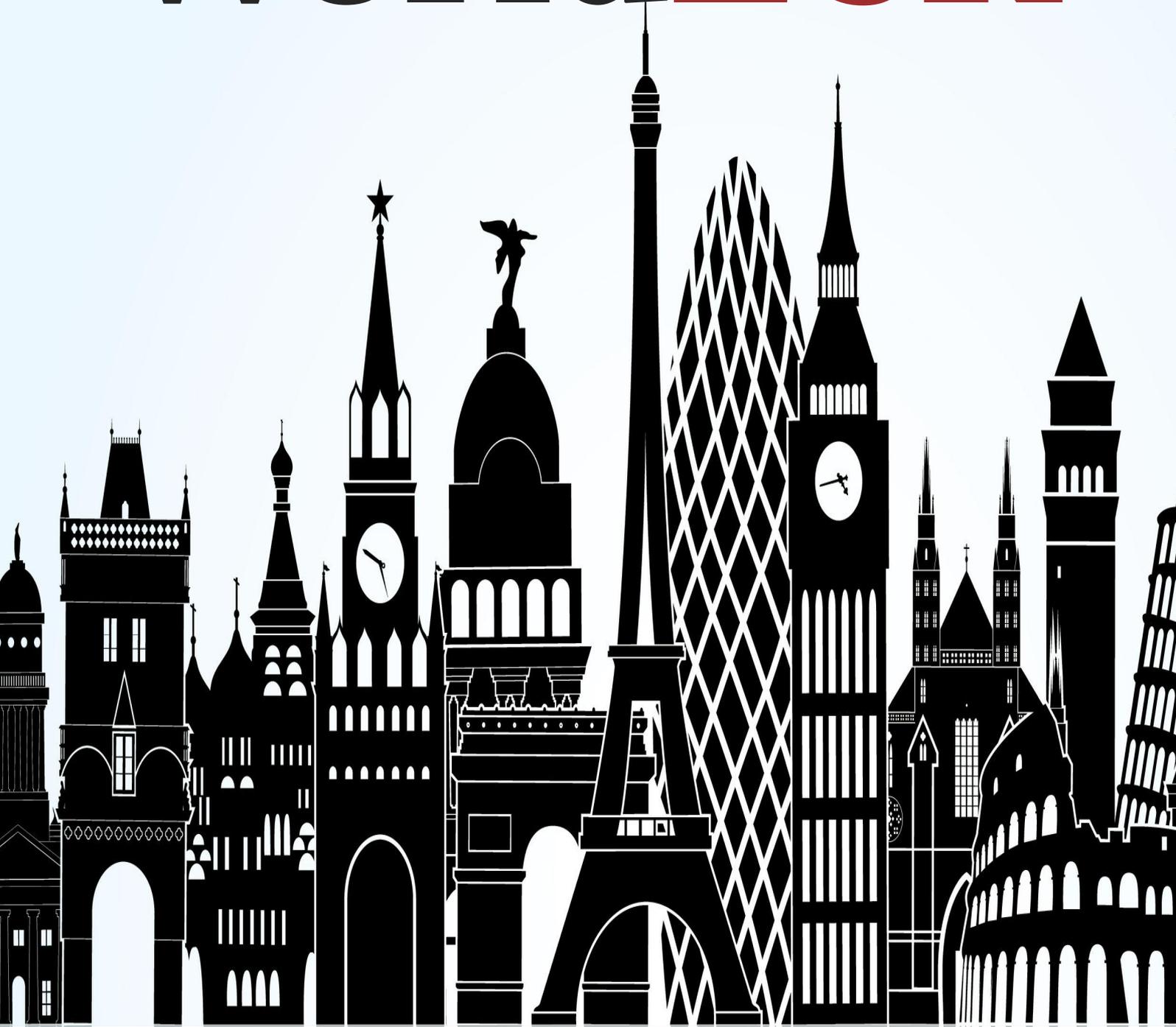


# WorldECR



## SPECIAL FOCUS EUROPE 2015

In 2014, conflict in Ukraine put EU sanctions and export controls firmly on the European corporate compliance agenda. In this Special Focus, *WorldECR* speaks to the lawyers advising on the impact of the regulations and the challenges facing business – and the regulators – in the year ahead.



