COMPLY SPHERE
ADVISORY FZCO
SANCTIONS SIMPLIFIED

SANCTIONS RISK MADE SIMPLE SERIES | COMPLIMENTARY GUIDE

Sanctions Risk Made Simple

The Essential Business Guide

Identify hidden sanctions risks before they disrupt your payments, shipments or business relationships.



Counterparty Risk | Ownership & Control | Jurisdiction Risk | Goods & Logistics Risk | Payment Risk

INCLUDES A PRACTICAL **10-POINT** BUSINESS RISK CHECKLIST

By Mayur Jethwa



2026 EDITION

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Your practical guide to cross-border sanctions risk.

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EXECUTIVE SUMMARY

Sanctions Risk in 2026: Beyond the Name on the List

Understand the exposure, not just the screening result.

Businesses can face sanctions exposure through ownership, third-party payments, shipping routes, goods and wider commercial relationships. This guide introduces practical steps to identify and assess those risks.

01 **Potential screening match**
A possible match requiring investigation and confirmation.

02 **Sanctions risk**
Potential exposure requiring assessment of facts and applicable rules.

03 **Sanctions prohibition**
A legal restriction that may prevent an activity unless an exception or authorisation applies.

Five principles Look beyond names. Understand ownership and control. Assess payment routes. Monitor applicable rules. Document defensible decisions.

THE TAKEAWAY

Apply the relevant rules and make informed, documented decisions.

CHAPTER 1

Could Your Business Be Exposed?

You may not deal directly with a sanctioned party, but could still be at risk.

Sanctions are not only a concern for banks or large multinationals. Traders, logistics providers, importers and exporters can also face exposure.

01

Restricted goods

Goods or technology may be subject to trade or export controls.

02

Indirect relationships

Customers, suppliers or intermediaries may have links to restricted parties.

03

Geography and routing

Origin, destination or transit may introduce additional restrictions.

04

Third-party payments

Unexplained payment arrangements may require further checks.

THE TAKEAWAY

Early checks can help reduce payment delays, shipment disruption and legal exposure.

Discover your exposure • Start your free scan

CHAPTER 2

Understanding Sanctions

What they are, how they work and who sets them.

Sanctions restrict certain activities involving parties, countries, sectors or goods. The applicable rules depend on the transaction and jurisdiction.

01

United States

OFAC administers US economic sanctions; some measures affect non-US persons.

02

United Kingdom

UK sanctions include financial, trade and other restrictions; OFSI implements financial sanctions.

03

European Union

EU restrictive measures are implemented and enforced by member states.

04

United Nations

Security Council sanctions are adopted by the Council and implemented by member states.

05

United Arab Emirates

The UAE implements UN targeted financial sanctions and its local terrorist list, alongside other applicable controls.

THE TAKEAWAY

Identify which regimes apply. Ownership, control and secondary sanctions rules differ.

CHAPTER 3

Why Sanctions Matter to Your Business

The risks are real; the impact can be significant.

Sanctions can affect operations, financial access, reputation and the ability to trade internationally.

01

Financial risk

Potential penalties, loss of funds and additional compliance costs.

02

Banking access

Payments may be delayed, rejected or blocked; banking relationships may be affected.

03

Operational disruption

Shipments, supplies and contracts may be interrupted.

04

Reputation

Customers, banks and partners may lose confidence.

THE TAKEAWAY

Sanctions exposure can disrupt business even without a direct listed-party relationship.

Discover your exposure • Start your free scan

CHAPTER 4

Five Hidden Areas of Sanctions Risk

The Comply Sphere Five-Dimension Framework

Use this educational framework to assess the whole transaction, not just the names involved.

COMPLY SPHERE | FIVE-DIMENSION FRAMEWORK

01 **Counterparty risk**
Verify customers, suppliers and intermediaries.

02 **Ownership and control**
Identify ultimate owners and controllers; apply relevant regime-specific rules.

03 **Jurisdiction risk**
Consider origin, destination, transit and applicable restrictions.

04 **Goods and logistics risk**
Check product restrictions, routes, end users and end use.

05 **Payment risk**
Understand third-party payments and financial intermediaries.

THE TAKEAWAY

Assess all five dimensions before making a decision.

Discover your exposure • Start your free scan

CHAPTER 5

Ten Red Flags You Should Never Ignore

Warning signs are not proof of a breach.

01 Unusual ownership
Complex, recently changed or unclear ownership.

02 Third-party payments
Unexplained payer or payment jurisdiction.

03 Higher-risk jurisdictions
Links requiring additional jurisdiction-specific checks.

04 Sensitive goods
Potentially restricted or dual-use items.

05 Unusual shipping patterns
Unexplained transshipment or destination changes.

06 New or related entities
New entities linked to higher-risk parties.

07 Inconsistent documents
Missing or contradictory commercial information.

08 Restricted sectors
Activities potentially subject to sectoral restrictions.

09 Adverse information
Credible reports of possible sanctions exposure.

10 Changes in behaviour
Unexplained changes in volume, routes or end users.

THE TAKEAWAY

Investigate warning signs proportionately before committing.

CHAPTER 6

Why Screening Alone Is Not Enough

A clear screening result does not tell the whole story.

Screening is an essential control, but a no-match result does not establish that a transaction is permissible.

01

Screen

Check parties against relevant lists and investigate potential matches.

02

Understand

Assess ownership and control. OFAC blocks entities owned 50% or more, directly or indirectly, in aggregate by blocked persons; control alone does not trigger that rule.

