



Sanctions 2025

Sixth Edition



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Australia

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1 Overview

1.1 Describe your jurisdiction's sanctions regime.

Australia implements two types of sanctions.

The first type is the United Nations Security Council ('UNSC') sanctions, which are imposed because of Australia's membership with the United Nations ('UN').

The second type is sanctions imposed autonomously by the Australian Government.

UNSC Sanctions Regime

As a member of the United Nations, Australia is required by Article 25 of the *Charter of the United Nations* ('the Charter') to implement UN Security Council decisions.

According to the Parliament of Australia, prior to 1993, Australia normally implemented Security Council resolutions by making Regulations under several Commonwealth Acts. However, due to limitations on the Government's power to make Regulations under those Acts, Australia became unable to give full effect to Security Council resolutions through that practice. In 1993, the Government amended the *Charter of the United Nations Act 1945* (Cth) ('COTUNA') to allow for Regulations to be made which gave full effect to Security Council sanction regimes.

Pursuant to subsections 27(1)–(3) of the COTUNA, an individual commits an offence if they contravene a UN sanction enforcement law, or a condition of a licence, permission, consent, authorisation or approval under a UN sanction enforcement law. If convicted of that offence, a maximum term of 10 years' imprisonment or a fine may be imposed by the Courts. Corporations are also subject to UNSC sanctions. Conduct that contravenes a UN sanction enforcement law or a condition of a licence, permission, consent, authorisation or approval under a UN sanction enforcement law are offences of strict liability and punishable by a fine.

Australian autonomous sanctions regimes

According to the Parliament of Australia, autonomous sanctions are punitive measures that do not involve the use of an armed force. Rather, they are imposed unilaterally by the Australian Government as a foreign policy tool and are implemented under the *Autonomous Sanctions Act 2011* (Cth) ('Sanctions Act') and the *Autonomous Sanctions Regulations 2011* (Cth) ('Sanctions Regulations'). Autonomous sanctions are discretionary tools which the Australian Government can apply, alone or with like-minded countries where appropriate, to address situations of international concern.

The Department of Foreign Affairs and Trade ('DFAT') notes that these sanctions can be aimed at bringing a situation of international concern to an end by:

- influencing those responsible (for example, by motivating foreign governments/leaders to adopt different policies);
- limiting the adverse impacts of a situation (for example, by denying access to military or paramilitary goods, or to goods, technologies or funding that are enabling the pursuit of programs of nuclear proliferation); or
- penalising those responsible (for example, by denying access to international travel or to the international financial system).

Where the Security Council has been unwilling, or unable, to impose sanctions, Australia's autonomous sanctions regime allows the Government to impose sanctions. In some cases, Australia has imposed additional autonomous sanctions which 'complement' Security Council sanctions already imposed by the Australian Government.

Pursuant to section 10 of the *Sanctions Act*, the regulations may make provision relating to several prohibitions, including the following:

- (a) proscription of persons or entities;
- (b) restriction or prevention of uses of, dealings with, and making available of, assets;
- (c) restriction or prevention of the supply, sale or transfer of goods or services; and
- (d) restriction or prevention of the procurement of goods or services.

Pursuant to section 11 of the *Sanctions Act*, sanctions regulations may be expressed to have extraterritorial effect, and applies:

- (a) in Australia;
- (b) to Australian citizens living abroad and Australian-registered bodies corporates abroad;
- (c) to bodies corporates incorporated by or under a law of the Commonwealth or of a State or Territory; or
- (d) on board an Australian aircraft or Australian ship.

Australian nationals living abroad may therefore be caught by offence provisions if in contravention of the autonomous sanctions regime in Australia.

Pursuant to sections 16(1)–(2) of the *Sanctions Regulations*, an individual commits an offence if their conduct contravenes a sanction law, or their conduct contravenes a condition of an authorisation (however described) under a sanction law. If convicted of that offence, a maximum term of 10 years' imprisonment or a fine may be imposed by the Courts. Corporations are also subject to autonomous sanctions. Conduct that contravenes a sanction law, or a condition of an authorisation (however described) under a sanction law are offences of strict liability and punishable by a fine.