# MEET THE LAWYERS

As the influence of export controls and sanctions reaches ever-increasing numbers of European businesses, *WorldECR* meets some of the EU's leading export controls/sanctions legal advisors.

**Fieldfisher** is a multinational law firm headquartered in London. Its EU International Trade and Regulatory practice, led by Laurent Ruessmann from the Brussels office, includes lawyers in Brussels, the UK and Germany. Also in Brussels, counsel Jochen Beck, is very well regarded.

The team advises clients from a wide range of industries – including, but not limited to, chemicals, metals, aerospace and defence, automobile and auto parts, insurance, publishing, software and IT, electronics and semi-conductors – on EU sanctions and export control matters, such as product classification, the application of catch-all controls, and controls over technology transfers, as well as

providing in-house compliance training for clients.

Ruessmann, himself, advises clients on aspects of the classification, export and intra-EU transfer of military and dual-use goods as well as technology transfers and end-use controls. In the sanctions area, he assists international companies in ensuring compliance with the EU sanctions regimes and represents parties in court challenges before the EU courts.

Jochen Beck has a particular focus on export controls, assisting international companies with technology transfers and end-use controls as well as with the classification of goods under the EU

and national military and dual-use lists, their export, and intra-EU transfer. He assists companies with implementing and maintaining internal compliance programmes, including the production of multi-jurisdictional compliance manuals, and in communications with authorities.

Examples of recent instructions for the firm include:

- Advising an international electronics company on various aspects of EU and German export control issues, concerning licence applications, internal compliance, sanctions and embargoes, etc.;
- Advising various international

companies on export control issues concerning data transfer and cloud computing;

- Advising a multinational with regard to the Russia embargo, assisting in dealing with authorities to obtain a 'no licence required' decision;
- Assisting a chemicals company concerning compliance with EU and Belgian export controls in the context of exports to Iran and Russia;
- Assisting a telecoms provider in ensuring compliance with the EU sanction regimes.

The EMEA International Trade Practice at **Baker & McKenzie LLP** is home to 24 partners and 27 associates, probably the largest practice of its kind. The team advises clients from industries that are 'typically most impacted by the introduction of new trade regulations', such as major industrial manufacturers, energy, IT, telecommunications and financial services companies, among others.

Recently, the team has:

- Advised two leading FTSE 100 international oil and gas companies on their compliance with EU, UK and U.S. sanctions in high-risk jurisdictions such as Iran and Libya;
- Advised a FTSE 100 chemicals company on all aspects of its compliance with EU, UK and U.S. export controls and sanctions, including risk assessment and product classification;
- Advised a leading global energy services company on creating, developing and implementing extensive global export control and sanctions compliance procedures, as well as assisting with a voluntary disclosure to HMRC;
- Advised an international consumer brand on EU and U.S. sanctions against Syria in relation to trademark licensing and distribution;
- Advised a global equipment supplier on EU sanctions against Myanmar;
- Advised UK defence manufacturers on export controls and sanctions

## EU EXPORT CONTROLS AND SANCTIONS LAW FIRMS

**Baker Botts LLP**

**Baker & McKenzie**

**Crowell & Moring LLP**

**Debevoise & Plimpton**

**Dechert LLP**

**Fieldfisher**

**Gide**

**Grayston & Company**

**Holman Fenwick Willan**

**Latham & Watkins**

**Sheppard Mullin**

**Sidley Austin LLP**

**Vinge**

**White & Case**

*This list does not purport to be exhaustive*

issues, particularly in relation to high-risk jurisdictions;

- Advised a global bank on U.S. and EU sanctions risks associated with trade finance business;
- Advised a global leader in propulsion and energy on compliance with EU and U.S. sanctions against Iran, Belarus, Russia, Myanmar;
- Advised a global leader in law enforcement software on the scope of new Wassenaar controls on 'intrusion' software and their EU/U.S. implementation.

