DWT 164,241GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357717; MMSI 677049300 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DAYLAM (9HEU9) Crude Oil Tanker 299,500DWT 160,576GRT None Identified flag; Former Vessel Flag Malta; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9218466; MMSI 256872000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DELVAR (9HEF9) Crude Oil Tanker 299,500DWT 160,576GRT None Identified flag; Former Vessel Flag Malta; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9218454; MMSI 256864000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DENA (9HED9) Crude Oil Tanker 296,894DWT 160,576GRT None Identified flag; Former Vessel Flag Malta; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9218480; MMSI 256861000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

FIANGA (f.k.a. FAEZ; f.k.a. MAESTRO; f.k.a. SATEEN) (T2DM4) Chemical/Products Tanker 35,124DWT 25,214GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9283760; MMSI 572438210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

FAEZ (a.k.a. FIANGA; f.k.a. MAESTRO; f.k.a. SATEEN) (T2DM4) Chemical/Products Tanker 35,124DWT 25,214GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9283760; MMSI 572438210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SATEEN (f.k.a. FAEZ; a.k.a. FIANGA; f.k.a. MAESTRO) (T2DM4) Chemical/Products Tanker 35,124DWT 25,214GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9283760; MMSI 572438210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

MAESTRO (f.k.a. FAEZ; a.k.a. FIANGA; f.k.a. SATEEN) (T2DM4) Chemical/Products Tanker 35,124DWT 25,214GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9283760; MMSI 572438210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ZEUS (f.k.a. HADI; f.k.a. PIONEER) (T2EJ4) Crude Oil Tanker 317,355DWT 163,650GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tuvalu; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9362073; MMSI 572459210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HADI (f.k.a. PIONEER; a.k.a. ZEUS) (T2EJ4) Crude Oil Tanker 317,355DWT 163,650GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tuvalu; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9362073; MMSI 572459210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

PIONEER (f.k.a. HADI; a.k.a. ZEUS) (T2EJ4) Crude Oil Tanker 317,355DWT 163,650GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tuvalu; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9362073; MMSI 572459210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HALISTIC (f.k.a. HAMOON; f.k.a. LENA; f.k.a. TAMAR) (T2EQ4) Crude Oil Tanker 299,242DWT 160,930GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more

information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9212929; MMSI 572465210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HAMOON (a.k.a. HALISTIC; f.k.a. LENA; f.k.a. TAMAR) (T2EQ4) Crude Oil Tanker 299,242DWT 160,930GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9212929; MMSI 572465210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

LENA (a.k.a. HALISTIC; f.k.a. HAMOON; f.k.a. TAMAR) (T2EQ4) Crude Oil Tanker 299,242DWT 160,930GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9212929; MMSI 572465210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

TAMAR (a.k.a. HALISTIC; f.k.a. HAMOON; f.k.a. LENA) (T2EQ4) Crude Oil Tanker 299,242DWT 160,930GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9212929; MMSI 572465210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

AMBER (f.k.a. FREEDOM; f.k.a. HARAZ) (5IM 597) Crude Oil Tanker 317,356DWT 163,660GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357406; MMSI 677049700 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HARAZ (a.k.a. AMBER; f.k.a. FREEDOM) (5IM 597) Crude Oil Tanker 317,356DWT 163,660GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357406; MMSI 677049700 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

FREEDOM (a.k.a. AMBER; f.k.a. HARAZ) (5IM 597) Crude Oil Tanker 317,356DWT 163,660GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357406; MMSI 677049700 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

MARINA (f.k.a. HARSIN; f.k.a. VALOR) (5IM600) Crude Oil Tanker 299,229DWT 160,930GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9212917; MMSI 677050000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HARSIN (a.k.a. MARINA; f.k.a. VALOR) (5IM600) Crude Oil Tanker 299,229DWT 160,930GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9212917; MMSI 677050000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

VALOR (f.k.a. HARSIN; a.k.a. MARINA) (5IM600) Crude Oil Tanker 299,229DWT 160,930GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9212917; MMSI 677050000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

MAJESTIC (f.k.a. GLORY; f.k.a. HATEF) (T2EG4) Crude Oil Tanker 317,367DWT 163,660GRT Tanzania flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tuvalu; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357183; MMSI 212256000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HATEF (f.k.a. GLORY; a.k.a. MAJESTIC) (T2EG4) Crude Oil Tanker 317,367DWT 163,660GRT Tanzania flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tuvalu; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357183; MMSI 212256000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

GLORY (f.k.a. HATEF; a.k.a. MAJESTIC) (T2EG4) Crude Oil Tanker 317,367DWT 163,660GRT Tanzania flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tuvalu; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see:

https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357183; MMSI 212256000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HAPPINESS (f.k.a. HENGAM; f.k.a. LOYAL; f.k.a. TULAR) (T2ER4) Crude Oil Tanker 299,214DWT 160,930GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9212905; MMSI 256875000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HENGAM (a.k.a. HAPPINESS; f.k.a. LOYAL; f.k.a. TULAR) (T2ER4) Crude Oil Tanker 299,214DWT 160,930GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9212905; MMSI 256875000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

LOYAL (a.k.a. HAPPINESS; f.k.a. HENGAM; f.k.a. TULAR) (T2ER4) Crude Oil Tanker 299,214DWT 160,930GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9212905; MMSI 256875000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

TULAR (a.k.a. HAPPINESS; f.k.a. HENGAM; f.k.a. LOYAL) (T2ER4) Crude Oil Tanker 299,214DWT 160,930GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9212905; MMSI 256875000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HONESTY (f.k.a. HIRMAND; f.k.a. HONESTY; f.k.a. MILLIONAIRE) (T2DZ4) Crude Oil Tanker 317,356DWT 163,660GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357391; MMSI 572450210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HIRMAND (a.k.a. HONESTY; f.k.a. HONESTY; f.k.a. MILLIONAIRE) (T2DZ4) Crude Oil Tanker 317,356DWT 163,660GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357391; MMSI 572450210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HONESTY (f.k.a. HIRMAND; a.k.a. HONESTY; f.k.a. MILLIONAIRE) (T2DZ4) Crude Oil Tanker 317,356DWT 163,660GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357391; MMSI 572450210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

MILLIONAIRE (f.k.a. HIRMAND; a.k.a. HONESTY; f.k.a. HONESTY) (T2DZ4) Crude Oil Tanker 317,356DWT 163,660GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357391; MMSI 572450210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HYDRA (f.k.a. EXPLORER; f.k.a. HODA; f.k.a. PRECIOUS) (T2EH4) Crude Oil Tanker 317,356DWT 163,660GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9362059; MMSI 572458210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HODA (f.k.a. EXPLORER; a.k.a. HYDRA; f.k.a. PRECIOUS) (T2EH4) Crude Oil Tanker 317,356DWT 163,660GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9362059; MMSI 572458210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

PRECIOUS (f.k.a. EXPLORER; f.k.a. HODA; a.k.a. HYDRA) (T2EH4) Crude Oil Tanker 317,356DWT 163,660GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9362059; MMSI 572458210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

EXPLORER (f.k.a. HODA; a.k.a. HYDRA; f.k.a. PRECIOUS) (T2EH4) Crude Oil Tanker 317,356DWT 163,660GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9362059; MMSI 572458210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9362059; MMSI 572458210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

COURAGE (f.k.a. HOMA) (5IM 596) Crude Oil Tanker 317,367DWT 163,660GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357389; MMSI 677049600 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HOMA (a.k.a. COURAGE) (5IM 596) Crude Oil Tanker 317,367DWT 163,660GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357389; MMSI 677049600 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DOVE (f.k.a. HONAR; f.k.a. JANUS; f.k.a. VICTORY) (T2EA4) Crude Oil Tanker 317,367DWT 163,660GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9362061; MMSI 209511000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HONAR (a.k.a. DOVE; f.k.a. JANUS; f.k.a. VICTORY) (T2EA4) Crude Oil Tanker 317,367DWT 163,660GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9362061; MMSI 209511000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

VICTORY (a.k.a. DOVE; f.k.a. HONAR; f.k.a. JANUS) (T2EA4) Crude Oil Tanker 317,367DWT 163,660GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9362061; MMSI 209511000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

JANUS (a.k.a. DOVE; f.k.a. HONAR; f.k.a. VICTORY) (T2EA4) Crude Oil Tanker 317,367DWT 163,660GRT None Identified flag; Former Vessel Flag Cyprus; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9362061; MMSI 209511000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HORIZON (f.k.a. HORMOZ; f.k.a. SCORPIAN) (9HEK9) Crude Oil Tanker 299,261DWT 160,930GRT None Identified flag; Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9212890; MMSI 256870000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HORMOZ (a.k.a. HORIZON; f.k.a. SCORPIAN) (9HEK9) Crude Oil Tanker 299,261DWT 160,930GRT None Identified flag; Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9212890; MMSI 256870000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SCORPIAN (a.k.a. HORIZON; f.k.a. HORMOZ) (9HEK9) Crude Oil Tanker 299,261DWT 160,930GRT None Identified flag; Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9212890; MMSI 256870000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HUWAYZEH (9HEJ9) Crude Oil Tanker 299,242DWT 160,930GRT None Identified flag; Former Vessel Flag Malta; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9212888; MMSI 256869000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

IMICO NEKA 455 (a.k.a. YARD NO. 455 IRAN MARINE) Shuttle Tanker 63,000DWT 40,800GRT Iran flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9404546 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

YARD NO. 455 IRAN MARINE (a.k.a. IMICO NEKA 455) Shuttle Tanker 63,000DWT 40,800GRT Iran flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9404546 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

IMICO NEKA 456 (a.k.a. YARD NO. 456 IRAN MARINE) Shuttle Tanker 63,000DWT 40,800GRT Iran flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9404558 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

YARD NO. 456 IRAN MARINE (a.k.a. IMICO NEKA 456) Shuttle Tanker 63,000DWT 40,800GRT Iran flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9404558 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

IMICO NEKA 457 (a.k.a. YARD NO. 457 IRAN MARINE) Shuttle Tanker 63,000DWT 40,800GRT Iran flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9404560 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

YARD NO. 457 IRAN MARINE (a.k.a. IMICO NEKA 457) Shuttle Tanker 63,000DWT 40,800GRT Iran flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9404560 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

IRAN FAHIM Chemical/Products Tanker 34,900DWT 26,561GRT Iran flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9286140 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

IRAN FALAGH Chemical/Products Tanker 34,900DWT 25,000GRT Iran flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9286152 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

IRAN FAZEL (9BAC) Chemical/Products Tanker 35,155DWT 25,214GRT Iran flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9283746; MMSI 422303000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

MARIVAN (EQKH) Tanker 640DWT 478GRT Iran flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 8517243; MMSI 422143000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

NYOS (f.k.a. BRAUNY; f.k.a. MARIGOLD; f.k.a. NABI) (T2DS4) Crude Oil Tanker 298,731DWT 156,809GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9079080; MMSI 572443210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

NABI (f.k.a. BRAUNY; f.k.a. MARIGOLD; a.k.a. NYOS) (T2DS4) Crude Oil Tanker 298,731DWT 156,809GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9079080; MMSI 572443210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

BRAUNY (f.k.a. MARIGOLD; f.k.a. NABI; a.k.a. NYOS) (T2DS4) Crude Oil Tanker 298,731DWT 156,809GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9079080; MMSI 572443210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

MARIGOLD (f.k.a. BRAUNY; f.k.a. NABI; a.k.a. NYOS) (T2DS4) Crude Oil Tanker 298,731DWT 156,809GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9079080; MMSI 572443210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

NAINITAL (f.k.a. MIDSEA; f.k.a. MOTION; f.k.a. NAJM) (T2DR4) Crude Oil Tanker 298,731DWT 156,809GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9079092; MMSI 572442210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

NAJM (f.k.a. MIDSEA; f.k.a. MOTION; a.k.a. NAINITAL) (T2DR4) Crude Oil Tanker 298,731DWT 156,809GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9079092; MMSI 572442210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9079092; MMSI 572442210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

MOTION (f.k.a. MIDSEA; a.k.a. NAINITAL; f.k.a. NAJM) (T2DR4) Crude Oil Tanker 298,731DWT 156,809GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9079092; MMSI 572442210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

MIDSEA (f.k.a. MOTION; a.k.a. NAINITAL; f.k.a. NAJM) (T2DR4) Crude Oil Tanker 298,731DWT 156,809GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9079092; MMSI 572442210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

NATIVE LAND (f.k.a. NESA; f.k.a. OCEANIC; f.k.a. TRUTH) (T2DP4) Crude Oil Tanker 298,732DWT 156,809GRT Tanzania flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9079107; MMSI 572440210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

NESA (a.k.a. NATIVE LAND; f.k.a. OCEANIC; f.k.a. TRUTH) (T2DP4) Crude Oil Tanker 298,732DWT 156,809GRT Tanzania flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9079107; MMSI 572440210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

TRUTH (a.k.a. NATIVE LAND; f.k.a. NESA; f.k.a. OCEANIC) (T2DP4) Crude Oil Tanker 298,732DWT 156,809GRT Tanzania flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9079107; MMSI 572440210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

OCEANIC (a.k.a. NATIVE LAND; f.k.a. NESA; f.k.a. TRUTH) (T2DP4) Crude Oil Tanker 298,732DWT 156,809GRT Tanzania flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9079107; MMSI 572440210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

NAPOLI (f.k.a. ELITE; f.k.a. NOAH; f.k.a. VOYAGER) (T2DQ4) Crude Oil Tanker 298,731DWT 156,809GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9079078; MMSI 572441210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

NOAH (f.k.a. ELITE; a.k.a. NAPOLI; f.k.a. VOYAGER) (T2DQ4) Crude Oil Tanker 298,731DWT 156,809GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9079078; MMSI 572441210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ELITE (a.k.a. NAPOLI; f.k.a. NOAH; f.k.a. VOYAGER) (T2DQ4) Crude Oil Tanker 298,731DWT 156,809GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9079078; MMSI 572441210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

VOYAGER (f.k.a. ELITE; a.k.a. NAPOLI; f.k.a. NOAH) (T2DQ4) Crude Oil Tanker 298,731DWT 156,809GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9079078; MMSI 572441210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

MAHARLIKA (f.k.a. NOOR) (9HES9) Crude Oil Tanker 298,732DWT 156,809GRT Tanzania flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9079066; MMSI 256882000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

NOOR (a.k.a. MAHARLIKA) (9HES9) Crude Oil Tanker 298,732DWT 156,809GRT Tanzania flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9079066; MMSI 256882000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9079066; MMSI 256882000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SUNSHINE (f.k.a. CARNATION; f.k.a. SAFE; a.k.a. YARD NO. 1220 SHANGHAI WAIGAOQIAO) Crude Oil Tanker 318,000DWT 165,000GRT None Identified flag; Former Vessel Flag Tuvalu; alt. Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9569205 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

YARD NO. 1220 SHANGHAI WAIGAOQIAO (f.k.a. CARNATION; f.k.a. SAFE; a.k.a. SUNSHINE) Crude Oil Tanker 318,000DWT 165,000GRT None Identified flag; Former Vessel Flag Tuvalu; alt. Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9569205 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SAFE (f.k.a. CARNATION; a.k.a. SUNSHINE; a.k.a. YARD NO. 1220 SHANGHAI WAIGAOQIAO) Crude Oil Tanker 318,000DWT 165,000GRT None Identified flag; Former Vessel Flag Tuvalu; alt. Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9569205 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

CARNATION (f.k.a. SAFE; a.k.a. SUNSHINE; a.k.a. YARD NO. 1220 SHANGHAI WAIGAOQIAO) Crude Oil Tanker 318,000DWT 165,000GRT None Identified flag; Former Vessel Flag Tuvalu; alt. Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9569205 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SPOTLESS (f.k.a. LANTANA; f.k.a. SANANDAJ) (51M591) Crude Oil Tanker 159,681DWT 81,479GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9172040; MMSI 677049100 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SANANDAJ (f.k.a. LANTANA; a.k.a. SPOTLESS) (51M591) Crude Oil Tanker 159,681DWT 81,479GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9172040; MMSI 677049100 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

LANTANA (f.k.a. SANANDAJ; a.k.a. SPOTLESS) (51M591) Crude Oil Tanker 159,681DWT 81,479GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9172040; MMSI 677049100 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SARDASHT (EQKG) Landing Craft 640DWT 478GRT Iran flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 8517231; MMSI 422142000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SPLENDOUR (f.k.a. BLACKSTONE; f.k.a. SARV) (9HNZ9) Crude Oil Tanker 163,870DWT 85,462GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Seychelles; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357377; MMSI 249257000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SARV (f.k.a. BLACKSTONE; a.k.a. SPLENDOUR) (9HNZ9) Crude Oil Tanker 163,870DWT 85,462GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Seychelles; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357377; MMSI 249257000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

BLACKSTONE (f.k.a. SARV; a.k.a. SPLENDOUR) (9HNZ9) Crude Oil Tanker 163,870DWT 85,462GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Seychelles; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357377; MMSI 249257000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SABRINA (f.k.a. MAGNOLIA; f.k.a. SARVESTAN) (51M590) Crude Oil Tanker 159,711DWT 81,479GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9172052; MMSI 677049000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SARVESTAN (f.k.a. MAGNOLIA; a.k.a. SABRINA) (5IM590) Crude Oil Tanker 159,711DWT 81,479GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9172052; MMSI 677049000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

MAGNOLIA (a.k.a. SABRINA; f.k.a. SARVESTAN) (5IM590) Crude Oil Tanker 159,711DWT 81,479GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9172052; MMSI 677049000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SWALLOW (f.k.a. CAMELLIA; f.k.a. SAVEH) (5IM 594) Crude Oil Tanker 159,758DWT 81,479GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9171462; MMSI 677049400 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SAVEH (f.k.a. CAMELLIA; a.k.a. SWALLOW) (5IM 594) Crude Oil Tanker 159,758DWT 81,479GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9171462; MMSI 677049400 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

CAMELLIA (f.k.a. SAVEH; a.k.a. SWALLOW) (5IM 594) Crude Oil Tanker 159,758DWT 81,479GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9171462; MMSI 677049400 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SPARROW (f.k.a. CLOVE; f.k.a. SEMNAN) (5IM 595) Crude Oil Tanker 159,681DWT 81,479GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9171450; MMSI 677049500 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SEMNAN (f.k.a. CLOVE; a.k.a. SPARROW) (5IM 595) Crude Oil Tanker 159,681DWT 81,479GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9171450; MMSI 677049500 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

CLOVE (f.k.a. SEMNAN; a.k.a. SPARROW) (5IM 595) Crude Oil Tanker 159,681DWT 81,479GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9171450; MMSI 677049500 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SANCHI (f.k.a. GARDENIA; f.k.a. SEAHORSE; f.k.a. SEPID) (T2EF4) Crude Oil Tanker 164,154DWT 85,462GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9356608; MMSI 572455210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SEPID (f.k.a. GARDENIA; a.k.a. SANCHI; f.k.a. SEAHORSE) (T2EF4) Crude Oil Tanker 164,154DWT 85,462GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9356608; MMSI 572455210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

GARDENIA (a.k.a. SANCHI; f.k.a. SEAHORSE; f.k.a. SEPID) (T2EF4) Crude Oil Tanker 164,154DWT 85,462GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9356608; MMSI 572455210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SEAHORSE (f.k.a. GARDENIA; a.k.a. SANCHI; f.k.a. SEPID) (T2EF4) Crude Oil Tanker 164,154DWT 85,462GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9356608; MMSI 572455210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SUCCESS (f.k.a. BAIKAL; f.k.a. BLOSSOM; f.k.a. SIMA) (T2DY4) Crude Oil Tanker 164,154DWT 85,462GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357353; MMSI 572449210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SIMA (f.k.a. BAIKAL; f.k.a. BLOSSOM; a.k.a. SUCCESS) (T2DY4) Crude Oil Tanker 164,154DWT 85,462GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357353; MMSI 572449210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

BLOSSOM (f.k.a. BAIKAL; f.k.a. SIMA; a.k.a. SUCCESS) (T2DY4) Crude Oil Tanker 164,154DWT 85,462GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357353; MMSI 572449210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

BAIKAL (f.k.a. BLOSSOM; f.k.a. SIMA; a.k.a. SUCCESS) (T2DY4) Crude Oil Tanker 164,154DWT 85,462GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357353; MMSI 572449210 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SUNEAST (f.k.a. AZALEA; f.k.a. SINA) (9HNY9) Crude Oil Tanker 164,154DWT 85,462GRT Seychelles flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag None Identified; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357365; MMSI 249256000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SINA (f.k.a. AZALEA; a.k.a. SUNEAST) (9HNY9) Crude Oil Tanker 164,154DWT 85,462GRT Seychelles flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag None Identified; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357365; MMSI 249256000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

AZALEA (f.k.a. SINA; a.k.a. SUNEAST) (9HNY9) Crude Oil Tanker 164,154DWT 85,462GRT Seychelles flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; alt. Former Vessel Flag None Identified; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357365; MMSI 249256000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SMOOTH (a.k.a. YARD NO. 1225 SHANGHAI WAIGAOQIAO) Crude Oil Tanker 318,000DWT 165,000GRT None Identified flag; Former Vessel Flag Malta; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9569657 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

YARD NO. 1225 SHANGHAI WAIGAOQIAO (a.k.a. SMOOTH) Crude Oil Tanker 318,000DWT 165,000GRT None Identified flag; Former Vessel Flag Malta; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9569657 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

FORTUN (f.k.a. SONATA; a.k.a. YARD NO. 1222 SHANGHAI WAIGAOQIAO) Crude Oil Tanker 318,000DWT 165,000GRT None Identified flag; Former Vessel Flag Malta; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9569633 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

YARD NO. 1222 SHANGHAI WAIGAOQIAO (a.k.a. FORTUN; f.k.a. SONATA) Crude Oil Tanker 318,000DWT 165,000GRT None Identified flag; Former Vessel Flag Malta; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9569633 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SONATA (a.k.a. FORTUN; a.k.a. YARD NO. 1222 SHANGHAI WAIGAOQIAO) Crude Oil Tanker 318,000DWT 165,000GRT None Identified flag; Former Vessel Flag Malta; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9569633 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SALALEH (f.k.a. SONGBIRD; a.k.a. YARD NO. 1224 SHANGHAI WAIGAOQIAO) Crude Oil Tanker 318,000DWT 165,000GRT None Identified flag; Former Vessel Flag Malta; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9569645 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

YARD NO. 1224 SHANGHAI WAIGAOQIAO (a.k.a. SALALEH; f.k.a. SONGBIRD) Crude Oil Tanker 318,000DWT 165,000GRT None Identified flag; Former Vessel Flag Malta; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9569645 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SONGBIRD (a.k.a. SALALEH; a.k.a. YARD NO. 1224 SHANGHAI WAIGAOQIAO) Crude Oil Tanker 318,000DWT 165,000GRT None Identified flag; Former Vessel Flag Malta; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9569645 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DOJRAN (f.k.a. RAINBOW; f.k.a. SOUVENIR; a.k.a. YARD NO. 1221 SHANGHAI WAIGAOQIAO) Crude Oil Tanker 318,000DWT 165,000GRT Tanzania flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9569619 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

YARD NO. 1221 SHANGHAI WAIGAOQIAO (a.k.a. DOJRAN; f.k.a. RAINBOW; f.k.a. SOUVENIR) Crude Oil Tanker 318,000DWT 165,000GRT Tanzania flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9569619 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SOUVENIR (a.k.a. DOJRAN; f.k.a. RAINBOW; a.k.a. YARD NO. 1221 SHANGHAI WAIGAOQIAO) Crude Oil Tanker 318,000DWT 165,000GRT Tanzania flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9569619 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

RAINBOW (a.k.a. DOJRAN; f.k.a. SOUVENIR; a.k.a. YARD NO. 1221 SHANGHAI WAIGAOQIAO) Crude Oil Tanker 318,000DWT 165,000GRT Tanzania flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tuvalu; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9569619 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SUPERIOR (f.k.a. DAISY; f.k.a. SUSANGIRD) (5IM584) Crude Oil Tanker 159,681DWT 81,479GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9172038; MMSI 677048400 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SUSANGIRD (f.k.a. DAISY; a.k.a. SUPERIOR) (5IM584) Crude Oil Tanker 159,681DWT 81,479GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9172038; MMSI 677048400 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DAISY (a.k.a. SUPERIOR; f.k.a. SUSANGIRD) (5IM584) Crude Oil Tanker 159,681DWT 81,479GRT None Identified flag; Former Vessel Flag Malta; alt. Former Vessel Flag Tanzania; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9172038; MMSI 677048400 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

TOLOU (EQOD) Crew/Supply Vessel 250DWT 178GRT Iran flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 8318178 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

VALFAJR2 (EQOX) Tug 650DWT 419GRT Iran flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 8400103 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

YAGHOUB (EQOE) Platform Supply Ship 950DWT 1,019GRT Iran flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 8400103 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 8316168; MMSI 422150000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

YANGZHOU DAYANG DY905 (a.k.a. YARD NO. DY905 YANGZHOU D.) LPG Tanker 11,750DWT 8,750GRT Iran flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9575424 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

YARD NO. DY905 YANGZHOU D. (a.k.a. YANGZHOU DAYANG DY905) LPG Tanker 11,750DWT 8,750GRT Iran flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9575424 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

YOUSEF (EQOG) Offshore Tug/Supply Ship 1,050DWT 584GRT Iran flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 8316106; MMSI 422144000 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

NATIONAL IRANIAN TANKER COMPANY (a.k.a. NITC), NITC Building, 67-88, Shahid Atefi Street, Africa Avenue, Tehran, Iran; Website www.nitc.co.ir; Email Address info@nitc.co.ir; alt. Email Address administrator@nitc.co.ir; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Telephone (98)(21)(66153220); Telephone (98)(21)(23803202); Telephone (98)(21)(23803303); Telephone (98)(21)(66153224); Telephone (98)(21)(23802230); Telephone (98)(9121115315); Telephone (98)(9128091642); Telephone (98)(9127389031); Fax (98)(21)(2224537); Fax (98)(21)(23803318); Fax (98)(21)(22013392); Fax (98)(21)(22058763) [IRAN].

NITC (a.k.a. NATIONAL IRANIAN TANKER COMPANY), NITC Building, 67-88, Shahid Atefi Street, Africa Avenue, Tehran, Iran; Website www.nitc.co.ir; Email Address info@nitc.co.ir; alt. Email Address administrator@nitc.co.ir; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Telephone (98)(21)(66153220); Telephone (98)(21)(23803202); Telephone (98)(21)(23803303); Telephone (98)(21)(66153224); Telephone (98)(21)(23802230); Telephone (98)(9121115315); Telephone (98)(9128091642); Telephone (98)(9127389031); Fax (98)(21)(2224537); Fax (98)(21)(23803318); Fax (98)(21)(22013392); Fax (98)(21)(22058763) [IRAN].

NATIONAL IRANIAN TANKER COMPANY LLC (a.k.a. NATIONAL IRANIAN TANKER COMPANY LLC SHARJAH BRANCH; a.k.a. NITC SHARJAH), Al Wahda Street, Street No. 4, Sharjah, United Arab Emirates; P.O. Box 3267, Sharjah, United Arab Emirates; Website <http://nitcsharjah.com/index.html>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Telephone +97165030600; Telephone + 97165749996; Telephone +971506262258; Fax +97165394666; Fax +97165746661 [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

NATIONAL IRANIAN TANKER COMPANY LLC SHARJAH BRANCH (a.k.a. NATIONAL IRANIAN TANKER COMPANY LLC; a.k.a. NITC SHARJAH), Al Wahda Street, Street No. 4, Sharjah, United Arab Emirates; P.O. Box 3267, Sharjah, United Arab Emirates; Website <http://nitcsharjah.com/index.html>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Telephone +97165030600; Telephone + 97165749996; Telephone +971506262258; Fax +97165394666; Fax +97165746661 [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

NITC SHARJAH (a.k.a. NATIONAL IRANIAN TANKER COMPANY LLC; a.k.a. NATIONAL IRANIAN TANKER COMPANY LLC SHARJAH BRANCH), Al Wahda Street, Street No. 4, Sharjah, United Arab Emirates; P.O. Box 3267, Sharjah, United Arab Emirates; Website <http://nitcsharjah.com/index.html>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Telephone +97165030600; Telephone + 97165749996; Telephone +971506262258; Fax +97165394666; Fax +97165746661 [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

N.I.T.C. REPRESENTATIVE OFFICE (a.k.a. NATIONAL IRANIAN TANKER COMPANY), Droogdokweg 71, Rotterdam 3089 JN, Netherlands; Email Address nitcrdam@tiscali.net; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Telephone +31 010-4951863; Telephone +31 10-4360037; Fax +31 10-4364096 [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

NATIONAL IRANIAN TANKER COMPANY (a.k.a. N.I.T.C. REPRESENTATIVE OFFICE), Droogdokweg 71, Rotterdam 3089 JN, Netherlands; Email Address nitcrdam@tiscali.net; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Telephone +31 010-4951863; Telephone +31 10-4360037; Fax +31 10-4364096 [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ARTA SHIPPING ENTERPRISES LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf.

center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (357)(22660766); Fax (357)(22678777) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ARASH SHIPPING ENTERPRISES LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (357)(22660766); Fax (357)(22678777) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

PROTON PETROCHEMICALS SHIPPING LIMITED (a.k.a. PROTON SHIPPING CO; a.k.a. "PSC"), Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

PROTON SHIPPING CO (a.k.a. PROTON PETROCHEMICALS SHIPPING LIMITED; a.k.a. "PSC"), Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

"PSC" (a.k.a. PROTON PETROCHEMICALS SHIPPING LIMITED; a.k.a. PROTON SHIPPING CO), Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DANESH SHIPPING COMPANY LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DAVAR SHIPPING CO LTD, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (357)(22660766); Fax (357)(22678777) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HADI SHIPPING COMPANY LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HARAZ SHIPPING COMPANY LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HATEF SHIPPING COMPANY LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HIRMAND SHIPPING COMPANY LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HODA SHIPPING COMPANY LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HOMA SHIPPING COMPANY LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

HONAR SHIPPING COMPANY LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

TC SHIPPING COMPANY LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

MEHRAN SHIPPING COMPANY LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

MERSAD SHIPPING COMPANY LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SAMAN SHIPPING COMPANY LIMITED, Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ASAN SHIPPING ENTERPRISE LIMITED, 85 St. John Street, Valletta VLT 1165, Malta; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (356)(21241817); Fax (356)(25990640) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SARV SHIPPING COMPANY LIMITED, 198 Old Bakery Street, Valletta VLT 1455, Malta; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (356)(21241232) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SEPID SHIPPING COMPANY LIMITED, 198 Old Bakery Street, Valletta VLT 1455, Malta; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (356)(21241232) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SIMA SHIPPING COMPANY LIMITED, 198 Old Bakery Street, Valletta VLT 1455, Malta; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (356)(21241232) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

SINA SHIPPING COMPANY LIMITED, 198 Old Bakery Street, Valletta VLT 1455, Malta; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (356)(21241232) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

CASPIAN MARITIME LIMITED, Fortuna Court, Block B, 284 Archbishop Makarios II Avenue, Limassol 3105, Cyprus; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (357)(25800000); Fax (357)(25588055) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

MINAB SHIPPING COMPANY LIMITED (f.k.a. MIGHAT SHIPPING COMPANY LIMITED), Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcboa_faqs.pdf; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

MIGHAT SHIPPING COMPANY LIMITED (a.k.a. MINAB SHIPPING COMPANY LIMITED), Diagoras House, 7th Floor, 16 Panteli Katelari Street, Nicosia 1097, Cyprus; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see:

https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Telephone (357)(22660766); Fax (357)(22668608) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

PARS PETROCHEMICAL SHIPPING COMPANY, 1st Floor, No. 19, Shenasa Street, Vali E Asr Avenue, Tehran, Iran; Website www.parsshipping.com; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

DENA TANKERS FZE, Free Zone, P.O. Box 5232 , Fujairah, United Arab Emirates; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

PETRO SUISSE INTERTRADE COMPANY SA, 6 Avenue de la Tour-Haldimand, Pully 1009, Switzerland; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

HONG KONG INTERTRADE COMPANY, Hong Kong; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

NOOR ENERGY (MALAYSIA) LTD., Labuan, Malaysia; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Company Number LL08318 [IRAN].

PETRO ENERGY INTERTRADE COMPANY, Dubai, United Arab Emirates; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SIMA GENERAL TRADING CO FZE (a.k.a. SIMA GENERAL TRADING & INDUSTRIALS FOR BUILDING MATERIAL CO FZE), Office No. 703 Office Tower, Twin Tower, Baniyas Rd., Deira, P.O. Box 49754, Dubai, United Arab Emirates; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SIMA GENERAL TRADING & INDUSTRIALS FOR BUILDING MATERIAL CO FZE (a.k.a. SIMA GENERAL TRADING CO FZE), Office No. 703 Office Tower, Twin Tower, Baniyas Rd., Deira, P.O. Box 49754, Dubai, United Arab Emirates; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

POLINEX GENERAL TRADING LLC, Health Care City, Umm Hurair Rd., Oud Mehta Offices, Block A, 4th Floor 420, Dubai, United Arab Emirates; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

ASIA ENERGY GENERAL TRADING (LLC), Suite 703, Twin Tower, Baniyas Street, Deira, Dubai, United Arab Emirates; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SYNERGY GENERAL TRADING FZE, Sharjah - Saif Zone, Sharjah Airport International Free Zone, United Arab Emirates; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

CAMBIS, Dimitris (a.k.a. KAMPIS, Dimitrios Alexandros; a.k.a. "KLIMT, Gustav"); DOB 14 Oct 1963; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf (individual) [IRAN].

KAMPIS, Dimitrios Alexandros (a.k.a. CAMBIS, Dimitris; a.k.a. "KLIMT, Gustav"); DOB 14 Oct 1963; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf (individual) [IRAN].

"KLIMT, Gustav" (a.k.a. CAMBIS, Dimitris; a.k.a. KAMPIS, Dimitrios Alexandros); DOB 14 Oct 1963; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf (individual) [IRAN].

IMPIRE SHIPPING COMPANY (a.k.a. IMPIRE SHIPPING; a.k.a. IMPIRE SHIPPING LIMITED), Greece; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person

Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

IMPIRE SHIPPING LIMITED (a.k.a. IMPIRE SHIPPING; a.k.a. IMPIRE SHIPPING COMPANY), Greece; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

IMPIRE SHIPPING (a.k.a. IMPIRE SHIPPING COMPANY; a.k.a. IMPIRE SHIPPING LIMITED), Greece; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

AURA (f.k.a. OCEAN PERFORMER) Crude Oil Tanker Mongolia flag; Former Vessel Flag Liberia; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9013749 (vessel) [IRAN].

OCEAN PERFORMER (a.k.a. AURA) Crude Oil Tanker Mongolia flag; Former Vessel Flag Liberia; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9013749 (vessel) [IRAN].

BRIGHT (f.k.a. ZAP) Crude Oil Tanker Mongolia flag; Former Vessel Flag Liberia; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9005235 (vessel) [IRAN].

ZAP (a.k.a. BRIGHT) Crude Oil Tanker Mongolia flag; Former Vessel Flag Liberia; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9005235 (vessel) [IRAN].

ATLANTIC (f.k.a. SEAGULL) Crude Oil Tanker Liberia flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9107655 (vessel) [IRAN].

SEAGULL (a.k.a. ATLANTIC) Crude Oil Tanker Liberia flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9107655 (vessel) [IRAN].

DESTINY (f.k.a. ULYSSES 1) Crude Oil Tanker Mongolia flag; Former Vessel Flag Liberia; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9177155 (vessel) [IRAN].

ULYSSES 1 (a.k.a. DESTINY) Crude Oil Tanker Mongolia flag; Former Vessel Flag Liberia; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9177155 (vessel) [IRAN].

BICAS (f.k.a. GLAROS) Crude Oil Tanker Liberia flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9077850 (vessel) [IRAN].

GLAROS (a.k.a. BICAS) Crude Oil Tanker Liberia flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9077850 (vessel) [IRAN].

ORIENTAL (f.k.a. LEYCOTHEA) Crude Oil Tanker Unknown flag; Former Vessel Flag Panama; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9183934 (vessel) [IRAN].

LEYCOTHEA (a.k.a. ORIENTAL) Crude Oil Tanker Unknown flag; Former Vessel Flag Panama; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9183934 (vessel) [IRAN].

HUMANITY (f.k.a. OCEAN NYMPH) Crude Oil Tanker Mongolia flag; Former Vessel Flag Panama; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9180281 (vessel) [IRAN].

OCEAN NYMPH (a.k.a. HUMANITY) Crude Oil Tanker Mongolia flag; Former Vessel Flag Panama; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9180281 (vessel) [IRAN].

CARIBO (f.k.a. NEREYDA) Crude Oil Tanker Panama flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9011246 (vessel) [IRAN].

NEREYDA (a.k.a. CARIBO) Crude Oil Tanker Panama flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9011246 (vessel) [IRAN].

GRACE BAY SHIPPING INC, Care of Sambouk Shipping FCZ, 1st Floor, FITCO Building No 3, Inside Fujairah Port, PO Box 50044, Fujairah, United Arab Emirates; Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro MH96960, Marshall Islands; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

GARBIN NAVIGATION LTD, Care of Sambouk Shipping FCZ, Office 101, 1st Floor, FITCO Building No 3, Inside Fujairah Port, PO Box 50044, Fujairah, United Arab Emirates; 80 Broad Street, Monrovia, Liberia; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

MONSOON SHIPPING LTD, Care of Sambouk Shipping FCZ, Office 101, 1st Floor, FITCO Building No 3, Inside Fujairah Port, PO Box 50044, Fujairah, United Arab Emirates; Valletta, Malta; Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro MH96960, Marshall Islands; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

KONING MARINE CORP, Care of Sambouk Shipping FCZ, Office 101, 1st Floor, FITCO Building No 3, Inside Fujairah Port, PO Box 50044, Fujairah, United Arab Emirates; 80 Broad Street, Monrovia, Liberia; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

BLUE TANKER SHIPPING SA, Care of Sambouk Shipping FCZ, Office 101, 1st Floor, FITCO Building No 3, Inside Fujairah Port, PO Box 50044, Fujairah, United Arab Emirates; Majuro MH, Marshall Islands; Liberia; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

JUPITER SEAWAYS SHIPPING, Care of Sambouk Shipping FCZ, Office 101, 1st Floor, FITCO Building No 3, Inside Fujairah Port, PO Box 50044, Fujairah, United Arab Emirates; 80 Broad Street, Monrovia, Liberia; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

HERCULES INTERNATIONAL SHIP, Care of Sambouk Shipping FCZ, Office 101, 1st Floor, FITCO Building No 3, Inside Fujairah Port, PO Box 50044, Fujairah, United Arab Emirates; 80 Broad Street, Monrovia, Liberia; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

HERMIS SHIPPING SA, Care of Sambouk Shipping FCZ, Office 101, 1st Floor, FITCO Building No 3, Inside Fujairah Port, PO Box 50044, Fujairah, United Arab Emirates; Panama City, Panama; Monrovia, Liberia; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SAMBOUK SHIPPING FZC, FITCO Building No. 3, Office 101, 1st Floor, P.O. Box 50044, Fujairah, United Arab Emirates; Office 1202, Crystal Plaza, PO Box 50044, Buhaira Corniche, Sharjah, United Arab Emirates; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

BADR (EQJU) Iran flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 8407345 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

ATLANTIS (5IM316) Crude Oil Tanker Tanzania flag (NITC); Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9569621 (vessel) [IRAN].

