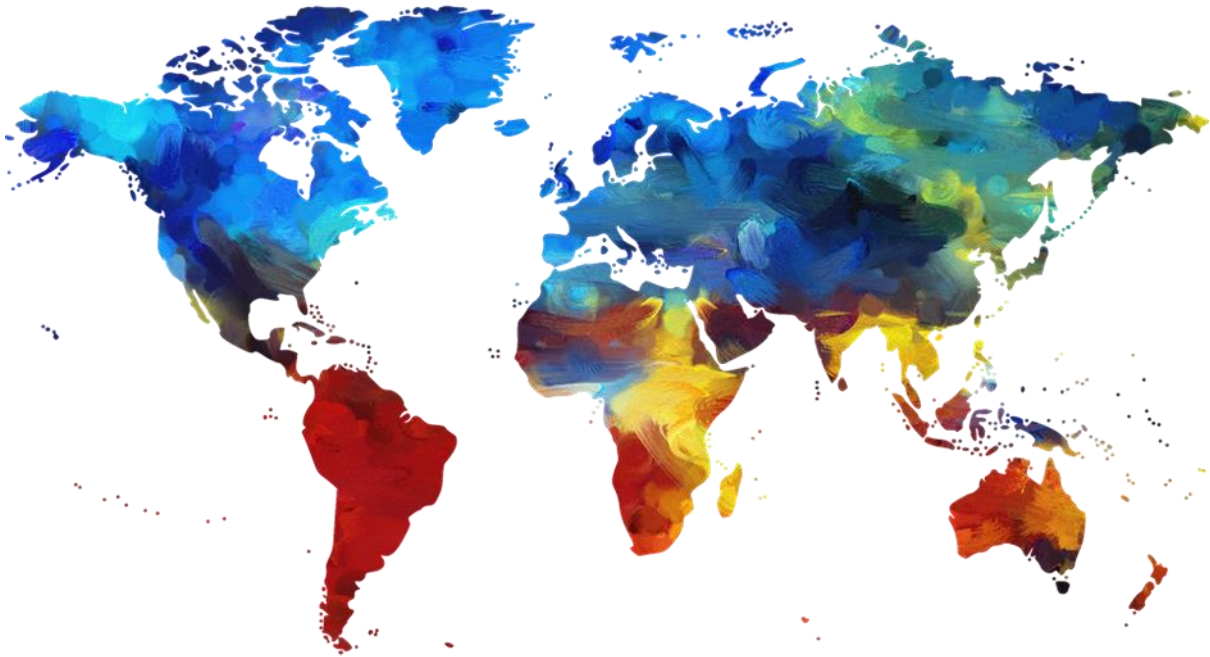


INTERNATIONAL SANCTIONS



UPDATES FROM JANUARY, FEBRUARY AND MARCH 2020

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INTERNATIONAL SANCTIONS JANUARY 2020

EUROPEAN UNION

1. RUSSIA

- On 28 January the Official Journal of the European Union published the *Implementing Regulation (EU) 2020/119*¹ and *Council Decision (CFSP) 2020/120*², amending *Annex I to Regulation (EU) 2014/269* and *Annex I to Decision (CFSP) 2014/145* respectively. By means of the aforementioned amendments, four (4) natural persons of Russian nationality are included in both Annexes and are subject to the freezing of all their funds and economic resources on account of their involvement in the organisation of local elections by Russia in the Autonomous Republic of Crimea and in the Ukrainian city of Sevastopol.

2. UKRAINE

- On 28 January 2020, pursuant to the abovementioned *Council Decision (CFSP) 2020/120* and *Implementing Regulation (EU) 2020/119*, three (3) natural persons of Ukrainian nationality are subject to the freezing of all funds and economic resources on account of their involvement in the organisation by Russia of local elections in the Autonomous Republic of Crimea and in the Ukrainian city of Sevastopol.