Key members of the team include Ross Denton, a partner in the London office, and Jasper Helder, based in Amsterdam.

Ross Denton routinely advises U.S. and Japanese multinationals on EU and UK international trade law issues. He has experience advising clients on various international compliance matters, including EU and UK public procurement, UK and EU export controls and sanctions, customs fraud and international regulation of smuggling.

With a focus on economic sanctions and EU export controls (dual-use and military products and technologies),

Jasper Helder advises a range of multinationals on EU and UN sanctions compliance for countries such as Iran, Myanmar, Syria and interaction with U.S. sanctions as well as assisting U.S. clients with their EU compliance. He works with clients on drafting and maintaining compliance programmes and conducts internal training as well as internal investigations. He represents clients before European national (customs, export and other) administrations and courts as well as before the EU Commission, its advisory committees and the European Court of Justice.

Other key members of the firm's EMEA International Trade Practice include Alex Bychkov, a partner in the Moscow office; Philippe Reich, partner, Zurich; and Sunny Mann, partner, London.

**Holman Fenwick Willan** is an international law firm headquartered in the United Kingdom, with further offices in Europe, the Middle East, Asia and South America. The export controls/sanctions practice is part of a larger Regulatory Department, and is overseen by five partners and seven associates: two partners and two associates based in Brussels; two partners and four associates are in London; and one partner and one associate based in Paris.

Konstantinos Adamantopoulos in the Brussels office is the firm's key contact, advising clients on EU sanctions and export controls and corporate M&A due diligence. He is a *Dikigoros*, qualified in Greece. He appears regularly before the EU Courts of Justice on related matters.

In London, Daniel Martin and Anthony Woolich advise on export controls, and EU and UK sanctions, respectively, as well as on customs and anti-corruption matters.

HFW advises clients from a wide range of industry sectors, including shipping, aviation/aeronautics; commodities; oil and gas, as well as extraction equipment and machinery; IT and telecommunications equipment; food and agricultural products; education materials; and



Olivier Prost,  
Gide



Alexis Massot,  
Gide



John Grayston,  
Grayston & Company



Carolina Dackö,  
Vinge

sports. Clients have included Hellenic Petroleum, UEFA and CF Sharp Shipping, Singapore.

Amongst recent instructions, the firm has been

- Advising a major oil refinery on Iran sanctions and payments for deliveries of crude oil;
- Advising a major shipping company on deliveries of gas to Syria;
- Advising a producer of detailed geographical and nautical maps on exports to Iran for education purposes;
- Advising a sports association on the application of EU sanctions to a football club in Belorussia;
- Representing a major shipping agency in EU court procedures against its inclusion on an EU sanctions list.

**Crowell & Moring's** International Trade Group operates from Washington, DC, Brussels, London, and California, and is home to four partners, two counsel, seven associates and three trade professionals.

In Brussels, Dr. Salomé Cissal de Ugarte, advises on export control of both dual-use and defence-related items, including intra-EU transfers of defence-related items, as well as on EU economic sanctions regimes as part of a wider trade law practice.

Splitting his time between Brussels and Washington, Jeff Snyder, Chair of the International Trade Group, is a well-known leader in the field. He develops approaches for multinationals to manage the impact of U.S. extraterritorial regulations, such as the sanctions administered by the Office of Foreign Assets Control and assists companies in day-to-day compliance

with these laws, and with interventions, such as audits and investigations, and civil enforcement proceedings.

In London, Alan Gourley has been representing clients in export controls and sanctions enforcement, licensing, and compliance matters for more than 30 years. He performed the audit mandated in The Boeing Company's 1998 settlement with the Directorate of Defense Trade Controls ('DDTC') related to the Sea Launch programme and defended Lockheed Martin in its 2000 settlement with DDTC over allegations related to interactions with a China rocket manufacturer for the AsiaSat satellite launch.