DEMOS (5IM656) Crude Oil Tanker Tanzania flag (NITC); Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9569683 (vessel) [IRAN].

INFINITY (5IM411) Crude Oil Tanker Tanzania flag (NITC); Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9569671 (vessel) [IRAN].

SUNRISE LPG Tanker None Identified flag (NITC); Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9615092 (vessel) [IRAN].

SKYLINE (5IM632) Crude Oil Tanker Tanzania flag (NITC); Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9569669 (vessel) [IRAN].

YOUNES (EQYY) Platform Supply Ship Iran flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 8212465 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

JUSTICE Crude Oil Tanker None Identified flag; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block this Property and Interests in this Property Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Vessel Registration Identification IMO 9357729 (vessel) [IRAN] (Linked To: NATIONAL IRANIAN TANKER COMPANY).

BANDAR IMAM PETROCHEMICAL COMPANY, North Kargar Street, Tehran, Iran; Mahshahr, Bandar Imam, Khuzestan Province, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

BOU ALI SINA PETROCHEMICAL COMPANY (a.k.a. BUALI SINA PETROCHEMICAL COMPANY), No. 17, 1st Floor, Daman Afshar St., Vanak Sq., Vali-e-Asr Ave, Tehran 19697, Iran; Petrochemical Special Economic Zone (PETZONE), Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

BUALI SINA PETROCHEMICAL COMPANY (a.k.a. BOU ALI SINA PETROCHEMICAL COMPANY), No. 17, 1st Floor, Daman Afshar St., Vanak Sq., Vali-e-Asr Ave, Tehran 19697, Iran; Petrochemical Special Economic Zone (PETZONE), Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

MOBIN PETROCHEMICAL COMPANY, South Pars Special Economic Energy Zone, Postal Box: 75391-418, Assaluyeh, Bushehr, Iran; PO Box, Mashhad, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

NOURI PETROCHEMICAL COMPANY (a.k.a. BORZUYEH PETROCHEMICAL COMPANY; a.k.a. NOURI PETROCHEMICAL COMPLEX), Pars Special Economic Energy Zone, Assaluyeh Port, Bushehr, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

BORZUYEH PETROCHEMICAL COMPANY (a.k.a. NOURI PETROCHEMICAL COMPANY; a.k.a. NOURI PETROCHEMICAL COMPLEX), Pars Special Economic Energy Zone, Assaluyeh Port, Bushehr, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

NOURI PETROCHEMICAL COMPLEX (a.k.a. BORZUYEH PETROCHEMICAL COMPANY; a.k.a. NOURI PETROCHEMICAL COMPANY), Pars Special Economic Energy Zone, Assaluyeh Port, Bushehr, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

PARS PETROCHEMICAL COMPANY, Pars Special Economic Energy Zone, PO Box 163-75391, Assaluyeh, Bushehr, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SHAHID TONDGOOYAN PETROCHEMICAL COMPANY (a.k.a. SHAHID TONGUYAN PETROCHEMICAL COMPANY), Petrochemical Special Economic Zone (PETZONE), Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SHAHID TONGUYAN PETROCHEMICAL COMPANY (a.k.a. SHAHID TONDGOOYAN PETROCHEMICAL COMPANY), Petrochemical Special Economic Zone (PETZONE), Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SHAZAND PETROCHEMICAL COMPANY (a.k.a. AR.P.C.; a.k.a. ARAK PETROCHEMICAL COMPANY; a.k.a. SHAZAND PETROCHEMICAL CORPORATION), No. 68, Taban St., Vali Asr Ave., Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

AR.P.C. (a.k.a. ARAK PETROCHEMICAL COMPANY; a.k.a. SHAZAND PETROCHEMICAL COMPANY; a.k.a. SHAZAND PETROCHEMICAL CORPORATION), No. 68, Taban St., Vali Asr Ave., Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SHAZAND PETROCHEMICAL CORPORATION (a.k.a. AR.P.C.; a.k.a. ARAK PETROCHEMICAL COMPANY; a.k.a. SHAZAND PETROCHEMICAL COMPANY), No. 68, Taban St., Vali Asr Ave., Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

ARAK PETROCHEMICAL COMPANY (a.k.a. AR.P.C.; a.k.a. SHAZAND PETROCHEMICAL COMPANY; a.k.a. SHAZAND PETROCHEMICAL CORPORATION), No. 68, Taban St., Vali Asr Ave., Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

TABRIZ PETROCHEMICAL COMPANY, Off Km 8, Azarshahr Road, Kojubar Road, Tabriz, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

GHALEBANI, Ahmad (a.k.a. GHALEHBANI, Ahmad; a.k.a. QALEHBANI, Ahmad); DOB 01 Jan 1953 to 31 Dec 1954; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Passport H20676140 (Iran); Managing Director, National Iranian Oil Company; Director, Hong Kong Intertrade Company; Director, Petro Suisse Intertrade Company (individual) [IRAN].

GHALEHBANI, Ahmad (a.k.a. GHALEBANI, Ahmad; a.k.a. QALEHBANI, Ahmad); DOB 01 Jan 1953 to 31 Dec 1954; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Passport H20676140 (Iran); Managing Director, National Iranian Oil Company; Director, Hong Kong Intertrade Company; Director, Petro Suisse Intertrade Company (individual) [IRAN].

QALEHBANI, Ahmad (a.k.a. GHALEBANI, Ahmad; a.k.a. GHALEHBANI, Ahmad); DOB 01 Jan 1953 to 31 Dec 1954; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Passport H20676140 (Iran); Managing Director, National Iranian Oil Company; Director, Hong Kong Intertrade Company; Director, Petro Suisse Intertrade Company (individual) [IRAN].

JASHNSAZ, Seifollah (a.k.a. JASHN SAZ, Seifollah; a.k.a. JASHNSAZ, Seyfollah); DOB 22 Mar 1958; POB Behbahan, Iran; nationality Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Passport R17589399 (Iran); alt. Passport T23700825 (Iran); Chairman & Director, Naftiran Intertrade Co. (NICO) Sarl; Chairman & Director, Naft Iran Intertrade Company Ltd.; Director, Hong Kong Intertrade Company; Chairman of the Board of Directors, Iranian Oil Company (U.K.) Limited; Chairman & Director, Petro Suisse Intertrade Company (individual) [IRAN].

JASHNSAZ, Seyfollah (a.k.a. JASHN SAZ, Seifollah; a.k.a. JASHNSAZ, Seifollah); DOB 22 Mar 1958; POB Behbahan, Iran; nationality Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Passport R17589399 (Iran); alt. Passport T23700825 (Iran); Chairman & Director, Naftiran Intertrade Co. (NICO) Sarl; Chairman & Director, Naft Iran Intertrade Company Ltd.; Director, Hong Kong Intertrade Company; Chairman of the Board of Directors, Iranian Oil Company (U.K.) Limited; Chairman & Director, Petro Suisse Intertrade Company (individual) [IRAN].

JASHN SAZ, Seifollah (a.k.a. JASHNSAZ, Seifollah; a.k.a. JASHNSAZ, Seyfollah); DOB 22 Mar 1958; POB Behbahan, Iran; nationality Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Passport R17589399 (Iran); alt. Passport T23700825 (Iran); Chairman & Director, Naftiran Intertrade Co. (NICO) Sarl; Chairman & Director, Naft Iran Intertrade Company Ltd.; Director, Hong Kong Intertrade Company; Chairman of the Board of Directors, Iranian Oil Company (U.K.) Limited; Chairman & Director, Petro Suisse Intertrade Company (individual) [IRAN].

NIKOUSOKHAN, Mahmoud; DOB 01 Jan 1961 to 31 Dec 1962; nationality Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Passport U14624657 (Iran); Finance Director, National Iranian Oil Company; Director, Hong Kong Intertrade Company; Director, Petro Suisse Intertrade Company (individual) [IRAN].

BAZARGAN, Farzad; DOB 03 Jun 1956; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Passport D14855558 (Iran); alt. Passport Y21130717 (Iran); Managing Director, Hong Kong Intertrade Company (individual) [IRAN].

POURANSARI, Hashem; nationality Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Passport B19488852 (Iran); Managing Director, Asia Energy General Trading (individual) [IRAN].

BAHADORI, Masoud; nationality Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Passport T12828814 (Iran); Managing Director, Petro Suisse Intertrade Company (individual) [IRAN].

EXECUTION OF IMAM KHOMEINI'S ORDER (a.k.a. EIKO; a.k.a. SETAD; a.k.a. SETAD EJRAEI EMAM; a.k.a. SETAD-E EJRAEI-E FARMAN-E HAZRAT-E EMAM; a.k.a. SETAD-E FARMAN-EJRAEI-YE EMAM), Khaled Stamboli St., Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

EIKO (a.k.a. EXECUTION OF IMAM KHOMEINI'S ORDER; a.k.a. SETAD; a.k.a. SETAD EJRAEI EMAM; a.k.a. SETAD-E EJRAEI-E FARMAN-E HAZRAT-E EMAM; a.k.a. SETAD-E FARMAN-EJRAEI-YE EMAM), Khaled Stamboli St., Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SETAD (a.k.a. EIKO; a.k.a. EXECUTION OF IMAM KHOMEINI'S ORDER; a.k.a. SETAD EJRAEI EMAM; a.k.a. SETAD-E EJRAEI-E FARMAN-E HAZRAT-E EMAM; a.k.a. SETAD-E FARMAN-EJRAEI-YE EMAM), Khaled Stamboli St., Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SETAD-E EJRAEI-E FARMAN-E HAZRAT-E EMAM (a.k.a. EIKO; a.k.a. EXECUTION OF IMAM KHOMEINI'S ORDER; a.k.a. SETAD; a.k.a. SETAD EJRAEI EMAM; a.k.a. SETAD-E FARMAN-EJRAEI-YE EMAM), Khaled Stamboli St., Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SETAD-E FARMAN-EJRAEI-YE EMAM (a.k.a. EIKO; a.k.a. EXECUTION OF IMAM KHOMEINI'S ORDER; a.k.a. SETAD; a.k.a. SETAD EJRAEI EMAM; a.k.a. SETAD-E EJRAEI-E FARMAN-E HAZRAT-E EMAM), Khaled Stamboli St., Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SETAD EJRAEI EMAM (a.k.a. EIKO; a.k.a. EXECUTION OF IMAM KHOMEINI'S ORDER; a.k.a. SETAD; a.k.a. SETAD-E EJRAEI-E FARMAN-E HAZRAT-E EMAM; a.k.a. SETAD-E FARMAN-EJRAEI-YE EMAM), Khaled Stamboli St., Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

TOSEE EQTESAD AYANDEHSAZAN COMPANY (a.k.a. TEACO; a.k.a. TOSEE EGHTEHAD AYANDEHSAZAN COMPANY), 39 Gandhi Avenue, Tehran 1517883115, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

TEACO (a.k.a. TOSEE EGHTEHAD AYANDEHSAZAN COMPANY; a.k.a. TOSEE EQTESAD AYANDEHSAZAN COMPANY), 39 Gandhi Avenue, Tehran 1517883115, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

TOSEE EGHTEHAD AYANDEHSAZAN COMPANY (a.k.a. TEACO; a.k.a. TOSEE EQTESAD AYANDEHSAZAN COMPANY), 39 Gandhi Avenue, Tehran 1517883115, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

TADBIR ECONOMIC DEVELOPMENT GROUP (a.k.a. TADBIR GROUP), 16 Avenue Bucharest, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

TADBIR GROUP (a.k.a. TADBIR ECONOMIC DEVELOPMENT GROUP), 16 Avenue Bucharest, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

TADBIR INVESTMENT COMPANY, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

MODABER (a.k.a. MODABER INVESTMENT COMPANY; a.k.a. TADBIR INDUSTRIAL HOLDING COMPANY); Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

TADBIR INDUSTRIAL HOLDING COMPANY (a.k.a. MODABER; a.k.a. MODABER INVESTMENT COMPANY); Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

MODABER INVESTMENT COMPANY (a.k.a. MODABER; a.k.a. TADBIR INDUSTRIAL HOLDING COMPANY); Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

TADBIR CONSTRUCTION DEVELOPMENT COMPANY (a.k.a. GORUH-E TOSE-E SAKHTEMAN-E TADBIR; a.k.a. TADBIR BUILDING EXPANSION GROUP; a.k.a. TADBIR HOUSING DEVELOPMENT GROUP), Block 1, Mehr Passage, 4th Street, Iran Zamin Boulevard, Shahrak Qods, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

TADBIR HOUSING DEVELOPMENT GROUP (a.k.a. GORUH-E TOSE-E SAKHTEMAN-E TADBIR; a.k.a. TADBIR BUILDING EXPANSION GROUP; a.k.a. TADBIR CONSTRUCTION DEVELOPMENT COMPANY), Block 1, Mehr Passage, 4th Street, Iran Zamin Boulevard, Shahrak Qods, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

GORUH-E TOSE-E SAKHTEMAN-E TADBIR (a.k.a. TADBIR BUILDING EXPANSION GROUP; a.k.a. TADBIR CONSTRUCTION DEVELOPMENT COMPANY; a.k.a. TADBIR HOUSING DEVELOPMENT GROUP), Block 1, Mehr Passage, 4th Street, Iran Zamin Boulevard, Shahrak Qods, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

TADBIR BUILDING EXPANSION GROUP (a.k.a. GORUH-E TOSE-E SAKHTEMAN-E TADBIR; a.k.a. TADBIR CONSTRUCTION DEVELOPMENT COMPANY; a.k.a. TADBIR HOUSING DEVELOPMENT GROUP), Block 1, Mehr Passage, 4th Street, Iran Zamin Boulevard, Shahrak Qods, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

TADBIR ENERGY DEVELOPMENT GROUP CO., 6th Floor, Mirdamad Avenue, No. 346, Tehran, Iran; Website <http://www.tadbirenergy.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

REY INVESTMENT COMPANY, 2nd and 3rd Floors, No. 14, Saba Boulevard, After Esfandiar Crossroad, Africa Boulevard, Tehran 1918973657, Iran; Website <http://www.rey-co.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

REYCO GMBH. (a.k.a. REYCO GMBH GERMANY), Karlstrasse 19, Dinslaken, Nordrhein-Westfalen 46535, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

REYCO GMBH GERMANY (a.k.a. REYCO GMBH.), Karlstrasse 19, Dinslaken, Nordrhein-Westfalen 46535, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

MCS INTERNATIONAL GMBH (a.k.a. MANNESMAN CYLINDER SYSTEMS; a.k.a. MCS TECHNOLOGIES GMBH), Karlstrasse 23-25, Dinslaken, Nordrhein-Westfalen 46535, Germany; Website <http://www.mcs-tch.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

MANNESMAN CYLINDER SYSTEMS (a.k.a. MCS INTERNATIONAL GMBH; a.k.a. MCS TECHNOLOGIES GMBH), Karlstrasse 23-25, Dinslaken, Nordrhein-Westfalen 46535, Germany; Website <http://www.mcs-tch.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

MCS TECHNOLOGIES GMBH (a.k.a. MANNESMAN CYLINDER SYSTEMS; a.k.a. MCS INTERNATIONAL GMBH), Karlstrasse 23-25, Dinslaken, Nordrhein-Westfalen 46535, Germany; Website <http://www.mcs-tch.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

MCS ENGINEERING (a.k.a. EFFICIENT PROVIDER SERVICES GMBH), Karlstrasse 21, Dinslaken, Nordrhein-Westfalen 46535, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

EFFICIENT PROVIDER SERVICES GMBH (a.k.a. MCS ENGINEERING), Karlstrasse 21, Dinslaken, Nordrhein-Westfalen 46535, Germany; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

GOLDEN RESOURCES TRADING COMPANY L.L.C. (a.k.a. "GRTC"), 9th Floor, Office No. 905, Khalid Al Attar Tower 1, Sheikh Zayed Road, After Crown Plaza Hotel, Al Wasl Area, Dubai, United Arab Emirates; Postal Box 34489, Dubai, United Arab Emirates; Postal Box 14358, Dubai, United Arab Emirates; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

"GRTC" (a.k.a. GOLDEN RESOURCES TRADING COMPANY L.L.C.), 9th Floor, Office No. 905, Khalid Al Attar Tower 1, Sheikh Zayed Road, After Crown Plaza Hotel, Al Wasl Area, Dubai, United Arab Emirates; Postal Box 34489, Dubai, United Arab Emirates; Postal Box 14358, Dubai, United Arab Emirates; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

CYLINDER SYSTEM L.T.D. (a.k.a. CILINDER SISTEM D.O.O.; a.k.a. CILINDER SISTEM D.O.O. ZA PROIZVODNJU I USLUGE), Dr. Mile Budaka 1, Slavonski Brod 35000, Croatia; 1 Mile Budaka, Slavonski Brod 35000, Croatia; Website <http://www.csc-sb.hr>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 050038884 (Croatia); Tax ID No. 27694384517 (Croatia) [IRAN].

CILINDER SISTEM D.O.O. (a.k.a. CILINDER SISTEM D.O.O. ZA PROIZVODNJU I USLUGE; a.k.a. CYLINDER SYSTEM L.T.D.), Dr. Mile Budaka 1, Slavonski Brod 35000, Croatia; 1 Mile Budaka, Slavonski Brod 35000, Croatia; Website <http://www.csc-sb.hr>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 050038884 (Croatia); Tax ID No. 27694384517 (Croatia) [IRAN].

CILINDER SISTEM D.O.O. ZA PROIZVODNJU I USLUGE (a.k.a. CILINDER SISTEM D.O.O.; a.k.a. CYLINDER SYSTEM L.T.D.), Dr. Mile Budaka 1, Slavonski Brod 35000, Croatia; 1 Mile Budaka, Slavonski Brod 35000, Croatia; Website <http://www.csc-sb.hr>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 050038884 (Croatia); Tax ID No. 27694384517 (Croatia) [IRAN].

AMIN INVESTMENT BANK (a.k.a. AMINIB), No. 51 Ghojadiyan Street, Valiasr Street, Tehran 1968917173, Iran; Website <http://www.aminib.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

AMINIB (a.k.a. AMIN INVESTMENT BANK), No. 51 Ghojadiyan Street, Valiasr Street, Tehran 1968917173, Iran; Website <http://www.aminib.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

PARDIS INVESTMENT COMPANY (a.k.a. SHERKAT-E SARMAYEGOZARI-E PARDIS), Iran; Unit D4 and C4, 4th Floor, Building 29 Africa, Corner of 25th Street, Africa Boulevard, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S.

Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SHERKAT-E SARMA YEGOZARI-E PARDIS (a.k.a. PARDIS INVESTMENT COMPANY), Iran; Unit D4 and C4, 4th Floor, Building 29 Africa, Corner of 25th Street, Africa Boulevard, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

MELLAT INSURANCE COMPANY, No. 48, Haghani Street, Vanak Square, Before Jahan-Kodak Cross, Tehran 1517973913, Iran; No. 40, Shahid Haghani Express Way, Vanak Square, Tehran, Iran; No. 9, Nilooofar Street, Sharabyani Avenue, Taavon Boulevard, Shahr-e-Ziba, Tehran, Iran; 72 Hillview Court, Woking, Surrey GU22 7QW, United Kingdom; No. 697 Saeedi Alley, Crossroads College, Enghelab St., Tehran, Iran; Website <http://www.mellatinsurance.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

IRAN & SHARGH COMPANY (a.k.a. IRAN AND EAST COMPANY; a.k.a. IRAN AND SHARGH COMPANY; a.k.a. IRANOSHARGH COMPANY; a.k.a. SHERKAT-E IRAN VA SHARGH), 827, North of Seyedkhandan Bridge, Shariati Street, P.O. Box 13185-1445, Tehran 16616, Iran; No. 41, Next to 23rd Alley, South Gandhi St., Vanak Square, Tehran 15179, Iran; Website <http://www.iranoshargh.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

IRANOSHARGH COMPANY (a.k.a. IRAN & SHARGH COMPANY; a.k.a. IRAN AND EAST COMPANY; a.k.a. IRAN AND SHARGH COMPANY; a.k.a. SHERKAT-E IRAN VA SHARGH), 827, North of Seyedkhandan Bridge, Shariati Street, P.O. Box 13185-1445, Tehran 16616, Iran; No. 41, Next to 23rd Alley, South Gandhi St., Vanak Square, Tehran 15179, Iran; Website <http://www.iranoshargh.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SHERKAT-E IRAN VA SHARGH (a.k.a. IRAN & SHARGH COMPANY; a.k.a. IRAN AND EAST COMPANY; a.k.a. IRAN AND SHARGH COMPANY; a.k.a. IRANOSHARGH COMPANY), 827, North of Seyedkhandan Bridge, Shariati Street, P.O. Box 13185-1445, Tehran 16616, Iran; No. 41, Next to 23rd Alley, South Gandhi St., Vanak Square, Tehran 15179, Iran; Website <http://www.iranoshargh.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

IRAN AND EAST COMPANY (a.k.a. IRAN & SHARGH COMPANY; a.k.a. IRAN AND SHARGH COMPANY; a.k.a. IRANOSHARGH COMPANY; a.k.a. SHERKAT-E IRAN VA SHARGH), 827, North of Seyedkhandan Bridge, Shariati Street, P.O. Box 13185-1445, Tehran 16616, Iran; No. 41, Next to 23rd Alley, South Gandhi St., Vanak Square, Tehran 15179, Iran; Website <http://www.iranoshargh.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

IRAN AND SHARGH COMPANY (a.k.a. IRAN & SHARGH COMPANY; a.k.a. IRAN AND EAST COMPANY; a.k.a. IRANOSHARGH COMPANY; a.k.a. SHERKAT-E IRAN VA SHARGH), 827, North of Seyedkhandan Bridge, Shariati Street, P.O. Box 13185-1445, Tehran 16616, Iran; No. 41, Next to 23rd Alley, South Gandhi St., Vanak Square, Tehran 15179, Iran; Website <http://www.iranoshargh.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

IRAN & SHARGH LEASING COMPANY (a.k.a. IRAN AND EAST LEASING COMPANY; a.k.a. IRAN AND SHARGH LEASING COMPANY; a.k.a. SHERKAT-E LIZING-E IRAN VA SHARGH), 1st Floor, No. 33, Shahid Atefi Alley, Opposite Mellat Park, Vali-e-Asr Street, Tehran 1967933759, Iran; Website <http://www.isleasingco.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

IRAN AND EAST LEASING COMPANY (a.k.a. IRAN & SHARGH LEASING COMPANY; a.k.a. IRAN AND SHARGH LEASING COMPANY; a.k.a. SHERKAT-E LIZING-E IRAN VA SHARGH), 1st Floor, No. 33, Shahid Atefi Alley, Opposite Mellat Park, Vali-e-Asr Street, Tehran 1967933759, Iran; Website <http://www.isleasingco.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SHERKAT-E LIZING-E IRAN VA SHARGH (a.k.a. IRAN & SHARGH LEASING COMPANY; a.k.a. IRAN AND EAST LEASING COMPANY; a.k.a. IRAN AND SHARGH LEASING COMPANY), 1st Floor, No. 33, Shahid Atefi Alley, Opposite Mellat Park, Vali-e-Asr Street, Tehran 1967933759, Iran; Website <http://www.isleasingco.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

IRAN AND SHARGH LEASING COMPANY (a.k.a. IRAN & SHARGH LEASING COMPANY; a.k.a. IRAN AND EAST LEASING COMPANY; a.k.a. SHERKAT-E LIZING-E IRAN VA SHARGH), 1st Floor, No. 33, Shahid Atefi Alley, Opposite Mellat Park, Vali-e-Asr Street, Tehran 1967933759, Iran; Website <http://www.isleasingco.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

TADBIR BROKERAGE COMPANY (a.k.a. SHERKAT-E KARGOZARI-E TADBIRGARAN-E FARDA; a.k.a. TADBIRGARAN FARDA BROKERAGE COMPANY; a.k.a. TADBIRGARAN-E FARDA BROKERAGE COMPANY; a.k.a. TADBIRGARANE FARDA MERCANTILE EXCHANGE CO.), Unit C2, 2nd Floor, Building No. 29, Corner of 25th Street, After Jahan Koudak, Cross Road Africa Street, Tehran 15179, Iran; Website <http://www.tadbirbroker.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

TADBIRGARAN FARDA BROKERAGE COMPANY (a.k.a. SHERKAT-E KARGOZARI-E TADBIRGARAN-E FARDA; a.k.a. TADBIR BROKERAGE COMPANY; a.k.a. TADBIRGARAN-E FARDA BROKERAGE COMPANY; a.k.a. TADBIRGARANE FARDA MERCANTILE EXCHANGE CO.), Unit C2, 2nd Floor, Building No. 29, Corner of 25th Street, After Jahan Koudak, Cross Road Africa Street, Tehran 15179, Iran; Website <http://www.tadbirbroker.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

TADBIRGARANE FARDA MERCANTILE EXCHANGE CO. (a.k.a. SHERKAT-E KARGOZARI-E TADBIRGARAN-E FARDA; a.k.a. TADBIR BROKERAGE COMPANY; a.k.a. TADBIRGARAN FARDA BROKERAGE COMPANY; a.k.a. TADBIRGARAN-E FARDA BROKERAGE COMPANY), Unit C2, 2nd Floor, Building No. 29, Corner of 25th Street, After Jahan Koudak, Cross Road Africa Street, Tehran 15179, Iran; Website <http://www.tadbirbroker.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SHERKAT-E KARGOZARI-E TADBIRGARAN-E FARDA (a.k.a. TADBIR BROKERAGE COMPANY; a.k.a. TADBIRGARAN FARDA BROKERAGE COMPANY; a.k.a. TADBIRGARAN-E FARDA BROKERAGE COMPANY; a.k.a. TADBIRGARANE FARDA MERCANTILE EXCHANGE CO.), Unit C2, 2nd Floor, Building No. 29, Corner of 25th Street, After Jahan Koudak, Cross Road Africa Street, Tehran 15179, Iran; Website <http://www.tadbirbroker.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

TADBIRGARAN-E FARDA BROKERAGE COMPANY (a.k.a. SHERKAT-E KARGOZARI-E TADBIRGARAN-E FARDA; a.k.a. TADBIR BROKERAGE COMPANY; a.k.a. TADBIRGARAN FARDA BROKERAGE COMPANY; a.k.a. TADBIRGARANE FARDA MERCANTILE EXCHANGE CO.), Unit C2, 2nd Floor, Building No. 29, Corner of 25th Street, After Jahan Koudak, Cross Road Africa Street, Tehran 15179, Iran; Website <http://www.tadbirbroker.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

ZARIN RAFSANJAN CEMENT COMPANY (a.k.a. RAFSANJAN CEMENT COMPANY; a.k.a. ZARRIN RAFSANJAN CEMENT COMPANY), 2nd Floor, No. 67, North Sindokht Street, West Dr. Fatemi Avenue, Tehran 1411953943, Iran; Website <http://www.zarrincement.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

RAFSANJAN CEMENT COMPANY (a.k.a. ZARIN RAFSANJAN CEMENT COMPANY; a.k.a. ZARRIN RAFSANJAN CEMENT COMPANY), 2nd Floor, No. 67, North Sindokht Street, West Dr. Fatemi Avenue, Tehran 1411953943, Iran; Website <http://www.zarrincement.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

ZARRIN RAFSANJAN CEMENT COMPANY (a.k.a. RAFSANJAN CEMENT COMPANY; a.k.a. ZARIN RAFSANJAN CEMENT COMPANY), 2nd Floor, No. 67, North Sindokht Street, West Dr. Fatemi Avenue, Tehran 1411953943, Iran; Website <http://www.zarrincement.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

RISHMAK PRODUCTIVE & EXPORTS COMPANY (a.k.a. RISHMAK COMPANY; a.k.a. RISHMAK EXPORT AND MANUFACTURING P.J.S.; a.k.a. RISHMAK PRODUCTION AND EXPORT COMPANY; a.k.a. RISHMAK PRODUCTIVE AND EXPORTS COMPANY; a.k.a. SHERKAT-E TOLID VA SADERAT-E RISHMAK), Rishmak Cross Rd., 3rd Km. of Amir Kabir Road, Shiraz 71365, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

RISHMAK COMPANY (a.k.a. RISHMAK EXPORT AND MANUFACTURING P.J.S.; a.k.a. RISHMAK PRODUCTION AND EXPORT COMPANY; a.k.a. RISHMAK PRODUCTIVE & EXPORTS COMPANY; a.k.a. RISHMAK PRODUCTIVE AND EXPORTS COMPANY; a.k.a. SHERKAT-E TOLID VA SADERAT-E RISHMAK), Rishmak Cross Rd., 3rd Km. of Amir Kabir Road, Shiraz 71365, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SHERKAT-E TOLID VA SADERAT-E RISHMAK (a.k.a. RISHMAK COMPANY; a.k.a. RISHMAK EXPORT AND MANUFACTURING P.J.S.; a.k.a. RISHMAK PRODUCTION AND EXPORT COMPANY; a.k.a. RISHMAK PRODUCTIVE & EXPORTS COMPANY; a.k.a. RISHMAK PRODUCTIVE AND EXPORTS COMPANY), Rishmak Cross Rd., 3rd Km. of Amir Kabir Road, Shiraz 71365, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to

Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

RISHMAK PRODUCTION AND EXPORT COMPANY (a.k.a. RISHMAK COMPANY; a.k.a. RISHMAK EXPORT AND MANUFACTURING P.J.S.; a.k.a. RISHMAK PRODUCTIVE & EXPORTS COMPANY; a.k.a. RISHMAK PRODUCTIVE AND EXPORTS COMPANY; a.k.a. SHERKAT-E TOLID VA SADERAT-E RISHMAK), Rishmak Cross Rd., 3rd Km. of Amir Kabir Road, Shiraz 71365, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

RISHMAK EXPORT AND MANUFACTURING P.J.S. (a.k.a. RISHMAK COMPANY; a.k.a. RISHMAK PRODUCTION AND EXPORT COMPANY; a.k.a. RISHMAK PRODUCTIVE & EXPORTS COMPANY; a.k.a. RISHMAK PRODUCTIVE AND EXPORTS COMPANY; a.k.a. SHERKAT-E TOLID VA SADERAT-E RISHMAK), Rishmak Cross Rd., 3rd Km. of Amir Kabir Road, Shiraz 71365, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

RISHMAK PRODUCTIVE AND EXPORTS COMPANY (a.k.a. RISHMAK COMPANY; a.k.a. RISHMAK EXPORT AND MANUFACTURING P.J.S.; a.k.a. RISHMAK PRODUCTION AND EXPORT COMPANY; a.k.a. RISHMAK PRODUCTIVE & EXPORTS COMPANY; a.k.a. SHERKAT-E TOLID VA SADERAT-E RISHMAK), Rishmak Cross Rd., 3rd Km. of Amir Kabir Road, Shiraz 71365, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

OMID REY CIVIL & CONSTRUCTION COMPANY (a.k.a. OMID DEVELOPMENT AND CONSTRUCTION; a.k.a. OMID REY CIVIL AND CONSTRUCTION COMPANY; a.k.a. OMID REY RENOVATION AND DEVELOPMENT CO.); Website <http://www.omidrey.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

OMID DEVELOPMENT AND CONSTRUCTION (a.k.a. OMID REY CIVIL & CONSTRUCTION COMPANY; a.k.a. OMID REY CIVIL AND CONSTRUCTION COMPANY; a.k.a. OMID REY RENOVATION AND DEVELOPMENT CO.); Website <http://www.omidrey.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

OMID REY RENOVATION AND DEVELOPMENT CO. (a.k.a. OMID DEVELOPMENT AND CONSTRUCTION; a.k.a. OMID REY CIVIL & CONSTRUCTION COMPANY; a.k.a. OMID REY CIVIL AND CONSTRUCTION COMPANY); Website <http://www.omidrey.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

OMID REY CIVIL AND CONSTRUCTION COMPANY (a.k.a. OMID DEVELOPMENT AND CONSTRUCTION; a.k.a. OMID REY CIVIL & CONSTRUCTION COMPANY; a.k.a. OMID REY RENOVATION AND DEVELOPMENT CO.); Website <http://www.omidrey.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

BEHSAZ KASHANE TEHRAN CONSTRUCTION CO. (a.k.a. BEHSAZ KASHANEH CO.), No. 40, East Street Journal, North Shiraz Street, Sadra Avenue, Tehran, Iran; Website <http://www.behsazco.ir>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

BEHSAZ KASHANEH CO. (a.k.a. BEHSAZ KASHANE TEHRAN CONSTRUCTION CO.), No. 40, East Street Journal, North Shiraz Street, Sadra Avenue, Tehran, Iran; Website <http://www.behsazco.ir>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

ROYAL ARYA CO. (a.k.a. ARIA ROYAL CONSTRUCTION COMPANY), Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

ARIA ROYAL CONSTRUCTION COMPANY (a.k.a. ROYAL ARYA CO.), Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

HORMOZ OIL REFINING COMPANY, Next to the Current Bandar Abbas Refinery, Bandar Abbas City, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

GHAED BASSIR PETROCHEMICAL PRODUCTS COMPANY (a.k.a. GHAED BASSIR), No. 15, Palizvani (7th) Street, Gandhi (South) Avenue, Tehran 1517655711, Iran; Km 10 of Khomayen Road, Golpayegan, Iran; Website <http://www.gbpc.net>; Additional Sanctions Information - Not on the SDN List

and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

GHAED BASSIR (a.k.a. GHAED BASSIR PETROCHEMICAL PRODUCTS COMPANY), No. 15, Palizvani (7th) Street, Gandhi (South) Avenue, Tehran 1517655711, Iran; Km 10 of Khomayen Road, Golpayegan, Iran; Website <http://www.gbpc.net>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

PERSIA OIL & GAS INDUSTRY DEVELOPMENT CO. (a.k.a. PERSIA OIL AND GAS INDUSTRY DEVELOPMENT CO.; a.k.a. TOSE SANAT-E NAFT VA GAS PERSIA), 7th Floor, No. 346, Mirdamad Avenue, Tehran, Iran; Ground Floor, No. 14, Saba Street, Africa Boulevard, Tehran, Iran; Website <http://www.pogidc.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

TOSE SANAT-E NAFT VA GAS PERSIA (a.k.a. PERSIA OIL & GAS INDUSTRY DEVELOPMENT CO.; a.k.a. PERSIA OIL AND GAS INDUSTRY DEVELOPMENT CO.), 7th Floor, No. 346, Mirdamad Avenue, Tehran, Iran; Ground Floor, No. 14, Saba Street, Africa Boulevard, Tehran, Iran; Website <http://www.pogidc.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

PERSIA OIL AND GAS INDUSTRY DEVELOPMENT CO. (a.k.a. PERSIA OIL & GAS INDUSTRY DEVELOPMENT CO.; a.k.a. TOSE SANAT-E NAFT VA GAS PERSIA), 7th Floor, No. 346, Mirdamad Avenue, Tehran, Iran; Ground Floor, No. 14, Saba Street, Africa Boulevard, Tehran, Iran; Website <http://www.pogidc.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

PARS OIL CO. (a.k.a. PARS OIL; a.k.a. SHERKAT NAFT PARS SAHAMI AAM), Iran; No. 346, Pars Oil Company Building, Modarres Highway, East Mirdamad Boulevard, Tehran 1549944511, Iran; Postal Box 14155-1473, Tehran 159944511, Iran; Website <http://www.parsoilco.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

PARS OIL (a.k.a. PARS OIL CO.; a.k.a. SHERKAT NAFT PARS SAHAMI AAM), Iran; No. 346, Pars Oil Company Building, Modarres Highway, East Mirdamad Boulevard, Tehran 1549944511, Iran; Postal Box 14155-1473, Tehran 159944511, Iran; Website <http://www.parsoilco.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SHERKAT NAFT PARS SAHAMI AAM (a.k.a. PARS OIL; a.k.a. PARS OIL CO.), Iran; No. 346, Pars Oil Company Building, Modarres Highway, East Mirdamad Boulevard, Tehran 1549944511, Iran; Postal Box 14155-1473, Tehran 159944511, Iran; Website <http://www.parsoilco.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

COMMERCIAL PARS OIL CO., 9th Floor, No. 346, Mirdamad Avenue, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

MARJAN PETROCHEMICAL COMPANY (a.k.a. MARJAN METHANOL COMPANY), Ground Floor, No. 39, Meftah/Garmsar West Alley, Shiraz (South) Street, Molla Sadra Avenue, Tehran, Iran; Post Office Box 19935-561, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

MARJAN METHANOL COMPANY (a.k.a. MARJAN PETROCHEMICAL COMPANY), Ground Floor, No. 39, Meftah/Garmsar West Alley, Shiraz (South) Street, Molla Sadra Avenue, Tehran, Iran; Post Office Box 19935-561, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

GHADIR INVESTMENT COMPANY, 341 West Mirdamad Boulevard, Tehran, Iran; P.O. Box 19696, Tehran, Iran; Website <http://www.ghadir-invest.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SADAF PETROCHEMICAL ASSALUYEH COMPANY (a.k.a. SADAF ASALUYEH CO.; a.k.a. SADAF CHEMICAL ASALUYEH COMPANY; a.k.a. SADAF PETROCHEMICAL ASSALUYEH INVESTMENT SERVICE), Assaluyeh, Iran; South Pars Special Economy/Energy Zone, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SADAF ASALUYEH CO. (a.k.a. SADAF CHEMICAL ASALUYEH COMPANY; a.k.a. SADAF PETROCHEMICAL ASSALUYEH COMPANY; a.k.a. SADAF PETROCHEMICAL ASSALUYEH INVESTMENT SERVICE), Assaluyeh, Iran; South Pars Special Economy/Energy Zone, Iran; Additional

Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SADAF CHEMICAL ASALUYEH COMPANY (a.k.a. SADAF ASALUYEH CO.; a.k.a. SADAF PETROCHEMICAL ASSALUYEH COMPANY; a.k.a. SADAF PETROCHEMICAL ASSALUYEH INVESTMENT SERVICE), Assaluyeh, Iran; South Pars Special Economy/Energy Zone, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SADAF PETROCHEMICAL ASSALUYEH INVESTMENT SERVICE (a.k.a. SADAF ASALUYEH CO.; a.k.a. SADAF CHEMICAL ASALUYEH COMPANY; a.k.a. SADAF PETROCHEMICAL ASSALUYEH COMPANY), Assaluyeh, Iran; South Pars Special Economy/Energy Zone, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

POLYNAR COMPANY, No. 58, St. 14, Qanbarzadeh Avenue, Resalat Highway, Tehran, Iran; Website <http://www.polynar.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

ONE CLASS PROPERTIES (PTY) LTD. (a.k.a. ONE CLASS INCORPORATED), Cape Town, South Africa; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

ONE CLASS INCORPORATED (a.k.a. ONE CLASS PROPERTIES (PTY) LTD.), Cape Town, South Africa; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

ONE VISION INVESTMENTS 5 (PTY) LTD. (a.k.a. ONE VISION 5), 3rd Floor, Tygervalley Chambers, Bellville, Cape Town 7530, South Africa; Canal Walk, P.O. Box 17, Century City, Milnerton 7446, South Africa; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 2002/022757/07 (South Africa) [IRAN].

