

New Sanctions Guidance Increases Due Diligence Burden on Companies

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OFAC's Revised Guidance represents a tightening of the U.S. approach to its sanctions programs, including its Ukraine-Russia sanctions program. As a result, it is expected that a greater number of entities will be subject to U.S. blocking sanctions and sectoral sanctions. Significantly, as discussed further below, the Revised Guidance greatly increases the due diligence burden on U.S. companies and their foreign affiliates seeking to comply with OFAC sanctions programs.

To read more on this, click <u>here</u> for a piece authored by Akin Gump's International Trade group.

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