1.2 What are the relevant government agencies that administer or enforce the sanctions regime?

Australian Sanctions Office

The Australian Sanctions Office ('ASO'), within DFAT, is Australia's principal sanctions regulator. The ASO is responsible for the following:

- providing guidance to regulated entities, including government agencies, individuals, business and other organisations on Australian sanctions law;
- processing applications for, and issuing, sanctions permits;
- working with individuals, business and other organisations to promote compliance and help prevent breaches of the law;
- working in partnership with other government agencies to monitor compliance with sanctions legislation; and
- supporting corrective and enforcement action by law enforcement agencies in cases of suspected non-compliance.

The ASO also works with a network of federal partners, including the Department of Defence, AUSTRAC, Department of Home Affairs, Australian Border Force ('ABF') and the Australian Federal Police ('AFP'), to promote compliance with Australian sanctions law and respond to possible breaches.

Department of Defence

The Australian Defence Force ('ADF') supports the ASO by enforcing sanctions. 'Operation Argos' is an example of how the ADF demonstrates their commitment to the international effort to enforce UNSC sanctions on North Korea. As part of the operation, the ADF monitors and deters illegal ship-to-ship transfers of sanctioned goods. UNSC sanctions limit North Korea's imports of refined petroleum and crude oil, and its exports of coal, all of which are facilitated by such transfers. In practice, ADF assets such as Royal Australian Naval ships and Royal Australian Air Force maritime patrol aircraft are deployed to carry out the monitoring and the deterrence efforts.

AUSTRAC

AUSTRAC is Australia's financial intelligence unit, which supports the ASO by monitoring sanctions compliance. For example, AUSTRAC has a dedicated intelligence team to monitor and triage financial reporting about Russian sanctions, including suspicious matter reporting and international funds transfer reporting. That reporting is then used to produce actionable financial intelligence to the ASO and the AFP, to detect sanctions evasion.

Department of Home Affairs

The Department of Home Affairs is responsible for implementing all visa restrictions in respect of travel bans listed under Australian sanctions law. Travel bans prohibit the entry into or transit through Australia of designated persons. A person subject to a travel ban may be a citizen or resident of any country.

Australian Border Force

The ABF is responsible for stopping the import or export of goods from Australia to ensure compliance with Australian law and international obligations. If the ABF believes the import or export of goods may require a sanctions permit, the ABF will hold the goods at the border and request the ASO to conduct a sanctions assessment. The ABF may request further information if a person or corporation's exports or imports

have been referred to ASO for assessment. The ABF will not release goods until the ASO has completed its sanctions assessment, as the ABF must ensure that all export/import requirements have been met prior to any release.

Australian Federal Police

The AFP's principal role is gathering information about controlled assets relating to sanctions. The AFP also works with the ASO and ABF to investigate possible sanctions breaches, which can then lead to possible criminal prosecution by the Commonwealth Director of Public Prosecutions ('CDPP').

Pursuant to Regulation 23 of the *Autonomous Sanctions Regulations 2011*(Cth), a person who holds an asset that the person suspects is, or may be, a controlled asset may request the AFP to help the person determine whether or not the asset is owned or controlled by a designated person or entity.

1.3 Have there been any significant changes or developments impacting your jurisdiction's sanctions regime over the past 12 months?

The *Autonomous Sanctions Amendment Bill 2024* ('*Sanctions Bill*') amends the *Sanctions Act* to explicitly confirm that individuals and/or entities can be validly sanctioned based on past conduct or status. The *Sanctions Bill* also ensures the validity of sanctions that were made based on past conduct or status. The *Sanctions Bill* further confirms that sanctions are valid even where it is not explicitly clear that the Minister considered their discretion:

- to sanction the person/entity at all, where they meet the criteria for imposing sanctions; or
- to decide whether to only designate a person for targeted financial sanctions or only declare them for travel bans, or both.

On 8 April 2024, the *Sanctions Bill* was given royal assent and the amendments outlined in it have now been incorporated in the *Sanctions Act*.

