

GATE: Denied Parties
For prospective Customers

GATE: Denied Parties | Sanction Lists Overview

SAPPER provides several lists, which are described in detail on the following pages.

We differentiate between two types of lists:

Standard lists: These are checked daily to ensure that they are up-to-date and revised automatically.

Private lists: Those to some extent consist of restricted or non-public data, which do not belong to the standard list range yet or are company-internal lists that need to be setup individually.

SAPPER TestCONTENT

The addresses provided in list category «TEST» are not complete and current. It is just an extract from the EC regulations. The TestCONTENT is provided free of charge in the dominoWATCH test accounts to become familiar to the matching algorithm and functionalities of the dominoWATCH platform. Furthermore, the TestCONTENT is needed during the implementation process (RollOut) of the VALIDATION GATEWAY SERVER and the GATE: Denied Parties, to do the settings in the different forms and data sources prior to the production rollout. The selected respective ordered boycott lists will be enabled on the setup of a REAL dominoWATCH account, i.e. after the VALIDATION GATEWAY SERVER implementation process.

!! Please note that no «real» (legally valid) checks can be done with the TestCONTENT !!

Private Lists: Company-Internal Lists

Company-internal lists can be those that do not belong to the standard list range of SAPPER yet and therewith have to be setup especially for the customer or those consisting of «bad guys», the company do not want to exclude from any business.

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1. EU-VO - European Union

1.1. EU-VO Financial Sanctions

The European Union has resolved upon restrictive measures to counter terrorism in several regulations. Accordingly, it is forbidden to provide individuals, groups or entities, whose names are mentioned on one of the lists, with direct or indirect assets or economical resources. Economical resources are all sorts of assets, i.e. it is prohibited to supply suspicious individuals, groups or entities, either directly or indirectly with any sort of goods. The lists, underlying the legal restrictions, apply, regardless of the place of residence or domicile of the terrorist group, terrorists and entities. Furthermore, they affect all business transactions within Germany and the European Union. Also the import sector is concerned; within that area, payment obligations usually result from sales and supply contracts concerning the import of goods and commodities. Any company, located in a member state of the European Union is subject to these regulations.

This consolidated EU list includes all persons and entities against which EU financial sanctions exist.

!! EU sanctions are consolidated under EU-VO within the dominoCONTENT !!

1.2. EU-VO (Extension)

- COUNCIL REGULATION (EU) No **833/2014** and its amendments concerning restrictive measures in view of Russia's actions destabilizing the situation in Ukraine

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2. UNS - United Nations

2.1. UNS-CL

This *consolidated list* includes all persons or entities subject to sanctions by the UN Security Council. It applies to all UN member states. The individual data sets belong to different sanctions regimes.

!! Sanctions of the United Nations (except 1988 and 1989) are consolidated under UNS-CL within the dominoCONTENT !!

2.2. UNS-1988

A list of sanctions against the Taliban and individuals, groups, etc., associated with the Taliban.

2.3. UNS-1989 (ex 1267)

A list of sanctions against ISIL (Da'esh) Al-Qaida and associated individuals, groups and entities.

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3. United States of America (US LISTS)

3.1. US-SDN - Specially Designated Nationals – OFAC Part 764, Supplement No. 3 EAR

This is a *consolidated list* of SDN programs. US persons may not transact businesses with designated individuals and entities. Please find more information at the «US Department of the Treasury» homepage.

The individual programs "Program Tags" and their affiliation to the various US lists are published in the "Resource Center" of the «US Department of the Treasury»¹.

!! All SDN programs are consolidated under US-SDN within the dominoCONTENT !!

3.2. US-UL - Unverified List

The Unverified List was introduced in 2002 under the impression of the terrorist attacks of September 11, 2001. Each transaction, in which a listed person is involved, is classified as «red flag» by the BIS (if transaction as to part 732 EAR). The BIS advises all exporters to handle business transactions with registered enterprises with extreme care.

3.3. US-DPL - Denied Persons List

List of individuals dispensed with a denial order, according to violation of US-Export Law. Through the denial order, the accordant individuals are partly or completely banned from participating in exports or re-exports of goods with US origin. At the same time, the standard denial order bans third parties from business dealings to the extent of the denial order.

3.4. US-EL - Entity List

The Entity List (Supplement No. 4 to part 744 of the EAR) is published by the Bureau of Industry and Security (BIS) and includes entities which are, according to the knowledge of the BIS, involved in activities connected with the distribution of weapons of mass destruction. An export or re-export to one of the entities on the Entity List without a license means contempt of US-export law.

¹ Directory of all "Program Tags" and their list affiliation: https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/program_tags.aspx

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3.5. US-NPS - Nonproliferation Sanctions

A consolidated list of US sanctions against individuals, companies and governments involved in activities related to nuclear proliferation.