Instructions for the group, which counts General Motors and Alcoa among its clients, have included:

- Advising a global publisher with regard to various U.S. and EU export control and sanctions compliance issues, especially in light of the continued expansion of the U.S. and EU sanctions regimes targeting Iran and Russia/Ukraine;
- Performing a multi-site compliance review of an aerospace company, including all aspects of its export control compliance system from marketing of defence products, performing defence services, implementing licence limitations (provisos), controlling access to facilities, hiring of foreign nationals, denied party and other screening, and shipping and supplier management.
- Counselling a global auto parts manufacturer on the scope and application of U.S. and EU export controls and sanctions laws and regulations to numerous business dealings, including mergers and

acquisitions, existing and potential contracts with suppliers.

- Advising non-U.S. headquartered global financial institutions on the development of effective risk-based global sanctions and anti-money laundering compliance programmes, engaging with regulators where appropriate, and conducting innovative training for financial crimes compliance personnel.

The International Economic Sanctions & OFAC Compliance team at **Debevoise & Plimpton** includes members from the firm's offices in Washington, D.C., New York, London and Moscow. They advise clients on sanctions promulgated by the European Commission and implemented by EU Member States, and those administered by the United States Treasury's Office of Foreign Assets Control ('OFAC'). Clients come from a wide range of industry sectors, including energy and natural resources, healthcare, mining, pharmaceuticals, telecommunications and transport – the team is particularly well known for its sanctions practice serving financial institutions, where clients include American Express, CNA Financial and various private equity investment companies. Experience includes advising a major institution in a New York State Department of Financial Services enforcement action regarding sanctions compliance issues. Through its Moscow office, the firm advises clients on the impact of U.S. and European sanctions against Russia.

Key contacts in London are Matthew Getz and Jessica Gladstone; in Moscow, Alan Kartashkin; in



Jasper Helder,  
Baker & McKenzie



Ross Denton,  
Baker & McKenzie



Fabienne Vermeeren,  
White & Case



James Killick,  
White & Case

Washington, DC, Satish M. Kini; and in New York, Carl Micarelli.

International counsel, Matthew Getz advises clients in connection with EU and UK sanctions and money-laundering regulations, and EU and other data-protection regimes. He has represented both individuals and corporations under investigation by the Serious Fraud Office and has advised numerous clients on compliance with the FCPA and the UK Bribery Act.

Jessica Gladstone, international counsel, joined the firm in 2010 from the Foreign and Commonwealth Office, where she was a legal adviser. Her practice focuses on complex litigation, international commercial and investment arbitration, and public international law. *Chambers UK (2015)* notes her expertise in economic sanctions.

The team assists companies to develop new sanctions compliance programmes and enhance their existing compliance programmes. .

Global law firm **Sheppard Mullin** has five partners and nine associates specialising in export controls and sanctions across its Washington D.C., Brussels, Beijing, Seoul, Los Angeles, Palo Alto and San Diego offices. As part of the firm's Government Contracts, Investigations and International Trade Department, the team regularly advises clients on matters of export controls, Foreign Corrupt Practices Act ('FCPA'), anti-terrorism, economic sanctions, anti-boycott controls, and Customs.

Clients come from a wide range of industry sectors, including aerospace and defence, telecoms and satellites, computers and semiconductors,

software and encryption, cybersecurity, electronics, automotive, finance and banking, oil and gas, pharmaceuticals and chemicals, infrastructure and construction, entertainment and media and fashion and apparel. United Technologies, Abertis and Actavis are just a few of the companies who have sought representation with the firm in the past.

Recent instructions include:

- Obtaining U.S. State Department and CFIUS clearance for Irish, Danish and Italian investment in a new satellite based air navigation system;
- Obtaining U.S. State Department clearance for the sale of a satellite investment by a European investment company to a Chinese sovereign fund;
- Successfully defending a leading automotive manufacturer in one of the first verifications under the Korean Free Trade Agreement;
- Securing EU approval for the export of sensitive test equipment for a South Korean space programme;
- Successfully defending a European composites manufacturer against claims of unlawful ITAR exports.