The most notable amendment incorporated by the *Sanctions Bill* was the addition of section 10A into the *Sanctions Act*. Section 10A states the following:

'10A Proscription of persons or entities relating to past circumstances, actions or positions
Without limiting subsection 10(1), regulations made for the purposes of paragraph 10(1)(a) may make provision relating to the proscription of persons or entities (for specified purposes or more generally) on the basis of:
(a) specified circumstances; or
(b) the actions of, or position held by, those persons or entities; regardless of the period of time that has elapsed since the circumstances existed, the actions were so taken or position was so held.'

2 Legal Basis/Sanctions Authorities

2.1 What are the legal or administrative authorities for imposing sanctions?

The DFAT is responsible for administering and enforcing the *COTUNA*, the *Sanctions Act* and the *Sanctions Regulations*.

The Minister for Foreign Affairs ('*Minister*') is the person responsible for sanctions in Australia. Pursuant to section 6 of the *Sanctions Act*, the Minister may by legislative instrument, specify a provision of a law of the Commonwealth as a sanction

law. Pursuant to section 2B(1) of the *COTUNA*, the Minister may also, by legislative instrument, specify a provision of a law of the Commonwealth as a *UN sanction enforcement law*.

In addition, regulation 18 of the *Sanctions Regulations* enables the Minister to grant a person a permit authorising the following:

- the making of a sanctioned supply;
- the making of a sanctioned import;
- engaging in a sanctioned commercial activity;
- the provision of a sanctioned service;
- the making available of an asset to a person or entity that would otherwise contravene regulation 14 (injunctions provision); or
- a use of, or a dealing with, a controlled asset.

The Minister may grant a permit on the Minister's initiative or on application by a person, however, the Minister must not grant a permit unless the Minister is satisfied that it would be in the national interest to grant the permit, and about any circumstance or matter required by the regulation to be considered for a particular kind of permit. The Permit may be granted conditionally.

Persons or entities designated by the Minister under regulation 6 are listed in the ASO's Consolidated List. The Consolidated List is managed and updated by the ASO and contains all persons and entities sanctioned under Australian sanctions law. Under the autonomous regime, the Minister is empowered to designate a person or entity depending on the conditions that must be met per sanctioned country.

2.2 Does your jurisdiction implement United Nations sanctions? Describe that process. Are there any significant ways in which your jurisdiction fails to implement United Nations sanctions?

Please refer to question 1.1 above.

Australia implements UNSC sanctions through the *COTUNA*, *Charter of the United Nations (Dealing with Assets) Regulations 2008* (Cth), and other regulations implementing UNSC sanctions resolutions targeting particular countries or issues.

2.3 Is your jurisdiction a member of a regional body that issues sanctions? If so: (a) does your jurisdiction implement those sanctions? Describe that process; and (b) are there any significant ways in which your jurisdiction fails to implement these regional sanctions?

Regional bodies do not presently issue sanctions in Australia.

2.4 Does your jurisdiction maintain any lists of sanctioned individuals and entities? How are individuals and entities: a) added to those sanctions lists; and b) removed from those sanctions lists?

Please refer to question 2.1 above.

The ASO maintains a Consolidated List of designated entities and persons. Regulation 10 of the *Sanctions Regulations* enables the Minister to revoke the designation of a person or entity by legislative instrument and may do so on the Minister's own initiative.

Regulation 11 allows for applications to be made for the revocation of designations. These include by a designated person or entity to revoke the designation of the person or entity. The application must be in writing and set out the circumstances

relied upon to justify the application. For the UNSC sanctions regime, DFAT will provide a listed person or entity with a statement of reasons for the listing upon written request by the person or entity.

2.5 Is there a mechanism for an individual or entity to challenge its addition to a sanctions list?

Designated persons or entities may request to be removed from a sanctioned list. The body to which the request should be made depends on the person or entity who was designated.

For UNSC listings, requests should be made to the Focal Point for De-listing or through the country of citizenship or residence.