3. MALI

- On 28 January 2020, *Implementing Regulation (EU) 2020/116*³ and *Decision (CFSP) 2020/118*⁴ were published in the Official Journal of the European Union, amending *Annex I to Regulation (EU) 2017/1770* and *Annex I to Decision (CFSP) 2017/1775* respectively. Five (5) natural persons of Malian nationality are thus included in both Annexes for their involvement in acts that jeopardise peace, security, stability or the United Nations missions in Mali, by freezing all funds and economic resources of the persons concerned and applying the sanctions imposed on them pursuant to *United Nations Security Council Resolution 2374 (2017)*.

¹ *Implementing Regulation (EU) 2020/119, of 28 January 2020, which applies Regulation (EU) 2014/269 of 17 March 2014 concerning restrictive measures against actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine.*

² *Council Decision (CFSP) 2020/120, of 28 January 2020, amending Decision (CFSP) 2014/145 of 17 March 2014 concerning restrictive measures against actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine.*

³ *Implementing Regulation 2020/116, of 27 January 2020, implementing article 12 (1) of Regulation (EU) 2017/1770 concerning restrictive measures in view of the situation in Mali.*

⁴ *Decision (CFSP) 2020/118, of 27 January 2020, implementing Decision (CFSP) 2017/1775 concerning restrictive measures in view of the situation in Mali.*

4. TUNISIA

- On 28 January 2020, the *Implementing Regulation 2020/115/EC* was published in the Official Journal of the European Union⁵ and *Decision (CFSP) 2020/117*⁶, amending *Annex I to Regulation (EU) 2011/101* and *Annex I to Council Decision (CFSP) 2011/72* respectively. This amends the information set out in both Annexes concerning forty-eight (48) natural persons and entities of Tunisian nationality sanctioned for involvement in the misappropriation and embezzlement of Tunisian public funds, by freezing all their funds and economic resources.

UNITED STATES

1. CHINA

- On 23 January 2020, the Office of Foreign Assets Control ("OFAC") has added two (2) natural persons of Chinese nationality and five (5) Chinese entities to the *Specially Designated Nationals and Blocked Persons List* ("SDN List") for their investments in Iran, pursuant to *Executive Order 13846 of 6 August 2018*, which imposes sanctions on entities operating in certain strategic sectors of the Iranian economy, such as the oil, automobile or metal sectors.
- The United States Congress is still considering a bill on sanctions against China for the detention of the Uighur minority. No law has yet been passed.

2. RUSSIA

- On 29 January 2020 OFAC has added five (5) Russian natural persons to the SDN List, as well as one (1) Russian entity, pursuant to *Executive Order 13660 of 10 March 2014*, which was issued following the armed conflict in Ukraine and which freezes the assets of any natural or legal person found to be responsible for or complicit in actions that threaten the peace, stability, sovereignty or territorial integrity of Ukraine.

3. VENEZUELA

- On 17 January 2020, OFAC made changes to the following *General Licences*:

⁵ *Implementing Regulation 2020/115/EC, of 27 January 2020, implementing Council Regulation (EU) 2011/101, of 4 February 2011, on restrictive measures directed against certain persons, entities and bodies in view of the situation in Tunisia.*

⁶ *Decision (CFSP) 2020/117, of 27 January 2020, amending Council Decision (CFSP) 2011/72, of 31 January 2011, concerning restrictive measures against certain persons and entities in view of the situation in Tunisia.*

- *General Licence 8E* in relation to *Executive Orders 13850 of 1 November 2018 and 13884 of 5 August 2019*: replaces the previous *General Licence 8D* and extends, until 20 April 2020, the authorisation to five (5) US entities (Chevron Corporation, Halliburton, Schlumberger Limited, Weatherford International PLC and Baker Hughes Co) to carry out any actions necessary for the maintenance of contractual relations and pre-existing operations with PDVSA.
- *General Licence 6A* in connection with the aforementioned *Executive Order 13850 of 1 November 2018*: replaces the previous *General Licence 6* and authorizes, until 21 January 2020, certain transactions with the Venezuelan entities Globovisión Tele C.A. and Globovisión Tele CA, Corp.
- *General Licence 5B* in connection with *Executive Order 13835 of May 21, 2018*: replaces the previous *General License 5A* and authorizes transactions related to certain bonds issued by PDVSA.
- *General Licence 20B*, in connection with the aforementioned *Executive Orders 13850 of 1 November 2018 and 13884 of 5 August 2019*: replaces the previous *General License 20A* and authorizes certain international organizations (the United Nations, the World Bank, the Organization of American States, the Inter-American Development Bank and the International Red Cross Movement) to carry out any transaction or activity related to the Government or the Central Bank of Venezuela and prohibited by such *Executive Orders*.
- On January 21, 2020, OFAC has added seven (7) natural persons of Venezuelan nationality and fifteen (15) Venezuelan aircraft to the *SDN List*, pursuant to *Executive Order 13884 of August 5, 2019*, which immobilizes the assets of the Government of Venezuela, as well as those of any natural or legal person that has provided financial, material or technological support to persons sanctioned under said *Executive Order*.