!! Nonproliferation sanctions are consolidated under US-NPS within the dominoCONTENT !!

3.6. US-SDP - List of Statutorily Debarred Parties

Individuals and entities «legally» excluded respectively condemned by the US State Department according to violation of Arms Export Regulations.

3.7. US-ADP - List of Administratively Debarred Parties

Individuals and entities «administratively» excluded respectively condemned by the US State Department according to violation of Arms Export Regulations.

3.8. US-FSE - List of Foreign Sanctions Evaders (Iran / Syria)

Individuals and entities that have supported the Iran and Syria in evading the U.S. sanctions imposed on them.

3.9. US-SSI - Sectoral Sanctions Identifications List (Russia / Ukraine)

It is prohibited for US persons to conduct certain credit and investment transactions with the listed institutions.

3.10. US-CAATSA - Countering America's Adversaries Through Sanctions Act

This list was issued by the U.S. Department of State and concerns the sectors "Defense Sector of the Government of the Russian Federation" and the "Intelligence Sector of the Government of the Russian Federation".

This list was published as an advance warning, according to which all listed persons and organizations will be officially listed later.

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3.11. US-561 – The List of Foreign Financial Institutions Subject to Part 561 (Iran)

The "Part 561" list contains the names of US foreign financial institutions designated by NDAA and / or CISADA.

3.12. US-ISA – Non-SDN Iranian Sanctions Act List– currently without entries –

The list contains companies that have violated existing sanctions (Iran / Syria) and are not listed on the US-SDN. As part of the "Implementation Day", all records of this list were deleted until further notice.

3.13. US-IRAN – List of Persons Identified as Blocked Solely Pursuant to Executive Order 13599 – currently without entries -

A brief history:

This list was originally opened by the US authorities to list natural and legal persons as well as ships from Iran, Europe and other countries that were listed on the US SDN before the relaxation and partial lifting of the Iran embargo (in the course of Implementation Day).

In 2018, the US government tightened the sanctions again and transferred all entries on this list back to the US-SDN list.

3.14. US-TEL - Terrorist Exclusion List

List of individuals and entities connected with foreign terrorist organizations. The listed individuals and entities are not allowed to enter the United States, respectively they will be expelled from the country if there is knowledge that they stay on US territory.

3.15. US-PLC - Palestinian Legislative Council

List of individuals mentioned on the candidate list of Palestinian Legislative Council parties. The hereon mentioned individuals are not part of the US-SDN list.

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3.16. US-CAPTA – List of Foreign Financial Institutions Subject to Correspondent Account or Payable Through Account Sanctions

The CAPTA list concerns US foreign financial institutions that are subject to correspondence or payable-through account sanctions in accordance with the sanction authorities.

3.17. US-MEU – Military End User List

The list was issued by the Bureau of Industry and Security (BIS) and includes companies from China, Russia, and Venezuela identified by BIS as so-called "Military End Users."

3.18. US-NS-MBS – Non-SDN Menu Based Sanctions

The list was issued by the U.S. Department of Treasury or the Office of Foreign Assets Control (OFAC) and includes individuals subject to non-blocking menu-based sanctions. The sanctions were imposed pursuant to statutory or other authority, including certain sanctions from Section 235 CAATSA (Countering America's Adversaries Through Sanctions Act). This list is declared to be a non-SDN list (NS).

3.19. US-NS-CCMC – Non-SDN Communist Chinese Military Companies List (Aka: CMIC)

The publisher of this list is also the Office of Foreign Assets Control (OFAC). This list is also maintained as a new Non-SDN list and lists Chinese companies/individuals in connection with the Global Magnitsky Act (human rights violations). There are currently already individuals/companies on the current SDN (Specially Designated Nationals) list that are listed with the program tag "GLOMAG".

Note: This list is also listed with the authorities under the name "CHINESE MILITARY-INDUSTRIAL COMPLEX COMPANIES List".

4. Germany

4.1. D-BMWi – Implementation of UN Sanctions – currently without entries –

Temporary emergency measures of the Federal Ministry of Economics and Energy (BMWi).

4.2. DE-FW – Deutsche Frühwarnschreiben (German Early Warning List)

The BMWi's German Early Warning Letters list foreign recipients related to conventional armaments and/or weapons of mass destruction/carrier technology. According to the BMWi, the following applies to the content: "This list is intended exclusively for use in the Federal Republic of Germany. Existing sanction regulations must be observed in addition to and independently of this list" (source: IHK Pfalz).

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!! The DE-FW is provided by associations and IHK's only to German companies. We do not make this list available, we activate the matching with this list only for customers, who can prove the possession. Updates of this list must be provided by the client !!