For UNSC listings related to ISIL (Da'esh) and Al-Qaida, requests for removal should be made to the UN Office of the Ombudsperson or through the person or entities country of citizenship or residence.

For listings under the counter-terrorism sanctions regime or Australian autonomous sanctions, requests should be made through the DFAT sanctions contact page online at: <https://www.dfat.gov.au/international-relations/security/sanctions/Pages/contacts-and-links>

2.6 How does the public access those lists?

The Consolidated List is accessible online on DFAT's webpage: <https://www.dfat.gov.au/international-relations/security/sanctions/consolidated-list>

The Consolidated List was most recently updated on 24 May 2024.

2.7 Does your jurisdiction maintain any comprehensive sanctions or embargoes against countries or regions?

Australia has currently implemented UNSC sanctions connected to Iraq, Somalia, the Democratic Republic of the Congo, Sudan and South Sudan, Lebanon, the Democratic People's Republic of Korea, Iran, Libya, Guinea-Bissau, the Central African Republic, Yemen, and Mali, as well as against ISIL (Da'esh), Al-Qaida and the Taliban. Australia has also implemented counter-terrorism sanctions imposed by the Security Council.

Australia has implemented autonomous sanctions connected to the Democratic People's Republic of Korea, Iran, Libya, Myanmar, the Former Federal Republic of Yugoslavia, Russia/Ukraine, Syria and Zimbabwe.

Australia has also established thematic sanctions regimes with respect to significant cyber incidents, serious violations or abuses of human rights, and serious corruption.

2.8 Does your jurisdiction maintain any other sanctions?

Please refer to question 1.1 above.

2.9 What is the process for lifting sanctions?

Please refer to questions 2.4 and 2.5 above.

2.10 Does your jurisdiction have an export control regime that is distinct from sanctions?

Australia maintains an export control regime distinct from sanctions that is comprehensive and in place to ensure the control of goods imported and exported to and from Australia are carried out consistent with Australia's national interest and international obligations.

Australia's export control system is primarily implemented by Defence Export Controls, a unit within the Department of Defence. The agency is responsible for controlling the export of Australian goods, software and technologies and is accountable to the Minister of Defence. There are several federal legislation and regulations that collectively form Australia's export control system, including the following:

- *Customs Act 1901* (Cth) and *Customs (Prohibited Exports) Regulations 1958* (Cth), which primarily deal with controls for export of tangible defence and dual-use goods and technologies;
- *Weapons of Mass Destruction (Prevention of Proliferation) Act 1995* (Cth), an Act to control goods and technologies that are believed or suspected to be used in the weapons of mass destruction programme; and
- *Defence Trade Controls Act 2012* (Cth), an Act that controls the transfer of defence and strategic goods technologies.

2.11 Does your jurisdiction have blocking statutes or other restrictions that prohibit adherence to other jurisdictions' sanctions or embargoes?

No – there are presently no blocking statutes or other restrictions prohibiting adherence to other jurisdictions' sanctions or embargoes.

2.12 Does your jurisdiction impose any prohibitions or threaten any sanctions consequences for transactions that do not have a connection to that jurisdiction (sometimes referred to as "secondary sanctions")?

Australia does not presently impose secondary sanctions. Since sanctions regulations have extraterritorial effect, sanctions law applies in Australia, to Australian citizens and Australian-registered bodies corporates abroad or on board an Australian aircraft or vessel. There are primary offences for the contravention of sanctions for individuals and corporations.

3 Implementation of Sanctions Laws and Regulations

3.1 What parties and transactions are subject to your jurisdiction's sanctions laws and regulations? For example, do sanctions restrictions apply based on the nationality of the parties involved? Or the location where the transactions take place?

Please refer to question 1.1 above.

3.2 Are parties required to block or freeze funds or other property that violate sanctions prohibitions?

A person or entity that holds the asset has the responsibility of freezing an asset subject to targeted financial sanctions, for example, the financial institution that holds the funds of a designated person or entity.

