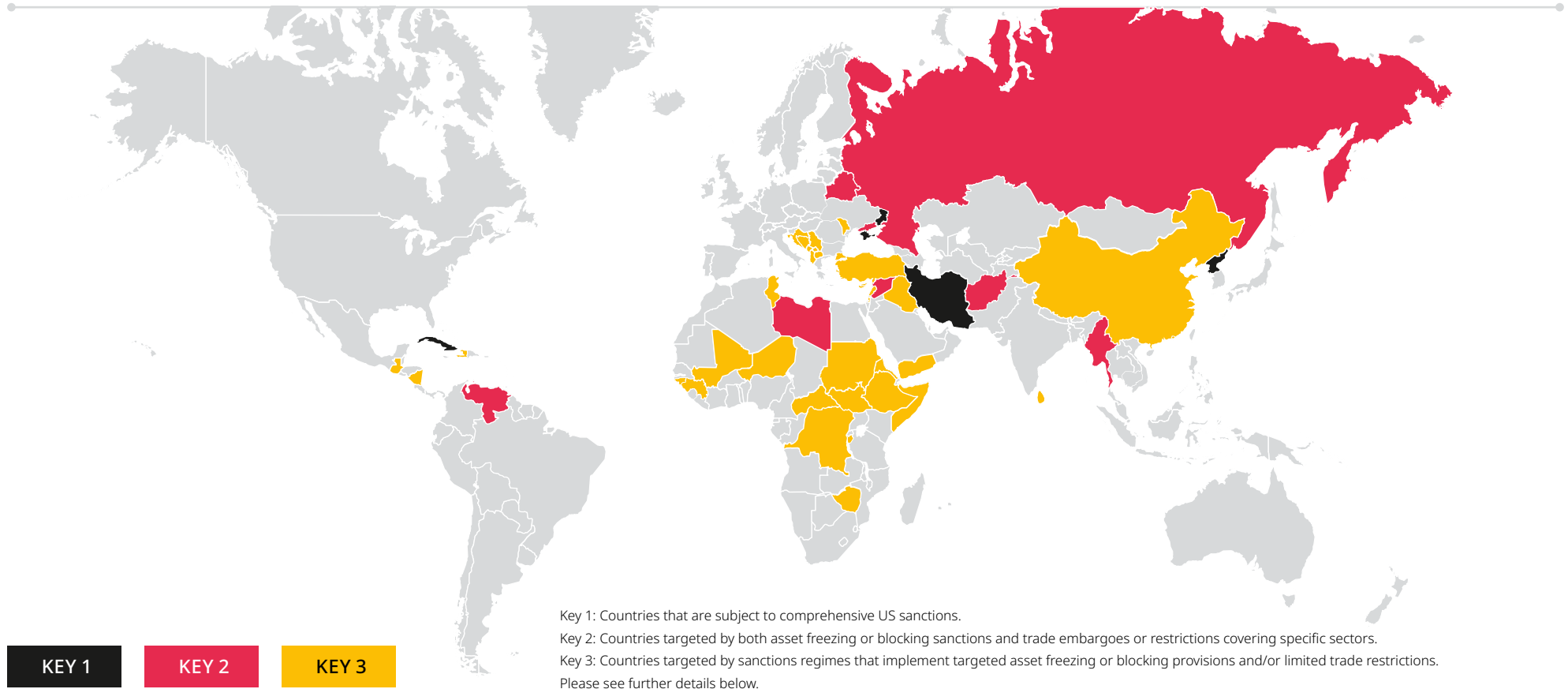




1 JULY 2026

Sanctions Matrix US, UK, EU and Canada

Global sanctions snapshot



Note: We recommend using Adobe Acrobat to view the Sanctions Matrix.

The content in this document is summarised from official sanctions sources and does not represent any commentary by, or opinion of, DLA Piper.

