



The London P&I Club

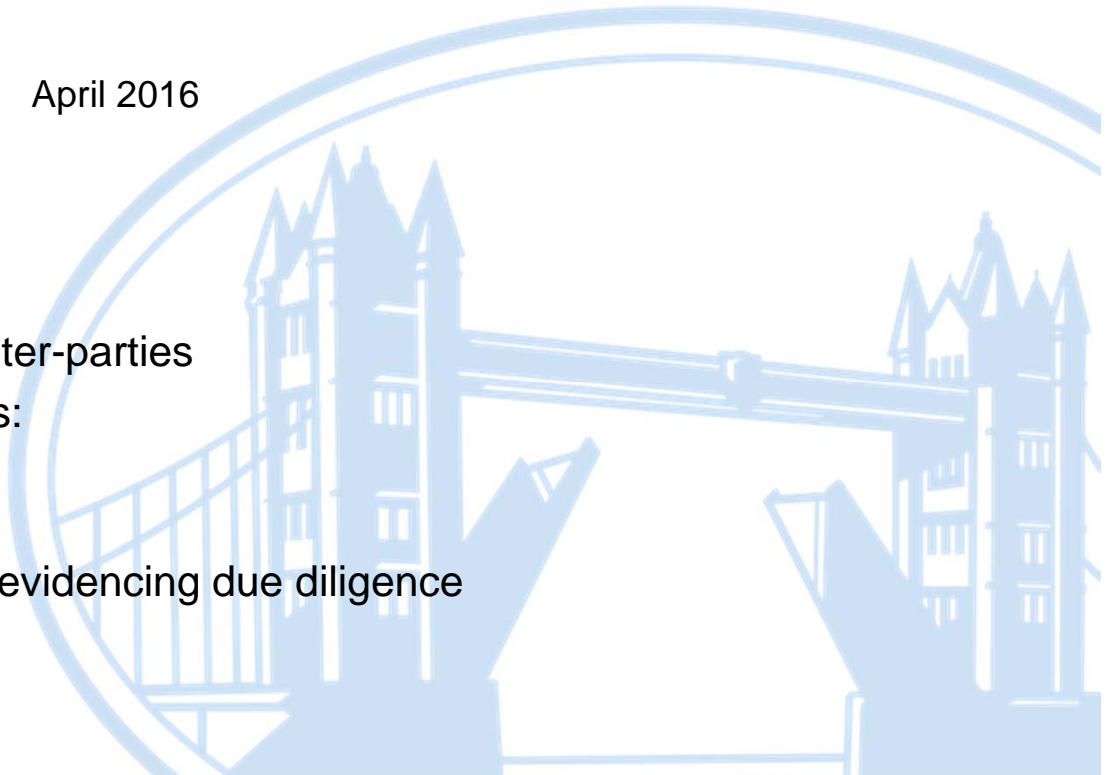
# Sanctions

Practical notes for screening counter-parties on the US and UK/EU sanctions lists.

April 2016

## **Contents:**

- 1) Where to go to screen counter-parties
- 2) How to screen - the two lists:
  - a) The US list
  - b) The UK/EU lists
- 3) Interpreting the results and evidencing due diligence





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# 1) Where to screen counter-parties?

- Go to the London P&I website and click on “Sanctions”.



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Members Area

The London P&I Club is one of the world's leading Protection and Indemnity Associations. It underwrites P&I and is a member of the International Group, playing a key role in coordinating and growth of the P&I industry on behalf of the shipowning community.

Sanctions

News

Ship Search

China – Zika Virus - Update on Mosquito Eradication Certificates - [Read more](#)

China – Zika Virus - Mosquito Eradication

For quick access to information on ships currently entered in the London Club.

Ships can be searched by **their name** or **IMO number**.




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## 1) The Club's sanctions page

- Once you have clicked on “**Sanctions**”, the below page will open. Scroll down to find the heading, “**Searchable List of Designated Entities**”.
- Search each of the US and UK/EU lists using the names of the companies to identify possible matches.