ONE VISION 5 (a.k.a. ONE VISION INVESTMENTS 5 (PTY) LTD.), 3rd Floor, Tygervalley Chambers, Bellville, Cape Town 7530, South Africa; Canal Walk, P.O. Box 17, Century City, Milnerton 7446, South Africa; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Registration ID 2002/022757/07 (South Africa) [IRAN].

PARS MCS (a.k.a. PARS MCS CO.; a.k.a. PARS MCS COMPANY), 2nd Floor, No. 4, Sasan Dead End, Afriqa Avenue, After Esfandiar, Crossroads, Tehran, Iran; No. 5 Sasan Alley, Atefi Sharghi St., Afrigha Boulevard, Tehran, Iran; Oshorjan Industrial Zone, Zob-e Ahan Highway, Isafahan, Iran; Website <http://www.parsmcs.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

PARS MCS COMPANY (a.k.a. PARS MCS; a.k.a. PARS MCS CO.), 2nd Floor, No. 4, Sasan Dead End, Afriqa Avenue, After Esfandiar, Crossroads, Tehran, Iran; No. 5 Sasan Alley, Atefi Sharghi St., Afrigha Boulevard, Tehran, Iran; Oshorjan Industrial Zone, Zob-e Ahan Highway, Isafahan, Iran; Website <http://www.parsmcs.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

PARS MCS CO. (a.k.a. PARS MCS; a.k.a. PARS MCS COMPANY), 2nd Floor, No. 4, Sasan Dead End, Afriqa Avenue, After Esfandiar, Crossroads, Tehran, Iran; No. 5 Sasan Alley, Atefi Sharghi St., Afrigha Boulevard, Tehran, Iran; Oshorjan Industrial Zone, Zob-e Ahan Highway, Isafahan, Iran; Website <http://www.parsmcs.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

OIL INDUSTRY INVESTMENT COMPANY (a.k.a. "O.I.I.C."), No. 83, Sepahbod Gharani Street, Tehran, Iran; Website <http://www.oiiic.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

"O.I.I.C." (a.k.a. OIL INDUSTRY INVESTMENT COMPANY), No. 83, Sepahbod Gharani Street, Tehran, Iran; Website <http://www.oiiic.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

REY NIRU ENGINEERING COMPANY (a.k.a. REY NIROO ENGINEERING COMPANY); Website <http://www.reyniroo.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in

Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

REY NIROO ENGINEERING COMPANY (a.k.a. REY NIRU ENGINEERING COMPANY); Website <http://www.reyniroo.com>; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SWISS MANAGEMENT SERVICES SARL, 28C, Route de Denges, Lonay 1027, Switzerland; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

SEYYEDI, Seyed Nasser Mohammad; DOB 21 Apr 1963; citizen Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Passport B14354139 (Iran); alt. Passport L18507193 (Iran); alt. Passport X95321252 (Iran); Managing Director, Sima General Trading (individual) [IRAN].

KASB INTERNATIONAL LLC (a.k.a. FIRST FURAT TRADING LLC), 10th Floor, Citi Bank Building, Oud Metha Road, Oud Metha, Dubai, United Arab Emirates; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Telephone Number: (971) (4) (3248000) [IRAN].

FIRST FURAT TRADING LLC (a.k.a. KASB INTERNATIONAL LLC), 10th Floor, Citi Bank Building, Oud Metha Road, Oud Metha, Dubai, United Arab Emirates; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Telephone Number: (971) (4) (3248000) [IRAN].

PETRO ROYAL FZE, United Arab Emirates; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

AA ENERGY FZCO, United Arab Emirates; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf [IRAN].

PARSAEI, Reza; DOB 09 Aug 1963; citizen Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Director, NIOC International Affairs (London) Ltd. (individual) [IRAN].

TABATABAEI, Seyyed Mohammad Ali Khatibi; DOB 27 Sep 1955; citizen Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Director, NIOC International Affairs (London) Ltd.; Director of International Affairs, NIOC (individual) [IRAN].

ZIRACCHEAN ZADEH, Mahmoud; DOB 24 Jul 1959; citizen Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Director, Iranian Oil Company (U.K.) Ltd. (individual) [IRAN].

MOHADDES, Seyed Mahmoud; DOB 07 Jun 1957; citizen Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Managing Director, Iranian Oil Company (U.K.) Ltd. (individual) [IRAN].

MOINIE, Mohammad; DOB 04 Jan 1956; POB Brojerd, Iran; citizen United Kingdom; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; Passport 301762718 (United Kingdom); Commercial Director, Naftiran Intertrade Company Sarl (individual) [IRAN].

KHAVARMIANEH BANK (a.k.a. MIDDLE EAST BANK), No. 22, Second Floor Sabounchi St., Shahid Beheshti Ave., Tehran, Iran; SWIFT/BIC KHMIIIRTH; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; All offices worldwide [IRAN].

MIDDLE EAST BANK (a.k.a. KHAVARMIANEH BANK), No. 22, Second Floor Sabounchi St., Shahid Beheshti Ave., Tehran, Iran; SWIFT/BIC KHMIIIRTH; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; All offices worldwide [IRAN].

GHAVAMIN BANK (a.k.a. "GHAVAMIN FINANCIAL & CREDIT INS."), No. 252 Milad Tower, Beginning of Africa Blvd., Argentina Sq, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property

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Publication of Updates to OFAC's Specially Designated Nationals and Blocked Persons List and 13599 List Removals

and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; All offices worldwide [IRAN].

"GHAVAMIN FINANCIAL & CREDIT INS." (a.k.a. GHAVAMIN BANK), No. 252 Milad Tower, Beginning of Africa Blvd., Argentina Sq, Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; All offices worldwide [IRAN].

GHARZOLHASANEH RESALAT BANK, Beside the No. 1 Baghestan Alley, Saadat Abad Ave., Kaj Sq., Tehran, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; All offices worldwide [IRAN].

KISH INTERNATIONAL BANK (a.k.a. KISH INTERNATIONAL BANK OFFSHORE COMPANY PJS), NBO-9, Andisheh Blvd, Sanayi Street , Kish Island, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; All offices worldwide [IRAN].

KISH INTERNATIONAL BANK OFFSHORE COMPANY PJS (a.k.a. KISH INTERNATIONAL BANK), NBO-9, Andisheh Blvd, Sanayi Street , Kish Island, Iran; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; All offices worldwide [IRAN].

KAFOLATBANK (a.k.a. CJSC KAFOLATBANK), Apartment 4/1, Academics Rajabovs Street, Dushanbe, Tajikistan; SWIFT/BIC KACJTJ22; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; All offices worldwide [IRAN].

CJSC KAFOLATBANK (a.k.a. KAFOLATBANK), Apartment 4/1, Academics Rajabovs Street, Dushanbe, Tajikistan; SWIFT/BIC KACJTJ22; Additional Sanctions Information - Not on the SDN List and Not Subject to Secondary Sanctions; U.S. Persons Must Continue to Block the Property and Interests in Property of this Person Pursuant to Executive Order 13599; For more information, please see: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/jcpoa_faqs.pdf; All offices worldwide [IRAN].

Presidential Documents

Title 3—

Executive Order 13599 of February 5, 2012

The President

Blocking Property of the Government of Iran and Iranian Financial Institutions

By the authority vested in me as President by the Constitution and the laws of the United States of America, including the International Emergency Economic Powers Act (50 U.S.C. 1701 *et seq.*) (IEEPA), the National Emergencies Act (50 U.S.C. 1601 *et seq.*), section 1245 of the National Defense Authorization Act for Fiscal Year 2012 (Public Law 112–81) (NDAA), and section 301 of title 3, United States Code,

I, BARACK OBAMA, President of the United States of America, in order to take additional steps with respect to the national emergency declared in Executive Order 12957 of March 15, 1995, particularly in light of the deceptive practices of the Central Bank of Iran and other Iranian banks to conceal transactions of sanctioned parties, the deficiencies in Iran's anti-money laundering regime and the weaknesses in its implementation, and the continuing and unacceptable risk posed to the international financial system by Iran's activities, hereby order:

Section 1. (a) 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.

(b) 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.

(c) 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 following persons are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt in: any person determined by the Secretary of the Treasury, in consultation with the Secretary of State, 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 order.

Sec. 2. I hereby determine that the making of donations of the type of articles specified in section 203(b)(2) of IEEPA (50 U.S.C. 1702(b)(2)) by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to section 1 of this order would seriously impair my ability to deal with the national emergency declared in Executive Order 12957, and I hereby prohibit such donations as provided by section 1 of this order.

Sec. 3. The prohibitions in section 1 of this order include but are not limited to: (a) the making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any person whose property and interests in property are blocked pursuant to this order; and

(b) the receipt of any contribution or provision of funds, goods, or services from any such person.

Sec. 4. (a) The prohibitions in section 1 of this order apply except to the extent provided by statutes, or in regulations, orders, directives, or licenses that may be issued pursuant to this order, and notwithstanding any contract entered into or any license or permit granted prior to the effective date of this order.

(b) The prohibitions in section 1 of this order do not apply to property and interests in property of the Government of Iran that were blocked pursuant to Executive Order 12170 of November 14, 1979, and thereafter made subject to the transfer directives set forth in Executive Order 12281 of January 19, 1981, and implementing regulations thereunder.

Sec. 5. (a) Any transaction by a United States person or within the United States that evades or avoids, has the purpose of evading or avoiding, causes a violation of, or attempts to violate any of the prohibitions set forth in this order is prohibited.

(b) Any conspiracy formed to violate any of the prohibitions set forth in this order is prohibited.

Sec. 6. Nothing in section 1 of this order shall prohibit transactions for the conduct of the official business of the Federal Government by employees, grantees, or contractors thereof.

Sec. 7. For the purposes of this order: (a) the term "person" means an individual or entity;

(b) the term "entity" means a partnership, association, trust, joint venture, corporation, group, subgroup, or other organization;

(c) the term "United States person" means any United States citizen, permanent resident alien, entity organized under the laws of the United States or any jurisdiction within the United States (including foreign branches), or any person in the United States;

(d) the term "Government of Iran" means the Government of Iran, any political subdivision, agency, or instrumentality thereof, including the Central Bank of Iran, and any person owned or controlled by, or acting for or on behalf of, the Government of Iran;

(e) the term "Iran" means the territory of Iran and any other territory or marine area, including the exclusive economic zone and continental shelf, over which the Government of Iran claims sovereignty, sovereign rights, or jurisdiction, provided that the Government of Iran exercises partial or total de facto control over the area or derives a benefit from economic activity in the area pursuant to international arrangements; and

(f) the term "Iranian financial institution" means a financial institution organized under the laws of Iran or any jurisdiction within Iran (including foreign branches), any financial institution in Iran, any financial institution, wherever located, owned or controlled by the Government of Iran, and any financial institution, wherever located, owned or controlled by any of the foregoing.

Sec. 8. For those persons whose property and interests in property are blocked pursuant to this order who might have a constitutional presence in the United States, I find that because of the ability to transfer funds or other assets instantaneously, prior notice to such persons of measures to be taken pursuant to this order would render those measures ineffectual. I therefore determine that for these measures to be effective in addressing the national emergency declared in Executive Order 12957, there need be no prior notice of a listing or determination made pursuant to section 1 of this order.

Sec. 9. The Secretary of the Treasury, in consultation with the Secretary of State, is hereby authorized to take such actions, including the promulgation of rules and regulations, and to employ all powers granted to the President by IEEPA as may be necessary to carry out the purposes of this order, other than the purposes described in section 11. The Secretary of the Treasury may redelegate any of these functions and authorities to other officers and agencies of the United States Government consistent with applicable law.

All agencies of the United States Government are hereby directed to take all appropriate measures within their authority to carry out the provisions of this order.

Sec. 10. The Secretary of the Treasury, in consultation with the Secretary of State, is hereby authorized to exercise the functions and authorities conferred upon the President by section 1245(d)(1)(A) of the NDAA and to redelegate these functions and authorities consistent with applicable law. The Secretary of the Treasury, in consultation with the Secretary of State, is hereby further authorized to exercise the functions and authorities conferred upon the President by section 1245(g)(1) of the NDAA to the extent necessary to exercise the other functions and authorities delegated in this section and may redelegate these functions and authorities consistent with applicable law.

Sec. 11. The Secretary of State, in consultation with the Secretary of the Treasury, the Secretary of Energy, and the Director of National Intelligence, is hereby authorized to exercise the functions and authorities conferred upon the President by section 1245(d)(4)(D) of the NDAA and to redelegate these functions and authorities consistent with applicable law. The Secretary of State, in consultation with the Secretary of the Treasury, is hereby further authorized to exercise the functions and authorities conferred upon the President by sections 1245(e)(1) and 1245(e)(2) of the NDAA and to redelegate these functions and authorities consistent with applicable law. The Secretary of State, in consultation with the Secretary of the Treasury, is hereby further authorized to exercise the functions and authorities conferred upon the President by section 1245(g)(1) of the NDAA to the extent necessary to exercise the other functions and authorities delegated in this section and may redelegate these functions and authorities consistent with applicable law.

Sec. 12. This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

Sec. 13. The measures taken pursuant to this order are in response to actions of the Government of Iran occurring after the conclusion of the 1981 Algiers Accords, and are intended solely as a response to those later actions.

Sec. 14. This order is effective at 12:01 a.m. eastern standard time on February 6, 2012.



THE WHITE HOUSE,
February 5, 2012.

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PROVISIONS ON COMPANIES IN UNITED STATES COMMERCIAL TREATIES *

BY HERMAN WALKER, JR.**

Office of International Trade and Resources, Department of State

Prior to World War II, U. S. commercial treaties either were silent concerning the applicability of their provisions to corporations and other associations, or provided in only a limited way for such entities. From the start, treaties of this kind concluded by the United States have been concerned with the rights and privileges of persons. It was not until 1911, however, that these treaties began to reflect attention to companies as such—artificial, as distinguished from natural—persons. Only during the last ten years have they dealt with companies systematically and comprehensively to a degree comparable with the treatment provided for natural persons.¹ This development has been characterized as “perhaps the most striking advance” effected by recent treaties over those antedating 1946.²

* Certain other features of U. S. commercial treaties have been discussed in articles by Robert R. Wilson, appearing in this JOURNAL, as follows: “Property-Protection Provisions in U. S. Treaties,” Vol. 45, pp. 83–107 (1951); “Access-to-Courts Provisions in U. S. Commercial Treaties,” Vol. 47, pp. 20–48 (1953); “Natural-Resources Provisions in U. S. Commercial Treaties,” Vol. 48, pp. 355–379 (1954). The term “commercial treaties” is used here in the same sense as in those articles; that is, broad treaties which contain provisions relating to establishment as well as to trade and shipping, and most frequently called treaties of “friendship, commerce and navigation.”

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¹ Those signed since World War II are: treaties of friendship, commerce and navigation with China, 1946 (63 Stat. Pt. 2, 1299), Italy, 1948 (63 Stat. Pt. 2, 2255; supplemented by Agreement of Sept. 26, 1951, S. Exec. H, 82d Cong., 2d Sess.), Ireland, 1950 (1 U. S. Treaties 785), Colombia, 1951 (S. Exec. M, 82d Cong., 1st Sess., withdrawn from Senate, June 30, 1953), Greece, 1951 (T.I.A.S. No. 3057), Israel, 1951 (5 U. S. Treaties, Pt. 1, 550), Denmark, 1951 (S. Exec. I, 82d Cong., 2d Sess.), Japan, 1953 (4 U. S. Treaties, Pt. 2, 2063), Federal Republic of Germany, 1954 (S. Exec. E, 84th Cong., 1st Sess.), Haiti, 1955 (S. Exec. H, 84th Cong., 1st Sess.); Nicaragua, signed Jan. 21, 1956 (S. Exec. G, 84th Cong., 2d Sess.); treaty of friendship, commerce and economic development with Uruguay, 1949 (S. Exec. D, 81st Cong., 2d Sess.); treaty of amity and economic relations with Ethiopia, 1951 (4 U. S. Treaties, Pt. 2, 2134); and treaty of amity, economic relations and consular rights with Iran, signed Aug. 15, 1955 (S. Exec. E, 84th Cong., 2d Sess.) These treaties fall into three patterns. Those succeeding the China and Italy treaties reflect an extensive reorganization and condensation of the content of those two instruments. The Ethiopia and Iran treaties represent a further abridgment of this material, and add provisions on diplomatic and consular rights. All are substantially alike, however, with regard to the points discussed in this article, except as otherwise noted and except that the Ethiopia and Iran treaties lack some of the refinements found in the others. The treaty with Japan will usually be used herein for illustrative purposes, because it is the most recent in point of signature to have entered into force.

² Testimony of Deputy Assistant Secretary of State Linder, Hearing before a Subcommittee of the Committee on Foreign Relations, U. S. Senate, Eighty-second Congress,

I

This country began entering into commercial treaties containing establishment provisions while the Revolutionary War was still being fought. The first treaty of any kind signed on behalf of the United States, in fact, appears to have been the Treaty of Amity and Commerce of February 6, 1778, with France;³ and throughout its history the United States has concluded many such treaties, to the number of approximately 130 great and small, according to one recent official estimate.⁴ Concurrently with the early growth of the U. S. commercial treaty network, business corporations also were growing in number and economic importance. Such entities, albeit few in number,⁵ were known even at the time of the Constitutional Convention. By 1800 no less than 300 corporations for profit had been chartered in the United States;⁶ in 1837, Chancellor Kent noted that incorporations had been increasing "to a most astonishing extent";⁷ and by 1839 the Chief Justice felt able to take judicial notice of the widespread involvement of corporations in interstate and foreign transactions.⁸

With the passage of time, of course, corporations became a fact of major magnitude in the American economy. Contemporaneously, corporations were from time to time coming to diplomatic attention, as is indicated by their appearance on occasion on the pages of diplomatic correspondence,⁹ and by internal evidence contained in a number of nineteenth-century agreements. Claims conventions concluded from mid-century onwards frequently made express provision for the claims of corporations as well as for those of individuals;¹⁰ and from at least as early as 1827, commercial treaties with European countries sometimes contained allusions to

second session, on treaties of friendship, commerce and navigation with Colombia, Israel, Ethiopia, Italy, Denmark, and Greece . . . May 9, 1952, p. 4.

³ This was signed even before the Franco-American treaty of alliance of the same date (5 Moore's Digest 586). Other commercial treaties prior to the adoption of the Constitution include those with the Netherlands, 1782; Sweden, 1783; and Prussia, 1785. Texts may be found in Malloy, *Treaties, Conventions, International Acts, Protocols and Agreements between the United States and Other Powers, 1776-1909*. Citations will not be given in this article for treaties which may readily be found in Malloy, or in the supplementary collections for 1910-1923 and 1923-1937 compiled by Redmond and Trenwith, respectively.

⁴ Fact Sheet entitled "Commercial Treaty Program of the United States" (Department of State, March, 1952), p. 3. An annex lists those actually in force as of that date.

⁵ McGovney, "A Supreme Court Fiction: Corporations in the Diverse Citizenship Jurisdiction of the Federal Courts," 56 *Harvard Law Rev.* 853, 897 (1943); Williston, "History of the Law of Business Corporations before 1800," 2 *ibid.* 149, 165-166 (1888).

⁶ Davis, *Essays in the Early History of American Corporations*, Vol. II, pp. 8, 331-334 (Cambridge, 1917).

⁷ *Commentaries on American Law*, Vol. II, p. 414 (14th ed.).

⁸ *Bank of Augusta v Earle*, 13 Peters 519, 585, 590 (1839).

⁹ For example, *Foreign Relations of the United States*, 1866, Vol. III, p. 552; 1867, Vol. I, pp. 452, 456; 1867, Vol. II, p. 272; 1868, Vol. II, p. 1034; 1871, p. 242; 1875, Vol. I, pp. 275-276, 278.

¹⁰ For example, the Claims Convention of 1853 with Great Britain, Art. I. The usual form of words in such instances was "all claims on the part of corporations, companies or individuals, citizens of . . . etc."

corporations. Typically, such allusions were of an obverse character, in the sense of identifying special-privilege entities of the grantor party against which the trade and shipping of the grantee party were to be protected (obligations imposed upon, rather than rights to be accorded to, such entities);¹¹ but in at least one instance, company privileges were mentioned as a standard to which a treaty right of citizens and vessels was referable,¹² and in two instances American companies were designated in a specialized way as beneficiaries of a treaty right in the other country.¹³ Nevertheless, until the treaty of 1911 with Japan, the general schematic policy consistently followed in describing the persons entitled to commercial treaty rights was to speak merely of "citizens," "subjects," "inhabitants," or "nationals."

That the treaty-makers of the past should have refrained from providing for corporations in commercial treaties seems explicable. Commercial treaties, although they have always tended to serve broad diplomatic objectives and although they have undergone changes in emphasis with the passage of time, were in their historical form designed primarily to promote trade and to protect the instrumentalities of trade—goods that move in commerce, ships that carry goods, "merchants" who "come with their ships and cargoes." Corporations do not figure in this mobile image.

A corporation, as explained in the oft-cited statement of Chief Justice Taney, is a creature of sovereignty which can exist only within the jurisdiction of the state creating it and cannot move or migrate outside that jurisdiction.¹⁴ This doctrine raised persistent problems for the courts, up into the present century, in developing constitutional protection for corporations in interstate relations,¹⁵ a circumstance which, for American

¹¹ For example, Art. VII of the 1827 Treaty of Commerce and Navigation with Sweden/Norway pledges each signatory "not to grant in its purchases, or in those which might be made by companies or agents acting in its name or under its authority, any preference to importations made in its own vessels . . ." (Art. XV of the same instrument contained also a rule concerning the services of "salvage companies," in connection with shipwrecks). A fairly common provision has been one providing non-discrimination in the matter of shipping charges "levied in the name or to the profit of the Government, the local authorities, or of any private establishments whatsoever" (Art. II of the 1837 treaty with Greece), phraseology which later became spelled out to read "Government, public functionaries, private individuals, corporations or establishments of any kind" (Art. VII, treaty of 1902 with Spain). The evident purpose of such references was to prevent indirect impairment or nullification of treaty rights through actions of entities not the government (*e.g.*, a monopolistic trading company enjoying special powers, such as an East India Company).

¹² Art. VIII, treaty of 1858 with Bolivia.

¹³ Art. IV (17) of the 1881 treaty with Madagascar (coaling rights of American steamship companies); Art. XII of the 1903 treaty with China (navigation on the inland waters of China).

¹⁴ *Bank of Augusta v. Earle*, 13 Peters 519, 588 (1839).

¹⁵ See McGovney, *loc. cit.* 853-898, 1090-1124; *Neirbo Co. v. Bethlehem Corp.*, 308 U. S. 165, 169 (1939); Willoughby on the Constitution 1291 (2nd ed., 1929); Willis, *Constitutional Law* 849-850 (Bloomington, 1936); note in 14 Col. L. R. 434-436 (1910); note in 48 Mich. L. R. 228-230 (1949). These two law review notes indicate that the Supreme Court's development of the main theoretical bases for constitutional protection to corporations was not complete until 1910.

negotiators at least, would have extended into the international sphere.¹⁶ As a practical matter, it was not until about the last quarter of the nineteenth century that "men's minds had become habituated to corporate activities which crossed state lines";¹⁷ and it was not until well into that quarter-century that authority for the creation of *mercantile* corporations, the particular type most readily associated with the traditional avowed purposes of a commercial treaty, came to be granted by many of the states.¹⁸ The seeking of redress in a claims convention for unlawful damages to the acquired property of corporations would thus appear to have been conceptually possible considerably before the active projection of corporations across jurisdictional boundaries in the framework of a commercial treaty.

It has been remarked, furthermore, that a real practical need for seeking treaty protection for corporations began to appear only around the turn of the century.¹⁹ But that period was one in which the United States Government was showing slight interest in concluding general commercial treaties, and hence having little occasion to make decisions about the subject. Very few indeed were entered into between the Serbian treaty of

¹⁶ Also of possible pertinence to the conceptual feasibility of treaty-making about corporations was the doctrinal debate between the "fictional" and "natural" schools which, according to Latty, was still so unresolved at the beginning of the 20th century that at that time "it could not be said . . . that there was any well defined principle of international law" as to the juridical position of foreign corporations. "International Standing in Court of Foreign Corporations," 29 Mich. L. R. 28, 32 (1930). Indeed, historically the "attribution of personality to business corporations was a matter of slow evolution" (Baty, "The Rights of Ideas—and of Corporations," 33 Harv. L. R. 358, 360 (1920)), an evolution accompanied by much debate. For example, Prof. Hohfeld argued vigorously in an article published in 1909 that the "only conduct of which the state can take notice by its laws *must* spring from natural persons—it cannot be derived from any abstraction called the 'corporate entity' . . ." 9 Col. L. R. 285, 289.

¹⁷ Justice Frankfurter in the *Neirbo* case, *supra*, 170. The American cases cited by Beale as settling the proposition, already known at common law, that a corporation may lawfully act (by agent) outside the jurisdiction of its creation, date mostly from the end of the 19th century (The Law of Foreign Corporations 154 (Boston, 1904)); and Keasbey remarks that it was only in 1865 that New Jersey, a leader in the latter 19th century in adopting legislation facilitating incorporations, recognized by statute that "any company organized under the general law might carry on part of its business outside of the state." "New Jersey and the Great Corporations," 13 Harv. L. R. 198, 204 (1899).

¹⁸ Justice Brandeis, in the course of his dissenting opinion in *Liggett Co. v. Lee*, states: "Authority to incorporate for mercantile business, where specifically provided, was given relatively late. *E.g.*, Md. Laws 1894, c. 599; Tenn. Acts 1887 c. 139; Vt. Laws 1884, no. 105; compare Ind. Laws 1889, c. 81, No. 1. And see Cook on Corporations (1889), p. 91: 'The general corporation laws [of Penna.] do not provide for mercantile corporations.' " 288 U. S. 517, 541, 555 n. Texas affords another illustration: *Empire Mills v. Alston Grocery Co.*, 15 S. W. 505 (1891).

¹⁹ Jones, "Claims on Behalf of Nationals Who Are Shareholders in Foreign Corporations," 26 Brit. Year Book of Int. Law 225-226 (1949). See also 3 Hackworth's Digest 432. In Wharton's Digest (1887) there appears only negligible material on corporations, whereas in Moore's Digest, published 20 years later, the amount is moderately substantial.

1881 and the Japanese treaty 30 years later.²⁰ There were, it may be noted, two instances during that time when the United States had occasion to experiment with the formulation of international engagements regarding corporate rights through the medium of special-purpose agreements.²¹ Thus there was no sharp break in treaty policy, but a period of gestation, so to speak, during which an assured basis for a re-oriented policy could take shape.

The textual silence of the older treaties with respect to corporate rights does not in and of itself, of course, necessarily answer the question of their applicability to corporations, if other textual references can be construed to cover them by implication. So, in correspondence concerning the diplomatic protection of corporations, it has sometimes been asserted or assumed that the word "citizens," "nationals" or "subjects" in an outstanding treaty includes corporations.²² Nevertheless, though there are analogies in constitutional and statutory construction for such an interpretation—as, indeed, there are analogies for the contrary²³—an historical analysis leads to a presumption that the absence of provisions for corporations in past treaties reflects a lack of intention to include rights for corporations. This presumption is strengthened by other considerations as well. An artificial person cannot in fact enjoy a number of rights commonly granted to "nationals" or the like, in commercial treaties (*e.g.*, liberty of conscience, exemption from compulsory military service). Strictly speaking, indeed, it cannot be a "national" or "citizen," since those terms imply relations of personal allegiance to a sovereign state which only natural persons can have.²⁴ At no time have corporations been subsumed under the expression "nationals," or the like, in the formal structure of

²⁰ During that span, it seems that the only general-purpose commercial treaty of a normal reciprocal type concluded was that with Peru in 1887, aside from the treaty of 1894 with Japan, which ended extraterritoriality for the United States in that country, and the treaty of 1902 with Spain, following the Spanish-American war. "After the Civil War, interest in treaty-making decreased with the dwindling of our merchant marine and the growing national absorption in industrialization and the development of our natural resources." Fact Sheet, cited *supra*, p. 4.

²¹ *Infra*, at notes 26 and 27.

²² Foreign Relations, 1889, pp. 480-483 (Art. I, 1837 treaty with Greece); Foreign Relations, 1891, pp. 3-4 (Art. IX, 1853 treaty with Argentina); Foreign Relations, 1899, pp. 345-347 (taxation under the treaties of 1850 with Switzerland and 1875 with Belgium); Foreign Relations, 1902, pp. 37-42 (1829 treaty with Austria-Hungary); Foreign Relations, 1910, pp. 61-66 (Art. III, 1853 treaty with Argentina); 3 Foreign Relations, 1929, pp. 227-229 (1864 and 1928 treaties with Honduras); and 3 Hackworth's Digest 428 (Art. XXIV, 1858 treaty with China). Further, see 2 Hyde, International Law 1181 (2nd ed.); and compare *Pearl Assurance Co. v. Harrington*, 38 F. Supp. 411, 413 (1941).

²³ For summary of statutory and constitutional construction, see 18 C.J.S. 388-389; 7 Words and Phrases 255-262 (1952), and note 15 *supra*.

²⁴ By way of a comparative note, McGovney, *loc. cit.*, emphasizes that the Supreme Court consistently, "over and over again, early and late" (p. 861), has held a corporation not actually to be a "citizen" for constitutional purposes. The jurisdictional privilege developed for corporations under the diversity-of-citizenship clause was based on a presumption concerning the citizenship of the individuals forming the corporation.

United States commercial treaties. Moreover, the inclusion of artificial persons in the broad sweep of a commercial treaty poses certain special problems of a technical as well as a policy nature which require special attention; and when commercial treaties did begin evidencing concern with corporations as a class, the provisions made for their rights were not only set apart from, but were for many years strictly limited as compared with, the provisions made for individuals. The now established official view, accordingly, is that in general corporations are not deemed to be within the purview of a commercial treaty except as there may be express provision to that effect.²⁵

II

Although the treaty of 1911 with Japan, like prior treaties, specified only "citizens or subjects" in its establishment provisions, it carried also a provision, new to United States commercial treaties, as follows:

Limited-liability and other companies and associations, commercial, industrial, and financial, already or hereafter to be organized in accordance with the laws of either High Contracting Party and domiciled in the territories of such Party, are authorized, in the territories of the other, to exercise their rights and appear in the courts either as plaintiffs or defendants, subject to the laws of such other Party.

The foregoing stipulation has no bearing upon the question whether a company or association organized in one of the two countries will or will not be permitted to transact its business or industry in the other, this permission remaining always subject to the laws and regulations enacted or established in the respective countries or in any part thereof. [Article VII]

The antecedents of this provision in United States practice were, aside from the above-cited claims conventions, special agreements with Greece in 1890²⁶ and with Russia in 1904,²⁷ though earlier examples occur in the

Compare, for example, *Pilgrim Real Estate, Inc. v. Superintendent of Police*, 112 N.E. (2d) 796 (Mass. 1953).

²⁵ 3 Hackworth's Digest 431-432. This would be so, at least, in the absence of persuasive evidence of a contrary intent in the negotiating record. Compare *Swiss Ins. Co. v. Miller*, 267 U. S. 42, 46 (1925). A similar position apparently has been taken on occasion by the Spanish Government (*ibid.* 430); by British legal officials (Law officers' opinion, 1891, cited in Jones, *loc. cit.*, 228 n.); and by the Supreme Court of Iowa (*Scottish Union and National Insurance Co. v. Herriott*, 80 N.W. 665 (1899)).

²⁶ This was in the form of an exchange of notes explaining that Art. I of the 1837 commercial treaty was construed to extend to business companies, especially in respect of access to courts, provided only such entities "always conform" to the "laws and customs" of the country. This exchange appears to have been considered merely declaratory of municipal law in the United States. *Foreign Relations*, 1889, pp. 482-483.

²⁷ Although this agreement is explicitly limited to status and juridical rights, and although there was at the time in force with Russia a treaty (of 1832) similar to that in force in 1890 with Greece, this document was handled independently and as a treaty requiring Senate approval. Whether this difference in procedure has bearing on the question raised at notes 22-25 *supra*, is not clear. These agreements were in each instance apparently occasioned by the policies of the other country (*Foreign Relations*, 1889, pp. 480-482; *Universal Adjustment Corp. v. Midland Bank*, 184 N.E. 152, 164 (Mass., 1933)), and illustrate the development of provisions on companies in response to practical need.

practice of other countries.²⁸ The precedent established by the treaty with Japan was followed by the treaty of 1920 with Siam, Article V thereof being identical in its first paragraph with the article of the Japan treaty, except for omission of the qualifying phrase "commercial, industrial, and financial." In lieu of the second paragraph of the Japan treaty article, however, there was a paragraph providing most-favored-nation treatment and national treatment for American companies with respect to access to the courts of Siam.

Beginning with the treaty of 1923 with Germany, twelve general commercial treaties were concluded during the inter-war period, all of which contained the following provision on companies:

Limited liability and other corporations and associations, whether or not for pecuniary profit, which have been or may hereafter be organized in accordance with and under the laws, National, State or Provincial, of either High Contracting Party and maintain a central office within the territories thereof, shall have their juridical status recognized by the other High Contracting Party provided that they pursue no aims within its territories contrary to its laws. They shall enjoy free access to the courts of law and equity, on conforming to the laws regulating the matter, as well for the prosecution as for the defense of rights in all the degrees of jurisdiction established by law.

The right of such corporations and associations of either High Contracting Party so recognized by the other to establish themselves within its territories, establish branch offices and fulfill their functions therein shall depend upon, and be governed solely by, the consent of such Party as expressed in its National, State, or Provincial laws.²⁹

This series of treaties expands somewhat the coverage of its predecessors in that notably the benefits of the provision are extended to non-profit entities, an advance apparently over normal international practice.³⁰ On the other hand, additional tests are inserted regarding recognition: *viz.*, in ad-

²⁸ For example, Great Britain had entered such agreements with several countries, beginning in 1862 with France and then Belgium (52 Brit. and For. State Papers 31 and 24); and a provision on companies had appeared in a number of commercial treaties concluded by Belgium, beginning with Portugal in 1874 (65 *ibid.* 322, Art. II).

²⁹ Treaty of Friendship, Commerce and Consular Rights signed Dec. 8, 1923, Art. XII. The others were with: Austria, 1928, Art. IX; El Salvador, 1926, Art. XII; Estonia, 1925, Art. XII; Finland, 1934, Art. XVI; Honduras, 1927, Art. XIII; Hungary, 1925, Art. IX; Latvia, 1928, Art. XIII; Liberia, 1938, Art. XVII; Norway, 1928, Art. XII; Poland, 1931, Art. XI; and Siam (Thailand), 1937, Art. 5. The treaties with Liberia and Siam were called "friendship, commerce and navigation"; the rest had the same title as the treaty with Germany. In addition, two short establishment conventions were concluded, each containing a single substantive article providing most-favored-nation treatment for nationals and corporations, with, respectively, Turkey (1931) and Greece (1936).

³⁰ The Siam treaty of 1920 was not explicit on the point, while the Japan treaty of 1911, as well as the earlier agreements with Greece and Russia, related only to "commercial, industrial, and financial" entities. Treaties made by other countries usually contain this qualifying formula or a variant thereof (*e.g.*, "for profit" or "economic character"). Sometimes provision will be made for "civil" as well as "commercial" entities (*e.g.*, Italy-Albania, 1924, Art. IX, 122 Brit. and For. State Papers 1) and, occasionally, for co-operatives (*e.g.*, Norway-Guatemala, 1938, Art. II, 142 Brit. and For. State Papers 619).

dition to being duly organized under the laws of one of the parties to the treaty, a company, in order to be recognized, must maintain a central office in the state of its creation and, secondly, must pursue no aims in the host state contrary to the laws of the latter. Finally, the far-reaching reservation of the second paragraph of the Japan treaty article is maintained. This reservation makes it clear that companies are not on a par with natural persons for the purpose of enjoying treaty privileges accorded to "nationals" with respect to engaging in activities. A similar reservation has been common in the contemporary treaties of other countries.³¹

III

The policy inaugurated with the China treaty of 1946³² has been to provide fully for the rights of companies to the same degree vouchsafed individuals, and according to like standards, in all clauses factually applicable to both artificial and natural persons. For example: "Nationals and companies of either Party shall be accorded national treatment with respect to engaging in all types of commercial, industrial, financial and other business activities. . . ." ³³ Just as certain other clauses are, owing to their nature, framed for "nationals" only, so the task of providing adequately for companies in an instrument so broad in scope as a modern treaty of friendship, commerce and navigation of the type favored by the United States, encounters distinct problems requiring special attention.