Curtis Dombek, who splits his time between Brussels, where he is the office managing partner, and Los Angeles, was appointed in 2011 to the President's Export Council Subcommittee on Export Administration, working directly with the U.S. Commerce Department to formulate the regulations implementing U.S. export control reform, and, in 2012, to the Regulations and Procedures Technical Advisory Committee of the Commerce

Department, with responsibility for reviewing and advising the Department on export control regulations.

**Vinge** is Sweden's largest commercial law firm. The export control/sanctions practice sits in Corporate Risk & Compliance and is staffed by three lawyers from the firm's Gothenburg office.

The team advises clients on trade regulation matters, helping to identify risks associated with international trade and exports, reviewing export transactions in order to ensure compliance, preparing bespoke compliance programmes, assisting with their implementation and training, and providing advice in areas such as product classification matters and permit procedures.

Carolina Dackö is the team's key contact. She practised in Brussels for ten years and has noteworthy experience in dealing with matters concerning the European Commission. She has expertise in both customs law and export controls, regularly advising clients on how to efficiently implement export control procedures and classify dual-use goods.

Instructions for the team, whose clients are found in the transport, automotive and machinery sectors among others, have included:

- Drawing up a suitable compliance programme for a large multinational, including implementation projects;
- Revising and implementing standard export control clauses in a wide variety of agreements for a well-known Swedish multinational;



Salomé Cignal de Ugarte,  
Crowell & Moring



Alan Gourley,  
Crowell & Moring



Les Carnegie,  
Latham & Watkins



Charles Claypoole,  
Latham & Watkins

- Advising on the possible sale of production equipment to a sanctioned country;
- Offering contacts and assistance in licensing procedures regarding particular products destined for Russia, including customs classification aspects.

Export controls and sanctions matters are dealt with at **Dechert LLP** by the International Trade and Government Affairs department. Partners Miriam Gonzalez and Jeremy Zucker lead the team, which includes seven other lawyers in London and Washington, DC, plus a number of former regulators, compliance officers and enforcement agents as well as trade negotiators and public affairs experts, which allow for a multidisciplinary approach that coordinates legal, strategic and public affairs advice to assist clients.

Clients of the international practice are drawn from a wide range of industry sectors, including, but not limited to, technology, banking and financial services, logistics, defence, telecommunications, financial information, software, energy, manufacturing, private equity and data protection and privacy.

In London, Miriam Gonzalez is a former European Commission official and Foreign Office adviser. She advises clients on trade policy, trade agreements, sanctions and embargoes, export controls, antidumping, foreign investment proceedings and EU internal market regulations and infringement proceedings.

Also in the London office, are Ana Gallo-Alvarez, a leading authority on European Union trade and government affairs and the Middle East, and

Matthew Rogers, formerly of the legal services departments at HM Treasury and the Bank of England. In Washington, DC, partner Jeremy Zucker is the key contact. Recent instructions for the firm include:

- Setting up all compliance policies for one of the main European companies specialised in the acquisition of manufacturing companies and handing a follow-up investigation for it in two jurisdictions;
- Advising one of the largest EU tourism service providers on sanctions compliance and leading an investigation for it in three jurisdictions;
- Advising an asset-management company on compliance with sanctions in relation to Libya and handling a parallel investigation for it in six jurisdictions;
- Advising one of the main European engineering companies on all its compliance policies and requests;
- Advising a major EU energy company on compliance with sanctions.

The International Trade Practice at **Sidley Austin LLP** is home to approximately 60 professionals distributed across each major office of the firm, working as a fully integrated team to provide global trade services. Brussels, Geneva, and Washington, D.C. are the key offices. Within the Brussels office, there are approximately 25 lawyers, of whom a dozen specialise in trade. As export controls and economic sanctions are one of the four core areas of the firm's trade practice, all of Sidley's trade lawyers are versed in such issues.

Recent instructions have included:

- Developing and implementing high-tech and complex compliance programmes across business units and subsidiaries of several multinationals. Significant clients include a major security systems company and an industrial group producing engineered products for global niche markets;
- Advising one of the world's largest building materials companies in an internal investigation focusing on export controls and economic sanctions compliance;
- Assisting one of the world's largest pharmaceutical companies in a wide range of economic sanctions work, including the successful application for certain licences enabling them to continue to do business.

