

Sanctions

Companies operating internationally face a growing number of economic sanctions regimes imposed by individual states, including the United States, regional bodies such as the European Union, and global organizations such as the United Nations. Failure to comply with sanctions regimes can put companies at risk of civil monetary penalties or criminal penalties

Our economic sanctions lawyers provide counsel to clients worldwide seeking to comply with U.S. and non-U.S. economic sanctions, and applicable EU and UK blocking statutes while pursuing their legitimate commercial activities. Working together with colleagues in our offices in the United States, UK, Europe and China/Hong Kong, our lawyers can address problems as they arise and help design reporting and compliance structures that anticipate and reduce the risks associated with such circumstances.

We help clients understand which of their global affiliates, officers, and employees are required to comply with sanctions and how corporate and governance structures affect the degree to which they are affected by sanctions. We assist clients in reducing their sanctions risk by assessing their compliance programs and making recommendations on how to institute operational changes in compliance with applicable sanctions. We have also assisted clients in getting licenses in the US, most EU Member States and the UK, permitting transactions otherwise prohibited by sanctions. Our team advises clients in all aspects of dealing with potential violations, including internal reviews/investigation, voluntary disclosures and penalty assessments. We are also involved in some of the largest ICC arbitration disputes brought by Russian companies against EU entities.

We monitor developments in the sanctions programs on a daily basis. We have extensive experience working with the agencies that implement sanctions regimes and in advising clients across a broad range of industries. Our clients are major multinational companies in the electronic, internet/technology, telecommunications, banking/financial, insurance, food, pharmaceutical, medical device, media, travel, retail, energy, infrastructure, aviation, automotive, manufacturing and education industries.

We are currently at the forefront of addressing U.S. sanctions and other measures regarding China and Hong Kong, including with respect to IPOs at the Hong Kong Stock Exchange, as well as Chinese counter-sanctions laws. Our U.S. offices work closely with our China and Hong Kong offices to advise clients on the complexities of U.S. human right sanctions targeting Xinjiang province and Hong Kong. We also advise on navigating conflicts of laws issues and mitigating risk under Chinese counter-sanctions measures.



Examples of our experience

- Advised **over 100 Hogan Lovells clients** throughout the U.S., UK, Europe, Middle East and Africa, Asia and Latin America on compliance with new sanctions that the U.S., EU and its Member States and UN have imposed against Iran, China / Hong Kong, Russia, Belarus, Venezuela, North Korea and Syria.
- Advising **ZTE** regarding a wide range of sanctions and export control issues related to the fulfillment of its obligations under its settlement agreements' obligations with the U.S. Government, including audits by an independent monitor.
- Advising **multiple pharmaceutical and medtech companies** on exiting operations from Russia, restructuring distributor and contract manufacturing relationships in Russia, obtaining authorizations from U.S., UK and EU member state governments for certain ongoing activities related to Russia, and conducting investigations and self-disclosures.
- Advising global agro food companies on their manufacturing and operations in Russia from US, EU and UK sanctions perspective.
- Applied for and/or obtained **over 170 EU services licenses** from UK, Netherlands, Belgium, Ireland, Spain, Poland, Italy and other EU member states for the provision of IT, financial, legal and other services to parties in Russia.
- Representing multiple global life sciences companies on sanctions issues related to the supply of medicine or medical devices to **sanctioned hospitals in the Xinjiang province of China**, including conducting investigations and disclosures, applying for authorizations from OFAC to permit transactions with such parties, and implementing related compliance procedures address both U.S. sanctions and Chinese counter-sanctions.
- Assisting **Lloyd's of London**, in working with the UK Government on the first General Trade Licence under the new UK SAMLA sanctions concerning Russia.
- Representing a **non-U.S. financial institution** in a voluntary disclosure to OFAC and in discussions with OFAC, HM Treasury and the Federal Reserve Bank of New York, after an extensive internal sanctions investigation in an Emerging Market jurisdiction.



Recognized for excellence

Band 1
Export Controls and Economic
Sanctions – Chambers USA 2024

Runner-up
Export Controls Law Firm of the
Year – WorldECR Awards 2021

Ranked
Sanctions – Chambers UK 2024

Runner-up
Sanctions Law Firm of the Year –
WorldECR Awards 2021



Clients say ...

'In comparison to other firms, Hogan Lovells' emphasis on cross-border collaboration and a global perspective sets it apart. Notable innovations include leveraging technology for efficient legal solutions and fostering diversity to enrich perspectives within the practice.'
– The Legal 500 United States 2024

'Hogan Lovells' international trade practice stands out for its comprehensive approach, blending legal expertise with a deep understanding of global trade dynamics. Also stands out for its strength in navigating complex regulatory landscapes and provision of strategic advice on trade policies.'
– The Legal 500 United States 2024

"They clearly understand our business and are very aware of changes in the industry, which they keep their clients informed on."
– Chambers USA 2024

"Hogan's ability to handle complex matters is exceptional."
– Chambers USA 2024



Global Regulatory Contacts



Ajay Kuntamukkala
Partner | Washington DC
+1 (202) 637 5552
ajay.kuntamukkala@
hoganlovells.com