Definition, Nationality and Status of Companies

A "company" is defined simply and broadly to mean any corporation, partnership, company or other association which has been duly formed under the laws of one of the contracting parties; that is, any "artificial" person acknowledged by its creator, as distinguished from a natural person, whether or not for pecuniary profit.³⁴ Every association³⁵ meeting

³¹ Of a sampling of 63 relevant treaties found in the British and Foreign State Papers for the years 1923, 1925, 1930, 1937 and 1938, and involving a wide variety of countries other than the U. S., 37 contain a qualification to this effect (sometimes in briefer terms and sometimes with the addition of a most-favored-nation clause). Of the remainder, 23 achieve a comparable result by limiting the rights of companies to most-favored-nation treatment, with or without an accompanying reference to an obligation to conform to the local laws; in one, the company provision is unilateral; and in another the provision on companies is confined expressly to the matter of juridical status. One instrument is of uncertain classification: a treaty of 1925 between Hungary and Poland (122 Brit. and For. State Papers 861, Art. 3). Earlier examples of an explicit reservation like that in the U. S. treaties in reference may be found in a number of treaties or agreements dating from the two decades preceding World War I, to which Japan, Russia, Germany, or Austria-Hungary, respectively, were signatory.

³² Citations to this and subsequent treaties are in note 1 *supra*, and will not be repeated.

³³ Art. VII, par. 1, Japan treaty of 1953.

³⁴ The standard definition is exemplified by Art. XXII, par. 3, of the 1953 Japan treaty. The question of government corporations is not dealt with in the present paper.

³⁵ A "company" for treaty purposes includes common-law partnerships and other unincorporated associations which are not regarded as distinct legal persons. This ab-

this simple test of valid existence must be accounted by the other party a company of the party of its creation, and have its juridical status recognized without any reservation for the laws of the forum. In comparison, as above noted, the twelve United States treaties of the 1923-38 series contained two additional requirements. Projected multilateral conventions³⁶ and treaties of other countries (especially of the twentieth century) dealing with companies,³⁷ have very frequently contained a requirement of the same general type as the "central office" requirement—usually in terms of "seat" ("*siège sociale*"), sometimes "domicile," occasionally "registered"—without necessarily leaving clear in all cases whether is meant merely the legal headquarters, or the real center of management, or the center of exploitation;³⁸ and a "control" test has sometimes been favored.³⁹

sense of differentiation between those which are, and those which are not, endowed with legal personality is stated to have been the general commercial treaty practice also of other countries (22 A.J.I.L. Spec. Supp. 160 (1928) as cited *infra*). U. S. Treaties follow the usual conflict-of-laws rule to the effect that the law of the place of creation determines whether a given association, whatever its name, enjoys the attribute of legal personality. *Ibid.* 189; *Liverpool Insurance Co. v. Massachusetts*, 10 Wall. 566; *Puerto Rico v. Russell and Co.*, 288 U. S. 476 (1933); 2 Beale, *Conflict of Laws* 736-738, 766-767 (1935); Wolff, *Private International Law* 302 (1950).

³⁶ For example, the recommendations of the League of Nations Committee of Experts for the Progressive Codification of International Law on conventions concerning, respectively, "Recognition of the Legal Personality of Foreign Commercial Corporations" and "Nationality of Commercial Corporations and their Diplomatic Protection" (Art. I of Draft Convention in each case), 22 A.J.I.L. Spec. Supp. 202 and 166 (1928); "Declaration on the Juridical Personality of Foreign Companies," opened for signature at the Pan American Union on June 25, 1936 (ratification of the U. S. deposited, Treaty Series No. 973). Art. 19 of the project on Private International Law prepared by the International Commission of Jurists (Rio de Janeiro, 1927) for submission to the 6th Conference of American States proposed that nationality be determined by "where the general meeting of shareholders is normally held" or, alternatively, by the location of its principal governing board (22 A.J.I.L. Spec. Supp. 273, 275 (1928)).

³⁷ This was true, for example, of four-fifths of the sample mentioned in note 31 *supra*. A notable group exception is afforded by a number of the treaties concluded between Siam and European countries in 1937-38.

³⁸ The normal continental rule apparently is that the determining factor is "*siège sociale*," in the sense of real center of administration or management. Wolff, *Private International Law* 297, 301 (Oxford, 1950). Further on "*siège sociale*," and the possibility of determining nationality by criteria other than center of management, see *ibid.* 297-299; and Ripert, *Traité Élémentaire de Droit Commercial* 250-251, 370-371 (Paris, 1951).

³⁹ *E.g.*, Kronstein, "The Nationality of International Enterprise," 52 Col. L. R. 983, 1001-1002 (1952); Ripert, *op. cit.* 371. The control test has been applied, for example, by the Franco-German Mixed Arbitral Tribunal, under the terms of the Treaty of Versailles (Lauterpacht, *Annual Digest*, 1919-22, p. 227, 1923-24, p. 259, 1925-26, p. 283). See also, for example, sec. 301(2) of the International Claims Settlement Act of 1949, as amended (P.L. 285, 84th Cong., 1st Sess., approved Aug. 9, 1955); and the Trading with the Enemy Act, as construed in the 1947 and 1952 Uebersee cases, 332 U. S. 480 and 343 U. S. 205. It has been suggested that "in general there has been in the post-war period a tendency to regard the control test as a transient measure conditioned and justified by reasons of national safety" (2 Oppenheim's *International Law* (7th ed., Lauterpacht) 276 n.). This subject has recently been reviewed by Domke,

The question of what should constitute a proper test has been much debated.⁴⁰

The simple "classical" test, which has been found acceptable by all countries with which the United States has signed commercial treaties since the late war, nevertheless follows a number of earlier treaties, especially examples dating from the last century,⁴¹ and is consonant also with other precedents.⁴² Further, it represents the practice followed by United States courts in determining the "citizenship" of corporations for jurisdictional and constitutional purposes.⁴³ Moreover, it fits consistently into the general scheme of the current treaty type in that it adapts to companies a nationality test analogous to that applied with reference to the other major objects dealt with in the treaties: goods, ships and individuals. A vessel, by definition, is deemed to have the nationality of the country whose flag it lawfully flies, without reference to such questions as who owns it or where it was built;⁴⁴ goods receive treaty benefits by virtue of having been grown, produced or manufactured within the territories of a party, without reference to who produced them or the routes of their transport in international trade;⁴⁵ and an individual is a national of a party which claims him under its laws.⁴⁶

"'Piercing the Corporate Veil' in the Law of Economic Warfare," *Wisconsin Law Review* (Jan. 1955), pp. 77-90. A "control" test is not necessary for such purpose in the treaty, however, as the treaties of the current series all contain an "essential security" reservation (*e.g.*, Art. XXI, par. 1(d), Japan treaty).

⁴⁰ One writer has concluded that, as to a recognized test of nationality, "in the corporate field, we find confusion and uncertainty" (Timberg, "Corporate Fictions," 46 *Col. L. R.* 533, 572 (1946)).

⁴¹ *E.g.*, the above-cited agreement of 1890 with Greece. A number of illustrations are afforded by treaties or agreements of that period entered into by Great Britain, Belgium, or Germany, respectively. An unusual compromise is found in an exchange of notes to the Italo-Rumanian treaty of 1930, providing that the rights accorded companies, in principle limited to those "domiciled" in the country of charter, will in certain instances be extended to those which "even" have their seat outside the country to which they "belong" (133 *Brit. and For. State Papers* 685, 712).

⁴² Crandall, "Principles of International Law Applied by the Spanish Treaty Claims Commission," 4 *A.J.I.L.* 806, 814-815 (1910); Feller, "The German-Mexican Claims Commission," 27 *ibid.* 62, 68 (1933); Woolsey, "Litigation of the Sabotage Claims Against Germany," 35 *ibid.* 282, 299-301 (1941); 6 *Moore's Digest* 641; Borchard, *Diplomatic Protection of American Citizens Abroad* 623; 2 *Hackworth's Digest* 567, 3 *ibid.* 420, 423. However, the government will not necessarily choose actually to espouse a specific claim in which a corporation lacks a substantial national interest in its ownership (see, for example, 1 *Whiteman, Damages in International Law* 129; 2 *Hackworth's Digest* 500, 5 *ibid.* 845; and Art. 2(B) of Agreement on Settlement of Pecuniary Claims Against Yugoslavia, signed July 19, 1948, T.I.A.S. No. 1803).

⁴³ Drachsler, "The Status of Alien Corporations in the Law of the United States," 23 *Fordham Law Review* 49, 50 (1954); *Steamship Co. v. Tugman*, 106 U. S. 118 (1882); *Thomas v. Trustees*, 195 U. S. 207 (1904); 20 *C.J.S.* 10.

⁴⁴ The standard rule recites: "Vessels under the flag of either Party, and carrying the papers required by its law in proof of nationality, shall be deemed to be vessels of that Party . . ." (Art. XIX, par. 2, Japan treaty of 1953).

⁴⁵ See, for example, Art. XXIV, par. 7, of the 1951 treaty with Greece in conjunction with Arts. XVII, par. 2, and XXI, par. 5, of the same.

⁴⁶ This normal principle is not usually spelled out in the commercial treaties. Two instances, in which it is, are afforded by the 1954 treaty with the Federal Republic of

The adoption of the simple test has been undoubtedly facilitated by the clear distinction maintained in the treaties between the so-called "civil" and "functional" capacities of companies. The recognition of status and nationality does not of itself create substantive rights; these are dealt with elsewhere on their own merits.⁴⁷ Thus the acknowledgment of a fact—the existence and legitimate paternity of an association—is not confused with problems associated with the functional rights and activities of alien-bred associations—whether or not they be for pecuniary profit.⁴⁸

*Access to Courts*⁴⁹

One of the normal consequences of recognition, an attribute of "civil" capacity, is the capacity to appear in the courts of justice, whether as plaintiff or as defendant.⁵⁰ While it is generally presumed, and under liberal rules of construction presumably would be held, that the recognized possession of the capacity to appear carries with it the right of appearing, enjoyment of a capacity does not as such necessarily mean that the exercise of the right will be permitted.⁵¹ In any event, the recognition of the capacity does not determine the terms and conditions under which the right to sue and be sued may be exercised.

In the 1911 treaty with Japan and the 1920 treaty with Siam the right is framed as follows, in terms very similar to those normally employed in treaties of other countries: "appear in the courts either as plaintiffs or

Germany (Art. XXV, par. 6; Protocol, par. 22) and the 1951 treaty with Israel (accompanying exchange of notes).

⁴⁷ Nationality and juridical status do not exhaust the roster of attributes of "civil capacity," as given in the usual definition. However, insofar as the exercise of rights associated with other civil attributes (*e.g.*, capacity to own property) is concerned, this is dealt with specifically in the treaty, as is the exercise of rights associated with functional capacity.

⁴⁸ In foreign treaty practice, in contrast, there has been evident a tendency to deal with business corporations to the exclusion of non-profit societies. See note 30 *supra*. The League of Nations projects, cited *supra*, were for their part confined to "commercial" corporations. For material bearing on this point, see Latty, *loc. cit.* 33-37, and Wolff, *op. cit.* 301.

⁴⁹ See Wilson, article in 47 A.J.I.L. (1954), cited *supra*.

⁵⁰ The inclusion of entities lacking legal personality in the concept of "companies" for treaty purposes (*supra*, note 35) is warranted on the ground that it is not always necessary for an association to have a distinct and independent personality for it to be recognized and regarded as an entity "capable of exercising certain rights and subject to certain obligations of a collective nature" (*e.g.*, to sue or be sued). 22 A.J.I.L. Spec. Supp. 159 (1928) (as cited *supra*, note 36); also Bryant Smith, "Legal Personality," 37 Yale L. J. 283, 299 (1928). Since the treaty rule is "national treatment," the question is left open as to whether, and under what circumstances and conditions, an unincorporated entity might be allowed to appear as party to litigation or exercise other rights. On this subject see notes in 37 Mich. L. R. 141 (1938); 38 Col. L. R. 454 (1938); 33 Calif. L. R. 444 (1945); Dodd, "Dogma and Practice in the Law of Associations," 42 Harv. L. R. 977 (1929); Sturges, "Unincorporated Associations as Parties to Actions," 33 Yale L. J. 383 (1924); and cases applying Rule 17(b) of the Federal Rules of Civil Procedure.

⁵¹ Recognition of legal status does not necessarily carry with it the right to access to courts. See 20 C.J.S. 65-67; Rabel, *The Conflict of Laws* (1947, Michigan Legal Studies), II, pp. 203-206.

defendants, subject to the laws of such other Party." The 1923-38 series merely elaborated somewhat the same thought. The more recent treaties introduced revisions which may be summarized in four parts as follows:

First, the basic standard established is that of national treatment: *i.e.*, the companies of one party will be allowed access to the courts of the other party on terms no less favorable than those applicable to the companies of such other party.⁵² As corollary to prohibiting discrimination as between the alien and the domestic company, there is no proviso to the effect that the exercise of this right may be qualified by local laws.⁵³

Secondly, most of the later treaties carry a protocol provision explaining, as a corollary of the major principle, that the non-discrimination rule shall extend to requirements regarding security for costs.⁵⁴ This provision follows prevailing United States practice to the effect that requirements for security should be based on objective tests, such as residence or ownership of property within the jurisdiction, rather than on the subjective test of nationality.⁵⁵ It precludes the imposition of discriminatory requirements which might burden the pursuit of judicial remedies and which otherwise, in the absence of a clear recorded understanding, might possibly be thought permissible under the treaty.⁵⁶

Thirdly, in recognition of the widespread present-day existence of commissions and agencies outside the regular judiciary to adjudicate, or to make determinations affecting, important interests and privileges, the usual provision for access "to the courts of justice, in all degrees of jurisdiction" is expanded in the new treaties so as to include in the same way "administrative tribunals and agencies."

Fourthly, relief from domestication and registration requirements has been provided for the company which has not been admitted to do business, and in fact is not engaged in activities within the jurisdiction, but which has occasion nevertheless to resort there to litigation (as to sue for breach of contract or infringement of trademark). The antecedent of this pro-

⁵² This standard is usually supplemented by a most-favored-nation treatment clause. A representative provision is that in the 1953 treaty with Japan (Art. IV, par. 1).

⁵³ The phrase "in conformity with the applicable laws and regulations" occurs, however, in the wording of the treaties with China and Italy. This phrase is framed in such manner as to imply that it does not constitute a reservation detracting from the treaty right; and such phraseology has been omitted from subsequent treaties.

⁵⁴ *E.g.*, Protocol, par. 1, of the Japan treaty: "The term 'access to the courts of justice and to administrative tribunals and agencies' as used in Article IV, paragraph 1, comprehends, among other things, legal aid and security for costs and judgment." For variant formulas see treaties with Ireland (Protocol, par. 4), Ethiopia (Art. VII, par. 2), Germany (Protocol, par. 6).

⁵⁵ 20 C. J. S. 368-373; 3 Hackworth's Digest 569.

⁵⁶ The only U. S. treaty in the inter-war period which mentions the subject is that with Estonia, which states in a Protocol that the access-to-courts provision does not embrace deposit of security requirements. There are continental cases reported in Lauterpacht's Annual Digest of Public International Law Cases holding that a general access-to-courts provision, without more, does not establish a rule with respect to such requirements (*op. cit.*, 1919-22, p. 243; 1929-30, p. 263; 1931-32, p. 276; 1933-34, p. 307). Similarly see Nussbaum, "American-Swiss Private International Law," 47 Col. L. R. 186, 189-190 (1947).

vision is an understanding attached by the United States to its adherence to the 1936 Inter-American Declaration on the Juridical Personality of Foreign Companies (cited above, note 36), for the reason that without this understanding the Declaration "would be of little value" to United States corporations in countries where it had been the practice "to require companies which have no permanent establishment, branch or agency in the country to register or domesticate themselves before they may become party to a suit, which registration or domestication would require payment of large fees, or subjection to taxation."⁵⁷

Functional Rights of Companies

From the viewpoint of economic foreign policy, a major current incentive for seeking modern treaties is the desire to establish agreed legal conditions favorable to private investment.⁵⁸ Inasmuch as investment nowadays occurs predominantly through the corporate medium, provisions for the rights merely of individuals would fail to a serious extent to meet real investor needs. Traditionally, the standard of "national treatment" for the activities of natural persons has been written into United States commercial treaties so that such persons are enabled freely to go about their affairs without discriminatory burdens or harassments. A salient characteristic of the treaties of the past ten years, therefore, has been the explicit extension to company activity of the same long-established principle. These treaties (with such exceptions and qualifications as will be mentioned below) thus assure to companies of either party equality of treatment with companies of the other party, with respect to engaging in all ordinary business activities, commercial, industrial and financial. This principle applies to both the initial establishment of an enterprise (the entry into the activity) and to the terms and conditions under which the company is entitled subsequently to conduct its enterprise (carry on the activity). To the extent that national treatment is not agreed upon, and in any event, the company will enjoy most-favored-nation treatment.⁵⁹

This principle is set forth in general terms, so as to comprehend the whole range of factors affecting the competitive position of the foreign

⁵⁷ Report of the Secretary of State on the Declaration, Sen. Exec. E., 77th Cong., 1st Sess. (1941), p. 3. A series of articles concerning "the judicial status of non-registered foreign corporations" in particular countries has run in the *Tulane L. R.*, as follows: Vol. 6, p. 558 (Argentina, Chile, Uruguay); Vol. 7, p. 210 (Brazil), p. 341 (Mexico); Vol. 8, p. 542 (Colombia); Vol. 9, p. 409 (Ecuador); Vol. 10, p. 58 (Nicaragua); Vol. 12, p. 74 (Guatemala); Vol. 15, p. 521 (Panama); Vol. 17, p. 575 (Venezuela).

⁵⁸ For illustrative examples of this viewpoint, which has been repeatedly asserted in recent years, both officially and unofficially, see testimony cited at note 2 *supra*; Final Declaration of the 37th National Foreign Trade Convention (N. Y., 1950, Nat. For. Trade Council, Inc.) 16-17; and 68 Stat. 847.

⁵⁹ Art. VII (in four paragraphs) of the Japan treaty exemplifies the approach taken to providing for the business activities of companies. The same approach is in principle extended to non-profit activities (Art. VIII, par. 3). The 1946 treaty with China, however, which marked the transition in U. S. treaty policy toward companies, was somewhat more reserved in its approach; it mentioned national treatment as a principle to be generally aimed for, but subject to a reservation for such municipal legislation as might deviate from that principle (Art. III, par. 3).

company in relation to the domestic company. But separate provisions deal with the special subjects of taxation, of employment of personnel and of real property. In the tax article, the basic principle remains national treatment and most-favored-nation treatment; but in the course of elaborating this principle in this highly technical field, adjustments are made concerning the apportionment of world income for tax purposes⁶⁰ and for double-tax conventions and other reciprocity arrangements.⁶¹ In the matter of employment, provisions have been developed technically going beyond national treatment, to prevent the imposition of ultra-nationalistic policies with respect to essential executive and technical personnel.⁶² As to tenure of real property, assured national treatment is limited to leaseholds of property needed for the conduct of treaty-recognized activities, thus substantially reconciling the treaty commitment with the alien disabilities existing in the laws of certain States of the Union.⁶³

In the matter of protection of acquired property, on the other hand, national and most-favored-nation treatment, though included as supporting standards, do not represent the major standard of treatment stipulated. The major standard, rather, is non-contingent, as in international law.⁶⁴ It is provided that there be "most constant protection and security" and freedom from unreasonable searches and seizures; that there be no arbitrary or unreasonable impairment of a lawfully acquired interest; and, above all, that prompt, just and effective compensation be given in event of expropriation, regardless of the extent to which nationals and companies of the expropriating party may be denied such compensation.⁶⁵

Utilization of the Domestic Company Device

The Supreme Court held in *Jordan v. Tashiro*⁶⁶ that under the 1911 treaty with Japan, subjects of that country were entitled, as a necessary

⁶⁰ *E.g.*, Japan treaty, Art. XI, par. 4. The foreign company is made taxable only as to income attributable to business done in the host country, a provision more advantageous than merely national treatment (under which tax liability might lie for the company's entire or "world" income).

⁶¹ *E.g.*, Japan treaty, Art. XI, par. 5.

⁶² *E.g.*, Japan treaty, Art. VIII, par. 1. This allows, first, free choice in selection of "accountants and other technical experts, executive personnel, attorneys, agents and other specialists" generally; and, second, freedom from professional licensing requirements in the particular case of "accountants and other technical experts" needed for internal auditing and survey purposes. A provision of this type first appeared in the Uruguay treaty (1949), and is not found in several of the treaties.

⁶³ *E.g.*, Japan treaty, Art. IX, par. 1. For recent summaries of the real property laws of the several States, as concerns alienage disabilities, see: McGovney in 35 Calif. L. R. 21-24 (1947); Boyd in 51 Mich. L. R. 1005 n. (1953); and Wilson, in 48 A.J.I.L. 363-365 (1954).

⁶⁴ For fuller discussion, see Wilson in 45 A.J.I.L. (1951), cited *supra*.

⁶⁵ A representative formulation of basic property-protection arrangements is Art. VI of the Japan treaty, together with Art. V, par. 1, thereof. The last-named (generally precluding "unreasonable or discriminatory measures that would impair legally acquired rights or interests") first appeared in the Uruguay treaty of 1949.

⁶⁶ 278 U. S. 123 (1928).

and proper incidental to the rights accorded by the treaty, to form and use the instrumentality of a domestic company, even though the treaty did not refer to this possibility. The right to organize and operate domestic companies, which was thus found to be implied in that treaty, was made the subject of a specific provision in eleven of the treaties of the 1923-38 series. This series of treaties, in reflecting a pioneering move in this subject, adopted the cautious principle of most-favored-nation treatment as to the right of nationals of one party to organize and participate in companies chartered under the laws of the other party. As to the functional rights of these domestic companies, as such, the treaties avoided both national and most-favored-nation treatment, but maintained the non-committal position that local legislation exclusively should govern.⁶⁷

The treaties of the current period have revised this approach in three respects.⁶⁸ First, the right to constitute a domestic company is expanded to include, in addition to the rights given "nationals" in the premises, the right of the alien company to establish a domestic subsidiary or, if it wishes, to acquire a subsidiary by buying up controlling interests in an existing domestic company. Secondly, the standard applicable to the right to organize domestic companies is in principle national treatment. However, owing to the frequent existence of legislation technically at variance with this principle in respect of such materially inconsequential matters as citizenship requirements for the signers of articles of incorporation or for certain members of the board of directors, the treaties in their latest version provide a limited qualification as follows:

The provisions of paragraph 1 of the present Article shall not prevent either Party from prescribing special formalities in connection with the establishment of alien-controlled enterprises within its territories; but such formalities may not impair the substance of the rights set forth in said paragraph.⁶⁹

⁶⁷ Art. XIII of the 1923 treaty with Germany. In other treaties of the period the like article appeared as that next following those cited in note 29 *supra*, except the treaty with Siam from which the provision was omitted.

⁶⁸ The provision of the treaty with Japan, cited at note 33 *supra*, continues as follows: "Accordingly, such nationals and companies shall be permitted within such territories: (a) to establish and maintain branches, agencies, offices, factories and other establishments appropriate to the conduct of their business; (b) to organize companies under the general company laws of such other Party, and to acquire majority interests in companies of such other Party; and (c) to control and manage enterprises which they have established or acquired. Moreover, enterprises which they control, whether in the form of individual proprietorships, companies or otherwise, shall, in all that relates to the conduct of the activities thereof, be accorded treatment no less favorable than that accorded like enterprises controlled by nationals and companies of such other Party."

⁶⁹ Art. VII, par. 3, of the Japan treaty. Most of the preceding treaties (those with China, Italy, Ireland, Colombia, Denmark, Greece, Uruguay) dealt with this matter in a different way: namely, the right to organize domestic companies is framed in non-contingent terms (*i.e.*, without a national treatment standard), with the result that so long as effective procedures are available there need not be identity of treatment as between the alien and the local party (*e.g.*, Art. VI, par. 2, treaty with Ireland); the most-favored-nation standard also is applicable.

Thirdly, the "controlled" domestic company is itself assured national treatment; discrimination against it in any way by reason of its domination by alien interests is not permissible.

Piercing the Corporate Veil

The marked hesitancy toward undertaking extensive treaty commitments in favor of alien corporations which has been manifest during the past half-century on the part of treaty-making countries, may have been in part attributable to a fear lest such commitments could become a cloak under cover of which rights would be gained by interests of third countries—in a situation in which the party to the treaty would not wish to be obligated to accord them, whether because such third countries were not party to the reciprocal arrangements embodied in the treaty or for other reasons. The recent treaties signed by the United States, at any rate, indicate that this possibility of a "free ride" by third-country interests is one to be guarded against; and it may be supposed that the reservation contained in those treaties for "piercing the corporate veil" has facilitated the post-1945 advance in the bilateral assumption of undertakings regarding corporations. That is, each party reserves the right to apply measures

denying to any company in the ownership or direction of which nationals of any third country or countries have directly or indirectly the controlling interest, the advantages of the present Treaty, except with respect to recognition of juridical status and with respect to access to courts. . . .⁷⁰

It will be observed that this reservation does not specify an automatic condition precedent to the enjoyment of treaty rights by companies; rather, it is a latent protective clause which a party may utilize if it wishes to take the initiative of so doing.⁷¹ Further, this reservation is directed primarily at the exercise by a company of its "functional" rather than its "civil" capacity. It cannot be invoked in a manner to deny recognition of nationality and legal existence, or of access to courts, regardless of the dominant real interests in the company.

The later treaties also provide for two circumstances in which a party is, on the other hand, obliged to "pierce the corporate veil." These both relate to protection of acquired property, and endeavor to assure that the investments of the ultimate party in interest, lying behind the corporate façade, are safeguarded. The principal of these is a provision, usually in the protocol, clarifying the applicability of the rule requiring prompt, just and effective compensation in event of expropriation:

⁷⁰ *E.g.*, Japan treaty, Art. XXI, par. 1(e). The "except" clause is not in the reservation found in the Italy and China treaties.

⁷¹ The "explanatory note" to sec. 41.71 (b) (3) of the CFR, regarding criteria used in determining the nationality of a company for purposes of eligibility of its representatives for "treaty trader" visas, suggests one type of situation in which the United States might resort to the reservation (33 Dept. of State Bulletin 477 (1955)).

The provisions of . . . for the payment of compensation shall extend to interests held directly or indirectly by nationals and companies of either Party in property which is taken within the territories of the other Party.⁷²

That is, a party must "pierce the veil" for purposes of assuring, but may not do so for purposes of denying, compensation to nationals of the other party on account of the interests they hold in any company whose property is expropriated, regardless of the nationality of the company, and however fractional or intermediately held such interests may be.⁷³ The second similar feature is one providing that any "enterprise" in which nationals or companies of one party have a "substantial interest" must be accorded, in the other, "not less than national treatment and most-favored-nation treatment in all matters relating to the taking of privately owned enterprises into public ownership and to the placing of such enterprises under public control."⁷⁴ This would cover, for example, the selection of enterprises for nationalization under a nationalization program, and protect entities which are neither chartered by the espousing state nor controlled by its nationals.

⁷² Japan treaty Protocol, par. 2. A provision of this sort first appeared in the 1948 treaty with Italy.

⁷³ A similar approach was adopted in the peace settlements following the two World Wars (*e.g.*, Art. 297(e) of the Treaty of Versailles; Art. 78(4) of the Treaty of Peace of 1947 with Italy, 61 Stat. 1245); and Art. 2(c) of the U. S.-Yugoslav Agreement on Pecuniary Claims Against Yugoslavia of July 19, 1948, T.I.A.S. No. 1803. *Cf.* the formulae adopted in Art. I of the U. S.-Mexican Claims Convention of 1923, wherein a "substantial" interest was stipulated; in the German-Mexican Claims Convention of 1925 and the Anglo-Mexican Claims Convention of 1926, allowing claims only if the German or British stockholder interest exceeded 50% (Feller, "The German-Mexican Claims Commission," 27 A.J.I.L. 62, 66-68 (1933), and 1 Whiteman 132); and in the International Claims Settlement Act of 1949, as amended, requiring American ownership of at least a 25% beneficial interest in the foreign company (sec. 311 (b), P.L. 285, approved Aug. 9, 1955). It should be noted that the latter law has to do with the distribution of a lump-sum settlement already obtained from the foreign government; and the "primary purpose" of a cut-off figure this high was stated to be administrative convenience (Cong. Rec., July 25, 1955, p. 9794). For a variant formula see paragraph 10 of agreement of Jan. 24, 1948, between the U. K. and Poland, 2 Int. L. Q. 544, 547.

Jones, "Claims on Behalf of Nationals Who Are Shareholders in Foreign Corporations," 26 Brit. Year Book of Int. Law 225 (1949), concludes that the "probable state of international law" (p. 251) is that intervention, unless provided by treaty, is "confined to exceptional cases" (pp. 256-257). Further, see 2 Hyde, *op. cit.* 904-908; comment on Art. 16(b), Harvard draft convention, "Responsibility of States for Injuries to Aliens," 23 A.J.I.L. Spec. Supp. 201 (1929); Maurer, "Protection of Non-Enemy Interests in Enemy External Assets," 16 Law and Contemporary Problems 407, 422-432 (1951); Berger, "'Disregarding the Corporate Entity' for Stockholders' Benefit," 55 Col. L. R. 808-829 (1955); and Baade, Diplomatic and Treaty Protection of Nationals Who Are Shareholders in Legal Entities Organized or Created under the Law of a Foreign State (LL.M. Thesis, Duke U., 1955).

⁷⁴ Art. VI, par. 4, of the Japan treaty. Such a provision first appeared in the 1948 treaty with Italy (Art. V, par. 3). A third notable respect in which the treaties afford protection to the parties-in-interest lying behind the corporate façade is that treated *supra*, at note 68, regarding the activities of alien-controlled domestic companies. Compare the axiomatic generalization "*ex hypothesi*, no state can intervene on behalf of a corporation against its own government" (Jones, *loc. cit.* 257).

Reconciliation of Basic Principles to Special Requirements of the Contracting Parties

The major policy impediment historically standing in the way of United States treaty engagements regarding the establishment and activities of alien corporations is the reserved rights of the States under the Constitution to bar or condition the admission of foreign (out-of-State) corporations, insofar as intra-State operations are concerned.⁷⁵ The formula which has been devised to provide in principle for realizing the major modern treaty objective of securing national treatment for alien companies, without infringing on the prerogatives of the States, has been as follows:

National treatment accorded under the provisions of the present Treaty to companies of . . . shall, in any State, Territory or possession of the United States of America, be the treatment accorded therein to companies created or organized in other States, Territories, and possessions of the United States of America.⁷⁶

All out-of-State companies, whether companies of a foreign country or of a sister State, being alike "foreign," each State is left free to exercise its prerogative so long as it does not single out the alien "foreign" company for discrimination as compared with the United States "foreign" company.

Notwithstanding its superficially unilateral character, this formula is not considered to result in fact in any significant inequality of treatment as between the treaty parties because: (1) the business and economy of the United States are today national, and corporations operate freely across State lines;⁷⁷ (b) the Federal courts have developed a large measure of legal protection for the "foreign" company, under the interstate commerce, due-process-of-law, and equal-protection-of-the-laws clauses of the Constitution;⁷⁸ (c) the formula places the alien company on a plane of equality

⁷⁵ *Paul v. Virginia*, 8 Wall. 168 (1868); Hearing before the Committee on Foreign Relations, U. S. Senate, 68th Cong., 1st Sess., on Treaty of Commerce and Consular Rights with Germany, January 25, 1924, p. 21.

⁷⁶ *E.g.*, treaty with Japan, Art. XXII, par. 4. The appropriateness of some such adjustment in respect of a country having a federal system has been recognized before. (See "federal clauses" applicable to "ressortissants" found in Art. I of Swiss treaties of establishment with: Belgium, 1887, 78 Brit. and For. State Papers 944, and Germany, 1876 and 1890, 67 Brit. and For. State Papers 534, and 82 *ibid.* 766).

⁷⁷ Although this phenomenon is sufficiently well known to need no documentation, a revealing figure is afforded by the Securities and Exchange Commission's Statistics of American Listed Corporations, Summary Report, Pt. I, pp. 25-26, 150, 154 (issued before the war and not since revised): 53% of all reporting corporations organized in 1936 and 1937 were chartered by the single small State of Delaware, whereas six of the larger States accounted for the head offices of $\frac{2}{3}$ of all tabulated corporations, wherever chartered.

⁷⁸ The one important field, unreserved by the treaties, in which apparently there exists in a number of the States a substantial degree of discrimination against the foreign company is that of insurance taxation, insurance being treated in effect as intra-state commerce (*Paul v. Virginia*, 8 Wall. 168, and an Act of Congress, 59 Stat. 33, U.S.C. 1011-13, following the Southeastern Underwriters case); but it has been stated that this discrimination has not as a practical matter seriously interfered with the interstate

with the bulk of its competitors and, on the other hand, assures it protection from certain disadvantages that could conceivably result from its being treated as a "domestic" company;⁷⁹ and (d) the alien company is given, by express provision of the treaty, the right to establish and operate under the form of a domestic subsidiary without discrimination, whenever that form might appear to it expedient or advantageous.⁸⁰

In addition to this formula, reservations have been introduced to safeguard policies known to exist in some States, or in Federal statutes, and which tend likewise to exist in the legislation of many foreign countries,⁸¹ with respect to alien disabilities in certain sensitive areas: *e.g.*, ownership of land, deposit banking, radio communications, domestic air transport.⁸² Apart from ownership of realty, most-favored-nation treatment is, however, assured with respect to these reserved activities; and in the most recent treaties there is a provision to safeguard as a vested interest any quantum of national treatment actually acquired.⁸³ This is in recognition of the

business of the industry (Federal, State and Local Government Fiscal Relations, S. Doc. 69, 78th Cong., 1st Sess., p. 260).

⁷⁹ A State may, for example, lawfully tax a "domestic" company on its total income wherever derived, but may tax a "foreign" company only on income fairly attributable to business done within the State. States have on occasion exercised their prerogative thus to tax their own companies on an apparently more burdensome basis; *e.g.*, Arkansas, Alabama, Louisiana, Mississippi, Tax Systems of the World 196-197 (Chicago, 8th ed., 1940). Similarly as to share taxes (*ibid.*, 26, 113, and *Corry v. Baltimore*, 196 U. S. 466); entrance-franchise taxes (Maxwell, *The Fiscal Impact of Federalism in the United States* 274 (1946)); and property taxes (Bittker, "The Taxation of Out-of-State Tangible Property," 56 *Yale L. J.* 640-669).

⁸⁰ The organization of domestic corporations in the United States tends to be a relatively simple, inexpensive and expeditious process. Eder, "Some Restrictions Abroad Affecting Corporations," 11 *Law and Contemporary Problems* 713 (1946); Breed, "Recognition of Foreign Corporations," paper read at 3rd Conference of the Inter-American Bar Assn., Mexico City, 1944, pp. 23-24.

⁸¹ Eder, *loc. cit.* 715.

⁸² In a number of treaties (those other than Japan listed in note 69 *supra*), the reservation is handled by indirection, except as to tenure of property: that is, the reserved subject-matter is omitted from the recitation of activities for which national treatment is provided. In those with Israel, Japan, Nicaragua, Germany and Haiti, broad coverage is provided for all activities, qualified by a specific reservation (*e.g.*, first sentence of Art. VII, par. 2, Japan treaty, reserving "public utilities enterprises, or enterprises engaged in shipbuilding, air or water transport, banking involving depository or fiduciary functions, or the exploitation of land or other natural resources"). See note 63 *supra*, for the way in which property-tenure rights of the treaty alien in the United States is dealt with; the property-tenure rights secured to Americans in the other country vary from treaty to treaty, the most liberal arrangement being one which assures Americans full national treatment subject to the right of the other party to reduce the treatment granted to the level reciprocally accorded its nationals and companies by particular States of the Union maintaining alienage disabilities, in the case of American nationals domiciled in or of companies chartered by such States (*e.g.*, treaties with Italy, Israel, Uruguay, Colombia).

⁸³ Those with Japan, Nicaragua, Germany and Haiti, Art. VII, par. 2, second sentence in each case, reading: "However, new limitations imposed . . . upon the extent to which aliens are accorded national treatment, with respect to carrying on such activities . . . shall not be applied as against enterprises which are engaged in such activities therein at the time such new limitations are adopted . . ." This is in accord with the principle enunciated in *Hanover Fire Ins. Co. v. Harding*, 272 U. S. 494 (1926).

fact that the reservations embody a least common denominator insofar as the States of the Union are concerned, and that either or both of the parties may often in practice not exercise their rights to prevent the establishment of companies of the other in one or more of the reserved activities.

The process of bilateral negotiation through which a mutually satisfactory and acceptable treaty text eventuates has, of course, resulted in a variety of other adjustments in individual treaties, to take account of the special requirements of the other countries. Space considerations do not permit a detailed listing of these adjustments. Many are of a relatively minor or secondary character. As a type, perhaps the major adjustment found in a number of the treaties has to do with the retention in one way or other of the party's right to apply special controls upon the initial establishment of foreign enterprises: *i.e.*, a qualification of the principle of the "open door" with respect to the entry of investment capital or the initiation of an enterprise, without, however, impairment of the principle of non-discriminatory treatment for authorized or admitted enterprises. The Ethiopia treaty contains no commitment as to initial establishment except the undertaking to provide "reasonable opportunity for the investment of capital, and for the establishment of appropriate commercial, industrial and other enterprises."⁸⁴ The treaty with Ireland contains a reservation for the Irish Control of Manufactures Act;⁸⁵ and the Protocols to the Denmark, Japan and German treaties contain provisions acknowledging a limited right to "screen" on balance-of-payments grounds.⁸⁶ Adjustments of this sort roughly equilibrate the treatment of capital to that normally provided in the treaties for individuals and goods: that is, entry of aliens and of imports is subject to special border restrictions and controls through, in the one case, the reservation for immigration statutes⁸⁷ and, in the other, limitation of customs privileges to merely most-favored-nation treatment,⁸⁸ but coupled with assurances of national treatment to duly admitted persons and goods.⁸⁹

IV

After several decades of evolution, there has now eventuated an evidently practicable method for dealing systematically and comprehensively with the status and rights of companies. The objective has been to extend to corporations and other associations a liberal degree of protection comparable

⁸⁴ Art. VIII, par. 4. The treaty with Iran, which is similar, omits even this imprecise undertaking.