4. UKRAINE

- On 29 January 2020 OFAC has added three (3) Ukrainian natural persons to the *SDN List* under the provisions of the aforementioned *Executive Order 13660 of 10 March 2014*.

INTERNATIONAL SANCTIONS FEBRUARY 2020

EUROPEAN UNION

1. TURKEY

- On 27 February 2020 the *Implementing Regulation (EU) 2020/274*⁷ and *Council Decision (CFSP) 2020/275*⁸ were published in the Official Journal of the European Union amending *Regulation (EU) 2019/1890* and *Decision (CFSP) 2019/1894* respectively.

These amendments were made to include two (2) natural persons of Turkish nationality who are linked to the *Turkish Petroleum Corporation* which, in turn, is involved in unauthorized drilling, exploration and production of hydrocarbons in the exclusive economic zone of the Republic of Cyprus.

2. BELARUS

- On 18 February 2020, *Council Decision (CFSP) 2020/214, of 17 February 2020, amending Decision (CFSP) 2012/642 concerning restrictive measures against Belarus* was published in the Official Journal of the European Union.

By means of this amendment, the European Union extends until 28 February 2021 the measures already in place against Belarus, i.e. the embargo on arms and equipment which might be used for internal repression as well as the freezing of assets and the travel ban on four (4) natural persons of Belarusian nationality.

3. CUBA

- The Court of First Instance No. 24 of Palma de Mallorca, by Order dated September 2, 2019, has determined that Spanish courts lack international jurisdiction to resolve the lawsuit filed by Central Santa Lucía L.C., former owner of some land located in Cuba in an area called "Ingenio Santa Lucía" and confiscated by the Cuban Government, against the Spanish company Melía Hotels International S.A. ("Melía"), seeking the seizure of the profits obtained by the latter

⁷ *Implementing Regulation (EU) 2020/274, of 27 February 2020, implementing Council Regulation (EU) 2019/1890, of 11 November 2019, concerning restrictive measures in respect of unauthorised drilling by Turkey in the Eastern Mediterranean.*

⁸ *Decision (CFSP) 2020/275, of 27 February 2020, amending Decision (CFSP) 2019/1894, of 11 November 2019, concerning restrictive measures in connection with Turkey's unauthorised drilling activities in the Eastern Mediterranean.*

from the operation of a hotel complex in Cuba located on the aforementioned expropriated land.

The aforementioned Order has been the subject of an appeal filed by Central Santa Lucía L.C. before the Provincial Court, against which Melía has filed a statement of opposition.

4. SYRIA

- *Council Implementing Regulation (EU) 2020/211⁹ and Council Implementing Decision (CFSP) 2020/212¹⁰* were published in the Official Journal of the European Union on 17 February 2020, amending both *Annex II to Council Regulation (EU) No 2012/36* and *Annex I to Council Decision (CFSP) 2013/255* respectively.

By these amendments, eight (8) natural persons of Syrian nationality and two (2) Syrian entities are added to the list of sanctioned persons, included in the above-mentioned *Annexes*, because of their links with the Assad regime in Syria.

5. UGANDA

- On 13 February 2020, *Council Implementing Regulation (EU) 2020/189¹¹ and Decision (CFSP) 2020/190¹²* were published in the Official Journal of the European Union, amending *Council Regulation (EU) 2005/1183* and *Council Decision (CFSP) 2010/788* respectively.