Lourdes Catrain
Partner | Brussels / Madrid
+32 (2) 505 09 33
lourdes.catrain@
hoganlovells.com



Beth Peters
Partner | Washington DC
+1 (202) 637 5837
beth.peters@
hoganlovells.com



Stephen Propst
Partner | Washington DC
+1 (202) 637 5894
stephen.propst@
hoganlovells.com



Aleksandar Dukic
Partner | Washington DC
+1 (202) 637 5466
aleksandar.dukic@
hoganlovells.com



Anthony Capobianco
Partner | Washington DC
+1 (202) 637 2568
anthony.capobianco@
hoganlovells.com



Aline Doussin
Partner | London
+44 (20) 72962961
aline.doussin@
hoganlovells.com



Ben Kostrzewa
Foreign Legal Consultant |
Washington D.C.
+1 202 637 5600
ben.kostrzewa@
hoganlovells.com

More information:

<https://www.hoganlovells.com/en/aof/sanctions>

Export Controls

Export control laws have played an increasingly important role in the efforts of governments to protect national security and fight terrorism. With increasingly restrictive controls targeting certain countries, greater enforcement, and higher penalties for export violations, it is more critical than ever for companies engaged in international trade to understand their exposure to trade controls and have effective export compliance programs.

We are at the forefront of virtually all cutting-edge export control issues, including advising on national security restrictions related to China, counselling on Russia/Belarus related restrictions, assessing technology transfers and deemed exports, advising on emerging technologies such as semiconductors, and analyzing the intersection between export controls and economic sanctions.

Our team combines experienced private practitioners with former government officials to deliver a broad scope of service. By maintaining regular contact with export control regulators across the US, EU and its member states, and other jurisdictions, we are able to keep our clients informed of new developments and to assist them in designing effective compliance programs.

We provide seamlessly support across multiple jurisdictions with our export controls lawyers in offices such as Washington, D.C., London, Brussels, Paris, Shanghai, Beijing, Hong Kong, Mexico City, Amsterdam, Madrid, Munich, Singapore, Rome, and Tokyo. Our clients engage us to guide them through the complex maze of global trade control regulations, many of which differ by county and region.

Examples of our experience

- Advising ZTE regarding a wide range of sanctions and export control issues related to the fulfilment of its obligations under its settlement agreements' obligations with the U.S. Government, including audits by an independent monitor.
- Assisting telecommunications, satellite, aircraft, engineering, and other companies in classifying commodities, technology, and software under the Export Administration Regulations (EAR) and the International Traffic in Arms Regulations (ITAR), seeking formal classification rulings from the U.S. Departments of Commerce and State and licenses as necessary.
- Assist multiple companies with voluntary self-disclosures and enforcement actions before the U.S. government, including conducting internal investigations, drafting disclosure reports and negotiating settlements with BIS and DDTC.
- Advising a range of companies and universities on cutting edge export control issues related to emerging technologies, including encryption technology, drone and counter-drone technology, autonomous vehicles, advanced nuclear reactors, and advanced data compression.
- Advising a range of companies on new export controls on advanced node semiconductors and related tools and technology.
- Assisting companies and universities regarding nuclear export controls, including seeking authorizations and licenses from the Commerce Department, Energy Department and Nuclear Regulatory Commission and assessing jurisdiction of specific technologies and items.
- Advising private equity firms and strategic investors on export control and sanctions implications of their investments in Chinese companies.

More information:
<https://www.hoganlovells.com/en/aof/export-controls>

Recognized for excellence

Band 1

Export Controls and Economic Sanctions – *Chambers USA 2024*

Tier 2

International Trade: Customs, Export Controls and Economic Sanctions – *Legal 500 USA 2024*

Runner-up: Export Controls Law Firm of the Year – *World ECR Awards 2021*

Clients say ...

“A formidable team offering in-depth knowledge of export controls and economic sanctions”
Chambers USA, 2020

“They are a global firm and they have been working across multiple jurisdictions. Their network and breadth internally has been fantastic.”
Chambers Global, 2021

“They clearly understand our business and are very aware of changes in the industry, which they keep their clients informed on.”
Chambers USA, 2024

“Hogan's ability to handle complex matters is exceptional.”
Chambers USA, 2024

Global Regulatory Contacts



Ajay Kuntamukkala
Partner | Washington DC
+1 (202) 637 5552
ajav.kuntamukkala@hoganlovells.com



Lourdes Catrain
Partner | Brussels / Madrid
+32 (2) 505 09 33
lourdes.catrain@hoganlovells.com



Beth Peters
Partner | Washington DC
+1 (202) 637 5837
beth.peters@hoganlovells.com



Stephen Propst
Partner | Washington DC
+1 (202) 637 5894
stephen.propst@hoganlovells.com



Aleksandar Dukic
Partner | Washington DC
+1 (202) 637 5466
aleksandar.dukic@hoganlovells.com



Anthony Capobianco
Partner | Washington DC
+1 (202) 637 2568
anthonyv.capobianco@hoganlovells.com



Aline Doussin
Partner | London
+44 (20) 72962961
aline.doussin@hoganlovells.com



Ben Kostrzewa
Foreign Legal Consultant | Washington D.C.
+1 202 637 5600
ben.kostrzewa@hoganlovells.com