⁸⁵ Art. VI, par. 4, and the Minute of Interpretation applicable thereto.

⁸⁶ Respectively, pars. 7, 6 and 16.

⁸⁷ The only assured rights of entry are with respect to so-called "treaty traders" (and, since 1952, "treaty investors"); freedom of action is retained as to others (*e.g.*, Art. I, par. 1, Japan treaty). On this subject, see Wilson, editorial comments in 44 A.J.I.L. 145-149 (1950) and 49 *ibid.* 366-370 (1955).

⁸⁸ *E.g.*, Art. XIV, par. 1, Japan treaty. Thereby each party is free to adopt such protective measures as it chooses, so long only as products of the other party are treated no worse than products of any other foreign country.

⁸⁹ *E.g.*, for goods, Art. XVI, par. 1, Japan treaty.

with that which past treaties have for long made familiar as regards natural persons. The chosen vehicle has been the bilateral commercial treaty, a venerable instrument originally designed in bygone days and other circumstances. The realization of this objective has entailed the solution, in terms mutually satisfactory to the signatories, of a number of special problems which impeded the adequate coverage of artificial entities in the past. The result, in terms of signed texts, exemplifies anew the resiliency of the traditional commercial treaty and its adaptability to changed conditions and different needs.⁹⁰

Quantitatively, the group of treaties concluded to date between the United States and like-minded countries since World War II measure perhaps but a modest accomplishment; qualitatively, moreover, shortcomings in the degree of completeness with which they meet all conceivable company requirements are doubtlessly detectable. Nevertheless, they mark a definite advance in an area in which progress through multilateral agreement has so far been lacking. There are sufficient realized examples, considering the variety and the geographical spread of the countries party to them, to form a fairly clear and forward-looking pattern. The growth of this pattern, if and as it occurs with the accretion in time of additional examples, should be conducive to the development of international standards of practice, not to say the crystallization of principles of international law, with respect to the treatment of companies. This consummation would seem especially appropriate in an age when international trade and business are so predominantly conducted through the corporate medium.

⁹⁰ On the historical uses and adaptability of this type of treaty, see Setser, "Treaties to Aid American Business Abroad," 40 *Foreign Commerce Weekly* 3 *et seq.* (U. S. Dept. of Commerce, Sept. 11, 1950); Fact Sheet, cited *supra*.

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ABHANDLUNGEN

United States Protection of Private Foreign Investment through Treaties of Friendship, Commerce and Navigation

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I. Introduction

The post-World War II era has been characterized by the struggle to improve economic conditions through the strengthening of the Western European economy and the advancement of underdeveloped areas. Until relatively recently, the United States was the only country which possessed capital in the quantities needed for this economic reconstruction and development, and consequently, the greatest part of the capital expended for these purposes since World War II was American. The United States foreign policy has been geared to this recovery and development¹).

Today, with its industrial potential restored, its currencies stable and economy sound, Western Europe's recovery is completed. A new economic balance of power has been created, and European countries need no longer rely solely on United States capital for economic development. With Europe once again on its feet, and the West challenged to an economic war by the Soviets, the emphasis has shifted from Europe to the underdeveloped countries of the world. While the United States is still the country with the most capital available for export, the amount of capital needed for economic development throughout the world is too great to be supplied solely through United States Government finance. Therefore, the Government has endeavored to stimulate private American investment in underdeveloped countries.

To facilitate the flow of capital from the United States to these countries, the Government has established agencies²) and cooperated in the establish-

1) See Foreign Assistance Act of 1948, 62 Statutes 137, as amended, 22 United States Code § 1501 (Supplement 1952) (Marshall Plan); and Act for International Development, 64 Statutes 204 (1950), 22 United States Code § 1557 a (Supplement 1952) (Point Four Program).

2) Export-Import Bank Act 1945, 59 Statutes 527, as amended, 12 United States Code § 635 (a) (1952); Foreign Assistance Act of 1948, note 1 supra, through which the U.S. Government guarantees investors against certain risks; and the Mutual

ment of international organizations³) to foster investment. In addition to the agencies which finance and guarantee foreign investments, the Government has attempted to create a favorable investment climate by providing tax incentives and informational and technical assistance programs⁴).

Although there are many reasons cited for the lack of private foreign investment⁵), many of them reflect one or the other of the two primary concerns of a private investor, prospective profit and risk. The Government has endeavored to stimulate investment by directly influencing these factors to create a favorable investment climate. For example, the purpose of tax incentives is to enhance prospective profits, whereas treaties of friendship, commerce and navigation and government guaranties are meant to reduce the risk involved. However, the fact remains that the results of the United States' efforts to stimulate private foreign investment have been unimpressive⁶).

Security Act of 1957, § 202 71 Statutes 357, 22 United States Code § 1872 (Supplement 1957), which created the Development Loan Fund.

3) International Bank for Reconstruction and Development, (World Bank); the International Finance Corporation; and more recently, The International Development Association; The Inter-American Development Bank; The Development Assistance Group; and the United Nations Special Fund. See *Shonfield*, The Attack on World Poverty, 1960; *Miller*, The ECA Guaranties and Stimulation of Foreign Private Investment in Georgetown Law Journal Vol. 39 (1950) p. 1; United States Agencies and International Organizations Which Foster Private American Investment Abroad (Note) in Harvard Law Review Vol. 71 (1958) p. 1102; Government Guaranties of Foreign Investment (Note) in Harvard Law Review Vol. 66 (1953) p. 514.

4) See *Surrey*, Current Issues in the Taxation of Corporate Foreign Investment in Columbia Law Review Vol. 56 (1956) p. 815; United States Agencies and International Organizations Which Foster Private American Investment Abroad (Note) supra note 3; Tax Incentives to Investment Abroad (Note) in Stanford Law Review Vol. 8 (1955) p. 77.

5) See U.S. Department of Commerce, Factors Limiting U.S. Investment Abroad Pts. 1 & 2 (1953-1954): "The complex reasons which underlie this shortage of private investment include: the competing attraction of domestic investments; the danger of war; possible political or economic instability in the country in which the investment is to be located; fear of such arbitrary action by the host government as confiscation, expropriation or discriminatory tax laws; legal restrictions on the type of investment or the degree of participation available to foreigners; and the risk of inadequate profits caused by limited markets, high production costs, unskilled labor, or lack of basic economic facilities." See also *Barlow and Wender*, Foreign Investment and Taxation, 1955, p. 77, 110, 143; *Wilcox*, A Charter for World Trade, 1949, p. 142-145; *Brandon*, Legal Aspects of Private Foreign Investment in Federal Bar Journal Vol. 18 (1958) p. 298, 298-302; *Domke*, The Settlement of International Investment Disputes in Business Lawyer Vol. 12 (1957) p. 264; *Littell*, Obstructions to Private Investment Abroad in Virginia Law Review Vol. 36 (1950) p. 873, 876; Foreign Trade and Development (Symposium) in Ohio State Law Journal Vol. 17 (1956) p. 254, 254-266.

6) *Rubin*, Private Foreign Investment, 1956, p. 74; Symposium, supra note 5, at p. 256; United States Agencies and International Organizations Which Foster

Of the many reasons cited for the lack of private foreign investment, none has had a greater impact than the nationalizations⁷⁾ affecting private property which have become rather commonplace in our mid-twentieth century international society. The problem created by these nationalizations involves the conflict between two basic principles, that of the sovereignty of a state over all that is within its territory, and the principle of respect for private property belonging to nationals of another state.

Under the generally accepted doctrine of international law, expropriation entails the duty to pay prompt, adequate, and effective compensation⁸⁾. However, the trend has been to accept lump-sum payments which amount to less than full satisfaction. This has been due to the recognition that something is better than nothing, or that a quick settlement is preferable to a long, drawn-out payment in which there is no guarantee that payments will be met⁹⁾. In some cases, that any compensation was received at all was probably due primarily to the fact that blocked accounts or property were situated outside of the nationalizing State.

Some U. S. nationals whose foreign property was subject to a "taking" have obtained relief through U. S. legislation¹⁰⁾. The International Claims

Private American Investment Abroad, *supra* note 3, at p. 1102; Government Guaranties of Foreign Investment, *supra* note 3, at p. 515. See also investment statistics, *Barlow and Wender*, *op. cit. supra* note 5, at p. 4, 11, 13, 15 and 21.

7) Nationalization is a compulsory taking of private property into public ownership. When the taking is accompanied with the payment of adequate compensation, the taking is expropriation. When the taking is not accompanied with the payment of adequate compensation, the taking is a confiscation. See *Hyde*, *International Law Chiefly as Interpreted and Applied by the United States*, Vol. 1 2nd edition. 1947 S 217 A at p. 710; *Brandon*, *supra* note 5, at p. 303-304; *Doman*, *Compensation for Nationalized Property in Post-war Europe in International Law Quarterly* Vol. 3 (1950) p. 323; *Schwarzenberger*, *The Protection of British Property Abroad in Current Legal Problems* Vol. 5 (1952) p. 295, 308.

8) *Hyde*, *op. cit. supra* note 7, at p. 710-717; *Schwarzenberger*, *International Law*, Vol. I 3rd edition 1957 at p. 660. The problem of expropriation in international law has remained highly controversial for nearly half a century, and the articles and books on the subject appear limitless. For a cross section of mid-twentieth century views on the subject, see: *Wortley*, *Expropriation in Public International Law*. 1959, who stresses the sanctity of property rights to the restriction of state sovereignty; *Foighel*, *Nationalization*, 1957, who very ably analyses the problem in the light of state practice and arrives at a middle ground in the question of property rights versus state sovereignty; and *Friedman*, *Expropriation in International Law*, 1953, who emphasizes state sovereignty to the limitation of property rights.

9) *Clay*, *Recent Developments in the Protection of American Shareholders' Interests in Foreign Corporations in Georgetown Law Journal* Vol. 45 (1956) p. 1, 12.

10) See *Kuhn*, *Nationalization of Foreign-Armed Property in its Impact on International Law in American Journal of International Law* Vol. 45 (1951) p. 709, 710; *Rode*, *The International Claims Commission of the United States in American Journal of International Law* Vol. 47 (1953) p. 615, 617-621.

Settlement Act of 1949 created the International Claims Commission, the purpose of which was to adjudicate and give final decision with respect to claims of the U. S. or of its nationals arising out of the Yugoslav Claims Agreement of 1948 or, from claims arising out of future claims agreements between the United States and foreign countries¹¹⁾. Similarly, after the Communist regimes in Hungary, Rumania, and Bulgaria nationalized property belonging to U. S. nationals in violation of treaties, the United States in 1955 passed legislation designed to compensate disenfranchised U. S. nationals¹²⁾.

That the United States was holding gold belonging to the Yugoslav Government amounting to 46 800 000 dollars at the time of the Yugoslav nationalization was a fortuitous circumstance¹³⁾. Furthermore, that some American claimants whose property was nationalized shared in the distribution of Italian and Eastern European assets which were blocked in the United States under wartime conditions was another fortuitous situation¹⁴⁾. However, such good fortune may not be the case in the future when foreign investment controversies arise¹⁵⁾.

Under these conditions it is not surprising that United States private investors have not responded to the call for foreign investment. Nor is it strange that there have been a number of proposals made for an International Investment Code, not only by capital exporting interests, but also by capital importing interests who are in need of capital and are willing to give protection to the foreign investor¹⁶⁾.

To provide much needed protection to the American foreign investor, the United States has embarked on a treaty program by which protection of private property owned by United States nationals and situated in foreign countries is provided in bilateral treaties of friendship, commerce and navigation¹⁷⁾. It is the purpose of this paper to examine these treaties to determine to what extent they provide protection to foreign property owners.

11) *Kuhn*, supra note 10; *Rode*, supra note 10.

12) *Rubin*, op. cit. supra note 6, at p. 95-96.

13) See id. at p. 93; *Domke*, supra note 5, at p. 269.

14) *Domke*, supra note 5, at p. 269. The same is true in regard to the Egyptian assets blocked in the Bank of England after the nationalization of the Suez Maritime Canal Company.

15) Id. at p. 269.

16) See *W. Friedmann*, *Legal Aspects of Foreign Investment*, 1959, p. 701; *Miller*, *Protection of Private Foreign Investment by Multilateral Convention in American Journal of International Law* Vol. 53 (1959) p. 371; *Schwarzenberger*, *The Abs-Shawcross Draft Convention on Investments Abroad in Current Legal Problems* Vol. 14 (1961) p. 213.

17) See *Friedmann*, op. cit. supra note 16, at p. 705; *Walker*, *Treaties for the Encouragement and Protection of Foreign Investment: Present U.S. Practice in American Journal of Comparative Law* Vol. 5 (1956) p. 229. Since World War II the United States has negotiated commercial treaties with: China (1946), 63 Statu-

II. The Development of Commercial Treaties

The treaties signed by England and the other European powers of the 15th and 16th centuries are of historical importance because they contain the principles, in embryo form, which underlie all commercial treaties¹⁸). The principles are freedom of commerce, and equality of treatment of commercial nations, and are found in the early treaty provisions which provided for the freedom of entry and visit by foreign merchants in cities and ports of states¹⁹). These principles developed more fully in European treaties of commerce during the 17th and the beginning of the 18th centuries²⁰). This period is referred to by *Nolde* in connection with the development of treaties of commerce as "la grande époque dans leur évolution"²¹).

The 19th and 20th centuries witnessed the further development of commercial treaties. The protection originally granted to the person and property of foreign merchants was extended to all foreign nationals, and the extensive use of the most-favored-nation clause in commercial treaties caused such protection to be greatly extended throughout the world²²). Whereas early commercial treaties contained general provisions in broad language, present-day commercial treaties are composed of numerous provisions covering in detail the many facets of 20th century international commerce.

Early commercial treaties were concerned primarily with the protection

tes 1299, 25 United Nations Treaty Series 69; Italy (1948), 63 Statute (2) 2255, 79 United Nations Treaty Series 171; Ireland (1950), 1 United States Treaties 785, 206 United Nations Treaty Series 269; Greece (1951), 5 United States Treaties 1829, 224 United Nations Treaty Series 279; Israel (1951), 5 United States Treaties 550, 219 United Nations Treaty Series 237; Ethiopia (1951), 4 United States Treaties 2134, 206 United Nations Treaty Series 41; Japan (1953), 4 United States Treaties 2063, 206 United Nations Treaty Series 143; Federal Republic of Germany (1954), 7 United States Treaties 1839, Treaties and Other International Acts Series No. 3593; Iran (1955), 8 United States Treaties 899, Treaties and Other International Acts Series No. 3853; Netherlands (1956), 8 United States Treaties 2043, 285 United Nations Treaty Series 231; Korea (1956), 8 United States Treaties 2217, Treaties and Other International Acts Series No. 3947; Nicaragua (1956), Treaties and Other International Acts Series No. 4026; Pakistan (1959), Treaties and Other International Acts Series No. 4683; France (1959), Treaties and Other International Acts Series No. 4625. The United States has also concluded commercial treaties with Columbia, Denmark, Haiti, and Uruguay which, for various reasons, are not in effect. Supplementary agreements have been concluded with Finland (1950), 4 United States Treaties 2047, 92 United Nations Treaty Series 179, and Italy. The latter agreement is not yet in force. As to treaties of commerce of the United States generally cf. *Wilson*, United States Commercial Treaties and International Law, 1960.

18) *Nolde*, *Droit et Technique des Traités de Commerce in Recueil des Cours* Vol. 3 (1924, II) p. 291, at p. 301-304.

19) *Ibid.*

20) *Id.* at p. 305.

21) *Ibid.*

22) *Id.* at p. 363; *Schwarzenberger*, *op. cit. supra* note 8, at p. 207.

of the rights and privileges of persons. Recipients of rights under these treaties were usually identified by such terms as "citizen", "subject", "inhabitants", or "nationals"²³). There is no mention of corporations, companies, partnerships or other legal entities in U.S. commercial treaties until the 1911 treaty with Japan²⁴). Since then, provisions for such legal entities have multiplied to the point where they are, in present-day treaties, dealt with to a degree comparable to that of natural persons²⁵).

Provisions for legal entities are just one of many provisions which, although absent from earlier treaties, are an integral part of present-day treaties. Recent treaties of friendship, commerce and navigation contain provisions for such things as: piercing the corporate veil; access-to-courts envisioning administrative tribunals and agencies, as well as legal aid, security for costs and judgment; public corporations and state trading; nationalization and compensation; exchange restrictions in light of the International Monetary Fund; and international trade in light of The General Agreement on Tariffs and Trade.

Just as one can see the change in treaty provisions to include legal entities as the need arose, so also the metamorphosis of the access-to-courts provisions in earlier treaties can be traced from the embryonic stage of a general principle in broad language²⁶), to the stage of development at which we find it today, including within its perview administrative tribunals and agencies, legal aid and costs²⁷). Some provisions found in present-day treaties are new and have but a short history, while others are old and have a long and interesting history spanning several centuries. However, all have been shaped by a myriad of influences and have taken their present form according to the exigencies of the day²⁸).

The provisions pertaining to the protection of private property are no exception to this phenomenon. They too are a product of the forces of history which determined their present structure. There is no need to go into detail

23) *Herod*, Favored Nation Treatment, 1901, p. 36; *Walker*, Provisions on Companies in U.S. Commercial Treaties in *American Journal of International Law* Vol. 50 (1956) p. 373, 377.

24) *Walker*, *supra* note 23, at p. 373.

25) *Id.* at p. 380.

26) See *Nolde*, *supra* note 18, at p. 308, for an example of an 18th century access-to-courts provision.

27) See, e.g., Treaty of friendship, commerce and navigation with Israel (1951), 5 United States Treaties 550, 219 United Nations Treaty Series 237, Art. V and Protocol, par. 5. See generally *Wilson*, Access-to-Courts Provisions in U.S. Commercial Treaties in *American Journal of International Law* Vol. 47 (1953) p. 20.

28) See *Nolde*, *supra* note 18, at p. 325. When commenting on the forty-three commercial treaties in force in Germany in 1911, *Nolde* states: "Chacun de ces traités, appartenant à des époques si différentes, porte le style de son temps, fait valoir les préoccupations qui dominaient au moment de sa conclusion et répond aux méthodes de réglementation qui étaient alors acceptés."

concerning the effects created by the nationalizations of private property in the Union of Soviet Socialist Republics in 1917, in Mexico in 1938, in the countries of eastern Europe following World War II, and more recently, in Iran and Egypt. Nor is there need to describe the economic, social and political circumstances of Europe following World War II, as well as the conditions in many underdeveloped countries of the world. Nonetheless, from the above circumstances, and the political and economic position in which the United States found itself, and its consequent desire to stimulate the flow of private capital from the United States to areas in which it was needed, one can see some of the forces which shaped present-day treaties of friendship, commerce and navigation.

In the case of protection of private foreign investment, however, instead of merely changing the structure of a provision from one, general in character, to one more precisely detailed reflecting current needs, the force was so great and consequent changes so many that the entire emphasis of the treaties has been changed. Although they are still called treaties of friendship, commerce and navigation and contain all those treaties usually contain, the emphasis has been changed to such an extent that they are now primarily investment treaties²⁹).

III. The Standards of International Economic Law

Although the treaties of friendship, commerce and navigation vary in content and it is not feasible to pick one as a model for analyzation, there are homogeneous threads woven through all of them. These threads are the standards of international economic law³⁰) which are indigenous to all commercial treaties, and which form a basis for examination and analyzation.

Early commercial treaties contained provisions which reflected, in absolute form, the principles of freedom of commerce and equality of treatment of commercial nations. As international commerce expanded the need arose for provisions which, though based on these principles, provided for exceptions and modifications. Thus, from the need and consequent creation of provisions which provided for preferential treatment and which were exceptions to the principle of equality, developed the preferential treatment standard.

Similarly, early treaties often provided, on the basis of reciprocity and subject to local laws, that the nationals of each country were to have the

29) See *Walker*, supra note 17, at p. 239-240, 244.

30) The standards of international economic law are: minimum standards of international law; national treatment standard; most-favored-nation standard; equitable treatment standard; standard of the open door; standard of mutuality; and the standard of preferential treatment. See *Schwarzenberger*, *The Province and Standards of International Law in International Law Quarterly* Vol. 2 (1948) p. 402, 409-411; *id.* *The Frontiers of International Law*, Chapter 9, (in the press).

right to live in the other country, to buy and sell in the foreign markets, and to be secure in person and property³¹). From these provisions developed the standard of national treatment.

A most-favored-nation clause appeared for the first time in its modern form in the treaty between England and Bretagne in 1486³²). This clause was conceived in its unconditional form, and it was not until the treaty between the United States and France in 1778, the first treaty concluded by the United States, that a most-favored-nation clause appeared in its conditional form³³). From provisions of this nature developed the most-favored-nation standard.

It is beyond the scope of this paper to trace the development of each of the standards of international economic law. However, essential to any examination of commercial treaties is an understanding of the purposes and functionings of these standards. To illustrate the importance of these standards as fundamental constituents of all treaties of friendship, commerce and navigation, we shall examine provisions concerning access-to-courts, search and seizure, ownership of real property, patents, trademarks and trade names, and taxes, in treaties of friendship, commerce and navigation signed on behalf of the United States with China, Italy, Ireland, Greece, Israel, and the Netherlands³⁴).

With the aid of the charts, appended, it is possible to see the international standards which have been used in each of the treaties to cover the subjects listed across the top of the chart. The basic standards in all the treaties are national treatment and most-favored-nation treatment³⁵). These standards are used both in their absolute and modified forms, as well as in combina-

31) *Herod*, op. cit. supra note 23, at p. 1; *Nolde*, op. cit. supra note 18, at p. 301-304.

32) *Nolde*, op. cit. supra note 18, at p. 303-304.

33) *Id.* at 312. It is important to distinguish between conditional and unconditional most-favored-nation treatment. Conditional most-favored-nation treatment is not most-favored-nation treatment with exceptions. See *Hawkins, Commercial Treaties and Agreements - Principles and Practice*, 1951, p. 67; *Herod*, op. cit. supra note 23, at p. 6; *Nolde*, supra note 18, at p. 422-424.

34) These six treaties were chosen for purposes of illustration because: they are of relatively recent origin; they provide a good cross section due to diversity of such things as geographical location, cultural background, degree of economic advancement and political circumstance; and, for purposes of expediency, they are readily available in the United Nations Treaties Series. In regard to the absence of a treaty with a South American country, see text at note 47 infra and authorities therein. The below mentioned charts are reprinted infra at p. 302 et seq.

35) All of the post-World War II treaties of friendship, commerce and navigation state in their preambles that they are based in general upon the principles of national and unconditional most-favored-nation treatment, except China (1946), Ethiopia (1951), and Iran (1955). The Iranian treaty provides that the treaty is to be "on the basis of reciprocal equality of treatment".

tion with each other and other standards³⁶). It should be noted that some of the standards are mutually exclusive in their absolute form, and can only be harmonized by a grant of exemptions. For example, the most-favored-nation standard is incompatible with the standard of preferential treatment³⁷).

An examination of the chart will reveal the extensive interplay between the various standards created by the modifications and combinations of the standards. In several of the treaties, where the possibility of prejudicial treatment was foreseeable through individual state legislation concerning the right to hold real property in the states of the United States, the possible absence of reciprocity was averted by the insertion of the standard of mutuality³⁸). Where a problem arose concerning the conflict of a treaty provision and national law dealing with companies, the United States accepted a provision granting national treatment subject to "screening"³⁹) by the national law⁴⁰). Other provisions contain standards modified by the acknowledgement of the State's overriding obligations to such international institutions as the International Monetary Fund and the General Agreement on Tariffs and Trade⁴¹). All of these provisions reflect the flexibility of the treaty provisions as a whole, and in particular, the many combinations and

36) It is important to distinguish between standards as abstract principles, and specific standards in treaties which, although based on the principle of a particular standard, are subject to the modifications contained in the treaty.

37) *Schwarzenberger*, supra note 29, at p. 410-411. Following the Peace Treaty of Utrecht (1713), the Parliament of England rejected the famous commercial treaty with France because Article 8 of the treaty contained a most-favored-nation clause which would have conflicted with a treaty with Portugal under which Portuguese wines received preferential treatment in exchange for the admittance of English textiles into Portugal. After nearly a century of conventionless commercial relations due to the English rejection of the commercial treaty in 1713, a new treaty of commerce was concluded in 1786 which contained an explicit exception to the rights accorded Portugal under the Methuen Treaty (1703). *Nolde*, supra note 18, at p. 308 and 312. See also *Lecky*, *A History of England in the Eighteenth Century*, Vol. 1, 2nd edition, 1879, p. 142-145.

38) Treaty of friendship, commerce and navigation with China (1946), 63 Statutes 1299, 25 United Nations Treaty Series 69, Art. VIII, par. 1; Treaty of friendship, commerce and navigation with Italy (1948), 63 Statute (2) 2255, 79 United Nations Treaty Series 171, Art. VII, par. 1; Treaty of friendship, commerce and navigation with Israel (1951), 5 United States Treaties 550, 237, Art. IX, par. 2.

39) See *Friedmann*, op. cit. supra note 16, at p. 749; *Walker*, supra note 17, at p. 242, 246.

40) Treaty of friendship, commerce and navigation with Ireland (1950), 1 United States Treaties 785, 206 United Nations Treaty Series 269, Art. VI.

41) See, e.g., Treaty of friendship, commerce and navigation with the Netherlands (1956), 8 United States Treaties 2043, 285 United Nations Treaty Series 231, Art. XII, par. 2, and Art. XXII, par. 4. Arrangements under the Common Market are provided for in the Exchange of Notes ratifying the treaty.

permutations of the standards of international economic law which can be created to fit the particular needs of the contracting parties.

The above indicates generally the development of commercial treaties, and the importance and functions of the standards of international economic law. We shall now examine the provisions which deal specifically with the protection of property to determine the degree of protection they afford.

IV. Property Protection Provisions in Post-World War I Commercial Treaties

Shortly after World War I the United States negotiated a series of commercial treaties. Beginning with the treaty between the United States and Germany in 1923, and ending with the treaty between the United States and Liberia in 1938, all the commercial treaties signed on behalf of the United States contained a standard provision pertaining to the protection of property in the territories of the contracting parties⁴²). The standard provision provided: "The nationals of each High Contracting Party shall receive within the territories of the other, upon submitting to conditions imposed upon its nationals, the most constant protection for their persons and property, and shall enjoy in this respect the degree of protection that is required by international law. Their property shall not be taken without due process of law and without payment of just compensation⁴³."

A number of things should be noted with regard to the above provision. The first is that the provision accords protection to "nationals", and makes no specific reference to companies. Companies were not specifically mentioned in this respect in United States commercial treaties until the treaty with China in 1946⁴⁴). It has been inferred that companies may be impliedly covered by the term "national"⁴⁵). However, the generally accepted view

42) *Wilson*, *The International Law Standard in Treaties of the United States*, 1953, p. 92.

43) This provision appears in treaties with: Germany, 1923 (44 Statute [3] 2132); Hungary, 1925 (44 *ibid.* [3] 2441); Estonia, 1925 (44 *ibid.* [3] 2379); El Salvador, 1926 (46 *ibid.* [2] 2817); Honduras, 1927 (45 *ibid.* [2] 2618); Latvia, 1928 (45 *ibid.* [2] 2641); Norway, 1928 (47 *ibid.* [2] 2135); Austria, 1928 (47 *ibid.* [2] 1876); Poland, 1931 (48 *ibid.* [2] 1507); Danzig, 1934 (48 *ibid.* [2] 1680); Finland, 1934 (49 *ibid.* [2] 2659); Siam, 1937 (53 *ibid.* [3] 1731); Liberia, 1938 (54 *ibid.* [2] 1739). The provision is slightly varied in the treaty with Siam. *Wilson*, *op. cit. supra* note 42, at p. 92-93. For the above treaties which are still in effect, see *Treaties in Force*, U. S. Department of State Publication.

44) Treaty of friendship, commerce and navigation with China (1946) 63 Statutes 1299, 25 United Nations Treaty Series 69, Art. VI, par. 2; *Walker*, *supra* note 23, at p. 380.

45) *Wilson*, *op. cit. supra* note 42, at p. 20 note 76. When referring to the property-protection clause in pre-World War II treaties *Wilson* states: "companies are not mentioned . . . separately from nationals." When referring to post-World War II property protection provisions he states: "... companies are covered by specific

is that in general companies are not covered by commercial treaty provisions except where expressly so provided⁴⁶).

The next question concerns the effect of the phrase "... upon submitting to conditions imposed upon its nationals..." Some writers and statesmen have put forth the thesis that national treatment is the most that can be claimed by foreign nationals under international customary law⁴⁷). However, it is generally accepted today that there are international minimum standards binding all nations regardless of the standards a particular nation chooses to apply to its own nationals⁴⁸). Thus, this provision does not make national treatment the maximum that foreign nationals can claim. Although it may be expected that the protection accorded local nationals will not fall below the level of international minimum standards, the fact remains that each state is free to treat its nationals in whatever manner it sees fit. Such is not the case in regard to foreign nationals, and the inclusion in a treaty of a national treatment provision does not absolve the state from its obligations imposed by the international minimum standards of international law⁴⁹).

The third observation concerns the degree of protection accorded persons and property, and the specific reference to international law. What consti-

language, without leaving their inclusion to be implied." See also *Wilson*, Property-Protection Provisions in United States Commercial Treaties in *American Journal of International Law* Vol. 45 (1951) p. 83, 100.

46) *Hackworth*, Digest of International Law, Vol. III. 1942, at p. 431-433; *Walker*, supra note 23, at p. 377-378. British practice would seem to be in accord with this; see *Mervyn Jones*, Claims on Behalf of Nationals Who Are Shareholders in Foreign Corporations in *British Yearbook of International Law* Vol. 26 (1949) p. 225, 228. But see, Protocol modifying commercial treaty with Finland (1952), 4 United States Treaties 2047, 205 United Nations Treaty Series 149, in which the term "nationals" is used with no reference to companies.

47) See *Wilson*, Property-Protection Provisions in United States Commercial Treaties, supra note 45, at p. 85-86, and the authorities cited therein. See also, *Wilcox*, op. cit. supra note 5, at p. 31-32, 145-148; *Fenwick*, The Ninth international Conference of American States in *American Journal of International Law* Vol 42 (1948) p. 533; id., The Revision of the Pact of Bogota in *American Journal of International Law* Vol. 48 (1954) p. 123; id. The Tenth Inter-American Conference at Caracas in *American Journal of International Law* Vol. 48 (1954) p. 136; *J. N. Hyde*, Permanent Sovereignty Over Natural Wealth and Resources in *American Journal of International Law* Vol. 50 (1956) p. 854; *Lockwood*, The Economic Agreement of Bogota in *American Journal of International Law* Vol. 42 (1948) p. 608.

48) See *Wilson*, supra note 47, at p. 86-87, and the authorities cited therein.

49) See *Schwarzenberger*, op. cit. supra note 8, at p. 248: "Even if the standard of national treatment is laid down in a treaty, the presumption is that it has been the intention of the parties to secure to their nationals in his manner additional advantages, but not to deprive them of such rights as, in any case, they would be entitled to enjoy under international customary law or the general principles of law recognized by civilized nations."

tutes "the most constant protection" would be for a judicial tribunal to decide, but it is, at the very least, that protection required by the minimum standards of international customary law ⁵⁰).

The fourth observation concerns the meaning of "property" as used in the property protection provisions. Does it include all property? Would it include the good will and tangible property of a partially owned American subsidiary company incorporated under the laws of the contracting foreign state? The latter would seem to be a reasonable question to a lawyer today in view of the current mode of operating abroad through foreign incorporated subsidiaries. However, a definite answer to this question cannot be given. The word "property" would have to be interpreted in the light of the intention of the parties at the time the agreement was reached, and not in light of current practices ⁵¹). Unfortunately, this indefiniteness, apparent here as well as under our third observation, still exists in present-day property protection provisions, and is the price that must be paid for broad and very general protection.

Finally, the question arises as to what constitutes "due process" and "payment of just compensation". The above phrases do not necessarily require that which would be required under the United States Constitution ⁵²). In the absence of specific provisions to that effect, no municipal law of a state, either of the contracting parties or a third state, would govern. The agreement, being one between two sovereign states, would be governed by public international law, and "due process", "payment" and "just compensation" would be that which is required by international law ⁵³).

Under international law would payment in a blocked account, or in the currency of the foreign state constitute "payment"? Must the payment be at the time the property is taken, or a reasonable time thereafter, or at any time? Once again it is difficult to give definite answers. But this time the defect is not in the treaty, but in international law itself. Opinions differ as to what is required by international law, and the answers to these questions remain highly controversial ⁵⁴).

Our examination of the standard property protection provisions of post-World War I commercial treaties has raised a number of questions. We shall now examine post-World War II property protection provisions to determine to what extent the above questions are answered and added protection is provided to foreign property owners.

50) *Ibid.*

51) See *Hyde*, op. cit. supra note 7, Vol. II, § 533 H at p. 1495; *McNair*, *The Law of Treaties*, 1938, p. 252; *Oppenheim*, *International Law*, Vol. I. 8th edition 1955. § 554 at p. 953; *Schwarzenberger*, op. cit. supra note 8, at p. 490.

52) *Wilson*, supra note 42, at p. 101.

53) *Ibid.*

54) See note 8 supra.

V. Property Protection Provisions in Post-World War II Commercial Treaties

For purposes of illustration, abstracts of treaty provisions are contained on charts 2, 3, 4, 5, 6 and 7⁵⁵). It is essential to be mindful of the fact that the abstracted parts of provisions found on the charts are usually merely parts of one article, and that the particular article is just one of many articles which compose a treaty. It is imperative, when interpreting a treaty, to interpret it as a whole, without putting undue stress on any particular provision, in this case the property protection provisions. This applies with equal force to the previous section in which we examined the property protection provisions in earlier treaties. Although the same provision appears in each treaty, in each case it would have to be interpreted as part of the treaty in which it appears, rather than in the abstract.

The provisions from post-World War II treaties of friendship, commerce and navigation on charts 2, 3, 4 and 5 contain significant changes from the standard provisions examined in the preceding section. All of the property protection provisions in the post-World War II treaties provide that protection shall extend to corporations and associations⁵⁶). Thus, protection is no longer restricted to nationals, and the question of protection for companies is resolved.

The words "the most constant protection and security" appear in each property protection provision, but a specific reference to "international law" appears only in the treaties with China (1946), Italy (1948), Ireland (1950), and Iran (1955). The reference to international law is not necessary since, in the absence of specific agreement to the contrary, the treaty would be governed by international law.

The provisions dealing with expropriation and compensation go much further in protecting property owners than did their counterparts in the post-World War I treaties. Whereas the earlier treaties provided for "payment of just compensation", present-day provisions provide significant added protection. Beginning with the treaty with China (1946) which provided for "the payment of just and effective compensation", the provisions have developed to the point where the most commonly found provision provides not only for the prompt payment of just compensation, but provides further

55) Reprinted *infra* at pp. 306 et seq. Before referring to these charts a word of caution. They are presented to aid the reader in understanding the commentary on the property-protection provisions of the post-World War II commercial treaties, and by presenting the provisions in chronological order, to reveal the development and changes that have occurred. Frequently modifications and exceptions appear in articles at the end of a treaty, as well as in "Protocols", "Additional Protocols", and in the final "Exchange of Notes". Therefore, in no case should the charts be used in definitive reference for the terms of a treaty.

56) See text at notes 23, 24 and 25 *supra*.

that the property shall not be taken except for public purposes, that compensation shall be in an effectively realizable form representing the (full) equivalent of the property taken, and that adequate provision be made for timely payment thereof⁵⁷).

The basic standard in the provisions dealing with the protection of property is the minimum standards of international law. This represents no change from the post-World War I provisions. However, several provisions include, in addition to the minimum standards, the standards of national treatment and most-favored-nation treatment⁵⁸). The addition of these standards gives significant protection to the foreign property owner since the standard of treatment is less indefinite under national treatment and most-favored-nation treatment than it is under the minimum standards of international law. This represents a valuable improvement over the post-World War I provisions⁵⁹).

The problem of the compatibility of treaty provisions with domestic law was resolved in several treaties by what is called "screening"⁶⁰). The enjoyment of national treatment and most-favored-nation treatment is thereby made dependent upon compliance with applicable laws and regulations. Whether the applicable laws and regulations are discriminatory will depend once again on the good faith of the contracting parties.

When examining the standard post-World War I property protection provision a question arose concerning the meaning of the word "property". In this regard it is significant that several of the treaties contain the following provisions which, because of space limitations, could not be put on the charts: "Moreover, enterprises in which nationals and companies of either Party have a substantial interest shall be accorded, within the territories of the other Party, not less than national treatment and most-favored-nation treatment in all matters relating to the taking of privately owned enterprises into public ownership and to the placing of such enterprises under public control"⁶¹).

57) See charts 2, 3, 4, 5, 6 and 7 appended (*infra* at pp. 306 et seq.).

58) *Ibid.*

59) In this respect, national treatment and most-favored-nation treatment standards do not appear in the treaties with: Israel (1951), 5 United States Treaties 550, 219 United Nations Treaty Series 237; Ethiopia (1951), 4 United States Treaties 2134, 206 United Nations Treaty Series 41; Iran (1955), 8 United States Treaties 899, Treaties and Other International Acts Series No. 3853; Korea (1956), 8 United States Treaties 2217, Treaties and Other International Acts Series No. 3947.

60) See note 39 *supra*.

61) Treaties of friendship commerce and navigation with: Ireland (1950), 1 United States Treaties 785, 206 United Nations Treaty Series 269, Art. VIII, par. 3; Israel (1951), 5 United States Treaties 550, 219 United Nations Treaty Series 237, Art. VI, par. 5; Japan (1953), 4 United States Treaties 2063, 206 United Nations Treaty Series 143, Art. VI, par. 4; Federal Republic of Germany (1954), 7 United States Treaties 1839, Treaties and Other International Acts Series No. 3593, Art. V,

There remains to be examined the various provisions relating to exchange restrictions and their effect on repatriation of capital. Provisions concerning the repatriation of capital appear for the first time in the post-World War II treaty with China (1946). As distinguished from the treaties with China (1946) and Italy (1948) which provided for "screened" national treatment and most-favored-nation treatment, nearly all of the later treaties provide for unrestricted national treatment and most-favored-nation treatment⁶²). The two exceptions are the treaties with Ethiopia (1951) and Iran (1955). All of the post-World War II treaties provide that the contracting parties acknowledge their obligations as members of the International Monetary Fund⁶³).