One (1) natural person of Ugandan nationality is thus included in *Annex I* to both rules for engaging in and supporting acts that undermine peace, stability and security in the Democratic Republic of the Congo.

⁹ *Implementing Regulation (EU) 2020/211, of 17 February 2020, implementing Council Regulation (EU) No. 2012/36, of 18 January 2012, concerning restrictive measures in view of the situation in Syria.*

¹⁰ *Council Decision (CFSP) 2020/212, of 17 February 2020, implementing Decision (CFSP) 2013/255 of 31 May 2013 concerning restrictive measures against Syria.*

¹¹ *Council Implementing Regulation (EU) 2020/189, of 12 February 2020, implementing Article 9 of Council Regulation (EU) 2005/1183 of 18 July 2005 imposing certain specific restrictive measures directed against persons acting in violation of the arms embargo with regard to the Democratic Republic of the Congo.*

¹² *Decision (CFSP) 2020/190, of 12 February 2020, implementing Council Decision (CFSP) 2010/788, of 20 December 2010, concerning restrictive measures against the Democratic Republic of the Congo and repealing Common Position (CFSP) 2008/369.*

6. ZIMBABWE

- On 18 February 2020, *Regulations (EU) 2020/213*¹³ and *2020/219*¹⁴, as well as *Council Decision (CFSP) 2020/215*¹⁵, were published in the Official Journal of the European Union amending *Regulation (EU) 2004/314* and *Decision (CFSP) 2011/101* respectively.

These amendments extend the restrictions on Zimbabwe until 20 February 2021. They also remove from the list of sanctioned persons one (1) natural person, former Zimbabwean President Robert Gabriel Mugabe, and add four (4) natural persons of Zimbabwean nationality, including Zimbabwean Army General Constantino Chiwenga and Grace Mugabe, widow of Robert Gabriel Mugabe, and the Zimbabwean entity Zimbabwe Defense Industries, associated with the Ministry of Defence of Zimbabwe.

UNITED STATES

1. CUBA

- On February 3, 2020, in connection with the lawsuit filed by Havana Docks Corporation ("Havana Docks") against Carnival Corporation in Florida State Court (*Havana Docks Corporation v. Carnival Corporation D/B/A Carnival Cruise Lines*) under *Title III* of the *Cuban Liberty and Democratic Solidarity (Freedom) Act of 1996*, also known as the *Helms-Burton Act*, Havana Docks has filed a motion to oppose Carnival Corporation's new exception to the lawsuit.

The lawsuit was filed by Havana Docks on May 2, 2019 against Carnival Corporation for, in the terminology of the *Helms-Burton Act*, "trafficking" in "properties confiscated" by the Cuban government, in this case in relation to certain properties located in the Port of Havana. Carnival Corporation objected, arguing that Havana Docks did not hold a property right to the land in question at the time it began operating on it.

On August 28, 2019, the Court rejected this exception raised by Carnival Corporation. However, in connection with two other claims filed by Havana Docks, also under the aforementioned *Title III* of the *Helms-Burton Act*, against MSC

¹³ *Regulation (EU) 2020/213, of 17 February 2020, amending Council Regulation 2004/314 concerning certain restrictive measures in respect of Zimbabwe.*

¹⁴ *Implementing Regulation (EU) 2020/219, of 17 February 2020, amending Council Regulation 2004/314 concerning certain restrictive measures in respect of Zimbabwe.*

¹⁵ *Council Decision (CFSP) 2020/215, of 17 February 2020, amending Decision (CFSP) 2011/101 concerning restrictive measures against Zimbabwe.*

Cruises and Norwegian Cruise Lines on similar grounds, the same Court did uphold the defences raised by both defendants, which requested the dismissal of the claim on the same grounds now alleged by Carnival Corporation. For this reason, Carnival Corporation raised the same objection again on 7 January 2020.

- On February 5, 2020, the U.S. Department of State informed Melia's Executive Vice President and CEO, Gabriel Escarrer, that it would veto their entry into U.S. territory under the measures provided for by *Title IV* of the aforementioned *Helms-Burton Act*.