Find a correspondent in our global network



Country:

Please select...

Site Search

- Iran Sanctions - EU Prohibitions Circular 27 June 2012 [Click Here](#)
- Trade Sanctions and their effect on P&I cover Circular 2 March 2011 [Click Here](#)
- Trade Sanctions and their effect on P&I cover Circular 3 August 2010 [Click Here](#)
- Trade Sanctions and their effect on P&I cover Circular 5 July 2010 [Click Here](#)

### GENERAL INFORMATION

- Sanctions legislation applicable to Members
- Compliance with sanctions legislation by Members
- Sanctions legislation applicable to the Association
- Effect of sanctions legislation on cover

### SEARCHABLE LIST OF DESIGNATED ENTITIES

- List of Designated Entities under US Legislation
- List of designated entities under UK/EU Legislation

### DISCLAIMER



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## 2a) How to screen - the US List

- The US Sanctions searchable list will display as follows:
- Type in the name to be searched.
- Click 'All' for Program.
- Click Search.

**OFAC**  
Office of Foreign Assets Control

### Sanctions List Search

This Sanctions List Search application ("Sanctions List Search") is designed to facilitate the use of the Specially Designated Nationals and Blocked Persons list ("SDN List") and all other sanctions lists administered by OFAC, including the Foreign Sanctions Evaders List, the List of Persons Identified as Blocked Solely Pursuant to E.O. 13599, the Non-SDN Iran Sanctions Act List, the Part 561 list, the Sectoral Sanctions Identifications List and the Non-SDN Palestinian Legislative Council List. Given the number of lists that now reside in the Sanctions List Search tool, it is strongly recommended that users pay close attention to the program codes associated with each returned record. These program codes indicate how a true hit on a returned value should be treated. The Sanctions List Search tool uses approximate string matching to identify possible matches between word or character strings as entered into Sanctions List Search, and any name or name component as it appears on the SDN List and/or the various other sanctions lists. Sanctions List Search has a slider-bar that may be used to set a threshold (i.e., a confidence rating) for the closeness of any potential match returned as a result of a user's search. Sanctions List Search will detect certain misspellings or other incorrectly entered text, and will return near, or proximate, matches, based on the confidence rating set by the user via the slider-bar. OFAC does not provide recommendations with regard to the appropriateness of any specific confidence rating. Sanctions List Search is one tool offered to assist users in utilizing the SDN List and/or the various other sanctions lists; use of Sanctions List Search is not a substitute for undertaking appropriate due diligence. The use of Sanctions List Search does not limit any criminal or civil liability for any act undertaken as a result of, or in reliance on, such use.

[Download the SDN List](#) [Visit The OFAC Website](#)  
[Download the Consolidated Non-SDN List](#) [Program Code Key](#)

**Lookup**

Type: All  
Name:   
ID #:   
Program: All  
Minimum Name Score:  100

Address:   
City:   
State/Province\*:   
Country: All  
List: All

**Lookup Results:**

Name	Address	Type	Program(s)	List	Score
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## 2b) How to screen - the UK/EU List

- Whereas the UK/EU list needs to be opened from this page:

**GOV.UK**

Search

Departments Worldwide How government works Get involved  
Policies Publications Consultations Statistics Announcements




Guidance

### Financial sanctions: consolidated list of targets

From: HM Treasury  
First published: 19 June 2013  
Last updated: 17 March 2016, [see all updates](#)

A guide to the current consolidated list of asset freeze targets and a list of persons subject to restrictive measures in view of Russia's actions destabilising the situation in the Ukraine.

**Documents**

-  [Consolidated list of targets](#)  
HTML
-  [Ukraine: list of persons subject to restrictive measures in view of Russia's actions destabilising the situation in Ukraine](#)  
HTML
-  [Consolidated list format guide](#)  
PDF, 158KB, 3 pages



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## 2b) How to screen - the UK/EU List cont...