What might be called the standard exchange restrictions provision provides that: (1) contracting states acknowledge their obligations to the International Monetary Fund; (2) exchange restrictions shall be imposed only when necessary to maintain monetary reserves; and (3) if exchange restrictions are imposed, each state shall, after making provision for exchange to assure the health and welfare of its people, provide exchange for the repatriation of capital.

The following is a further provision frequently found in exchange restriction provisions which was omitted from the chart due to space limitations: "If more than one rate of exchange is in force, the rate applicable to such withdrawals shall be a rate which is specifically approved by the Interna-

par. 6; Netherlands (1956), 8 United Nations Treaties 2043; 285 United Nations Treaty Series 231, Art. VI, par. 5; Korea (1956), 8 United States Treaties 2217, Treaties and Other International Acts Series No. 3947, Art. VI, par. 5; Nicaragua (1956), Treaties and Other International Acts Series No. 4024, Art. VI, par. 5; Pakistan (1956), Art. VI, par. 5. See also treaties of friendship, commerce and navigation with: Italy (1948), 63 Stat. (2) 2255, 79 United Nations Treaty Series 171, Art. V, par. 3; Greece (1951), 5 United States Treaties 1829, 224 United Nations Treaty Series 279, Art. 7, par. 4. The latter treaty also provides, in Art. 7, par. 3: "The provisions of the present paragraph shall extend to interests held directly or indirectly by nationals and companies of either Party in property which is taken within the territory of the other Party." Similar provisions appear in protocols in the treaties with Nicaragua (1956), Protocol 4; Pakistan (1956), Protocol 3; and France (1959), Protocol 5. In regard to the question of direct and indirect ownership of property, see *Foighel*, op. cit. supra note 8, at 112.

62) See charts 2, 3, 4, 5, 6 and 7 appended (infra at pp. 306 et seq.).

63) It would appear from the wording of the treaty with Israel (1951), 5 United States Treaties 550, 219 United Nations Treaty Series 237, Art. XII, par. 2, (see chart 3 appended) that the contracting parties assumed the right to bilaterally contract out of obligations they assumed on a multilateral basis as members of the International Monetary Fund. The United States and Israel are free to contract away rights they have acquired as members of the International Monetary Fund, barring provisions in the Article of the Agreement of the International Monetary Fund to the contrary. However, they are not free to bilaterally contract out of obligations assumed in a multilateral agreement, unless the multilateral agreement so provides, or the parties to it give their consent.

tional Monetary Fund for such transactions or, in the absence of a rate so approved, an effective rate which, inclusive of any taxes or surcharges or exchange transfers, is just and reasonable" 64).

By providing for national treatment and most-favored-nation treatment, the repatriation of capital provisions prevent the use of exchange controls as a means of discriminating against foreign investors, thus according needed protection. However, although the exceptions permitting the use of exchange restrictions are reasonable, the fact remains that international monetary imbalances of payments may cause periodical exchange stringencies. The manner in which they are handled and the consequent effect on foreign investors will once again depend largely on the good faith of the contracting parties concerned.

VI. The Evaluation of Treaty Protection

In the preceding part of this paper when examining the property protection provisions it was necessary to keep in mind that each provision had to be interpreted as part of the particular treaty in which it appeared, without undue stress on the particular provision being examined. Likewise, when evaluating treaties of friendship, commerce and navigation in general, it is necessary to be mindful of their place in international relations and of the limitations of the international judicial system which governs them. To examine them in the abstract, rather than in the international milieu in which they belong, would produce merely legal conclusions of limited practical value.

To evaluate treaties of friendship, commerce and navigation it is necessary to understand what they are, as well as the judicial system under which they function. In terms of municipal law, they are bilateral contracts 65), and have as their quid pro quo mutuality of benefit. By the terms of the agreements each party agrees to accord rights to nationals and companies of the other party. The contract is one which requires continuous performance, in contrast to a contract which has as its quid pro quo an act limited in time, which when completed, renders the contract performed.

64) Treaties with: Israel (1951), 5 United States Treaties 550, 219 United Nations Treaty Series 237, Art. XII, par. 4; Japan (1953), 4 United States Treaties 2063, 206 United Nations Treaty Series 143, Art. XII, par. 3; Iran (1955), 8 United States Treaties 899, Treaties and Other International Acts Series No. 3853, Art. VII, par. 2; Netherlands (1956), 8 United States Treaties 2043, 285 United Nations Treaty Series 231, Art. XII, par. 3; Korea (1956), 8 United States Treaties 2217, Treaties and Other International Acts Series No. 3947, Art. XII, par. 3.

65) See *Brierly*, Some Considerations on the Obsolescence of Treaties in Transactions of the Grotius Society for 1925, at p. 11; *Brierly*, The Basis of Obligations in International Law, 1958, p. 108.

Treaties of friendship, commerce and navigation are instruments of public international law, and their violation is unlawful under international law. All these post-World War II treaties provide that disputes arising under them shall be submitted to the International Court of Justice. The lack of the power of enforcement inherent in the international judicial system is manifest. Should it be necessary to have recourse to the international judicial system to enforce an agreement, the system may function properly, in which case a legal evaluation of the terms of the treaty will be significant, or not function properly, in which case a strictly legal evaluation will be of little significance. To evaluate treaties of friendship, commerce and navigation solely on their terms would involve the assumption that the international judicial system will function properly, and ignore its limitations, and the possibility that it may not function properly.

In the absence of a reliable law enforcing judicial system, performance of an agreement rests with the contracting parties. The question then turns to a consideration of the conditions under which the contracting states will comply with the terms of an agreement. There are many factors which must be taken into consideration in answering this question.

Of primary importance is the treaty itself, since the presumption is that the agreement will be honored and that the parties may rely on its terms. In our examination of post-World War II FCN treaties we noted that they have undergone a shift in emphasis, and in response to present-day investment problems provide much needed protection to the foreign investor. This added protection deserves emphasis. However, although the property protection provisions are more comprehensive than their post-World War I predecessors, they have, nevertheless, significant limitations which must also be taken into consideration.

Since the provisions attempt to provide for all types of investment, they are very general in nature, and consequently leave great scope for divergent interpretations. What is "necessary", "adequate", "just" or "unjust" could be very debatable even when both parties are acting in good faith⁶⁶). Likewise, that certain standards of protection are contingent upon compliance with local laws does not guarantee nondiscrimination, and once again emphasizes the importance of good faith.

Should a contracting state not honor the terms of a treaty, it will be the Government of the United States which will have a cause of action. An injured United States national will have no cause of action, and the espousal of the claim by the Government will be dependent upon many factors, including the international political circumstances and possible ramifications

66) See *Friedmann*, op. cit. supra note 16, at p. 708, 733. Guarantee agreements are less general and more definite since each one refers to a single investor, but they too have limitations. Id. at p. 733.

thereof, not to mention the uncertainties and difficulties of international litigation after espousal by the Government⁶⁷⁾.

Apart from the treaty itself, another important factor is mutuality of benefit, which is the basis of treaties of friendship, commerce and navigation. The problem of maintaining mutuality of benefit, or, in other words, adjusting *quid pro quo* as circumstances change with the passage of time, is not a new one. In labor-management contracts various types of escalator clauses and re-negotiation provisions have been used to solve the problem. In an area closer to international law, most of the more recent concession agreements have incorporated within them re-negotiation provisions which provide that the terms of the agreements can be examined and adjusted bilaterally, thus creating a living contract, capable of adjustment, rather than a static one which may become anachronistic with the passage of time.

Admittedly, there is less need for adjustment in treaties of friendship, commerce and navigation than in private contracts. In the latter, the profits of the contractants may be influenced in a short period of time by many factors. Whereas, these treaties, by their very nature, tend to become obsolete at a much slower rate, barring revolutions and large scale international disturbances. Many of the provisions merely treatify rules which the parties believe to be international customary law, and in this regard, the object is to solidify the terms of the agreement rather than make them flexible⁶⁸⁾. However, there are many provisions in treaties of friendship, commerce and navigation which are not declaratory of existing principles of international law which bind the states *inter se* as long as the treaties exist. It is

67) *Ibid.* For conditions precedent to espousal by the Government, see *Clay*, *supra* note 9, at p. 7.

68) In this regard, compare: *Brandon*, *supra* note 5, at p. 307: "Since essentially these treaties each contain the same general provisions, it is submitted they may be regarded as a method whereby conventional international law is evidenced by a quasi-multilateral treaty system composed of a series of bilateral treaties containing substantially similar terms and a party common to each. They are, it is further submitted, themselves generally illustrative of current prevailing rules of international law" with, *Friedmann*, *op. cit. supra* note 16, at p. 733: "The particular provisions of the various instruments present, as we have seen, strong similarities to each other. They may be seen as heralding the development of a body of common international law. Its precise contents would be found in the provisions of treaties and investment laws, as well as contracts and 'instruments of approval' . . . Of course, it would be fallacious to maintain that such a body of law exists today. It is only now beginning to be formed and its future existence is still uncertain" and, *Foighel*, *op. cit. supra* note 8, at p. 85: "It must be admitted, nevertheless, that it is not possible solely on the basis of international treaty practice to give a definite answer to the question whether lawful nationalization entails a liability to pay compensation to the victim of the same in case they are nationals of a foreign state. Treaty practice up till now has not been extensive enough, and in some respects has been too special in character, to be a basis for a decisive attitude to this question."

these static provisions which, when viewed from the dynamic pace of 20th century international political and economic change, may become obsolete from the point of view of one of the contracting states⁶⁹).

Another consideration under the factor of mutuality of benefit is the type of investment contemplated. Does it require large investments of capital for a number of years before it will become profitable, or is it one which requires a small capital outlay with prospects of rapid amortization? To what degree can the proposed enterprise be geared to the economic and social requirements of the country in which it is to be located?⁷⁰ An investment which is primarily concerned with the extraction of natural resources may, because of its very nature encounter resistance and discrimination due to the psychological distrust of foreign capital and unforgotten past instances of exploitation and profiteering. Whereas, a secondary industry producing consumer goods may not encounter such a problem.

The fact is that the day of exploitation is over. Just as large domestic corporations have learned that they have obligations to the community in which they are located, as well as to the country as a whole, so too the foreign investor must accept his responsibilities to the foreign state. Where there is social and economic integration of an enterprise in a foreign community there will be less likelihood of having to rely on treaty provisions for protection.

The date of the agreement relied upon is a significant factor. If it is of recent date it probably reflects a favorable investment climate, since by negotiating the agreement the country indicates that it realizes the value of, and acknowledges its need for, foreign investment, and is willing to offer protection to get it⁷¹).

As mentioned above, good faith is a significant consideration. Where passage of time and change of circumstances effect mutuality of benefit, the good faith of the parties may create the necessary force to hold the parties to their agreement. When states honor treaty obligations the principle of "good faith" is frequently cited by the contracting states⁷²). An examination of the particular state's practice with regard to international treaties, as well as its treatment of property in general under national law provisions for expropriation, may prove significant.

Another factor to consider is the particular civilization to which the con-

69) All of the post-World War II commercial treaties (except China) provide that they shall remain in force for ten years, and after that time they can be terminated by either party by one year's written notice.

70) *Clay*, supra note 65, at p. 18; *Littell*, Legal Incentives for Private Investment Abroad in *Virginia Law Review* Vol. 40 (1954) p. 977, 978.

71) *Friedmann*, op. cit. supra note 16, at p. 709.

72) See *Schwarzenberger*, *The Fundamental Principles of* p. 195, *International Law*; *Recueil des Cours* Vol. 87 (1955, I) at p. 290. See also *B. Cheng*, *General Principles of Law as applied by International Courts and Tribunals*, 1953, p. 105.

tracting state belongs. Is it part of our western civilization, reflecting in its culture the deep rooted respect for private property which is basic to western legal systems and reflected in international customary law? Or, is it a country which has consistently stated that it recognizes no restriction of its sovereignty with regard to property rights, that national treatment is all that any foreigner can claim, and that there is no rule of international customary law to the contrary⁷³⁾?

Other factors include the stability of the government of the contracting state. Is it securely rooted, or threatened by revolution and apt to topple at any time? It is a soft-currency underdeveloped country which may honor its international agreements in order to encourage foreign investment, and also to keep open the possibilities of investment through foreign and international institutions such as the United States Export-Import Bank or the World Bank⁷⁴⁾? What is its geographical location is its international political alignment?

Admittedly, under a perfected international judicial system many of the above considerations would be irrelevant. However, under present circumstances, to evaluate an international agreement as a legal document without considering power politics and the East-West split would be to fall prey to the prevalent fallacy of "legalism"⁷⁵⁾.

That Iran and Egypt were legally bound by international agreements was certainly of less significance than the fact that geographically they are located between the two opposing world forces, and thus, were able to violate international law with impunity. Unfortunately, the problem cannot be reduced into a purely legal one because it is inextricably tied to the everyday realities of economics and politics, and to solve it in a purely legal sense would be to solve it in a vacuum.

VII. Conclusions

The factors which must be considered by a prospective foreign investor are so numerous that it is impossible to control or even influence a sufficient number of them to create artificially a favorable investment climate. At most, only a few of the factors considered by prospective investors before engaging in foreign investment can be made favorable towards investment.

Thus, with respect to the question of profitability, a tax incentive may help to make the contemplated investment appear feasible from the profit standpoint⁷⁶⁾. But, tax questions, although ubiquitous in this day and age,

73) See note 47 *supra*.

74) See *Friedmann*, *op. cit.* *supra* note 16, at p. 782.

75) See *Miller*, *supra* note 18, at p. 377.

76) However, see *Barlow and Wender*, *op. cit.* *supra* note 5 at p. 215: "We found no evidence to suggest that United States taxes has been an impediment that had prevented particular investments in foreign countries. More important, we

are merely one aspect of the problem of profitability. There are many other factors such as cost of transportation, nearness to raw materials, labor cost, size of market, etc. which are of varying importance, and over which there is no control or, at most, limited control for purposes of creating this favorable investment climate⁷⁷).

Likewise, the risk factor, although very important, nonetheless, is just one of the many factors which must be considered. The Government's treaty of friendship, commerce and navigation program is one way of making this consideration favorable to investment. Government guarantees is another⁷⁸). Whereas, a negative answer to the consideration of security may act as an automatic veto on investment, a positive answer does not necessarily mean that investment will be made. It will be made only if a sufficient number of the other considerations indicate that investment is warranted⁷⁹).

Within this framework, the question arises: How much protection do treaties of friendship, commerce and navigation provide to a prospective foreign investor? A definitive answer to this general question cannot be given without entering the area of conjecture. Depending on circumstances, the protection provided by such a treaty may be extremely broad, or absolutely nil. It will depend on the interplay of many factors at the time a particular treaty of friendship, commerce and navigation is relied upon for protection. Although this lacks the definiteness so often assiduously sought by lawyers, to be more definite would possibly be to mislead.

Each treaty must be evaluated separately on the basis of the factors suggested herein, as well as on others which may be pertinent to the particular case. The factor of primary importance is the treaty itself. Its provisions reflect the amount of protection the investor is entitled to under international law. If the contracting parties adhere to the rules of international law, the protection provided in the treaty will be effective. It is hoped that as time goes on the United Nations will grow in international stature and authority, and that the force of world opinion against extralegal action by

found no instance where executives believed that total exemption of foreign income from United States taxes would have tipped the balance and changed a decision that had been made against a particular investment" (emphasis omitted).

77) See *id.*, at p. 217: "It is difficult to suggest ways of encouraging investment that relate directly to the factors limiting investment because these factors are primarily within the control of foreign countries." Also, *Rubin*, *supra* note 6, at p. 84-85: "It is often suggested that the negotiation of such treaties will, by improving the investment climate abroad, augment the outward flow of desirable investment capital. There is unfortunately little evidence that this suggestion is not merely an assumption. . . . ability to negotiate a satisfactory investment clause in a treaty generally reflects an already-existent climate favorable to foreign investment. The treaty tends to record the fact, not create it."

78) See notes 2 and 3 *supra*.

79) See *Friedmann*, *op. cit. supra* note 16, at p. 732.

states will strengthen the international rule of law. However, in the meantime, one must think realistically.

With this in mind, it is submitted that besides the treaty itself, the circumstances under which it will be honored must be considered. The motives, such as ethics, fear, power, benefit, etc., which underlie the observance by states of international treaty obligations are generally mixed and vary in primacy with time. However, it is the manifestations of these motives in the everyday realities of the international existence of states which must be considered before a realistic evaluation of treaty protection can be made.

In this regard, some of the more important factors to be considered include: the date of signature of the treaty (Does it reflect a favorable investment climate?); lapse of time and the nexus of change of circumstances and mutuality of benefit; international economic and political stability; international and national state practice; alignment in international politics; and the current state of international tensions. Any evaluation of the protection accorded by an treaty of friendship, commerce and navigation which did not take into consideration the international milieu to which the treaty is indigenous as an international agreement would be too unrealistic to be seriously considered.

In concluding, it would be difficult to improve upon the last three sentences of a recent book on the subject of foreign investment⁸⁰): "But until international society has reached a degree of integration, which will provide for additional powers inherent in the international community as such, it behooves the lawyer to be aware of the limit of equal protection for the foreign investor. Legal arrangements will provide some ancillary protection. The foreign investor's main safety, however, must reside in the correctness of his estimates as to the economic and social stability of the country of investment, and in the establishment of a moral as well as an economic position in the foreign country, which will make drastic interference with his interests unlikely."

80) *Friedmann*, op. cit. supra note 16, at p. 783.

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PROPERTY-PROTECTION PROVISIONS IN UNITED STATES COMMERCIAL TREATIES

BY ROBERT R. WILSON

Of the Board of Editors

The matter of public international rules for the protection of private property rights has frequently received the attention of publicists, courts and treaty-makers. Some recent developments, bearing upon different aspects of the general subject, seem to attest its current and continuing importance. For example, the presentation to Congress of President Truman's Point Four plan occasioned questions as to the guaranteeing of overseas investments of United States citizens.¹ A few weeks later, at a meeting of the Economic and Social Council of the United Nations, a Belgian speaker and a representative of the International Chamber of Commerce emphasized the need for treating lenders according to certain standards of decency and fair play, and expressed the view that an economic climate encouraging to foreign investment was as far away as ever.² On a somewhat broader plane, the appearance in the Universal Declaration of Human Rights (1948),³ but not in the more recently evolved International Covenant on Human Rights (1950),⁴ of provisions looking to the right of individuals to own property ("alone as well as in association with others") and to be free from being arbitrarily deprived of it, raises questions as to whether the right of private property is not a basic "human" right.⁵

¹ Cong. Rec., Vol. 96, No. 102 (May 23, 1950), Senate, pp. 7603, 7604. See also note 106, *infra*.

² New York Times, July 11, 1950, p. 19.

³ U. S. Department of State Bulletin, Vol. XIX, No. 494 (Dec. 19, 1948), pp. 752-754; this JOURNAL, Supp., Vol. 43 (1949), p. 127. The relevant part of the Declaration is Art. XVII.

With this may be compared Art. VIII of the Draft Declaration of the Rights and Duties of Man, presented to the Ninth International Conference of American States by the Inter-American Juridical Committee, and Art. XXIII of the American Declaration of the Rights and Duties of Man, as approved by the Conference (Report cited in note 103, *infra*, pp. 118, 264), this JOURNAL, Supp., Vol. 43 (1949), p. 137.

⁴ Dept. of State Bulletin, Vol. XXII, No. 571 (June 12, 1950), pp. 949-954.

⁵ See statement by James Simsarian of the Department of State (*ibid.*, at p. 949): "The Commission decided not to include economic and social articles in the Covenant but, instead, to postpone the consideration of these articles until its 1950 session. It will consider at its 1950 session whether these articles should be contained in additional conventions on human rights or whether other measures should be proposed with respect to them. Consideration will particularly be given to the extent to which other organs and specialized agencies within the framework of the United Nations are already taking action with respect to these rights."

In the present study it is proposed to examine closely but one aspect of the general subject, namely, the manner in which protection of private property rights in general has been provided for in bilateral treaties of a particular type (general commercial treaties) to which the United States has been a party. The inquiry has been further restricted (1) to treaty provisions relating to the taking of property for public use, as distinct from those concerning aliens' rights to acquire, use and dispose of property, and (2) to the form and legal effect of such provisions in time of peace, the limitations of a brief study precluding a consideration of the effect of war upon private property rights. It seems useful, as a preliminary to an examination of the treaty provisions themselves, to note the amount of attention which the general subject of private property rights has received in some recent legal literature, and to consider, at least through illustrative decisions, case law on international aspects of the subject as declared by international tribunals.

I. VIEWS OF PUBLICISTS

Not merely international lawyers, but social scientists in general, have recently given considerable attention to the whole concept of property in its relation to society, political authority and law.⁶ As attention here is to

⁶ See, for example, Robert H. Lowie, "Incorporeal Property in Primitive Society," *Yale Law Journal*, Vol. 37 (1927-28), pp. 551-563; John Lurye, "The Evolution and Philosophy of Property," *Res Judicatae*, Vol. 3 (1946-47), pp. 181-186; A. Irving Hallowell, "The Nature and Function of Property as a Social Institution," *Journal of Legal and Political Sociology*, Vol. I (1943), Nos. 3-4, pp. 115-138; Herbert W. Schneider, "Pragmatism and Property," *ibid.*, pp. 5-9; Roscoe Pound, "The New Feudalism," *American Bar Association Journal*, Vol. 16 (1930), pp. 553-558; Francis S. Philbrick, "Changing Conceptions of Property in Law," *University of Pennsylvania Law Review*, Vol. 86 (1938), pp. 691-732; Robert E. MacIver, "Government and Property," *Journal of Legal and Political Sociology*, Vol. IV (1945-46), pp. 5-18; Mary Thomasine Cusack, *The Significance of a Changing Concept of Ownership in Social and Economic Planning* (1940); James H. Gilbert, "The Changing Concept of Property," *Papers of the Pacific Coast Economic Association*, 1942, pp. 5-14; Jacob Viner, "International Relations between State-Controlled Economies," *Amer. Economic Rev., Supp. (Papers and Proceedings)*, Vol. 34 (1944), pp. 315-329.

Property measures taken by the Nazi rulers of Germany are usefully discussed in Albert T. Lauterbach, *Economics in Uniform* (1943), especially at pp. 37, 79, 110, 148, 215. See also Paul Abel, "Foreign Confiscatory Legislation and Private International Law," *Modern Law Review*, Vol. 6 (1943), pp. 166-167; Martin Domke, "International Aspects of European Expropriation Measures," *New Jersey Law Journal*, Vol. 65 (1942), p. 37; Vinding Kruse, *The Right of Property* (tr. from the Danish by P. T. Federspiel, 1939), pp. 7-9; Frieda Wunderlich, "Germany's Defense Economy," *Quarterly Journal of Economics*, Vol. 52 (1938), pp. 401-430.

As examples of provisions in national constitutions on the subject of private property may be cited Art. 43 of the Constitution of Ireland (1937), and Arts. 38 and 39 of the Constitution of Argentina (1949); texts in Amos G. Peaslee (ed.), *Constitutions of Nations* (1950), Vol. I, p. 71, Vol. II, pp. 260-261.

be limited to the international legal aspects, it seems convenient to consider first the point of view of those who deny that there is, apart from treaties, a right of private property (in the sense of an alien owner's right to that which has been acquired in accordance with municipal law) under international law.

It has been suggested that to say that a state may expropriate property of foreign owners only with adequate compensation, is to follow a "scholastic" doctrine.⁷ One publicist, who is among the best known holders of the point of view, has stressed the importance of preserving universality, the difficulty or impossibility of securing from collectivist states assent to a doctrine of inviolability, and the risk of discrediting international law by entrenching individualism within it.⁸ He has questioned the justification for transforming a legal limitation of municipal law (affecting the power of the state in relation to those directly subject to its authority) into a duty of a state in relation to other states.⁹ An observer writing in 1939 suggested that "Fourteenth Amendment psychology" had doubtless been responsible in large measure for the American attitude on the question, and concluded that the assumption that international law upholds the sacred character of private wealth had had considerable validity in the past, but could no longer be considered as a rule of international law.¹⁰ It is obvious

On nationalization of property in the period since the close of hostilities in the second World War, see Seymour J. Rubin, "Nationalization and Private Foreign Investment: The Role of Government," *World Politics*, Vol. II (1950), pp. 482-510; Nicholas R. Doman, "Compensation for Nationalized Property in Post-War Europe," *International Law Quarterly*, Vol. III (1950), pp. 323-342.

⁷ E. A. Harriman, "The Right of Property in International Law," *Boston University Law Review*, Vol. 6 (1926), pp. 103-110, at pp. 104-105. The writer seemed to feel, however, that an "international right of property" might become a reality through the establishment and functioning of international organizations.

⁸ John Fischer Williams, "International Law and the Property of Aliens," *British Year Book of International Law*, Vol. IX (1928), pp. 1-30, at pp. 21-22.

⁹ *Ibid.*, p. 17.

¹⁰ Payson Wild, Jr., "International Law and Mexican Oil," *Quarterly Journal of Inter-American Relations*, Vol. I, No. 2 (1939), pp. 9, 10. What appears to be essentially the same conclusion is offered in Alf Ross, *Textbook of International Law* (1947), pp. 166-167.

Writing before the expropriations of the fourth decade of the twentieth century, Frederick S. Dunn in "International Law and Private Rights," *Columbia Law Review*, Vol. 28 (1928), pp. 166-180, observed (at p. 180): "From a functional point of view a possible solution would be to retain the rule of intervention but to except from its operation all governmental acts infringing upon vested property rights which were the result of *bona fide* social or economic reform, genuinely aimed to benefit the nation as a whole, and were not discriminatory against foreigners as such, nor liable to disturb to any substantial extent the existing methods of carrying on intercourse between nations." The writer pointed out that the instances in which, up to that time, responsibility had been successfully invoked in protection of vested property interests had been confined to cases of particular, rather than general, expropriations of property, and that these cases had not involved a wholesale social reform or a general redistribu-

that such views would not be inconsistent with belief in private property rights as matters of municipal law, and advocacy of them even on a wider geographical basis on grounds of morality, comity or utility. To deny that, apart from treaties, there is an international legal right of property, would not be to deny that the institution of private property was desirable. It would simply be to deny that, as a matter of international law, such a right exists.

Against this position is still arrayed, however, what is believed to be the weight of authority, which asserts that there is an international legal obligation, apart from treaties or other specific agreements, binding a state to respect the property rights that aliens have acquired within its territory in accordance with existing and applicable law.¹¹ This implies that there is, as one authority expresses it, an "instantly accruing obligation," when such property is taken by the state, to compensate or arrange to compensate.¹² Acceptance of this view would not seem necessarily to lead to the conclusion that a state, by its "attack upon the international agreement as to the sacredness of private property" and its failure to "agree with the common conscience of all other civilized nations upon its most fundamental question of morals and ethics," would be "excluded and excommunicated" from the society of civilized nations.¹³ If, however, it does not mean that international law requires any state to establish or maintain a system of private property,¹⁴ it does assert the obligation to respect the existing rights of foreigners in their legally acquired holdings. It does not concede that international law on this subject is non-existent because

tion of property at the expense of the existing propertied classes. On the distinction between large nationalization programs and isolated, non-programmatic expropriations, see Seymour J. Rubin, *loc. cit.*, pp. 484-485, 509-510. Cf. Oppenheim, *International Law* (7th ed.), Vol. I (1948), at p. 318, to the effect that, where fundamental changes in the political system and economic structure of a state, or far-reaching social reforms, entail interference on a large scale with private property, neither the principle of absolute respect for alien private property nor rigid equality with dispossessed nationals offers a satisfactory solution, and that, in such cases, it is probable that partial compensation will offer a solution consistent with legal principle.

¹¹ Charles Cheney Hyde, *International Law* (1945 ed.), Vol. I, pp. 710-722; Oppenheim, *op. cit.*, pp. 316, 627; A. V. Freeman, *International Responsibility of States for Denial of Justice* (1938), pp. 497-570; Alexander Fachiri, "Expropriation and International Law," *British Year Book of International Law*, Vol. VI (1925), pp. 159-171; "International Law and the Property of Aliens," *ibid.*, Vol. X (1929), pp. 32-56; Georges Kaeckenbeek, "*La Protection Internationale des Droits Acquis*," Hague Academy of International Law, *Recueil des Cours*, Vol. 59 (1937, I), pp. 321-415; material cited by E. M. Borchard in *Proceedings, American Society of International Law*, 1939, p. 62, note.

¹² Charles Cheney Hyde, *op. cit.*, Vol. I, p. 722.

¹³ As suggested by a speaker before the International Law Association, Report of the 34th Conference (1926), p. 259 (cited after John H. Herz, "Expropriation of Private Property," *Social Research*, Vol. VIII, No. 1 (1941), pp. 63-78).

¹⁴ Contrast Lorimer, *The Institutes of the Law of Nations* (1883-1884), Vol. I, p. 99.

of the supposition that "the status of private property is in a transition phase throughout the world, even in the politically most conservative states."¹⁵ Nor, as it has been advanced by the United States, does it concede that national treatment is the maximum which aliens whose property has been taken for public use may, in every case, demand. As is generally known, the proposition that no state can be legally held to accord to foreigners better treatment than that which its nationals receive, has not prevailed as a rule of customary international law.¹⁶ Opposed to it has been the idea of a minimum standard of justice, enforceable as international law, and which has come to be emphasized particularly in recent years. One writer, regarding the concept of equal treatment as an "outworn concept" in view of the fact that expropriating states sometimes offer their own nationals inadequate compensation, if any at all, observes that only since socialistic doctrines have been combined with the territorial concept of sovereignty has the principle of "international justice" or "minimum standard of justice" become important as a standard that can produce fair and equitable compensation.¹⁷

Given the existence of a rule of international law that there must be just and adequate compensation if alien-owned property is taken by the state for public use, there still remain difficulties in applying the general principle of law in particular situations. There will naturally be questions of what constitutes a "taking," of what comprises "arbitrariness" of taking,¹⁸ of how value is determined, and of procedural requirements in relation to the local law. A conclusion of publicists upholding the right to protection under international law would be less impressive if there were not a record of practice, and particularly of international case law, to support their conclusion.

II. DECISIONS BY INTERNATIONAL TRIBUNALS

Holdings of international tribunals furnish strong evidence of the fact that uncompensated expropriation of alien-owned property is contrary

¹⁵ Wild, *loc. cit.*, note 10, *supra*, at p. 9.

¹⁶ Andreas H. Roth, *The Minimum Standard of International Law Applied to Aliens* (1949), p. 122; Oppenheim, *op. cit.* (7th ed.), Vol. I (1948), pp. 316, 627; E. M. Borchard, "The 'Minimum Standard' of the Protection of Aliens," *Proceedings, American Society of International Law*, 1939, pp. 51-74; notes of July 21 and Aug. 22, 1938, from the Secretary of State to the Mexican Ambassador at Washington, concerning compensation for lands in Mexico expropriated by the Mexican Government (U. S. Department of State Publication No. 1288, Inter-American Series No. 16); Kaeckenbeeck, *op. cit.*, p. 412.

¹⁷ Nicholas R. Doman, "Postwar Nationalization of Foreign Property in Europe," *Columbia Law Review*, Vol. 48 (1948), pp. 1125-1161, at pp. 1135-1136.

¹⁸ *Ibid.*, p. 1130, referring particularly to the David Goldenberg case before the Mixed German-Rumanian Tribunal (*Mix. Arb. Trib., Recueil des Décisions*, Vol. VIII, pp. 694-697).

to existing international law. Nor is the payment of compensation in itself enough to satisfy the requirements of the law, since the "minimum standard" presupposes previous investigation of individual cases (as distinct from expropriations of a summary nature), the possibility of redress by legal action, and conformity with essentials of expropriation procedure.¹⁹

Among the nineteenth-century illustrations most commonly adduced in support of the proposition that the law protects aliens' property rights are the *Sicilian Sulphur Monopoly* case,²⁰ the diplomatic settlement arrived at between Greece and the United States in the case of Jonas King,²¹ and the *Delagoa Bay Railway Arbitration*.²² In the first of these there was a treaty on which the British relied in part, but this was not necessarily the sole ground on which the award was made, and the Sicilian Government did not succeed in its contention that foreigners were entitled to no better treatment than that which nationals received.²³ In the Jonas King matter the United States successfully pressed the argument that an American whose land in Athens was taken as a site for a church but later declared by the state to be needed for a road and parkway, was entitled to an indemnity, while the Greek Government failed in its contention that King, according to the law of nations and Article I of the treaty of Dec. 22, 1837, between Greece and the United States, was subject to Greek laws.²⁴ In the *Delagoa Bay Railway Arbitration* the applicant and the respondent state seemed from the *compromis* to agree that compensation was legally due for confiscation of tangible property (line and materials); the amount of compensation was left to be determined by the tribunal.²⁵

It does not substantially strengthen the case for international legal protection of aliens' property to speak of the latter in terms of "vested" rights,²⁶ although such descriptive language has often been used. Nor is it considered particularly helpful to define as vested those "private rights of foreigners which they enjoy in accordance with minimum standards of international law."²⁷ In whatever manner described, such rights seem to have been distinguished by the Permanent Court of International Justice in the case relating to German interests in Polish Upper Silesia, when it spoke of

¹⁹ Georg Schwarzenberger, *International Law*, Vol. I (1949), p. 102.

²⁰ 28 *British and Foreign State Papers* 1163.

²¹ J. B. Moore, *Digest*, Vol. VI, p. 263.

²² J. B. Moore, *International Arbitrations*, Vol. II, p. 1865.

²³ Cf. discussion in Alexander Fachiri, second article cited in note 11, *supra*, at p. 34.

²⁴ Sen. Doc. 9, 33rd Cong., 2nd Sess. (In the final settlement, Greece paid an indemnity of \$25,000.)

²⁵ Cf. Alexander Fachiri, second article cited in note 11, *supra*, at p. 37.

²⁶ Cf. the statement by Austin to the effect that to speak of "vested" rights is either to use a term that is superfluous or to beg the question. *Lectures on Jurisprudence* (1863), Vol. III, pp. 69, 70.

²⁷ Georg Schwarzenberger, *op. cit.*, Vol. I (1949), p. 85.

expropriation allowed under the terms of a convention as a "derogation" from the rules generally applied in regard to the treatment of foreigners.²⁸ In the later judgment relating to the indemnity in the *Chorzów Factory Case*, the Court distinguished between expropriation (the taking for fair compensation, *i.e.*, the value of the undertaking at the moment of dispossession plus interest to the day of payment), and the seizure (even with compensation) of property which, under a treaty rule, could not be taken at all, save under exceptional circumstances specified in the treaty.²⁹

The question of what constitutes a "taking" must be settled in the light of the circumstances of each case. Confiscatory breaches of concessions may be productive of, or accompanied by, the taking or transfer of property.³⁰ In some instances it has been held that arbitrary prohibition of exportation of property would in effect amount to confiscation.³¹ A mixed arbitral tribunal under the Treaty of Versailles found that the sequestrator of a forest had ordered the felling of trees which the condition of the forest did not require and that this effected a real disposal of property.³²

Tribunals necessarily have considerable discretion in computing losses suffered through expropriation. In the matter of Jonas King, already referred to, the Secretary of State suggested to the American Minister in Greece that loss suffered might be ascertained "by taking the opinion of intelligent and impartial foreigners, by recent sales of land in the vicinity,

²⁸ P. C. I. J., Series A, No. 7, p. 22.

²⁹ P. C. I. J., Series A, No. 17, pp. 46, 47.

A statement of the general principle, made by Arbitrator Huber in passing upon British claims against Spain, is reproduced in Jackson H. Ralston, Supplement to the Law and Procedure of International Tribunals (1936), pp. 51-52. See also the statement by Commissioner Bainbridge in the Rudloff claim (Venezuelan Arbitrations, Ralston's Report (1903), pp. 182, 189) to the effect that the taking away of rights that have been acquired, transmitted and defined by a contract is as much a wrong, entitling the sufferer to redress, as the taking away or destruction of tangible property, and that such an act committed by a government against an alien gives, by established rules of international law, the right to such aliens' government to demand and receive just compensation. In the George W. Upton claim (Report of Robert C. Morris, United States-Venezuelan Claims Commission, Sen. Doc. 317, 58th Cong., 2nd Sess., pp. 384-389), the Commission conceded the right of a state, under stress of necessity, to appropriate private property for public use, but always with the corresponding obligation to make just compensation to the owner.

³⁰ Charles Cheney Hyde, *op. cit.*, Vol. I, p. 713. In the Oscar Chinn Case, however, the Permanent Court of International Justice held that respect due to vested rights of an alien does not imply an obligation for a state to refrain from granting such special rights to its own nationals as might result incidentally in losses to an alien (P. C. I. J., Series A/B, No. 63 (1934)). It would appear that protection against such losses to alien investors might be secured through national treatment provisions in treaties.

³¹ Claim of Costa Pendelion and George Andrew, in Fred K. Nielsen, American-Turkish Claims Settlement (1937), pp. 333, 336.

³² *Héritiers Gény v. État allemand; Alfred et Pierre Gény v. État allemand*, Mix. Arb. Trib., *Recueil des Décisions*, Vol. I, p. 394.

by a private arbitration of disinterested persons, or by any other sources of information," the purpose being, the Secretary indicated, to determine "not speculative and consequential losses, but such as would probably be adjudged by candid and practical men."³³ In the *Norwegian Ships Arbitration* the tribunal said that compensation was to be measured by the fair value of the property taken at the time and place of taking and in the light of all the surrounding circumstances; the fair market value must be paid, and this must be assessed *ex aequo et bono*.³⁴ In the *De Sabla Case*, the Panamanian-American Tribunal used as a basis for valuation an offer to buy at a time near that of the taking.³⁵ Replacement, as distinct from market, value has sometimes been found just.³⁶

Determination of the time at which the obligation to pay compensation arises might ordinarily be expected to present less difficult problems than would matters of valuation. Reasonably deferred payments will presumably not be unjustly burdensome to the claimant, if interest is awarded. In the case of the *Lord Nelson*,³⁷ the rule was applied that, if payment is not made when it is due (which would ordinarily be at the time of taking), interest should be paid at the rate that was current in the place at the time the principal became due. A leading authority speaks of the "fiscal equivalent of prompt payment . . . duly arranged at the outset."³⁸ Nor, according to what is believed to be the sound view, does the claimant necessarily have to bear the loss occasioned by long-drawn-out judicial proceedings in local courts. In the case of *Armendariz*, the Mexican-American Claims Commission under the convention of July 4, 1868, made an award against the United States and refused to agree with the argument of the American Agent that, since the case involved questions essentially judicial, no award should be made to the claimant while those questions were pending undetermined.³⁹

III. TREATY PROVISIONS BEFORE 1923

Space limitations of a brief study have permitted consideration of only a limited number of international judicial decisions relating to the re-

³³ J. B. Moore, *Digest*, Vol. VI, p. 263.