Key contacts for export controls and sanctions matters in Brussels include Arnoud Willems, co-founder of Sidley Austin's Brussels office and Head of Sidley's EU Trade and Customs team, Sven De Knop, and Yohan Benizri

The team has real expertise in trade matters impacting a vast range of industries, from pharmaceuticals to metals and minerals, technology and manufacturing. It advises clients on EU and Member State export licensing, embargoes, sanctions, and enforcement initiatives; conducting due diligence on export and national security controls in M&A transactions; deploying and implementing global compliance programmes, including training programmes; advising on the classification of dual-use goods; counselling on the scope and enforcement of EU, U.S. and third-country embargoes and blocking



Chris Caulfield,  
Baker Botts



Georg Berrisch,  
Baker Botts



Miriam Gonzalez,  
Dechert



Curtis Dombek,  
Sheppard Mullin

statutes; supply-chain restructuring; internal investigations of possible export violations, preparing voluntary disclosures, and representing clients in penalty actions by government authorities.

**Grayston & Company** was established in 2007 by Englishman John Grayston, who has practised in Brussels for more than 20 years. The firm specialises in providing cost-effective advice on trade and regulatory issues to a wide range of EU and non-EU clients.

John Grayston heads a team of lawyers and other advisers who are qualified in numerous EU jurisdictions (including Italy, France, UK, Denmark, Spain and Germany). They advise on all matters relating to EU sanctions, and have experience of the regimes related to Russia, Iran, Syria, Belarus, Myanmar, Iraq, Zimbabwe and Ivory Coast, regularly working closely with in-house legal and compliance teams.

The firm offers:

- Guidance and counselling: to companies and individuals active in locations or regions subject to EU sanctions and restrictions;
- Representation for individuals and companies before national administrations in relation to compliance requirements including notification and exemption procedures and also voluntary disclosure procedures and representing companies and individuals who face information-gathering procedures or formal charges in relation to the national enforcement of EU sanctions or trade restrictions;
- Advice and representation to companies who wish to contest

decisions of the EU to list persons or entities. Such procedures include engaging with the EU Council to pursue administrative reviews of listing decisions and/or bringing proceedings before the European Courts of Justice.

The firm's lawyers have extensive experience advising on export control issues, including on classification and licence applications and on the application of EU dual-use controls and the way that they're implemented and applied by Member States. Key focal points are the relationship between EU and Member State national controls with those of third-country trading partners and export compliance issues arising out of the extraterritorial application of U.S. laws.

The team is active advising on

- Classification of items;
- Pre- and post-merger audit and re-organisation;
- Using EU General Export Authorisations;
- Applications for individual authorisations;
- Creation and implementation of internal compliance programmes; Voluntary disclosure procedures;
- Specific national listings of dual-use goods.

**Latham & Watkins'** Export Controls, Economic Sanctions and Customs practice includes 17 partners, four counsel and 21 associate across 14 offices in Europe and the U.S. Team members advise on issues arising out of trade and financial sanctions, export control laws, anti-boycott laws, anti-terrorism controls, customs and import regulations, foreign investment, anti-

money laundering regimes, FCPA and the UK Bribery Act. They frequently advise international businesses faced with multi-jurisdictional compliance challenges and on potential conflicts between OFAC sanctions, competing legal obligations and EU or national anti-boycott rules.

Clients come from a wide range of industries, including, but not limited to, aerospace and defence, banking and finance, energy, high technology, pharmaceuticals, consumer products, manufacturing and consulting services.

In London, counsel Charles Claypoole advises on a wide range of international trade, international investment, public international law and dispute resolution matters. He has extensive experience advising on UN, EU and UK sanctions, as well as EU and UK export control law. Charles is familiar with all EU sanctions regimes currently in force, and has recently been busy advising companies and financial institutions on the scope and impact of the sanctions imposed by the EU on Russia. He is frequently asked to assist on due diligence in respect of sanctions and export control compliance in the context of financing transactions and corporate acquisitions.