- Once the Consolidated list of targets is opened in the required format, the parties' names can be searched in the alphabetical list.

ONS-co Consolidated list of targets ...

GOV.UK Search

HM Treasury [See more information about this Guidance](#)

Guidance  
**Consolidated list of targets**

Updated 17 March 2016

[Contents](#)

Please use the links below to download the consolidated list in the format you need.

[Get the HTML version of the consolidated list](#)

[Get the delimited version \(.csv\) of the consolidated list](#)

[Get the Excel version of the consolidated list](#)





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## 2b) How to screen - the UK/EU List cont...

- The Consolidated list of targets appears as below. To search for a party's name, press the 'Ctrl' and 'F' keys together to bring up the 'Find' function where names can be entered in the search box and any matches will be highlighted.

Find: Abdul Previous Next Options More than 100 matches

### CONSOLIDATED LIST OF FINANCIAL SANCTIONS TARGETS IN THE UK

Last Updated: 23/03/2016

Status: Asset Freeze Targets

**REGIME: Afghanistan**

**INDIVIDUALS**

- Name 6: ABBASIN 1: **ABDUL** AZIZ 2: n/a 3: n/a 4: n/a 5: n/a.  
DOB: --/--/1969. POB: Sheykhan Village, Pirkowti Area, Orgun District, Paktika Province, Afghanistan a.k.a: MAHSUD, **Abdul** Aziz Other Information: UN Ref TLA.15. Network under Sirajuddin Jallaloudine Haqqani. Taliban Shadow Governor of Orgun District, Paktika Province, as of early 2010. Listed on: 21/10/2011 Last Updated: 17/02/2012
- Name 6: **ABDUL** AHAD 1: AZIZIRAHMAN 2: n/a 3: n/a 4: n/a 5: n/a.  
DOB: --/--/1972. POB: Shega District, Kandahar Province, Afghanistan Nationality: Afghan National Identification no: 44323 (Afghan) (tazkira) Position: Third Secretary Arab Emirates Other Information: UN Ref TLA.121.01. Listed on: 23/02/2001 Last Updated: 29/03/2012 Group ID: 7055.
- Name 6: **ABDUL** AHMAD TURK 1: **ABDUL** GHANI 2: BARADAR 3: n/a 4: n/a 5: n/a.  
Title: Mullah DOB: --/--/1968. POB: Yatimak village, Dehrawood District, Uruzgan Province, Afghanistan a.k.a: (1) AKHUND, Baradar (2) BARADAR, **Abdul** Ghani Na Minister of Defence under the Taliban regime Other Information: UN Ref TLA.24.01. Arrested in Feb 2010 and in custody in Pakistan. Extradition request to Afghanistan p as of June 2011. Belongs to Popalzai tribe. Senior Taliban military commander and member of Taliban Quetta Council as of May 2007. Listed on: 02/04/2001 Last Updated: 17/02/2012
- Name 6: **ABDUL** BASEER 1: **ABDUL** QADEER 2: BASIR 3: n/a 4: n/a 5: n/a.



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### 3) Interpreting and saving the results

- **No matches/hits** - save a copy of what is displayed as a screen shot.
- **Positive matches/hits** – again save a screen shot and consider what party has generated the ‘hit’. If there is a positive ‘hit’ then members should contact their usual club representative for further guidance.
- **Evidencing Due Diligence** - members will need to evidence the due diligence that has been carried out. The simplest way to achieve this is to save each search that is displayed as a screen shot and either paste this into an email to yourself or, paste it into a document in order to save it to your company’s document management system.
- **Screen Shot** - to capture a screen shot, press the “**Print Scrn**” button on your keyboard, open a new email or document and click ‘**paste**’ or press, “**Ctrl**” and “**v**” together, to paste the screen shot.