1. The DLA Piper Sanctions Matrix

- 1.1 The DLA Piper Sanctions Matrix provides a snapshot of the combined impact of financial and trade sanctions laws and regulations imposed by the US, UK, Canada, and the EU. Each edition also highlights key updates to the underlying legal frameworks since the previous edition.
- 1.2 Each entry in the Matrix is a high-level introduction to the legal framework for a global sanctions' regime. It is not a complete summary of all sanctions laws and regulations and does not capture all sanctions-related developments. For example, additions to, or deletions from, asset-freeze or blocking lists are not captured unless they form part of a significant package of asset-freeze, blocking, or other measures, or are of particular significance. Nor are general licences captured unless we consider them to be significant.
- 1.3 For the avoidance of doubt, the Sanctions Matrix does not generally provide information on EU, UK, US, or Canadian export controls. However, some country entries refer to export control measures where we consider them to be sufficiently adjacent to sanctions to inform the overall traffic-light rating. Where an entry does not refer to export control measures, this should not be taken as an indication that no EU, UK, US, or Canadian export controls have been implemented in respect of that country. Similarly, where export controls are referred to in an entry, this should not be taken as a comprehensive summary of the export control measures targeting that country.

2. Key

- 2.1 The traffic-light ratings used are of a general nature. Any assessment of sanctions risk should be tailored to your company's or firm's specific activities, taking into account factors such as:
 - (a) the locations and nationalities of the persons and entities involved in the business;
 - (b) the identity and locations of counterparties and third parties;
 - (c) the business activity, sector, product profile, or specific services to be provided; and
 - (d) the transaction or business structure, including payment flow.

BLACK – Countries that are subject to comprehensive US sanctions. In these jurisdictions, the US implements both wide-ranging assets-freezing or blocking provisions and extensive additional restrictions on carrying out a range of cross-border activities eg physical exports, provision of services, investment activity and financial transfers. The UK, Canada, and EU do not have an exact equivalent to “comprehensive” sanctions and their approach to the comprehensively sanctioned US countries varies from country to country.

RED – Countries targeted by both asset-freezing or blocking sanctions and trade embargoes, or by more extensive trade restrictions covering specific types of trade flows or targeting particular sectors of the economy, such as the military and defence, oil and gas, telecommunications, petroleum, and petrochemicals sectors. The scope of sanctions implemented in respect of a “red” country varies from country to country and may differ across the US, UK, Canada, and the EU.

AMBER – Countries targeted by sanctions regimes that implement targeted asset-freezing or blocking measures and/or limited trade restrictions, such as arms embargoes or restrictions on specific equipment that may be used for internal repression. The scope of sanctions implemented in respect of an “amber” country varies from country to country and may differ across the US, UK, Canada, and the EU.

3. Thematic sanctions regimes

- 3.1 Not all sanctions regimes are implemented on a geographical basis. So-called “Magnitsky sanctions”, for example, may be imposed on persons who commit serious human rights violations, regardless of their location. This Sanctions Matrix covers these regimes; however, the locations of persons sanctioned under them are not reflected in the snapshot map.

4. Circumvention and evasion risk

- 4.1 The US, UK, EU, and Canada all prohibit sanctions circumvention, although there are differences in the way each jurisdiction frames, implements, and enforces its sanctions regimes. Sanctions circumvention is an area of enforcement focus for authorities across all four jurisdictions. Some jurisdictions, such as the UK, publish lists of countries that are not themselves subject to sanctions but in respect of which enhanced due diligence is recommended. Where published, these lists can also be useful in assessing overall sanctions risk. However, these lists change frequently and, accordingly, countries included on them are not reflected in the snapshot map.

5. Secondary sanctions

- 5.1 This Matrix addresses primary sanctions only and does not analyse secondary sanctions risk, which involves a level of detail and granularity beyond the scope of this document. Please note that such secondary sanctions exposure may nonetheless exist, and we would be pleased to advise on it upon request.