In Washington, Les Carnegie is co-head of the firm's Export Controls, Economic Sanctions & Customs Practice. He advises on a wide variety of international trade and national security matters, focusing on legal, policy and enforcement issues arising under U.S. export controls, trade and economic sanctions, antiboycott restrictions, national security reviews of foreign investments in the United States, compliance with the Foreign Corrupt Practices Act ('FCPA'), and leading complex internal investigations



Matthew Getz,  
Debevoise & Plimpton



Jessica Gladstone,  
Debevoise & Plimpton



Konstantinos Adamatopoulos,  
Holman Fenwick Willan



Daniel Martin,  
Holman Fenwick Willan

and preparing disclosures to the U.S. government.

William (Bill) McGlone, also in Washington, is co-head of the practice. He focuses on legal, policy and enforcement issues arising under United States control laws, trade and economic sanctions, and other laws governing cross-border transactions, including the FCPA.

The export controls/sanctions practice of **Gide** sits mainly within the International Trade practice group, which is based in Brussels. The financial sanctions team, which comprises four partners and three senior associates, two of whom are former in-house counsel at the French Treasury, works closely with the Banking and Finance practice group in Paris and London. The firm's Washington, DC office is the point of contact for export controls and financial sanctions matters in the U.S.

Key contacts in Brussels include Olivier Prost, Benoit Le Bret and Alexis Massot. They offer assistance on a wide range of export controls and sanctions matters, drafting legal opinions on the interpretation and application of EU sanctions; liaising with national authorities to obtain individual and global licences; assisting in the design and implementation of corporate compliance programmes; conducting due diligence of export control risks in the context of mergers and acquisitions; advising on criminal sanctions; advising on data transfers and cryptology; and monitoring the adoption and evolution of trade and financial sanctions in Brussels and the case law of the European Court of Justice and UK courts.

Industry sector expertise is wide.

The team advises a wide range of dual-use manufacturers; private banks and multilateral financial institutions; shipping companies; air transport companies and aircraft and aeronautic equipment manufacturers; pharma; software and high-tech companies; and chemical and materials companies.

Recent instructions include:

- Advising a consortium of banks on the refinancing of a European subsidiary in Syria;
- Advising a U.S. entity in the due diligence of a prospective acquisition in France;
- Advising a French bank in the performance of a contract with an Eastern European Eximbank in relation to a deal in North Africa;
- Advising a French exporter of agro-food products in the preparation of a deal in Iran;
- Advising a European aircraft maintenance company in the performance of a deal in Myanmar;
- Advising a shipping company in the performance of a contract involving trade with Iran; and
- Advising a Chamber of Commerce in the application of sanctions to the notification of arbitral awards.

Partners Georg Berrisch in Brussels and Chris Caulfield in London lead the European Trade Sanctions and Export Control department of **Baker Botts**. The team also includes five associates – Brian Byrne, Simina Suciuc and Elena Cortes in Brussels, and Kiran Unni and Laurie Frey in London. The firm's U.S. team, with which Europe works closely, is around twice this size.

The team is experienced in working with clients in energy/natural resources (particularly oil and gas),

banking and finance, civil aviation, technology, engineering, chemicals, and pharmaceuticals, having represented leading energy, banking and aviation corporates in Russia, as well as leading European chemical companies.

Georg Berrisch advises on a wide range of trade matters, including export control of dual-use items and the operation of the EU's economic sanctions against Russia, Iran, Syria and other countries.

Chris Caulfield has practised for nearly a decade in the fields of economic sanctions and export control. He advises clients in relation to the requirements of UK and EU law and also has experience in designing compliance programmes and handling self-disclosures to the UK authorities.

The team is currently advising Russia's largest state-owned oil company and one of the four largest state-owned banks in Russia on the scope and effect of EU sanctions on relevant transactions.