03

Analyse

Review goods, routing, end use and payment arrangements.

04

Assess and decide

Apply relevant regimes, including different UK and EU ownership/control tests. Document and escalate unresolved concerns.

THE TAKEAWAY

Use screening as the first step, not the final decision.

Discover your exposure • Start your free scan

CHAPTER 7

When Your Bank Stops a Payment

A payment stop is a signal, not necessarily a breach.

Banks may delay payments for screening matches, ownership concerns, restricted goods or unusual routing. A delay does not establish a violation.

01

Understand

Ask the bank what information is required and why, where it can disclose this.

02

Provide

Share accurate contracts, invoices, shipping and end-use documents.

03

Verify

Review the underlying parties, ownership, goods and payment route.

04

Confirm the outcome

The payment may be released, rejected or remain blocked depending on applicable rules. Do not reroute to evade restrictions.

05

Learn

Record the outcome and improve internal checks.

THE TAKEAWAY

Respond promptly and transparently; never attempt to bypass restrictions.

CHAPTER 8

A Practical Business Case Study

Illustrative scenario — not an actual enforcement case.

A UAE industrial equipment trader buys from a third-country supplier for onward export. Initial screening finds no direct match.

01

Hidden ownership

Further review finds the supplier is 55% owned by an OFAC-blocked person.

02

Payment stopped

A bank pauses a USD payment for review. Assume a US bank is involved.

03

Evidence reviewed

The trader provides ownership records, commercial documents and end-use information.

04

Outcome

Under OFAC·s 50 Percent Rule the supplier is blocked; the US bank must apply applicable blocking requirements unless authorised or exempt. Other regimes require separate assessment.

THE TAKEAWAY

A clean name-screening result cannot replace ownership and transaction checks.

Discover your exposure • Start your free scan

CHAPTER 9

Your 10-Point Business Risk Checklist

Investigate any risk, information gap or uncertainty before proceeding.

01	**Know your counterparty** Verify identity, registration and business activity.	02	**Check ownership and control** Identify owners and controllers; apply relevant rules.
03	**Assess jurisdiction exposure** Check origin, destination and transit restrictions.	04	**Review goods and services** Check sanctions, export controls and dual-use restrictions.
05	**Understand the payment flow** Identify payer, payee and reasons for third-party payments.	06	**Check the supply chain** Identify agents, intermediaries and end users.
07	**Screen relevant lists** Investigate potential matches against applicable lists.	08	**Obtain supporting** documents Collect contracts, invoices and shipping/end-use evidence.
09	**Review red flags** Investigate inconsistencies and unusual arrangements.	10	**Document and decide** Record findings; escalate unresolved concerns.

THE TAKEAWAY

Do not proceed on the basis of a checklist alone when risks remain unresolved.

CHAPTER 10

Protecting Your Business: Next Steps

Turn awareness into action.

Five actions to take today

1. Understand your exposure
2. Strengthen proportionate controls
3. Help your people recognise red flags
4. Monitor relevant regulatory developments
5. Seek specialist guidance when needed

FREE SANCTIONS EXPOSURE SCAN

Identify potential risk areas across your business. Take the first step before your next cross-border transaction.

Start your free scan

Need more support? Explore Nexus™ or request a complimentary consultation. Follow our sanctions intelligence on Telegram.

THE TAKEAWAY

Understand the risk. Protect your business. Trade with confidence.

ABOUT

Comply Sphere Advisory FZCO

Sanctions risk advisory and technology for global business.

Who we are

A UAE-based sanctions risk advisory and technology company combining practical expertise with technology-enabled decision support for cross-border business.

Why Comply Sphere?

Commercially focused risk assessments, ownership and control analysis, payment and trade risk guidance, and Nexus™ transaction assessment technology.



Mayur Jethwa

Founder

Experience across sanctions, AML, financial crime and UK law enforcement, including senior sanctions leadership roles in international financial institutions.

www.complyspherеadvisory.com

THE TAKEAWAY

Practical expertise. Clear decisions. Technology-enabled risk assessment.

PUBLICATION INFORMATION

Official references and disclaimer

Primary sources for further reading.

OFAC — sanctions compliance framework

OFAC — 50 Percent Rule (FAQ 401)

UK Government — sanctions guidance

European Union — EU Sanctions Map

UN Security Council — sanctions

UAE — Executive Office for Control and Non-Proliferation

Important information

This publication is for general informational and educational purposes only. It is not legal advice, regulatory approval or a determination that a transaction is permissible. Sanctions rules change and applicability depends on the relevant facts and jurisdictions. Businesses should undertake appropriate due diligence and seek specialist or legal advice where necessary. Comply Sphere provides risk-based advisory and technology-enabled decision support; responsibility for decisions and compliance remains with the relevant business.

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SANCTIONS SIMPLIFIED

Navigate Sanctions Risk. Trade with Confidence. Grow Globally.

Expert sanctions risk advisory and technology for businesses that trade across borders.



REAL-WORLD EXPERTISE
Deep sanctions, trade and financial crime experience.

PRACTICAL SOLUTIONS
Clear, commercial and risk-based advice.

TECHNOLOGY-DRIVEN
Nexus™ for structured transaction risk assessment.

GLOBAL PERSPECTIVE
UAE/GCC, OFAC, UK, EU, UN and key markets.

START YOUR FREE SCAN

Identify potential risk areas before your next transaction.

TURN SANCTIONS COMPLEXITY INTO OPPORTUNITY.

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