³⁴ Text in this *JOURNAL*, Vol. 17 (1923), p. 362. As is well known, the United States, while paying the award, protested that it was based upon the speculative, rather than the actual, value of what had been taken.

Another case in which a tribunal said that the value of property should be determined *ex aequo et bono* involved scientific documents that were contained in boxes which were attached and sold (*Barthélemy v. État allemand*, *Mix. Arb. Trib., Recueil des Décisions*, Vol. II, p. 31).

³⁵ Report of Bert L. Hunt, Agent for the United States (U. S. Dept. of State, *Arbitration Series No. 6*, 1934), p. 379.

³⁶ Case cited in note 32, *supra*.

³⁷ American and British Claims Arbitral Tribunal, Claim No. 20 (1914).

³⁸ Charles Cheney Hyde, *op. cit.*, Vol. I, p. 719.

³⁹ J. B. Moore, *International Arbitrations*, Vol. IV, p. 3722.

sponsibility of states growing out of expropriation of alien-owned property. There remains to be considered the rôle of bilateral commercial treaties in the protection of private property against uncompensated takings for public use. It is obvious that, in a particular case, an applicant state may appeal to both customary law and treaties.⁴⁰ It is also clear that parties to a treaty may provide for treatment more specific and more favorable to aliens than would a provision to apply international law. A respondent state, having agreed to such a treaty rule, would, for the purpose of cases falling within it, have waived its right to have its liability determined solely on the basis of customary international law.

It is convenient to consider, first, commercial treaties made before 1923, and then treaties made since that date. The line of division has been set in 1923 since, with the Treaty of Friendship, Commerce and Consular Rights which the United States signed with Germany on December 8 of that year,⁴¹ a new treaty pattern and some new language on the subject of property protection came into use.

At the outset it may be noted that a general commercial treaty (commonly called today a treaty of friendship, commerce and navigation)⁴² is, of course, not the only type of international agreement in which are to be found provisions relating to protection of private property. Treaties of peace and agreements on various other subjects may contain them. Thus in the Jay Treaty, signed November 17, 1794, there was a provision whereby settlers and traders within prescribed precincts and jurisdictions were to continue to enjoy unmolested all their property of every kind, and were to be protected therein.⁴³ There were articles in the Oregon Treaty with Great Britain, signed June 15, 1846, relating to respect for property and providing for valuation of farms and other lands that might be taken for public use.⁴⁴ The Clayton-Bulwer Treaty, signed four years later, also provided for compensation for certain private property that might be taken.⁴⁵ In the Algeciras Convention, signed April 7, 1906, there were provisions whereby certain property might be expropriated with previous payment (in accordance with rules that were laid down) of a fair indemnity.⁴⁶ In the Conven-

⁴⁰ See note 23, *supra*.

⁴¹ 44 Stat. 2132; this JOURNAL, Supp., Vol. 20 (1926), p. 4.

⁴² On the scope of such treaties and their relation to economic foreign policy, see Robert R. Wilson, "Postwar Commercial Treaties of the United States," this JOURNAL, Vol. 43 (1949), pp. 262-287.

⁴³ 18 Stat. (2) 269, Art. II. There were separate provisions on land (Art. IX) and on non-sequestration and non-confiscation of debts (Art. X). For an instance of the application of Art. II, see *Magnani v. Harnett* (1939), 14 N. Y. S. (2d) 107.

⁴⁴ 18 Stat. (2) 320, Arts. III, IV.

⁴⁵ 18 Stat. (2) 322, Art. III.

⁴⁶ 34 Stat. 2905. By Art. 114, "Expropriation can only be effected on the ground of public utility and when necessity for the same shall have been ascertained by any administrative investigation, the formalities of which shall be determined by Shereefian regulations drawn up with the assistance of the Diplomatic Body." In the case of foreign

tion for the Construction of a Ship Canal, signed November 18, 1903, the United States and Panama agreed that damage caused to owners of lands or other private property by reason of grants contained in the treaty or by reason of operations of the United States should be appraised and settled by a joint commission, the awards to be paid by the United States, but without the proceedings preventing, delaying or impeding work on the Canal.⁴⁷ Somewhat later, in the series of treaties by which the United States assented to the mandating of territories, it not only secured assurances of treatment as favorable as that which Members of the League of Nations should receive, but also specified, in phraseology varying somewhat from treaty to treaty, protection of American property rights in the mandated regions.⁴⁸

In the commercial treaties themselves, provisions on the protection of private property rights have commonly occurred in more than one context. It will be convenient to consider the provisions of the pre-1923 treaties as they are to be found in contexts relating to (1) access to courts, (2) embargoes and detentions, (3) general statements as to protection and security, and (4) specific references to expropriation and compensation.

In twenty-two instances there are mentions of protection in connection with access to courts, beginning with the treaty with Colombia, signed Oct. 3, 1824,⁴⁹ and ending with that with Peru, signed Aug. 31, 1887.⁵⁰ In fourteen of these there is a reference to "special protection" of private property. The remaining eight specify "full and perfect protection."

Over the period beginning with the signing of a treaty with The Netherlands on Oct. 8, 1782,⁵¹ and ending with the treaty with Ethiopia, signed Dec. 27, 1903,⁵² the United States in twenty-eight agreements included provisions against seizures or detentions, sometimes in relation to embargoes. The eighth article of the treaty with The Netherlands provided:

Merchants, masters and owners of ships, mariners, men of all kinds, ships and vessells, and all merchandizes and goods in general, and effects of one of the confederates, or of the subjects thereof, shall not be seized or detained in any of the countries, lands, islands, cities, places, ports, shores, or dominions whatsoever of the other confederate, for any military expedition, publick or private use of any one, by ar-

owners, where there was disagreement between the competent administration and the owner of the property to be expropriated, the indemnity was to be fixed by a special jury, or by arbitration, with the possibility of appeal from an arbitrator's decision (Arts. 116-119).

⁴⁷ 33 Stat. 2234, Art. VI. By the same article, the appraisals and assessments of damages were to be based upon the value of the property "before the date of this convention." On the application of this provision see Marjorie E. Whiteman, *Damages in International Law*, Vol. II (1937), pp. 1392-1402.

⁴⁸ See, for example, the statement in Art. III of the Treaty with France relating to Rights in the Cameroons, signed Feb. 13, 1923 (43 Stat. 1778-1789): "Vested American property rights in the mandated territory shall be respected and in no way impaired."

⁴⁹ 18 Stat. (2) 150, Art. 10.

⁵⁰ 25 Stat. 1444, Art. 15.

⁵¹ 18 Stat. (2) 533, Art. 8.

⁵² 33 Stat. (2) 2254, Art. 2.

rests, violence or any colour thereof; much less shall it be permitted to the subjects of either party to take or extort by force anything from the subjects of the other party, without the consent of the owner; which, however, is not to be understood of seizures, detentions and arrests which shall be made by the command and authority of justice, and by the ordinary methods, on account of debts or crimes, in respect whereof the proceedings must be by way of law, according to the forms of justice.

The several commercial treaties which the United States made between 1782 and the end of the eighteenth century contained somewhat comparable clauses, but with express references to embargoes, as well as detentions. Article 16 of the treaty with Prussia, signed July 11, 1799, contained a provision for "equitable indemnity" for ships or goods detained or used.⁵³ The 1824 treaty with Colombia specified a "sufficient" indemnification,⁵⁴ and seven later treaties, all with Latin American Republics, used this formula. The treaty with New Granada, signed December 12, 1846,⁵⁵ as also those with San Salvador, signed Jan. 2, 1850,⁵⁶ and May 27, 1870,⁵⁷ specified "equitable and sufficient indemnification." Four other treaties with Latin American Republics contained the rule of "full and sufficient indemnification," to be agreed upon and paid in advance. The commercial treaty with Italy, signed Feb. 26, 1871,⁵⁸ provided for "sufficient indemnification," to be agreed in advance "when possible," while that with Spain, signed July 3, 1902,⁵⁹ provided that "sufficient indemnification" should be agreed upon in advance "if practicable." The treaty with Mexico, signed April 5, 1831,⁶⁰ contained a still different formula, its Article VIII providing that:

The citizens of neither of the contracting parties shall be liable to any embargo; nor shall their vessels, cargoes, merchandise, or effects, be detained for any military expedition, nor for any public or private purpose whatsoever, without corresponding compensation.

The treaty with China, signed July 3, 1844,⁶¹ contained, in its Article XXVIII, the following:

Citizens of the United States, their vessels and property, shall not be subject to any embargo; nor shall they be seized or forcibly detained for any pretence of the public service; but they shall be suffered to prosecute their commerce in quiet, and without molestation or embarrassment.

Distinguishable from the types of provisions just examined are statements in broader, more general form. Such treaty statements did not begin with the first commercial treaty of the United States, that signed with

⁵³ 18 Stat. (2) 648, Art. 16.

⁵⁵ 18 Stat. (2) 550, Art. 8.

⁵⁷ 18 Stat. (3) 725, Art. 8.

⁵⁹ 33 Stat. 2105, Art. 5.

⁶¹ 18 Stat. (2) 116.

⁵⁴ Cited in note 49, *supra*, Art. 5.

⁵⁶ 10 Stat. 891, Art. 8.

⁵⁸ 17 Stat. 845, Art. 4.

⁶⁰ 18 Stat. (2) 476.

France on Feb. 6, 1778. The "treaty plan" of 1776, as approved by the Continental Congress on September 17 of that year,⁶² had in fact contained but little concerning protection of property on land, as compared with the proposals concerning property at sea. While instructed to press for the acceptance of a clause whereby American merchants residing in France would be exempt from the *droit d'aubaine*, the American negotiators at Paris were told to "let not the fate of the Treaty depend upon obtaining it."⁶³ Another part of the plan of 1776 contemplated that, in the event of war between the signatories, the merchants of one party in the other's territory would be allowed six months in which to depart. For property taken within that time "full satisfaction" should be made. However, a general property-protection clause, such as came to be a feature of later commercial treaties of the United States, did not appear in the first commercial treaty with France, although there was precedent for including one, as, for example, in the British-Spanish Treaty of Peace and Friendship signed May 23, 1667 (later incorporated into the Treaty of Utrecht, 1713).⁶⁴

United States treaties of the late eighteenth and the nineteenth centuries provided for the application of various standards in the treatment of property rights of treaty aliens. Most-favored-nation treatment was agreed to in the treaty with France, signed September 30, 1800,⁶⁵ in an article that applied to "property and persons" as well as to "what concerns trade, navigation, and commerce." Some later treaties were to employ this standard alone,⁶⁶ while, by the provisions of half a dozen agreements between 1845 and 1902, national treatment or most-favored-nation treatment was to be accorded.⁶⁷ Sometimes national treatment alone was specified,⁶⁸ while

⁶² Journals of the Continental Congress, Vol. V, pp. 768-779.

⁶³ *Ibid.*, p. 815.

⁶⁴ See Arts. XXIX, XXXI, XXXIII and XXXIV of the treaty of 1667, also the special sanction provided for in Art. XXXVI (British and Foreign State Papers, Vol. I, Pt. I, pp. 573, 574, 575 and 623). On the extent to which principles of the plan of 1776 were taken from the Treaty of Utrecht and from other treaties, see S. F. Bemis, *A Diplomatic History of the United States* (1936), pp. 25-26.

⁶⁵ 18 Stat. (2) 224, Art. XI.

⁶⁶ See, for example, Art. 2 of the Treaty of Commerce and Navigation with Liberia, signed Oct. 21, 1862, 12 Stat. 1245.

⁶⁷ Illustrated in Art. VI of the treaty with the Two Sicilies, signed Dec. 1, 1845, 9 Stat. 833. An interpretation of such a formula, which would require that the recipient of the treatment be given the benefit of whichever standard (national or most-favored-nation treatment) was more favorable to him, would seem to be reasonable.

⁶⁸ These treaties provided for "constant protection and security" and for national treatment. For example, Art. III of the treaty with Italy, signed Feb. 26, 1871 (17 Stat. 845) contained the following: "The citizens of each of the high contracting parties shall receive, in the States and territories of the other, the most constant protection and security for their persons and property, and shall receive in this respect the same rights and privileges as are or shall be granted to the natives, on their submitting themselves to the conditions imposed upon the natives." A treaty amending

in other instances the provisions as to protection of property were not, in terms, on a contingent basis. Thus the Treaty of Amity, Commerce and Navigation with Mexico, signed April 5, 1831, set forth that the citizens of each state in the territory of the other should enjoy "in their houses, persons and properties the protection of the Government. . . ." ⁶⁹ In its treaties signed with China in 1844 and 1858, ⁷⁰ and in that signed with Korea in 1882, ⁷¹ the United States secured provisions whereby its citizens were to be accorded special protection by local authorities, who were, if necessary, to despatch military forces to protect Americans' dwellings or property. It has been seen that another article of the 1844 treaty with China was designed to protect the property and vessels of American citizens from detention or seizure. The United States, however, has not taken the position that under no conditions could property of its citizens be taken for public use in the other country. As late as 1922 an instruction from the Department of State said that:

. . . Concerning the question of whether the Chinese authorities may exercise the right of eminent domain over property owned by American citizens in China, the Department may state that since the right is so essential to the existence of any sovereign state, the Department would not be inclined to question the exercise of the right by China in an appropriate case, that is, for a public purpose, but would of course be under the necessity of insisting that just compensation be made for any property taken or damaged and that there shall be no discrimination in this respect against American citizens. ⁷²

Without being so specific as were those in the treaties with China, provisions have sometimes been broad without referring to either national or most-favored-nation treatment. Thus the treaty with Peru, signed August 31, 1887, after referring to permitted liberty of commerce and navigation,

this one, signed with Italy on Feb. 25, 1913 (38 Stat. 1669, 1670), provided, in Art. I, for "the most constant security and protection for their persons and property and for their rights. . . ." A treaty with Belgium, signed Nov. 10, 1845, had provided that "the same security and protection that is enjoyed by the citizens or subjects of each country shall be guaranteed on both sides" (18 Stat. (2) 48, Art. I). Similar wording is in Art. I of the treaty of March 18, 1875, with Belgium.

⁶⁹ 18 Stat. (2) 476, Art. 15. With this may be compared Art. 12 of the treaty with Honduras, signed July 4, 1864, which provides that citizens of each state "residing in any of the territories of the other party shall enjoy in their houses, persons, and properties the protection of the government, and shall continue in possession of the guarantees which they now enjoy" (13 Stat. 699); also Art. 12 of the treaty with Nicaragua, signed June 21, 1867 (18 Stat. (2) 566).

⁷⁰ The first of these is cited in note 61, *supra*. The second is in 12 Stat. 1023; see Art. XI.

⁷¹ 23 Stat. 720, Art. IV.

⁷² Hackworth, Digest, Vol. III, p. 654. On the point that the United States has not considered eminent domain as a practice that brought about confiscation, see Hearings before a Senate Sub-Committee, 80th Cong., 2nd Sess., Apr. 30, 1948, on the commercial treaty with Italy (signed Feb. 2, 1948), at p. 11.

residence and occupation of dwellings and warehouses, set forth that "everything pertaining thereto shall be respected. . . ." ⁷³ The 1894 treaty with Japan provided simply that citizens and subjects of each state in the territory of the other should "enjoy full and perfect protection for their persons and property." ⁷⁴

In exceptional cases there are references to constitutional provisions as affecting treatment. For example, the treaty with Switzerland, signed Nov. 25, 1850, ⁷⁵ and that with the Orange Free State, signed Dec. 22, 1871, ⁷⁶ provided for admission and treatment by each party of the citizens of the other (including, presumably, their treatment as to property rights) "on a footing of reciprocal equality," where such admission and treatment should not conflict with the constitutional or legal provisions of the contracting parties.

In a few of the commercial treaties which the United States made before 1923 there are, in contrast to the more general assurances noted above, specific references to "expropriation" or to compensation therefor, or to both. The first such provision was apparently that in the 1850 treaty with Switzerland, referred to above, which sets forth (in Article II, paragraph 3) that:

in cases of . . . expropriation for purposes of public utility, the citizens of one of the two countries, residing or established in the other, shall be placed upon an equal footing with the citizens of the country in which they reside with respect to indemnities for damages they may have sustained.

The treaty with the Orange Free State (also referred to above) follows the same formula, except that for "expropriation" are substituted the words "seizure or occupation," and for the words "purposes of public utility," the words "public purposes." Two nineteenth-century treaties with Latin American states ⁷⁷ contained clauses whereby property "of any kind" belonging to citizens of one party in the territory of the other, was not to be "taken for any public object without full and just compensation to be paid

⁷³ 25 Stat. 1444, Art. 2. In Art. 24 of the same treaty the parties, in a national treatment context relating to protection of persons and property, declare that "only in case that such protection should be denied, on account of the fact that the claims preferred have not been promptly attended to by the legal authorities, or that manifest injustice has been done by such authorities, and after all the legal means have been exhausted, then alone shall diplomatic intervention take place."

⁷⁴ 29 Stat. 848, Art. I. By Art. III of a convention signed with the United States on June 23, 1850 (18 Stat. (2) 79), the Sultan of Borneo engaged that citizens of the United States within his territories should, so far as lay within his power, enjoy "full and complete protection and security" for themselves and for any property which they might have acquired before the date of the convention or might acquire in the future.

⁷⁵ 11 Stat. 587, Art. 1.

⁷⁶ 18 Stat (2) 580, Art. 1.

⁷⁷ 1867 treaty with Nicaragua, cited in note 69, *supra*, Art. IX, par. 3; 1870 treaty with Salvador, cited in note 57, *supra*, Art. XXIX, par. 4.

in advance." A treaty with the Congo State, signed Jan. 24, 1891, provided that property of the citizens and inhabitants of each party in the territory of the other party should "not be taken for public use without an ample and sufficient compensation."⁷⁸

From the foregoing it will appear that before 1923 detailed procedural provisions on what should be done in the event of a party's taking property for public use were not the rule. That the broad language in which the treaty provisions were phrased was intended to be applied according to a rule of reason would seem to be clear from the manner in which the clauses were applied, and sometimes from special wording in the instruments themselves. For example, an instruction of April 9, 1886, pointed out that "the thirteenth article of the treaty of 1846 with New Granada expressly provides for the special protection of citizens of the United States and their property against acts amounting . . . to *arbitrary* confiscations *by mere executive decree* of the property of citizens of the United States." The "special" protection provided for in the treaty, a further instruction stated, was "inconsistent with any *arbitrary* act of either Government whereby a citizen of the other may be deprived of his rights or injured in his property *without due process of law.*"⁷⁹ In Article I of the treaty with Siam, signed Dec. 16, 1920, there is provision for "the most constant protection and security" for property, and specification of the national treatment standard. There is no specific reference in the text to the taking of property by due process or with the payment of just compensation; but notes exchanged at the time of signing stated that "Of course, all Mission lands are held subject to the exercise by the Siamese Government of the right of eminent domain."⁸⁰

IV. TREATY PROVISIONS SINCE 1923

If, as has been seen, the practice before 1923 was (except in the case of treaties with states that were not relatively advanced, and in some of which the United States had extraterritorial privileges) to incorporate broad statements of principle rather than detailed procedural prescriptions,⁸¹ there was to be no wide departure from this rule with respect to property

⁷⁸ 27 Stat. 926, Art. 3.

⁷⁹ U. S. Foreign Relations, 1886, pp. 170, 172 (italics inserted). See also Marjorie E. Whiteman, *op. cit.*, Vol. II, pp. 889-891.

⁸⁰ 42 Stat. 1928.

⁸¹ This does not overlook the fact of exceptional clauses appearing in particular treaties, as, for example, anti-monopoly clauses. See Art. 15 of the 1844 treaty with China (cited in note 61, *supra*); Art. 9 of the 1859 treaty with Paraguay (12 Stat. 1091); Art. 2 of the 1862 treaty with Turkey (12 Stat. 1213); and Art. 2 of the 1862 treaty with Liberia (12 Stat. 1245). See also Art. VII of the treaty of 1855 with the Two Sicilies (cited in note 67, *supra*).

Some treaties before 1923 had clauses on special types of property, as, for example, industrial property, or property in the form of commercial travelers' samples.

protection in treaties which the United States concluded between the first and second World Wars. Perhaps the greatest innovation was the inclusion in the treaty with Germany, signed Dec. 8, 1923, and in later treaties modeled on this one, ending with that signed with Liberia on August 8, 1938, of a specific mention of international law in indication of the degree of protection to be accorded. The formula follows:

The nationals of each High Contracting Party shall receive within the territories of the other, upon submitting to conditions imposed upon its nationals, the most constant protection for their persons and property, and shall enjoy in this respect that degree of protection that is required by international law. Their property shall not be taken without due process of law and without payment of just compensation.⁸²

The treaty with Siam, signed Nov. 13, 1937, has substantially similar language, except that in the comparable article there is added to the first sentence a statement that nationals of each party within the territories of the other "shall enjoy in this respect the same rights and privileges as are or may be granted to nationals of the State of residence," this being followed by a phrase similar to that in the other treaties concerning submis-

⁸² This language appears in treaties with the following states (the date of signature being shown in each case): Germany, Dec. 8, 1923 (cited in note 41, *supra*); Hungary, June 24, 1925 (44 Stat. 2441); Estonia, Dec. 23, 1925 (44 Stat. 2379); Salvador, Feb. 22, 1926 (46 Stat. 2817); Honduras, Dec. 7, 1927 (45 Stat. (2) 2618); Latvia, Apr. 20, 1928 (45 Stat. 2641); Norway, June 5, 1928 (47 Stat. 2135); Austria, June 19, 1928 (47 Stat. 1876); Poland, June 15, 1931 (48 Stat. (2) 1507); Finland, Feb. 13, 1934 (49 Stat. 2659); Liberia, Aug. 8, 1938 (54 Stat. 1739).

Concerning what had been done in the draft treaty for protection of a treaty alien, the Secretary of State said, in an instruction of Aug. 3, 1923, to the American Ambassador in Germany: "In the last paragraph of Article I unusual steps are taken to provide for the protection and security of his person and property in accordance with the requirements of international law. Moreover, his property is not to be taken without due process of law and without payment of just compensation." Dept. of State file 711.622/22A (National Archives).

In the negotiation of the treaty with Hungary, the Minister of that country said: "My Government feels confident that no controversy will ever arise as to the interpretation of the term 'just compensation' contained at the close of the fourth paragraph of Article I as far as the United States and Hungary are concerned. My Government is unable, however, to view with the same assurance questions that might arise with respect to the property of nationals of other countries which might avail themselves, by virtue of the most favored nation treatment clause of the provisions of the said paragraph. In order to forestall the possibility of this complication arising, it would be desirable to have the following interpretation embodied in the final protocol: 'Whenever the property of nationals of one High Contracting Party within the territories of the other shall be expropriated after due process of law, the just amount of compensation to be paid shall be determined in accordance with the principle of equal treatment with the nationals of the latter party'" (Dept. of State file 711.642/10, National Archives). The proposed language was not, however, substituted for what the United States had proposed. On a protest in 1950 which invoked this treaty, see note 104, *infra*.

sion to conditions imposed upon nationals. Paragraph 4 of the Final Protocol accompanying the treaty recorded the parties' understanding "that the payment of just compensation provided for in Article I, paragraph 3, shall be determined by due process of law, without prejudice to redress, if any, according to international law."⁸³

The reference to "due process of law" in the German treaty and in later ones raises questions as to its meaning in relation to national constitutional arrangements.⁸⁴ In this connection, it has been subsequently emphasized that the "due process" mentioned in such a treaty as that with Germany is not the due process of the United States Constitution, but the due process required by international law, since the standard of "due process of law," whether procedural or substantive, of one of the parties is not controlling and does not necessarily reflect international law.⁸⁵

Another point of practical importance is the applicability of the treaty rules concerning property protection to artificial persons. With the treaty with Germany was begun the practice of including more specific reference

⁸³ 53 Stat. 1731. As in the case of the earlier treaty with Siam (note 80, *supra*), an exchange of notes recorded the parties' agreement that mission lands were held subject to the exercise of the right of eminent domain.

⁸⁴ A memorandum of the Solicitor of the Department of State concerning the paragraph of the German treaty, as quoted above, observed that: "This stipulation will operate to secure protection against arbitrary and unjust treatment in any particular in which the Government of a country does not accord its own nationals as liberal treatment as that which is recognized by international law" (Department of State file 711.622/60, National Archives).

A letter from the Solicitor to the Under Secretary and the Secretary of State, Dec. 5, 1923, noted as "what was perhaps the major German proposal" one that was amendatory of that provision of Art. I which contemplated that property should not be taken without due process of law and without the payment of just compensation. "The German Ambassador," the letter continued, "stated that the German Constitution permitted the taking of property without payment of just compensation and that the sentence quoted might be a violation of their fundamental law. While he intimated that it would be unlikely that the German legislature would avail itself of its constitutional right to take property of aliens without payment of just compensation, he stated there was a strong feeling in his country that the Constitution should not be interfered with. The reply in behalf of the Department was that the sentence in the American text did not contemplate a yielding of anything which the German Constitution forbade, and it was, therefore, in no sense a violation of that document; and that it merely marked an agreement by Germany *not to exercise a constitutional right*, and one which if exercised would cause immediate protest by this Government in so far as it applied to American citizens." U. S. Foreign Relations, 1923, Vol. II, p. 28 (*italics inserted*).

On the meaning of "process of law" as used in a treaty (not a commercial treaty), see *Ops. Atty. Gen.*, Vol. V, pp. 333, 338, and Vol. VI, p. 533.

⁸⁵ Hearings before the Committee on Patents, House of Representatives, 77th Cong., 1st Sess., on H. J. Res. 32, 73, and 123, at pp. 59, 64, 69. *Cf.* the opinion of Georg Schwarzenberger, *op. cit.*, pp. 99, 238, on the minimum standards of international law in relation to the "minimum requirements of the rule of law in the Anglo-American sense of the term."

to companies ("limited liability and other corporations and associations") in connection with some treaty rights and privileges. Without prejudice to the interpretation of earlier treaties (those which made no *specific* reference to artificial persons) in such a way as to confer upon companies rights and privileges which were conferred in terms upon "nationals," "citizens," or "residents," it would appear that so basic a right as the protection of private property against uncompensated expropriation would be understood to exist by reason of customary international law, whether or not it was also spelled out in the terms of particular treaties.⁸⁶ On this point, later agreements were, however, to be more specifically inclusive.

Soon after the cessation of hostilities in the second World War the United States began to make new commercial treaties. The first of these, signed with China on Nov. 4, 1946,⁸⁷ referred, as had the treaties of the inter-war period, to "the most constant protection and security" to be accorded nationals of one party in territory of the other; but, for the words "that degree of protection that is required by international law," were substituted the words "the full protection and security required by international law." In the same paragraph it was stated that "in so far as the term 'national' where used in this paragraph is applicable in relation to property it shall be construed to include corporations and associations." The following paragraph contains the rule that:

The property of nationals, corporations and associations of either High Contracting Party shall not be taken within the territories of the other High Contracting Party without due process of law and without the prompt payment of just and effective compensation.

There follow in the same paragraph provisions relating to exchange withdrawal privileges for the recipient of such compensation. A separate paragraph commits the parties to accord national and most-favored-nation treatment with respect to the matters covered in the preceding paragraphs of the article.⁸⁸ By a provision in the general exceptions

⁸⁶ In the course of the hearings referred to in note 85, a witness expressed the opinion that Art. 12 of the treaty with Germany (concerning recognition of the juridical personality of limited liability and other corporations and associations) extended the protective provisions of Art. I to limited liability companies, corporations and associations (*loc. cit.*, p. 64).

⁸⁷ U. S. Treaties and Other International Acts Series, No. 1871, this JOURNAL, Supp., Vol. 43 (1949), p. 27.

⁸⁸ The part of Art. VI relating to exchange withdrawal is as follows: "The recipient of such compensation shall, in conformity with such applicable laws and regulations as are not inconsistent with paragraph 3 of Article XIX of this Treaty, be permitted without interference to withdraw the compensation by obtaining foreign exchange, in the currency of the High Contracting Party of which such recipient is a national, corporation or association, upon the most favorable terms applicable to such currency at the time application therefor is filed, provided application is made within one year after receipt of the compensation to which it relates. The High Contracting Party

article (XXVI, par. 5), the parties reserve the right to deny rights and privileges to companies which, while created or organized under the laws and regulations of the other party, are owned or controlled by nationals or companies of any third country or countries.⁸⁹ The commercial treaties which the United States has signed since 1946 (that with Italy, Feb. 2, 1948,⁹⁰ that with Uruguay, Nov. 23, 1949,⁹¹ and that with Ireland, Jan. 21, 1950),⁹² reveal some variations from the treaty with China. The Italian treaty follows fairly closely the language referred to above, except that there is some difference in the exchange withdrawal provisions;⁹³ and a provision in the protocol makes clear that "property" is to apply to interests held directly or indirectly.⁹⁴ There is a rule to apply to the taking of private enterprises into public ownership and under public control,⁹⁵ and another in regard to treatment of certain types of foreign-owned enterprises that are in competition with local publicly owned or controlled enterprises.⁹⁶

The treaty with Uruguay—called a Treaty of Friendship, Commerce and Economic Development rather than a treaty of friendship, commerce and navigation—does not refer in terms to international law in connection with protection of property. Article II, paragraph 1, is as follows:

The nationals of either High Contracting Party within the territories of the other Party shall receive the most constant protection and security, and shall be accorded, in like circumstances and conditions, treatment, protection and security no less favorable than are accorded

allowing such withdrawal reserves the right, if it deems necessary, to allow such withdrawal in reasonable instalments over a period not to exceed three years." Art. XIX, par. 3, referred to in the foregoing quotation, states principles as to exchange control and includes, *inter alia*, national and most-favored-nation treatment provisions.

⁸⁹ See note 98, *infra*.

⁹⁰ U. S. Treaties and Other International Acts Series, No. 1965.

⁹¹ Sen. Ex. D, 81st Cong., 2nd Sess.

⁹² Sen. Ex. H, 81st Cong., 2nd Sess.

⁹³ These refer to the most favorable terms applicable "at the time of taking of the property" rather than at the time application is filed. The same sentence contains the words "exempt from any transfer or remittance tax." There is no specific provision for instalment withdrawals. It is, of course, to be noted that these and other provisions of the treaties are to be read in the light of the general exceptions provisions, *e.g.*, on foreign exchange. Art. XXVI, par. i (c) of the treaty with China, and, in the case of the Italian treaty, Art. XXIV, par. I (f), and especially par. 6 of the Additional Protocol. The latter reads as follows: "Whenever a multiple exchange rate system is in effect in Italy, the rate of exchange which shall be applicable for the purposes of Article V, paragraph 2, need not be the most favorable of all rates applicable to international financial transactions of whatever nature; provided, however, that the rate applicable will in any event permit the recipient of compensation actually to realize the full economic value thereof in United States dollars. In case dispute arises as to the rate applicable, the rate shall be determined by agreement between the High Contracting Parties."

⁹⁴ Protocol, par. 1, with its cross-reference to Art. V, par. 2.

⁹⁵ See Art. V, par. 3, final sentence.

⁹⁶ Protocol, par. 2.

to the nationals of such other Party for the protection of their persons, rights, and property. This rule shall be applicable also to institutions, juridical persons, and associations.

An assurance of protection and security for property is in the second paragraph of Article VIII of the same treaty, which is as follows:

Property of nationals and companies of either Party shall receive the most constant protection and security within the territories of the other Party. The taking of property legally acquired by the nationals and companies of either Party within the territories of the other Party shall be subject to procedures and conditions no less favorable than those legally applicable in the case of the taking of the property of nationals of such other Party. Any expropriation shall be made in accordance with the applicable laws, which shall at least assure the payment of just compensation in a prompt, adequate and effective manner.⁹⁷

A new article (IV) in the Uruguayan treaty, not found in earlier treaties that have been referred to, provides as follows:

Each High Contracting Party shall at all times accord equitable treatment to the capital of nationals and companies of the other Party. Neither Party shall take unreasonable or discriminatory measures that would impair the legally acquired rights or interests of such nationals and companies in the enterprises which they have established or in the capital, skills, arts or technology which they have supplied. Neither Party shall without appropriate reason deny opportunities and facilities for the investment of capital by nationals and companies of the other Party; nor shall either Party unreasonably impede nationals and companies of the other Party from obtaining on equitable terms, the capital, skills, modern techniques and equipment it needs for its economic development.

As in the Italian treaty, there is a national-treatment provision on the taking of private enterprises into public ownership or under public control (Art. VIII, par. 3), and there are provisions (Protocol, par. 1) which are substantially similar to the corresponding provisions in the Italian treaty on treatment of certain types of foreign-owned enterprises that are in competition with local publicly controlled enterprises.

⁹⁷ There is not in this paragraph a provision concerning exchange withdrawal privileges in the event of expropriation. This is covered, however, in Article XV of the treaty that relates to exchange control. Its paragraph 4 mentions, as one of the types of transfer to which the rule of the paragraph applies, "transfers of compensation for property referred to in paragraph 2 of Article VIII." It should be noted that the same article, and comparable provisions in the treaties with Italy and Ireland, allow tolerances, in the matter of exchange withdrawals, in periods of financial stringency.

In the Minutes of Interpretation which were printed with the treaty as approved by the United States Senate (Cong. Rec., Senate, July 6, 1950, p. 9861) it is stated that the second sentence of Art. VIII, par. 2 is "not intended to require indemnification in cases such as confiscation of contraband and distraint for nonpayment of taxes or debt."

The treaty with Ireland contains two separate articles in which appear provisions looking to "most constant protection and security," but the first of these (Art. II, par. 1) does not in specific terms refer to property. The second paragraph of Article VIII is as follows:

Property of nationals and companies of either Party shall receive the most constant protection and security within the territories of the other Party, in no case less than that required by international law. Such property shall not be taken without the prompt payment of just and effective compensation. Nationals and companies of either Party shall be permitted to withdraw from the territories of the other Party the whole or any portion of such compensation, and to this end shall be permitted to obtain exchange in the currency of their own country freely at a rate of exchange that is just and reasonable.

The treaty with Ireland also contains (Protocol, par. 5) a provision similar to that contained in the Italian treaty, extending protection to property interests held directly or indirectly. There is in Article VIII, par. 2, a national-treatment rule in regard to taking property into public ownership or under public control, and provisions (Art. XV, par. 2) in regard to rights and privileges of certain types of private corporations in competition with local ones publicly owned and controlled. The fifth article of the Irish treaty contains wording comparable, although not identical, with the article quoted above from the Uruguayan one, on "equitable" treatment by each party of the capital of the nationals and companies of the other party.⁹⁸

It will be seen from the above (1) that each of the general commercial treaties which the United States has signed since 1923 specifies "the most constant protection" for property of one party's nationals in the other's territory; (2) that in the treaties signed since the cessation of hostilities in the second World War companies have been specifically mentioned as within this protection, without leaving this to be implied; (3) that with but one exception there is a reference to what international law requires (although that standard would seem to be, at least in the more recent treaties in which it is specified, expressive of the *minimum* treatment intended); (4) that fifteen of the treaties provide, *inter alia*, that property shall not be taken "without due process of law," while the treaty with Uruguay refers, in a national treatment context, to "procedures and conditions" in connection with taking, and that with Ireland makes no specific reference to "process" or "procedures" but makes clear that in

⁹⁸ The reservation (as in the treaties with China and Italy) of each party's right to deny treaty advantages to companies in the ownership or direction of which nationals of a third country or countries have a controlling interest is repeated in the treaties with Uruguay and Ireland, but with an exception in respect to recognition of juridical status and access to courts. See Art. XVIII, par. 1 (e) of the treaty with Uruguay and Art. XX, par. 1 (f) of that with Ireland.

no case shall less than national and most-favored-nation treatment be accorded; (5) that whereas the treaties of the inter-war period specified that, in the event of expropriation, there must be "just" compensation, three of the treaties signed since the cessation of hostilities in the second World War provide for "just and effective" compensation, while the treaty with Uruguay refers to applicable laws "which shall at least assure the payment of just compensation in a prompt, adequate and effective manner"; (6) that three of the four most recent treaties provide for "prompt" payment, while, as has just been noted, the treaty with Uruguay uses the adjective with reference to the *manner* in which payment must be provided for by local law; (7) that in three of the most recently signed instruments there are some provisions concerning exchange withdrawal in connection with expropriations; (8) that in the three most recently signed there are commitments for national treatment by each party of the other party's nationals and companies in all matters connected with the taking of privately owned enterprises into public ownership and under public control; (9) that in each of the same three treaties the parties agree that certain types of privately owned and controlled enterprises shall, with important exceptions, receive advantages accorded to local publicly owned and controlled enterprises which are in competition with them; (10) that in each of the two most recently signed treaties there is, in addition to other clauses relating to protection, a commitment to accord "equitable" treatment to capital.⁹⁹

In the matter of adjective law between states there is one point of sharp contrast between the new pattern of commercial treaty and earlier models, in that each of the four instruments signed since 1945 contains a compromissory clause looking to reference of disputes as to interpretation and application to the International Court of Justice. Questions of what treatment is "just," or what compensation is adequate or effective, need not be left, in the final analysis, to decision by each interested party for itself.

V. CONCLUSIONS

Perhaps the most general observation justified by the survey which has been undertaken is that, whereas commercial treaties have traditionally included provisions on protection of property, recent treaties have shown a tendency toward greater precision, and have reflected a realistic view of new economic developments. Various standards of treatment are in use. If, as in the case of nearly all the treaties since 1923, there is a reference to international law as a standard, the wording does not neces-

⁹⁹ On the general utility of "equitable" treatment as a standard, in comparison with others, see Georg Schwarzenberger, "The Province and Standards of International Economic Law," *International Law Quarterly*, Vol. II (1948), pp. 402, 411.

sarily do more than make this the "floor" in any case. As such, its reach extends to both adjective and substantive law. The alien property-owner's *right* may be distinguished from his remedy. Parties agreeing to what international law requires retain, of course, the rights which they have under the rule as to exhaustion of local remedies. It is not believed, however, that the prevailing concept of denial of justice has become so limitative as to make references to the international law standard ineffectual, or that the idea that international remedies may be excluded through Calvo Clauses has received sufficient assent to have such an effect.¹⁰⁰ Even without express reference to the law, it would still be true, as is in fact stated in words in the most recent of these treaties, that "treaty commitments are to be construed in the light of international law."¹⁰¹ There is an impressive body of case law which makes meaningful specific references to the standard, but the lack of universal agreement on what the standard now requires may make it appropriate to supplement practice with more precise rules.