The Australian Government can also seek to freeze the assets of a party that is alleged to hold or deal with an asset controlled or owned by a designated person or entity. The Minister may also 'freeze' certain funds or other assets, the consequence of which is that persons and entities are prohibited from dealing with it, as doing so would constitute an offence.

3.3 Are there licences available that would authorise activities otherwise prohibited by sanctions?

In some circumstances, it may be possible to obtain a sanctions permit to allow an activity related to a person or entity on the Consolidated List that would otherwise be prohibited by an Australian sanctions law.

The Minister may grant a sanctions permit provided the activity meets specific criteria. The criteria for a permit will depend on the specific regime. Permits under UNSC sanctions require approval from the UNSC.

3.4 Are there any sanctions-related reporting requirements? When must reports be filed and what information must be reported?

Under section 19 of the *Sanctions Act*, the CEO of a designated Commonwealth entity may require a person to give information or documents for the purpose of determining whether a sanction law has been or is being complied with. The person must provide the information or documents by the time and in any manner or form as specified in the CEO's notice. The time specified in the notice must be reasonable. The CEO may require the information to be verified by, or given on, oath or affirmation that the information is true.

It is not possible to use the privilege of self-incrimination to justify not providing information or documents. However, neither the information given, nor the giving of the document is admissible in evidence against the individual in any criminal proceedings, or in any proceedings that would expose the individual to a penalty, other than proceedings for an offence against:

- section 17 (false or misleading information given in connection with a sanction law); or
- section 21 (failure to comply with requirement to give information or document).

Failing to comply with the requirement is a criminal offence with a penalty of up to 12 months' imprisonment.

3.5 How does the government convey its compliance expectations? Are certain entities required to maintain compliance programmes? What are the elements of a compliance programme required (or recommended) by the competent regulator(s)?

Australian businesses and individuals are required to conduct due diligence to ensure that they do not deal with sanctioned persons or entities. Beyond this, there is no explicit reporting requirement for a sanctions compliance programme for entities.

4 Enforcement

4.1 Are there criminal penalties for violating economic sanctions laws and/or regulations?

Please refer to question 1.1 above.

The violation of economic sanction laws and regulations attract serious criminal offences with strict liability. Other offences under the *Sanctions Act* include the following:

- (a) giving false or misleading information given in connection with a sanction law;
- (b) giving information to a second person who then provides false or misleading information in connection with a UN sanction enforcement law; and
- (c) failure to comply with notice to give information by CEO of a Commonwealth entity. These offences are expressed in a similar language in sections 28 and 29 of the *COTUNA*.

4.2 Which government authorities are responsible for investigating and prosecuting criminal economic sanctions offences?

Please refer to questions 1.2 and 2.1 above.

4.3 Is there both corporate and personal criminal liability?

Yes – an individual or a body corporate can be criminally liable for breaching sanction laws.

The *Criminal Code Act 1995* (Cth) (*'Criminal Code'*) at Part 2.5 sets out the methods by which criminal offences can be attributed to corporations. Under section 12.2, the physical element of an offence may be attributed to a corporation using traditional agency principles, with physical acts of 'an employee, agent or officer acting within his or her actual or apparent authority' attributable to a corporation.

Section 12.3 of the *Criminal Code* provides that when an offence requires fault elements of intention, knowledge or recklessness, this state of mind is imputed to a corporation if it 'expressly, tacitly or impliedly authorised or permitted the commission of the offence'.

4.4 What are the maximum financial penalties applicable to individuals and legal entities convicted of criminal sanctions violations?

Please refer to questions 1.1 and 4.1 above.

4.5 Are there other potential consequences from a criminal law perspective?

An individual or body corporate may face a variety of consequences from a criminal law perspective, such as imprisonment or a fine. The consequences will depend on the sanctions regime that has been breached.

A breach of sanctions law may expose an individual or body corporate to offences in breach of terrorism financing laws, anti-money laundering or anti-fraud laws, customs law or other offences contained in the *Criminal Code*.

4.6 Are there civil penalties for violating economic sanctions laws and/or regulations?

No – there are currently no civil penalties for violating economic sanctions laws.