5. Switzerland

5.1. CH-SECO – Sanctions

This is a consolidated list drawn up by the State Secretariat for Economic Affairs SECO for the implementation of measures adopted by the United Nations, the Organisation for Security and Cooperation in Europe or Switzerland's main trading partners to ensure compliance with international law, in particular respect for human rights.

A detailed list of all currently existing sanctions against countries / persons and organisations can be viewed directly under the following link².

!! All sanctions are consolidated under CH-SECO within the dominoCONTENT !!

5.2. CH-SECO/EDA – Financial Sanctions and Freeze on Assets

This is a *consolidated list* consisting of financial sanctions imposed by the State Secretariat for Economic Affairs (SECO) and the freezing of assets of certain persons (PEPs) by the Federal Department of Foreign Affairs (FDFA).

- certain individuals from Tunisia
- certain individuals from Ukraine

² Link of the State Secretariat for Economic Affairs SECO:

https://www.seco.admin.ch/seco/de/home/Aussenwirtschaftspolitik_Wirtschaftliche_Zusammenarbeit/Wirtschaftsbeziehungen/exportkontrollen-und-sanktionen/sanktionen-embargos/sanktionsmassnahmen.html

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6. United Kingdom: UK-HM – Implementation of UN Sanctions and EU Regulations

A list of all active regimes and detailed descriptions can be found on the website of the British authorities³.

6.1. UK-HM – Status: Asset Freeze Targets

This consolidated list of financial sanctions of HM Treasury is based on the consolidated lists of the United Nations and the EC regulations of the European Union.

!! All regulations are consolidated under UK-HM within the dominoCONTENT !!

6.2. UK-FS-IBT-HM – Status: Investment Ban Targets

HM Treasury's list includes persons subject to restrictive measures with regard to Russia's measures to destabilize the situation in Ukraine.

7. The Netherlands: NL-NTL – National Terrorism List

It is a national list from the Netherlands, which is published by the government „Rijksoverheid“.

The list contains names of individuals and entities whose assets have been frozen because they are involved in terrorist activities.

8. France: FR-NTL – National Terrorism List

It is a national list from France, which is published by the Ministers for the Economy and Home Affairs.

The list contains names of individuals and entities whose assets have been frozen because they are involved in terrorist activities.

³ Overview „Financial sanctions targets by regime“: <https://www.gov.uk/government/collections/financial-sanctions-regime-specific-consolidated-lists-and-releases>

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9. Canada

9.1. CA-CASL – Anti-terrorism Financing

This consolidated list includes individuals and entities subject to specific sanctions regulations made under the Special Economic Measures Act (SEMA) and the Justice for Victims of Corrupt Foreign Officials Act (JVCFOA).

!! All regulations are consolidated under CA-CASL within the dominoCONTENT !!

9.2. CA-ATA - Anti-Terrorism Act

This list contains persons, groups and entities who knowingly carried out, participated in, or attempted to carry out terrorist activities and/or knowingly work on behalf of, or in connection with, such persons, groups or entities who carried out, participated in, or attempted to carry out terrorist activities.

10. Japan: JP-METI – WMD Sanctions

End user list with names of entities, accused to be connected with the distribution of Weapons of Mass Destruction (WMD).

11. India: IN-BTO – List of Banned Terrorist Organizations

List of Organizations declared as terrorist organizations under the unlawful activities (prevention) Act 1967.

12. Hong Kong: HK-MA – Implementation of UN Sanctions

List of individuals and entities burdened by the UN with financial sanctions (assets freeze), travel bans as well as arms embargos.

13. Republic of Singapore: SG-MAS – Implementation of UN Sanctions

List of individuals and entities burdened by the UN with financial sanctions (assets freeze), travel bans as well as arms embargos.

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14. Malaysia: MY-MOHA

It is a national list from Malaysia, which is published by the Ministry of Home Affairs.

The list contains names of individuals and entities whose assets have been frozen because they are involved in terrorist activities.

15. Australia: AU-FS (Financial Sanctions)

This consolidated list includes United Nations sanctions and the Australian Autonomous Sanctions Regimes.

The individual Program Tags are published on the website of the Australian Government - Department of Foreign Affairs and Trade⁴.

!! All sanctions are consolidated under AU-FS within the dominoCONTENT !!

16. CHINA: CHN-UEL – ready for pre-order

The Chinese Ministry of Commerce MOFCOM intends to publish its own sanctions list called "UEL Unreliable Entity List". This is to be modelled after the EU or US sanctions. The list was originally announced for the 1st of December 2020.

!! The list is not published yet but can be pre-ordered !!

⁴ An overview of sanctions regimes can be found on the website of the Australian authorities: <https://dfat.gov.au/international-relations/security/sanctions/pages/sanctions.aspx>