Specifically, *section 401* of said *Title IV* provides for the possibility of denying entry into the United States to those who "traffic" in "property confiscated" by the Cuban government as of January 1, 1959, including the directors of a company, or of its investee companies, who are accused of such behaviour. In any case, they must be persons who exercise a certain degree of control over the company.

- On February 26, 2020, the John S. Shepard Family Trust dismissed the lawsuit filed against NH Hotels USA Inc. and NH Hotel Group S.A. under *Title III* of the *Helms-Burton Act* (*John S. Shepard Family Trust, through John S. Shepard and Lawrence Jaffe as co-trustees v. NH Hoteles USA Inc., and NH Hotel Group S.A.*).

2. RUSSIA

- On 18 February 2020 the Office of Foreign Assets Control ('OFAC') added one (1) natural person of Russian nationality to the *Specially Designated Nationals and Blocked Persons List* ('SDN List') under *Executive Order 13850, of 1 November 2018*, for managing the sale and transportation of Venezuelan crude oil, activities which are sanctioned.

3. VENEZUELA

- On February 7, 2020, OFAC added to the *SDN List* one (1) Venezuelan entity and forty (40) Venezuelan aircraft, pursuant to *Executive Order 13884, of August 5, 2019*, which immobilizes the assets of the Government of Venezuela, as well as those of any natural or legal person that has provided financial, material or technological support to persons sanctioned under that *Executive Order*.

4. LEBANON

- On 26 February 2020, OFAC added twelve (12) Lebanese entities and three (3) individuals of Lebanese nationality linked to the Martyrs Foundation, part of Hezbollah's support network, to the *Specially Designated Global Terrorists List* ("SDGT List").

5. IRAN

- On 20 February 2020, OFAC has added five (5) natural persons of Iranian nationality to the SDN List, pursuant to *Executive Order 13876 of 24 June 2019*, which imposes individual sanctions on the Supreme Leader of the Islamic Republic of Iran, the Office of the Supreme Leader, any Iranian government official or person appointed by the Supreme Leader of the Islamic Republic of Iran to an official position. It also provides for the exclusion from the U.S. financial system of any financial entity that facilitates transactions in the interest of persons sanctioned under this *Executive Order*.
- On 27 February 2020, *General License 8 "Authorizing Certain Humanitarian Trade Transactions Involving the Central Bank of Iran"* was issued, allowing humanitarian transactions with the Central Bank of Iran in certain cases. This *General License* is granted on the occasion of the entry into force of the *Swiss Humanitarian Trade Agreement (SHTA)*, signed by the United States.

6. IRAQ

- On February 26, 2020, OFAC has added one (1) individual of Iraqi nationality to the SDN List for being the Secretary General of the Foreign Terrorist Organization Hezbollah.

7. SWITZERLAND

- On 18 February 2020 OFAC has added to the SDN List one (1) Swiss entity, under *Executive Order 13850, of 1 November 2018*, for managing the sale and transportation of Venezuelan crude oil, activities which are sanctioned.

INTERNATIONAL SANCTIONS MARCH 2020

EUROPEAN UNION

1. RUSSIA

- On 13 March 2020, *Council Decision (CFSP) 2020/399*¹⁶ and the *Implementing Regulation (EU) 2020/398*¹⁷ were published in the Journal of the European Union, amending *Council Decision (CFSP) 2014/145* and *Council Regulation (EU) No 2014/269* respectively.

These amendments extend until 15 September 2020 the measures imposed against persons of Russian nationality listed in the *Annex to Council Decision (CFSP) 2014/145* and in *Annex I to Council Regulation (EU) No 2014/269* as they are deemed to undermine or threaten the territorial integrity, sovereignty and independence of Ukraine. These measures consist mainly of the freezing of funds and the prohibition of making funds or other economic resources available to the persons listed in the above-mentioned Annexes.