4.7 Which government authorities are responsible for investigating and enforcing civil economic sanctions violations?

Please refer to questions 1.2 and 2.1.

4.8 Is there both corporate and personal civil liability?

There are currently no civil penalties for violating economic sanctions laws. Notwithstanding, there may be fines imposed in criminal proceedings for both individuals and corporations. Please refer to questions 1.1 and 4.3 above for further commentary.

4.9 What are the maximum financial penalties applicable to individuals and legal entities found to have violated economic sanctions?

Please refer to questions 1.1 and 4.1.

4.10 Are there other potential consequences from a civil law perspective?

There are limited civil consequences beyond director duties and officer duty principles.

4.11 Describe the civil enforcement process, including the assessment of penalties. Are all resolutions by the competent authorities public?

There is no civil enforcement process for sanctions in Australia. There is only a criminal enforcement process.

The criminal enforcement process involves DFAT, the AFP and the CDPP. The AFP and DFAT are involved in investigating and may refer matters to the CDPP for prosecution.

4.12 Describe the appeal process. Have companies challenged penalty assessments in judicial proceedings?

The appeal process for an individual or company convicted of a sanctions offence follows the general criminal appeals process. The individual or corporation must lodge the appeal against the conviction or sentence to the relevant court within a specific timeframe.

4.13 Are criminal and civil enforcement only at the national level? Is there parallel state or local enforcement?

Yes – Australian sanction laws and offences are legislated at a national level, and therefore, are only enforced at that level.

4.14 What is the statute of limitations for economic sanctions violations?

There is no statute of limitation for economic sanctions violations.

5 General

5.1 If not outlined above, what additional economic sanctions-related measures are proposed or under consideration?

The Australian Government is currently not considering the implementation of new economic sanctions regimes. Any new economic sanctions-related measures are likely to be related to the current Russian and Ukraine sanctions regimes.

5.2 Please provide information for how to obtain relevant economic sanctions laws, regulations, administrative actions, and guidance from the Internet. Are the materials publicly available in English?