The meaning of such words as "just," "adequate," "prompt," and "effective" can be ascertained from the intention of the parties, in the light of customary law and practice, and common sense.¹⁰² Questions of whether particular companies are public, or private, or mixed, may arise in connection with application of provisions touching selections for nationalization, or competition between foreign-owned private concerns and local public ones. The manner in which exchange withdrawal provisions of the newer treaties have been related to the obligations of parties under the Articles of Agreement of the International Monetary Fund and also the extent to which the treaties allow for elasticity in periods of financial stringency, seem likely to have a bearing upon their utility. Provisions which entrust to the International Court of Justice the office of final, authoritative interpreter should provide safeguards against any party state's arbitrary or unreasonable constructions.

Aside from strict legalism, questions of policy arise, and in their basic objectives the bilateral commercial treaties should be considered in relation to promotion of commercial and cultural exchange, to the provision of foreign economic assistance, and to the purposes of the United Nations.

¹⁰⁰ For an exceptional case of a treaty reference to "manifest injustice" and exhaustion of local remedies, see note 73, *supra*.

For what is believed to be a sound view as to limitations upon the capacity of private concerns to contract away international legal remedies, see K. Lipstein, "The Place of the Calvo Clause in International Law," *British Year Book of International Law*, Vol. XXII (1945), pp. 130-145.

¹⁰¹ Treaty with Ireland, Protocol, par. 12.

¹⁰² See the Treaty of Commerce and Navigation between the United States and the Ottoman Empire, signed Feb. 25, 1862, concerning plain and fair construction of the terms. 12 Stat. 1213, Art. XXI.

That the United States has not been willing to accept national treatment as the maximum which its private investors can rightfully expect is indicated by its position at the International Conference of American States at Bogotá in 1948, when, on a close vote, it successfully opposed the Mexican Delegation's proposal to the effect that there would be prompt, adequate and effective compensation for expropriation "except when the constitution of any country provided otherwise."¹⁰³ That the American Government is not disposed to condone uncompensated expropriation, or discriminatory treatment of its citizens as compared with other foreigners, is illustrated by a recent protest to Hungary over that country's actions under its nationalization law of December 28, 1949.¹⁰⁴ In the carrying out of its total economic foreign policy, especially that of promoting peace and raising standards of living by relieving and assisting economically underdeveloped areas, the United States has apparently assigned great relative importance to private capital and skills. The policy would seem to presuppose that democratic capitalism has the capacity to assist toward improvement of the world situation, and that private individuals and companies having part in this process, while accepting substantial obligations

¹⁰³ Report of Ninth International Conference of American States (U. S. Department of State Publication 3263, American Republics Series No. 3), pp. 66, 67. The provision referred to was proposed for insertion in Art. 25 of the Economic Agreement. Art. 23 of that Agreement provides, *inter alia*, that foreign investments should be made with due regard not only for the legitimate profit of the investors, but also with a view to accelerating the sound economic development of the country in which they are made, and that, with respect to employment and the conditions thereof, just and equitable treatment should be accorded to all personnel, both national and foreign. By Art. 25 "Any expropriation shall be accompanied by payment of fair compensation in a prompt, adequate and effective manner." On substantially the point involved in the Mexican proposal referred to above, the delegations of eight Latin American states made reservations to this article (document cited, pp. 214-216). See Martin Domke, "Some Aspects of the Protection of American Property Interests Abroad," Record of the Association of the Bar of the City of New York, Vol. 4, No. 7 (1949), p. 268.

¹⁰⁴ U. S. Dept. of State Bulletin, Vol. XXII, No. 558 (March 13, 1950), p. 399. The note, referring to the Treaty of Friendship, Commerce and Consular Rights signed in 1926 (cited in note 82, *supra*), said that the United States would hold the Government of Hungary "wholly responsible for the payment of adequate and effective compensation for the property rights of American nationals affected by the present edict as well as by previous laws and decrees," and drew attention to the fact that interests of the Soviet Union had been exempted from nationalization under provisions of the edict, this discrimination being in clear violation of the treaty.

On the 1948 agreement with Yugoslavia, by which the United States obtained funds with which to pay the claims of Americans who had suffered by reason of nationalization measures, see Seymour J. Rubin, *loc. cit.* (note 6, *supra*), pp. 489-490. The International Claims Commission, created by Public Law 455, 81st Cong., 2nd Sess., is authorized to apply, in the decision of such claims, provisions of the applicable claims agreement and "the applicable principles of international law, justice and equity."

as toward the countries in which they invest, are properly due reasonable protection.¹⁰⁵ Commercial treaties provide one means to that end.¹⁰⁶

¹⁰⁵ The Act for International Development, approved June 5, 1950, sets forth the finding of Congress that "Technical assistance and capital investment can make maximum contribution to economic development only where there is understanding of the mutual advantages of such assistance and investment and where there is confidence of fair and reasonable treatment and due respect for the legitimate interests of the peoples of the countries to which the assistance is given and in which the investment is made and of the countries from which the assistance and investments are derived. In the case of investment this involves confidence on the part of the people of the underdeveloped areas that investors will conserve as well as develop local resources, will bear a fair share of local taxes and observe local laws, and will provide adequate wages and working conditions for local labor. It involves confidence on the part of investors, through intergovernmental agreements or otherwise, that they will not be deprived of their property without prompt, adequate, and effective compensation; that they will be given reasonable opportunity to remit their earnings and withdraw their capital; . . . that they will enjoy security in the protection of their persons and property. . . ." Public Law 535, 81st Cong., 2nd Sess., Title IV.

¹⁰⁶ See the statement of the Secretary of State concerning the negotiation of such treaties, in Hearings before the Committee on Foreign Relations, U. S. Senate, 81st Cong., 2nd Sess., on the Act for International Development (March 30 and April 3, 1950) at pp. 6-7. On the relationship of the treaties to a plan for guaranties of private investments in the foreign field, see the statement of Norman M. Littell, *ibid.*, pp. 75, 76. Reporting on H. R. 8083, the House Committee on Banking and Currency, referring to treaty assurances in relation to the statutory plan for guaranties of investments said that: "Treaties alone . . . cannot give an investor the assurances which he may legitimately require in order to risk his capital abroad." It emphasized that in some circumstances, despite the good faith of foreign governments involved, expropriation might become unavoidable, there might be inability to pay promptly, and a guaranty plan might be needed to cover uncompensated expropriations or currency inconvertibility. House Report 1960, 81st Cong., 2nd Sess., pp. 2, 3-4.

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HERMAN WALKER, JR.

Treaties for the Encouragement and Protection of Foreign Investment: Present United States Practice

THE CURRENT United States interest in treaties for the encouragement and protection of foreign investment weds two national policies of long standing. Treaties in support of American citizens and their interests abroad, in line with the prevailing international needs and usages of each era, have been a normal and repeatedly used feature of American diplomacy since the days of the War of Independence. Concurrently, the Republic has from its earliest years favored the free international movement of private capital. This was true when it was an undeveloped, capital-deficient ex-colony; it remains true now that it has become a world power and reservoir of capital, able to help satisfy the investment requirements of others. Then, to the great benefit of its own economic growth, it embodied in its legal system principles favorable to foreign capital;¹ now through treaty negotiations it seeks to project similar principles onto the international plane, a consummation responsive alike to its own economic position and to the contemporary urge for accelerated economic development being manifested by the members of the world community.²

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¹ Alexander Hamilton in his celebrated *Report on Manufactures*, an analytical set of recommendations addressed to the first Congress in 1790, had urged such a policy in the following words:

"It is not impossible that there may be persons disposed to look with a jealous eye on the introduction of foreign capital as if it were an instrument to deprive our own citizens of the profits of our own industry. But perhaps there never could be a more unreasonable jealousy. Instead of being viewed as a rival, it ought to be considered as a most valuable auxiliary; conducing to put in motion a greater quantity of productive labor and a greater portion of useful enterprise than could exist without it. . . . [E]very farthing of foreign capital . . . is a precious acquisition." (Taussig, ed., *State Papers and Speeches on the Tariff*, Harvard 1892, pp. 39-40).

² For a recent authoritative exposition of this view, see section entitled "Promoting the International Flow of Goods and Capital" in the President's Economic Report transmitted January 24, 1956 (H. Doc. 280, 84th Cong., 2d sess.), carried in the Department of State Bulletin, vol. XXXIV, pp. 253-57.

I

Treaties for investment purposes deal with the basic legal conditions which influence the degree to which potential investors are willing to venture their capital in undertakings in a foreign land. They aim, on a joint consensual basis, to establish or confirm in the potential host country a governmental policy of equity and hospitality to the foreign investor. This means, above all, assurance that the enterprise and property of the alien will be respected and that he will be accorded equal protection of the laws alike with citizens of the country. This fundamental idea, then, is the raw material from which the variegated content of the treaties is elaborated.

The principal vehicle advocated by the United States Government thus to deal by agreement with the ground rules affecting investment is the bilateral treaty of friendship, commerce, and navigation—"FCN treaty" or "commercial treaty" for short. In the last ten years, such treaties have been signed with 15 countries,³ and others are in course of negotiation. The FCN treaty-type became the chosen instrument presumably because it afforded a ready-made framework into which the desired provisions could conveniently be fitted, and because past experience had demonstrated its negotiability. The diplomatic *desiderata* of precedent and tested practicability favored it.

This type of treaty is an instrument widely used by nations over the years to provide the juridical basis for their economic intercourse and to strengthen ties of good neighborliness in their everyday relations. It acquired in time a familiar and distinctive form and character, as a normal medium through which to provide extensively for the rights of each country's citizens, their property and other interests, in the territories of the other, and for the rules mutually to govern their trade and shipping. Around this central theme, this treaty-type has repeatedly proved its

³ *China*, 1946 (63 Stat. pt. 2, 1299); *Italy*, 1948 (63 Stat. pt. 2, 2255) supplemented by Agreement of September 26, 1951, S. Exec. H, 82d Cong., 2d Sess.; *Ireland*, 1950 (1 UST 785); *Colombia*, 1951 (S. Exec. M, 82d Cong., 1st Sess., withdrawn from Senate, June 30, 1953); *Greece*, 1951 (TIAS 3057); *Israel*, 1951 (5 UST, pt. 1, 550); *Denmark*, 1951 (S. Exec. I, 82d Cong., 2d Sess.); *Japan*, 1953 (4 UST, pt. 2, 2063); *Federal Republic of Germany*, 1954 (S. Exec. E, 84th Cong., 1st Sess.); *Haiti*, 1955 (S. Exec. H, 84th Cong., 1st Sess.); *Nicaragua*, 1956 (S. Exec. G, 84th Cong., 2d Sess.); *Netherlands*, 1956 (S. Exec. H, 84th Cong., 2d Sess.); *Uruguay*, 1949 (S. Exec. D, 81st Cong., 2d Sess.); *Ethiopia*, 1951 (4 UST, pt. 2, 2134); and *Iran* (S. Exec. E, 84th Cong. 2d Sess). These treaties fall into three patterns. Those succeeding the China and Italy treaties reflect an extensive reorganization and condensation of the content. The Ethiopia and Iran treaties represent a further abridgment of this material, and add provisions on diplomatic and consular rights. All are substantially similar, however, with regard to the points discussed in this article, except as otherwise noted and except that the Ethiopia and Iran treaties lack some of the refinements found in the others. They all bear the same title, except that in the Uruguay case the term "economic development" occurs, and "amity and economic relations" in the case of Ethiopia and Iran.

flexibility and its adaptability to the varying needs of different eras. Its history of use by the United States antedates the Constitution. Our first treaty, in fact, was a Treaty of Amity and Commerce, concluded in 1778 with France,⁴ as part of the arrangement which brought that country into our Revolutionary War as an ally. Numerous other examples followed, with countries of all conditions and locations, and with varying emphases and motivations, depending on the circumstances of the day.⁵

In more recent times, following World War I, such treaties were designed especially to promote international trade; and they afforded the medium through which this country embraced the unconditional form of the most-favored-nation clause. But latterly, since the enactment of the reciprocal Trade Agreements Act in 1934, other conventional tools of a special sort have been fashioned and employed to serve trade promotion and regulation: the bilateral trade agreement and now the GATT (the General Agreement on Tariffs and Trade).⁶ With the consequent decrease of emphasis on the FCN treaty's role in international trade, the instrument lay ready to hand following World War II to be retooled to fit the newly-crystallized investment need.⁷ This retooling did not mean abandonment of the old; the treaty remains one of commerce and navigation, *inter alia*. It meant rather a shift in orientation and internal balance, with the refinement, building up, and supplementing of familiar features especially pertinent to investor requirements. How this has been done may be described as follows.

⁴ Others of the pre-Constitution era included those with the Netherlands (1782), Sweden (1783), and Prussia (1785).

⁵ A recent publication mentions the figure "more than 130," counting those of smaller scope and size (Department of State Fact Sheet entitled "Commercial Treaty Program of the United States," March 1952, p. 3). For the various purposes historically served by these treaties, see *ibid* and Setser, "Treaties to Aid American Business Abroad," XL Foreign Commerce Weekly (U.S. Dept of Commerce, Sept. 11, 1950), pp. 3 *et seq.*

⁶ Originally negotiated at Geneva, 1947, and now adhered to by 35 countries. The present text, with pending revisions, was published in a State Department pamphlet under date of March, 1955; and a summary explanation in Department of State Publication 5813, April, 1955.

⁷ The change in the country's international capital position did not, of course, suddenly occur at this point of time. Even before the first World War, when the United States was the world's leading creditor nation, American investments abroad were growing, especially beginning about 1900. The graph of its creditor status between the two Wars, moreover, was uneven, there being periods in the 30's and early 40's when the net capital flow was markedly inward; and considerable foreign investment continues still to be made here. For the evolution of the United States position, see Lewis, *America's Stake in International Investments* (Brookings, 1948); Sammons, "International Investment Position of the United States," XVIII Foreign Commerce Weekly (January 27, 1945) 5-7; Pizer and Cutler, "International Investments and Earnings," Survey of Current Business (U.S. Department of Commerce), August 1955, pp. 10-20. See also, e.g., the summaries in Young, *The International Economy* (3rd ed. 1951) 497-502; and the OEEC Report on International Investment (Paris, 1950) 13-28.

TREATY OF FRIENDSHIP,
COMMERCE AND NAVIGATION

STANDARD DRAFT

This draft contains the standard provisions of the treaty of friendship, commerce and navigation as they had evolved through January 1, 1962. For special considerations respecting two provisions in brackets (Article XVIII(3) and Protocol (3)) see prefatory comments to the annotations for Articles VII and XVIII.

ARTICLE XIV

Entry of Goods

- Paragraph 1: Unconditional Most-Favored-Nation Treatment
- Paragraph 2: Quantitative Restrictions
- Paragraph 3: Application of Quantitative Restrictions
- Paragraph 4: Prohibitions and Restrictions on Noncommercial Grounds
- Paragraph 5: Treatment of Nationals and Companies
- Paragraph 6: Exceptions to Most-Favored-Nation Treatment

General:

Article XIV, together with the other trade provisions of the treaty (Articles XV, XVI, XVII, and XXI(2) and (3)) are derived principally from the general provisions of the early reciprocal trade agreements, of the proposed Havana Charter for an International Trade Organization (Department of State Publication 3206), and of the General Agreement on Tariffs and Trade (61 Stat. (5) and (6); 4 Bevans 639). Although the Havana Charter never entered into force, it represented the first significant effort to negotiate general trade provisions in a multilateral context. Because many of its provisions were included in GATT with little or no change, the Havana Charter is equally important as a source from which the trade provisions of the treaty were derived.

In the main the trade provisions of the treaty are shorter and more simply worded versions of comparable provisions of GATT and of the proposed Havana Charter. In a few instances, however, the treaty provisions are stated more broadly or

contain innovative material, although there are no extreme variations from the scope or content of the Charter and GATT.

Article XIV should be read in light of Article XXI(3), the so-called GATT exception. That provision reserves to each treaty partner the right to take any action "required or specifically permitted" by GATT while it is a contracting party to GATT, irrespective of the requirements of Article XIV. Similarly, the GATT exception removes any special trade advantages accorded under GATT from the most-favored-nation rules of the treaty insofar as they apply to the treatment of goods.

In terms of practical effect the GATT exception gives Article XIV and the other trade provisions a supplementary role in the overall scheme of the treaty. In a sense those provisions are suspended while the treaty partners are also contracting parties to GATT. The GATT exception is so worded, however, that any broader provisions in the treaty or provisions for which there is no GATT equivalent would be applicable unless their application resulted in some manner in conflict with a GATT provision, in which case the GATT exception could be invoked.

In terms of negotiating experience, the most significant provision of Article XIV is the customs union exception in Article XIV(6), for the discussion of this provision frequently raised central issues of United States trade policy. That policy is based on the principle that merchandise trade should be conducted on the basis of nondiscrimination, and it is embodied in Article I, the unconditional most-favored-nation treatment provision of GATT. One consequent aim of United States trade policy is to limit any exceptions to that principle to those provided for in GATT. In terms of preferential arrangements, the permissible arrangements are those specifically covered in

Article I of GATT, which are in practical terms preferences antedating GATT and which are subject to strict rules binding the margin of preference. In negotiating Article XXI(2), the United States customarily took a firm position in opposition to any relaxation of the GATT rules on preferences, unless there was reasonable prospect that the preferences could be absorbed in a customs union or free trade area.

In the case of other departures from the rule of unconditional most-favored-nation treatment, treaty policy similarly was to adhere to the GATT norms. These departures involve principally: (1) restrictions imposed on sanitary or other customary grounds of a non-commercial nature, as provided in Article XIV(4); (2) restrictions imposed to safeguard the balance of payments as provided in Article XIV of GATT; and (3) customs unions and free trade areas, as provided in Article XIV(6).

It was not an element of treaty policy to incorporate a balance of payments reservation in Article XIV or to initiate it during a negotiation but to offer it in response to a showing of need. The principal reason was that the GATT exception (Article XXI(3)) preserved the freedom of action of the treaty partners to impose discriminatory import or export restrictions on balance of payments grounds pursuant to Article XIV(3) of GATT. This provision, however, did not provide an adequate solution for treaty partners that were not contracting parties to GATT. In the circumstances, considerations of equity called for an accommodation in the form of a provision permitting the imposition of import and export restrictions having effect equivalent to exchange restrictions applied under Article XII. As a check upon indiscriminate resort to this device, however, the United States normally sought inclusion of language to the effect that such restrictions "shall be conformable with a policy designed to promote the maximum development of

nondiscriminatory foreign trade and to expedite the attainment both of a balance-of-payments position and of monetary reserves which will obviate the need for such restrictions." See Treaty with Israel, Protocol, Paragraph 6; Treaty with Japan, Article XIV(7).

In some cases where an extensive balance of payments reservation was not appropriate, the United States agreed to a more limited form of reservation. This provision permitted the use of import and export restrictions to facilitate the utilization of accumulated inconvertible currencies or to deal with a stringency of foreign exchange. It visualized in particular a situation in which a treaty partner comes to hold balances of inconvertible currencies of such magnitude that it is unable to reduce them without a measure of discrimination. Such accumulations are likely to occur when a substantial portion of a country's current receipts accrue from transactions with countries having inconvertible currencies, and the treaty partner is unable to use them within the prevailing pattern of trade and payments. Provisions of this kind, however, were made subject to the same qualifications as to attainment of nondiscriminatory foreign trade and satisfactory balance of payments and monetary reserve positions as the broader reservation. See Treaty with Togo, Article IX(5),

Article XIV, Paragraph 1: Unconditional Most-Favored-Nation Treatment

1. Each Party shall accord most-favored-nation treatment⁽¹⁾⁽²⁾ to products⁽³⁾ of the other Party⁽⁴⁾, from whatever place⁽⁵⁾ and by whatever type of carrier⁽⁶⁾ arriving, and to products destined for exportation⁽⁷⁾⁽⁸⁾ to the territories of such

other Party, by whatever route and by whatever type of carrier, with respect to customs duties and charges of any kind⁽⁹⁾⁽¹⁰⁾ imposed on or in connection with importation or exportation or imposed on the international transfer of payments for imports or exports⁽¹¹⁾, and with respect to the method of levying such duties and charges, and with respect to all rules and formalities in connection with imports and exports⁽¹²⁾⁽¹³⁾.

- (1) See Article I(1) of GATT and Article 16(1) of the proposed ITO Charter.
- (2) This provision is a shortened version of the unconditional most-favored-nation clause, which was included in treaties for the first time in the Treaty of Friendship, Commerce and Consular Rights of 1923 with Germany (44 Stat. 2132; 8 Bevens 153). The intent of that clause may be seen from the wording of Article VII, fourth paragraph, of that Treaty, which reads: "Any advantage of whatsoever kind which either High Contracting Party may extend to any article, the growth, produce, or manufacture of any other foreign country shall simultaneously and unconditionally, without request and without compensation, be extended to the like article the growth, produce or manufacture of the other High Contracting Party." For a representative example of the conditional most-favored-nation clause, as used in early United States commercial treaties, see Article 2 of the Treaty of Peace, Amity, Navigation, and Commerce of 1847 with Colombia (9 Stat. 881; 6 Bevens 868).

- (3) This term is defined in some treaties concluded since the Second World War as "articles the growth, produce or manufacture of," See Article XII(4) of Treaty with Ireland, Note use of this terminology also in Treaty of 1923 with Germany (note 2 above).
- (4) Products shipped to the territories of one treaty partner by way of a third country would be considered products of the other treaty partner if nothing were done in the third country involving further labor or processing that improved or modified the original product. Marks of origin, invoices, certificates of origin and other documents could be used to establish that the goods in question were truly products of the treaty partner.
- (5) This provision is related to the right of transit in Article XX. It precludes requirements for the direct consignment of goods and is broader than the comparable provisions of GATT (Article V(6)) and the proposed ITO Charter (Article 33(7)), which call for direct consignment in some circumstances. The intent is to ensure that Article XIV(1) applies to products which have been continuously in transportation, whether directly or in transit, and to products which have been or will be unloaded and reloaded, repacked, and warehoused, regardless of whether shipment to the territories of the treaty partner was contemplated when the products left their country of origin.
- (6) This provision is an innovation, as there are no provisions in the early reciprocal trade agreements, the proposed ITO Charter or GATT which expressly preclude discrimination based on the type of carrier used. Article V(2) of GATT precludes discrimination based on nationality, ownership or route of the carrier when in transit, but it does not apply with respect to carriers on direct routes or to differential treatment based on type of carrier, which could be of particular significance in connection with the last clause of Article XIV(1).

- (7) The term "destined for exportation" is understood to mean whenever the product involved was capable of or susceptible of actually being exported. Normally, the product would reach this condition upon completion of manufacture. In the case of raw materials or unfinished goods, it might be possible that the product would be destined for export whenever a contract had been concluded by the exporter.
- (8) The establishment of minimum quality standards for exported products was regarded as a matter of internal administration, and the maintenance by Japan of varying standards for products exported to different countries was not considered as contravening the treaty rule of nondiscrimination, as the demand for Japanese goods depended on many other factors such as price, with the result that there would be no discrimination in fact against United States buyers.
- (9) This wording is intended to be comprehensive, covering customs levies such as surcharges, import taxes, and various supplementary taxes so long as they are identified with importation and exportation. It also includes the wide range of fees and charges connected with the completion of customs formalities. See GATT Article VIII(4). Since the treaty does not impose absolute rules, it does not seek to alter the level of such charges by provisions such as that contained in Article VIII(1) of GATT to the effect that these charges should be limited in amount to the approximate cost of services rendered.
- (10) Article XIV(1) covers antidumping and countervailing duties inasmuch as such duties are presumed to be applied in an even-handed manner under uniform laws and regulations providing standards and criteria applicable to the trade of all countries.
- (11) This provision is derived from Article I(1) of GATT and Article 16(1) of the proposed ITO Charter. Its inclusion in the treaty is necessary, notwithstanding

Article XII, because the latter referred to international payments as such and accorded national and most-favored-nation treatment for nationals or companies of one treaty partner wishing to transfer funds from the territories of the other treaty partner to their own country or to any third country. In the case of payments for imports, however, these circumstances were less likely to prevail. The payments would be more likely to be made by the importer, normally a national or company of the other treaty partner which in effect was transferring funds from his own country to the exporter. Article XIV(1) is intended to cover this situation, so that the actual payment to the exporter would not be subject to discriminatory charges or formalities.

(12) This wording also is adapted from Article I(1) of GATT and Article 16(1) of the proposed ITO Charter. It is intended to apply the rule of nondiscrimination in a comprehensive manner to import and export procedures. Hence it in effect tolerates rules and procedures that may be regarded as nontariff trade barriers so long as their application is nondiscriminatory, whereas the GATT in some cases endeavors to curb or eliminate them. Rules for valuation such as American selling price, as originally formulated, would not contravene Article XIV(1), for they are not applied on a discriminatory basis. GATT, on the other hand, has in Article VII provisions establishing absolute rules on valuation.

(13) This provision is considered sufficiently broad in scope to cover marking requirements. In a number of cases, however, a specific provision was inserted at the instance of the treaty partner. See Treaty with Japan, Protocol, Paragraph 7, which contains rules designed to prevent certain deceptive marking practices in international trade in connection with the application of Article XIV(4).

TREATY OF FRIENDSHIP,
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can not be granted, and that rule would prevail in situations of private competition. If, on the other hand, the activity involved a concession by the state, Article XVII(2) would apply, and most-favored-nation treatment need not be accorded,

- (14) Clause (c) is intended to apply to such matters as shipping, radio, telegraph and telephone services. Its wording is broad enough to extend to aviation services, although it is not considered as applying to the operating rights of airlines, which are governed by bilateral air transport services agreements.
- (15) Postal services are excluded from coverage under clauses (b) and (c) by a standard Protocol provision, See Note 19 below.

Article XVII, Paragraph 3: Marine Insurance

3. Neither Party⁽¹⁶⁾ shall impose any measure of a discriminatory nature⁽¹⁷⁾ that hinders or prevents the importer or exporter of products of either country from obtaining marine insurance⁽¹⁸⁾ on such products in companies of either Party⁽¹⁹⁾.

- (16) This provision was included in the treaty at the instance of the Association of Marine Underwriters of the United States, which expressed to the Department of State and to the Senate its concern over the spread of discriminatory measures in foreign countries that reduced access of United States marine insurers to the market. The Association sought to bring influence to bear in various multilateral forums, including GATT and the United Nations Transport and Communications Commission to condemn such measures and further undertook to obtain bilateral treaty provisions designed to curb such discriminations,

The basic intent was to provide equality of competitive opportunity in bilateral relations between the treaty partners.

- (17) The problem for the marine underwriter derived from the placement of the risk. If the shipment is at the risk of the United States purchaser or seller, he is free to place insurance with any company. If, however, the risk was insured by a purchaser or seller of the treaty partner, his government might require that the insurance be placed with a domestic company. Such a requirement would foreclose a free market in insurance for approximately 50 per cent of the market. It is this market share that would be thrown open to competition by Article XVII(3). The marine underwriters were unable to obtain any protection from Article VII(1), because they normally conducted their operations from the United States, writing policies in dollars only and not establishing branches in foreign countries.
- (18) The United States agreed to a Belgian proposal to cover aviation as well as marine insurance but suggested that the provision refer to transport insurance as preferable in this context and more in keeping with the meaning and usage in GATT and other international forums in discussing this subject.
- (19) The balance of payments reservation for quantitative restrictions appearing, for example, in Article XIV (7) of the Treaty with Japan is not applicable to marine insurance and adding such a reservation, as in Article XV(3) of that Treaty, is redundant. The provision declaring that Article XII governs all exchange control matters was included in the Treaty with the Netherlands (Article XII(6)) to make it clear that any such reservation elsewhere in the treaty is redundant.

Presidential Documents

Executive Order 13059 of August 19, 1997

Prohibiting Certain Transactions With Respect to Iran

By the authority vested in me as President by the Constitution and the laws of the United States of America, including the International Emergency Economic Powers Act (50 U.S.C. 1701 *et seq.*) ("IEEPA"), the National Emergencies Act (50 U.S.C. 1601 *et seq.*), section 505 of the International Security and Development Cooperation Act of 1985 (22 U.S.C. 2349aa-9) ("ISDCA"), and section 301 of title 3, United States Code,

I, WILLIAM J. CLINTON, President of the United States of America, in order to clarify the steps taken in Executive Orders 12957 of March 15, 1995, and 12959 of May 6, 1995, to deal with the unusual and extraordinary threat to the national security, foreign policy, and economy of the United States declared in Executive Order 12957 in response to the actions and policies of the Government of Iran, hereby order:

Section 1. Except to the extent provided in section 3 of this order or in regulations, orders, directives, or licenses issued pursuant to this order, and notwithstanding any contract entered into or any license or permit granted prior to the effective date of this order, 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 or informational materials within the meaning of section 203(b)(3) of IEEPA (50 U.S.C. 1702(b)(3)), is hereby prohibited.

Sec. 2. Except to the extent provided in section 3 of this order, in section 203(b) of IEEPA (50 U.S.C. 1702(b)), or in regulations, orders, directives, or licenses issued pursuant to this order, and notwithstanding any contract entered into or any license or permit granted prior to the effective date of this order, the following are prohibited:

(a) 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, 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:

(i) such goods, technology, or services are intended specifically for supply, transshipment, or reexportation, directly or indirectly, to Iran or the Government of Iran; or

(ii) 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;

(b) 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, if:

(i) undertaken with knowledge or reason to know that the reexportation is intended specifically for Iran or the Government of Iran, and

(ii) the exportation of such goods, technology, or services to Iran from the United States was subject to export license application requirements under any United States regulations in effect on May 6, 1995, or thereafter

is made subject to such requirements imposed independently of the actions taken pursuant to the national emergency declared in Executive Order 12957; provided, however, that this prohibition shall not apply to those goods or that technology subject to export license application requirements if such goods or technology have been:

(A) substantially transformed into a foreign-made product outside the United States; or

(B) incorporated into a foreign-made product outside the United States if the aggregate value of such controlled United States goods and technology constitutes less than 10 percent of the total value of the foreign-made product to be exported from a third country;

(c) any new investment by a United States person in Iran or in property, including entities, owned or controlled by the Government of Iran;

(d) any transaction or dealing by a United States person, wherever located, including purchasing, selling, transporting, swapping, brokering, approving, financing, facilitating, or guaranteeing, in or related to:

(i) goods or services of Iranian origin or owned or controlled by the Government of Iran; or

(ii) goods, technology, or services for exportation, reexportation, sale, or supply, directly or indirectly, to Iran or the Government of Iran;

(e) any approval, financing, facilitation, or guarantee by a United States person, wherever located, of a transaction by a foreign person where the transaction by that foreign person would be prohibited by this order if performed by a United States person or within the United States; and

(f) any transaction by a United States person or within the United States that evades or avoids, or has the purpose of evading or avoiding, or attempts to violate, any of the prohibitions set forth in this order.

Sec. 3. Specific licenses issued pursuant to Executive Orders 12613 (of October 29, 1987), 12957, or 12959 continue in effect in accordance with their terms except to the extent revoked, amended, or modified by the Secretary of the Treasury. General licenses, regulations, orders, and directives issued pursuant to those orders continue in effect in accordance with their terms except to the extent inconsistent with this order or to the extent revoked, amended, or modified by the Secretary of the Treasury.

Sec. 4. For the purposes of this order:

(a) the term "person" means an individual or entity;

(b) the term "entity" means a partnership, association, trust, joint venture, corporation, or other organization;

(c) the term "United States person" means any United States citizen, permanent resident alien, entity organized under the laws of the United States (including foreign branches), or any person in the United States;

(d) the term "Iran" means the territory of Iran and any other territory or marine area, including the exclusive economic zone and continental shelf, over which the Government of Iran claims sovereignty, sovereign rights, or jurisdiction, provided that the Government of Iran exercises partial or total de facto control over the area or derives a benefit from economic activity in the area pursuant to international arrangements;

(e) the term "Government of Iran" includes the Government of Iran, any political subdivision, agency, or instrumentality thereof, and any person owned or controlled by, or acting for or on behalf of, the Government of Iran;

(f) the term "new investment" means:

(i) a commitment or contribution of funds or other assets; or

(ii) a loan or other extension of credit, made after the effective date of Executive Order 12957 as to transactions prohibited by that order, or otherwise made after the effective date of Executive Order 12959.

Sec. 5. The Secretary of the Treasury, in consultation with the Secretary of State and, as appropriate, other agencies, is hereby authorized to take such actions, including the promulgation of rules and regulations, the requirement of reports, including reports by United States persons on oil and related transactions engaged in by their foreign affiliates with Iran or the Government of Iran, and to employ all powers granted to me by IEEPA and the ISDCA as may be necessary to carry out the purposes of this order. The Secretary of the Treasury may redelegate any of these functions to other officers and agencies of the United States Government. All agencies of the United States Government are hereby directed to take all appropriate measures within their authority to carry out the provisions of this order.

Sec. 6. (a) The Secretary of the Treasury may authorize the exportation or reexportation to Iran or the Government of Iran of any goods, technology, or services also subject to export license application requirements of another agency of the United States Government only if authorization by that agency of the exportation or reexportation to Iran would be permitted by law.

(b) Nothing contained in this order shall be construed to supersede the requirements established under any other provision of law or to relieve a person from any requirement to obtain a license or other authorization from another department or agency of the United States Government in compliance with applicable laws and regulations subject to the jurisdiction of that department or agency.

Sec. 7. The provisions of this order consolidate the provisions of Executive Orders 12613, 12957, and 12959. Executive Order 12613 and subsections (a), (b), (c), (d), and (f) of section 1 of Executive Order 12959 are hereby revoked with respect to transactions occurring after the effective date of this order. The revocation of those provisions shall not alter their applicability to any transaction or violation occurring before the effective date of this order, nor shall it affect the applicability of any rule, regulation, order, license, or other form of administrative action previously taken pursuant to Executive Orders 12613 or 12959.

Sec. 8. Nothing contained in this order shall create any right or benefit, substantive or procedural, enforceable by any party against the United States, its agencies or instrumentalities, its officers or employees, or any other person.

Sec. 9. The measures taken pursuant to this order are in response to actions of the Government of Iran occurring after the conclusion of the 1981 Algiers Accords, and are intended solely as a response to those later actions.

Sec. 10. (a) This order is effective at 12:01 a.m. eastern daylight time on August 20, 1997.

(b) This order shall be transmitted to the Congress and published in the Federal Register.



THE WHITE HOUSE,
August 19, 1997.

Your Military ([//www.militarytimes.com/news/your-military/](https://www.militarytimes.com/news/your-military/))

Iran killed more US troops in Iraq than previously known, Pentagon says

By: **Kyle Rempfer** ([/author/Kyle Rempfer](#)) 📅 April 4

166

Correction: A previous version of this article reported that the number of U.S. troops in Iraq killed by Iranian-backed militants was at least 608, as written in a State Department transcript. However, the correct number is 603, according to a follow-up statement by the Pentagon.

The Pentagon is upping the official estimate on the number of U.S. troops in Iraq who were killed by Iranian-backed militias, now putting that number at at least 603.

Officials previously said that Iran was linked to the deaths of roughly 500 troops (<https://www.militarytimes.com/news/pentagon-congress/2015/07/14/iran-linked-to-deaths-of-500-u-s-troops-in-iraq-afghanistan/>).

That means roughly one in every six American combat fatalities in Iraq were attributable to Iran.

The deaths are attributed to proxies sponsored by the Islamic Revolutionary Guard Corps — Iran's elite military force that protects the regime from internal and external threats.

"During Operation Iraqi Freedom, DoD assessed that at least 603 U.S. personnel deaths in Iraq were the result of Iran-backed militants," Navy Cmdr. Sean Robertson, a Pentagon spokesman, said in an email.

"These casualties were the result of explosively formed penetrators (EFP), other improvised explosive devices (IED), improvised rocket-assisted munitions (IRAM), rockets, mortars, rocket-propelled grenades (RPG), small-arms, sniper, and other attacks in Iraq," Robertson said.

The Pentagon did not provide Military Times with the new report to independently assess.

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The new assessment was given to the State Department and reported to the press during a briefing Tuesday.

"This death toll is in addition to the many thousands of Iraqis killed by the IRGC's proxies," State Department deputy spokesman Robert Palladino said during the press brief.



(<https://www.militarytimes.com/news/your-military/2018/12/02/victims-look-to-punish-iran-for-attacks-against-us-troops-in-iraq/>)
Victims look to punish Iran for attacks against US troops in Iraq (<https://www.militarytimes.com/news/your-military/2018/12/02/victims-look-to-punish-iran-for-attacks-against-us-troops-in-iraq/>)

The lawsuit is asking for \$10 billion in damages for the victims and their families.

By: Todd South

That new total accounts for 17 percent of all deaths of U.S. personnel in Iraq (<https://www.militarytimes.com/news/your-military/2018/08/20/us-to-remain-in-iraq-as-long-as-needed-command-says/>) from 2003 to 2011, the State Department said.

"That's a Department of Defense statistic," Palladino added.

Most of the deaths occurred during the surge in Iraq, when President George W. Bush pushed thousands more troops into the country to deal with the sectarian civil war boiling over between Shiite and Sunni groups.

American personnel in Iraq faced off against highly lethal bombs, like the EFPs, which were allegedly manufactured and supplied by Iran to Shiite militias across the border in Iraq.

Lawsuits filed in U.S. District Court (<https://www.militarytimes.com/news/your-military/2015/04/01/lawsuit-alleges-iran-directed-killing-of-u-s-soldiers-in-iraq/>) in Washington have previously attempted to hold the Iranian government legally accountable for the deaths of Americans that died from these weapon systems.

166

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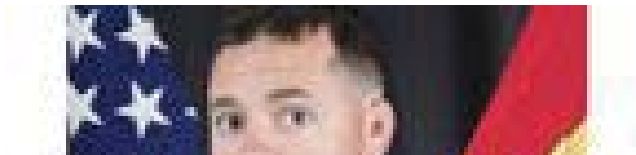
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