2. UKRAINE

- On 6 March 2020, *Council Decision (CFSP) 2020/373* was published in the Official Journal of the European Union¹⁸, and the *Implementing Regulation (EU) 2020/370*¹⁹. Both amend *Council Decision (CFSP) 2014/119* and *Council Regulation (EU) No 2014/208* respectively.

These amendments extend until 6 March 2021 the current freezing of assets against ten (10) natural persons of Ukrainian nationality held liable for misappropriation of Ukrainian public funds or abuse of power causing loss to Ukrainian public funds. These measures have not been extended for two (2) natural persons.

- On 13 March 2020, pursuant to the above-mentioned *Council Decision (CFSP) 2020/399* and *Implementing Regulation (EU) 2020/398*, the sanctions imposed on natural persons of Ukrainian nationality listed in the above-mentioned *Annex to Council Decision (CFSP) 2014/145* and *Annex I to Council Regulation (EU) No*

¹⁶ *Council Decision (CFSP) 2020/399 of 12 March 2020 amending Council Decision (CFSP) 2014/145 concerning restrictive measures against actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine.*

¹⁷ *Implementing Regulation (EU) 2020/398 of 12 March 2020 implementing Council Regulation (EU) No 2014/269 concerning restrictive measures against actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine.*

¹⁸ *Council Decision (CFSP) 2020/373 of 5 March 2020 amending Decision (CFSP) 2014/119 on restrictive measures directed against certain persons, entities and bodies in view of the situation in Ukraine.*

¹⁹ *Implementing Regulation (EU) 2020/370 of 5 March 2020 implementing Council Regulation (EU) No 2014/208 on restrictive measures directed against certain persons, entities and bodies in view of the situation in Ukraine.*

2014/269 are also extended until 15 September 2020 on the grounds that they undermine or threaten the territorial integrity, sovereignty and independence of Ukraine.

3. DEMOCRATIC REPUBLIC OF THE CONGO

- On 20 March 2020, *Council Implementing Regulation 2020/415*²⁰, amending *Annex I of Council Regulation (EC) 2005/1183*²¹, was published in the Official Journal of the European Union. Said modification updates the information relating to one (1) natural person subject to restrictive measures.

4. LIBYA

- On 30 March 2020 *Council Decision (CFSP) 2020/458*²², amending *Council Decision (CFSP) 2015/1333*²³ was published in the Official Journal of the European Union. Said amendment extends the existing restrictive measures in view of the situation in Libya until October 2, 2020.

5. EGYPT

- On 20 March 2020, *Council Decision (CFSP) 2020/418*²⁴ and *Council Implementing Regulation (EU) 2020/416*²⁵, amending *Council Decision (CFSP) 2011/172* and *Council Regulation (EU) No 2011/270* respectively, were published in the Official Journal of the European Union.

These amendments extend the restrictive measures in view of the situation in Egypt until 22 March 2021, i.e. the freezing of assets of the persons and entities of Egyptian nationality included in the *Annex to Council Decision (CFSP) 2011/172* and in *Annex II to Council Regulation (EU) No 2011/270*, in addition to a prohibition on making funds or assets available, directly or indirectly, to these persons.

²⁰ *Council Implementing Regulation (EU) 2020/415, of 19 March 2020, implementing Article 9 of Regulation (EC) 1183/2005, of 18 July 2005, imposing certain specific restrictive measures directed against persons acting in violation of the arms embargo with regard to the Democratic Republic of the Congo.*

²¹ *Council Regulation (EC) 1183/2005, of 18 July 2005, imposing certain specific restrictive measures directed against persons acting in violation of the arms embargo with regard to the Democratic Republic of the Congo.*

²² *Council Decision (CFSP) 2020/458, of 27 March 2020, amending Decision (CFSP) 2015/1333 concerning restrictive measures in view of the situation in Libya.*

²³ *Council Decision (CFSP) 2015/1333, of 31 July 2005, concerning restrictive measures in view of the situation in Libya.*

²⁴ *Council Decision (CFSP) 2020/418 of 19 March 2020 amending Decision (CFSP) 2011/172 on restrictive measures directed against certain persons, entities and bodies in view of the situation in Egypt.*

²⁵ *Implementing Regulation (EU) 2020/416 of 19 March 2020 implementing Council Regulation (EU) 2011/270 on restrictive measures directed against certain persons, entities and bodies in view of the situation in Egypt.*

6. CENTRAL AFRICAN REPUBLIC

- On 17 March 2020, *Council Decision (CFSP)*²⁶, amending *point g of article 2 (1) of Council Decision (CFSP) 2013/798*²⁷, was published in the Official Journal of the European Union. Said amendment extends the exemptions to the current arms embargo.