Other recent instructions include:

- Advising a large Russian state-owned oil company on the content and scope of EU sanctions, including assessing the impact of *force majeure* clauses and the English law doctrine of frustration on a number of highly complex affected joint venture projects and providing a daily report (including weekends) in relation to all developments regarding EU sanctions;
- Advising Russia's largest airline on the content and scope of EU sanctions, including analysing the impact of EU sanctions on a number of complex aircraft sale and leasing transactions, and assessing



Laurent Ruessmann,  
Fieldfisher



Jochen Beck,  
Fieldfisher



Arnoud Willems,  
Sidley Austin



Yohan Benizri,  
Sidley Austin

the impact of *force majeure* clauses and the English law doctrine of frustration on affected contracts;

- Advising a U.S. multinational corporation – one of the world’s largest oilfield services companies – on EU sanctions against Russia and export control regulations, including carrying out detailed risk assessments and providing detailed legal opinions in relation to proposed commercial acquisitions in connection with Russia or Russian entities;
- Advising a U.S. multinational corporation that designs, manufactures and sells drilling and production hardware and a wide variety of capital rig equipment for use by oil and gas companies on the impact of EU sanctions and export control regulations in relation to a number of existing and proposed international commercial transactions, and drafting necessary contractual provisions to reflect the relevant impact of sanctions; and
- Advising a major European chemicals company on the design and implementation of a comprehensive internal training and compliance programme for EU and U.S. sanctions and export controls and advising the client on numerous ad-hoc questions on the operation of the EU sanctions against Russia, Iran, and other countries as well as on matters relating to the EU Dual-Use Regulation.

Global law firm **White & Case’s** export controls and sanctions practice is part of the firm’s International Trade Group. The firm has an interdisciplinary, full-service global trade practice with more than 60 lawyers and trade professionals

operating in ten offices in North America, Europe and Asia.

The export controls/sanctions team is headed by three partners in Brussels and Washington, DC plus three counsel, five associates, and the Regional Director Europe – International Trade Services. In addition, the team is supported by three partners and two counsel in Paris, Warsaw, Berlin and Prague.

Clients of the team come from a wide range of industries, including oil and gas; financial services; chemicals, pharmaceuticals and biotechnology;; aircraft industry and avionics; aerospace; electronics; fabricated metals; advanced semiconductors/semiconductor design and manufacturing process technology; high-performance computers; encryption software and products and cloud computing; telecommunications, commercial communications satellites and related hardware and technology; fibre optics; and defence industries.

Key members of the team based in the Brussels office are James Killick, Fabienne Vermeeren and Sara Nordin.

Recent instructions have seen the team

- Advise a number of major companies (in the banking and financial sectors, oil & gas, transport, amongst others) on compliance with EU and U.S. sanctions on Russia and Iran;
- Advise on compliance programmes for a multinational EU-based company with a worldwide distribution network in relation to issues involving possible supply of products to Iran through non-EU distributors, etc;
- Prepare U.S. and EU sanctions and export controls compliance

programmes and procedures for a global producer of steel products;

- Develop procedures for complying with U.S. export control laws and regulations for a non-U.S. company that develops commercial encryption products;
- Advise a number of major companies on how the EU and U.S. Russia sanctions might affect their ongoing projects across a range of sectors;
- Advise on potential sanctions or dual-use related obligations arising from supply of products to countries such as Iran and Syria;
- Filing and obtaining export licences in three Member States in an R&D project also involving U.S. and Asian jurisdictions;
- Advise a major German chemical and pharmaceutical company on export control and embargo issues related to the outsourcing of IT services to a non-EU country;
- Conduct an in-depth due diligence check on compliance under EU and U.S. sanctions of a target company with an export control infringement record related to exports to Iran;
- Provide in-depth due diligence on compliance with the EU Iran sanctions regime (including fund transfer notification obligations) of a UK-owned target company involved in dealings with the Iranian oil and gas sector;
- Carry out in-depth due diligence check on compliance with U.S. sanctions and export controls of a non-U.S. pharmaceutical company with exports to Iran; and
- Provide U.S. sanctions compliance advice to non-U.S. company regarding possible meetings in Iran to discuss potential future business in Iran.