- DFAT Website – ‘Australia and sanctions’ (<https://www.dfat.gov.au/>).
- DFAT Consolidated List (<https://www.dfat.gov.au/international-relations/security/sanctions/consolidated-list>).
- Central African Republic and Democratic Republic of the Congo sanctions regimes (<https://www.dfat.gov.au/international-relations/security/sanctions/sanctions-regimes/Pages/central-african-republic-and-democratic-republic-congo-sanctions-regimes-sanctions-regime>).
- Counter-Terrorism (UNSC 1373) sanctions regime (<https://www.dfat.gov.au/international-relations/security/sanctions/sanctions-regimes/counter-terrorism-uns-1373-sanctions-regime>).
- Specified Ukraine regions sanctions regime (<https://www.dfat.gov.au/international-relations/security/sanctions/sanctions-regimes/specified-ukraine-regions-sanctions-regime>).
- Democratic People’s Republic of Korea (North Korea) sanctions regime (<https://www.dfat.gov.au/international-relations/security/sanctions/sanctions-regimes/democratic-peoples-republic-korea-sanctions-regime>).
- Former Federal Republic of Yugoslavia sanctions regime (<https://www.dfat.gov.au/international-relations/security/sanctions/sanctions-regimes/former-federal-republic-yugoslavia-sanctions-regime>).
- Guinea-Bissau sanctions regime (<https://www.dfat.gov.au/international-relations/security/sanctions/sanctions-regimes/Pages/guinea-bissau-sanctions-regime>).
- Iran sanctions regime (<https://www.dfat.gov.au/international-relations/security/sanctions/sanctions-regimes/iran-sanctions-regime>).
- Iraq sanctions regime (<https://www.dfat.gov.au/international-relations/security/sanctions/sanctions-regimes/Pages/iraq-sanctions-regime>).
- ISIL (Da’esh) and Al-Qaida sanctions regimes (<https://www.dfat.gov.au/international-relations/security/sanctions/sanctions-regimes/Pages/isil-daesh-and-al-qaida-sanctions-regime>).
- Lebanon sanctions regime (<https://www.dfat.gov.au/international-relations/security/sanctions/sanctions-regimes/Pages/lebanon-sanctions-regime>).
- Libya sanctions regime (<https://www.dfat.gov.au/international-relations/security/sanctions/sanctions-regimes/libya-sanctions-regime>).
- Myanmar sanctions regime (<https://www.dfat.gov.au/international-relations/security/sanctions/sanctions-regimes/myanmar-sanctions-regime>).
- Russia sanctions regime (<https://www.dfat.gov.au/international-relations/security/sanctions/sanctions-regimes/russia-sanctions-regime>).
- Serious corruption sanctions regime (<https://www.dfat.gov.au/international-relations/security/sanctions/sanctions-regimes/serious-corruption-sanctions-regime>).
- Serious violation or serious abuses of human rights sanctions regime (<https://www.dfat.gov.au/international-relations/security/sanctions/sanctions-regimes/serious-violations-or-serious-abuses-human-rights-sanctions-regime>).
- Significant cyber incidents sanctions regime (<https://www.dfat.gov.au/international-relations/security/sanctions/sanctions-regimes/significant-cyber-incidents-sanctions-regime>).
- Somalia sanctions regime (<https://www.dfat.gov.au/international-relations/security/sanctions/sanctions-regimes/Pages/somalia-sanctions-regimes>).
- Sudan and South Sudan sanctions regimes (<https://www.dfat.gov.au/international-relations/security/sanctions/sanctions-regimes/Pages/sudan-and-south-sudan-sanctions-regime>).
- Syria sanctions regime (<https://www.dfat.gov.au/international-relations/security/sanctions/sanctions-regimes/syria-sanctions-regime>).
- The Taliban sanctions regime (<https://www.dfat.gov.au/international-relations/security/sanctions/sanctions-regimes/Pages/the-taliban-sanctions-regime>).
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- Yemen sanctions regime (<https://www.dfat.gov.au/international-relations/security/sanctions/sanctions-regimes/Pages/yemen-sanctions-regime>).
- Zimbabwe sanctions regime (<https://www.dfat.gov.au/international-relations/security/sanctions/sanctions-regimes/zimbabwe-sanctions-regime>).
- Legislation: Charter of the United Nations Act 1945 (<https://www.legislation.gov.au/C1945A00032/latest/text>).
- Autonomous Sanctions Act 2011 (<https://www.legislation.gov.au/C2011A00038/latest/text>).
- Autonomous Sanctions Regulations 2011 (<https://www.legislation.gov.au/F2011L02673/latest/text>).
- Criminal Code Act 1995 (<https://www.legislation.gov.au/C2004A04868/latest/text>).
- Customs (Prohibited Exports) Regulations 1958 (<http://www.legislation.gov.au/Series/F1996B03403>).
- Customs (Prohibited Imports) Regulations 1956 (<https://www.legislation.gov.au/F1996B03651/latest/text>).



Dennis Miralis is a leading Australian defence lawyer who specialises in international criminal law, with a focus on complex multijurisdictional regulatory investigations and prosecutions. His areas of expertise include bribery and corruption, global tax investigations, proceeds of crime, anti-money laundering, worldwide freezing orders, cybercrime, national security law, Interpol Red Notices, extradition and mutual legal assistance law. Dennis advises individuals and companies under investigation for economic crimes both locally and internationally. He has extensive experience in dealing with all major Australian and international investigative agencies.

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Arman Salehirad is a senior lawyer whose practice covers matters being investigated and prosecuted by the Australian Criminal Intelligence Commission, the Australian Federal Police, the Australian Securities and Investments Commission, the Australian Taxation Office, the Commonwealth Director of Public Prosecutions, and all state agencies including the Office of the Director of Public Prosecutions and NSW Police State Crime Command.

Arman is experienced in matters involving global cyber investigations and incident response, data breaches and protection, financial crime, foreign bribery, high value taxation investigations and disputes, money laundering, tax fraud and evasion, regulatory compliance, and unexplained wealth.

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