UNITED STATES

1. CHINA

- On March 2, 2020, the Office of Foreign Assets Control ("OFAC") added two (2) natural persons of Chinese nationality to the *Specially Designated Nationals And Blocked Persons List* ("SDN List") for involvement in the laundering of crypto currencies, having previously carried out a cyber raid.
- On 18 March 2020, OFAC added five (5) Chinese entities to the SDN List, pursuant to *Executive Order 13846 of 6 August 2018*, which imposes sanctions on entities operating in certain strategic sectors of the Iranian economy, such as the automotive petroleum or metallurgical sectors.

2. UKRAINE

- On March 20, 2020 OFAC has amended two *General Licenses* related to GAZ Group to extend them: *Ukraine-related General License No.13N* authorizing certain types of GAZ Group transactions and *Ukraine-related General License No. 15H* authorizing certain types of GAZ Group activities.

3. NICARAGUA

- On March 5, 2020, OFAC added three (3) natural persons of Nicaraguan nationality and one (1) Nicaraguan entity to the SDN List, due to human rights violations by the Nicaraguan National Police (PNN).

4. UNITED ARAB EMIRATES

- On March 19, 2020, OFAC added five (5) UAE entities to the SDN List under the provisions of the aforementioned *Executive Order 13846 of August 6, 2018*.

²⁶ *Council Decision (CFSP) 2020/408, of 17 March 2020, amending Council Decision 2013/798/CFSP, of 23 December 2013, concerning restrictive measures against the Central African Republic.*

²⁷ *Council Decision (CFSP) 2013/798, of 23 December 2013, concerning restrictive measures against the Central African Republic.*

5. IRAN

- On 18 March 2020, OFAC added four (4) natural persons of Iranian nationality and two (2) Iranian entities to the SDN List, pursuant to the above-mentioned *Executive Order 13846 of 6 August 2018*.
- On 26 April 2020, OFAC added eleven (11) natural persons and three (3) entities of Iranian nationality to the *Specially Designated Global Terrorists List*.

6. IRAQ

- On 26 April 2020, OFAC added four (4) natural persons and two (2) entities of Iraqi nationality to the *Specially Designated Global Terrorists List*.

7. MEXICO

- On March 11, 2020 OFAC added four (4) Mexican entities to the SDN List for their relationship with drug trafficking, pursuant to the provisions of the *Foreign Narcotics Kingpin Designation Act of December 3, 1999* ("Kingpin Act"), which imposes economic and financial sanctions on foreign drug traffickers, as well as on these organizations at the international level.

8. SYRIA

- On 17 March 2020, OFAC added one (1) natural person of Syrian nationality to the SDN List, pursuant to *Executive Order 13894 of 14 October 2019*, blocking his assets and suspending his entry because of his contribution to the situation in Syria.

9. SOUTH AFRICA

- On 18 March 2020 OFAC has added one (1) South African entity to the SDN List under the provisions of the aforementioned *Executive Order 13846 of 6 August 2018*.

10. SWITZERLAND

- On March 12, 2020 OFAC has added to the SDN List and the *Sectoral Sanctions Identifications List* ("SSIL List") one (1) Swiss entity for managing the sale and transportation of Venezuelan crude oil.

11. ZIMBABWE

- On 11 March 2020 OFAC has added two (2) Zimbabwean individuals to the SDN List under *Executive Order 13288 of 6 March 2003*, which freezes the assets of individuals for compromising democracy and institutions in Zimbabwe, while four (4) Zimbabwean individuals have been removed.

In Madrid, 30 March 2020

Department of International Trade and Sanctions