



SANCTIONS
SOS
TRAINING

TRAINING
CATALOGUE





WELCOME MESSAGE



In the ever changing worlds of sanctions and export controls, training is central to building understanding and knowledge which leads to greater implementation and enforcement of sanctions and ultimately both compliance and effectiveness.

At Sanctions SOS, we take a practical and integrated approach to sanctions and export control training, bringing together the perspectives of policy, compliance, investigation and enforcement. Our permanent and visiting experts draw on decades of experience working on sanctions and export controls with governments, regulators and the private sector around the world.

Our training is designed for professionals at every stage of their sanctions and export control journey - from those building their foundational knowledge to experienced practitioners tackling complex compliance and enforcement challenges. We offer both scheduled and bespoke courses, combining expert instruction with realistic scenarios exercises to help you apply what you learn in your day-to-day work.

A critical element that sets out training apart is the use of complex well-developed immersive scenarios which allow those studying with us to test their new knowledge against real-world inspired issues.

We look forward to supporting you in your professional development.

A handwritten signature in black ink, appearing to read "Ian Bolton".

Ian Bolton
Founder and CEO

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WHAT ARE SANCTIONS AND WHY THEY MATTER

Sanctions are a foreign policy tool that are used by both multilateral and regional bodies, as well as countries seeking to alter an undesirable behaviour or activity of another country, entity, group or person. They are used to coerce a change in behaviour, constrain a behaviour, and/or to communicate a clear political message to other countries or persons.

When the use of sanctions is threatened or imposed, those imposing them are using 'negative incentives' to influence governments, individuals or groups to change existing forms of behaviour deemed to jeopardise the interests of the sanctioning party/parties. Sanctions may also be used when the sanctioned party threatens to, or violates international norms, such as human rights abuses, genocide, and proliferation of weapons of mass destruction. Sanctions are often seen as the last diplomatic tool before military action.

Sanctions are used routinely in response to geo-political events, often involving the breaching of international norms. Sanctions can be used by multilateral organisations such as the United Nations, and European Union to pursue peace and security. They can also be used autonomously by individual countries to pursue a foreign policy objective in addition to those reasons already given.

So, why do they matter?

Sanctions create risks for individuals, businesses and organisations, risks which must be mitigated carefully through compliance, in order to avoid potential significant regulatory and criminal enforcement of sanctions breaches. Sanctions Compliance is essential is vital in terms of managing both reputational and regulatory risk. Failure to successfully identify and mitigate sanctions risks, by conducting and creating thorough sanctions risk compliance checks may result in penalties imposed by governments.

For example, if you are in breach of US sanctions, you may be penalised by US regulators ranging from substantive fines to potential criminal prosecution and custodial sentences. Compliance with sanctions also matters to enhance implementation and effectiveness of sanctions therefore delivering against the objectives of the sanctions regime.

WHO WE ARE

Sanctions SOS is a UK-based specialist consultancy focused exclusively on sanctions and export controls. Drawing on extensive in-house experience and expertise, we deliver immersive training, specialist consultancy, capacity building, thought leadership and sanctions-focused events for governments and private-sector organisations worldwide.

We bring together expertise from government, academia and the private sector to help organisations understand how sanctions and export controls are designed, implemented, complied with, and enforced. Our work is practical by design, combining technical expertise with real-world experience.

Our mission is simple: make sanctions easier to understand, help professionals build confidence in sanctions decision-making, and strengthen public-private engagement. In doing so we support efforts to make sanctions more effective.

Sanctions SOS Pillars

Sanctions SOS brings together expertise across four core pillars, providing specialist leadership and support within the sanctions landscape.

Pillar One: Training



Our training programmes include scheduled online and in-person courses, bespoke organisational training and specialist briefings. Our immersive courses use realistic scenarios, exercises and evolving injects to bring complex sanctions issues to life and give participants practical experience in responding to real-world challenges. Specialist topics include advanced sanctions compliance, investigations, evasion, and trade-based sanctions.

Pillar Two: Capacity Building



We work with governments and multilateral organisations to strengthen sanctions implementation and enforcement capabilities. This includes supporting institutional development, sharing international best practice and working with relevant public- and private-sector stakeholders to build effective and sustainable sanctions frameworks.

Pillar Three – Thought Leadership



We produce in-depth research, policy analysis and expert commentary on sanctions regimes and emerging sanctions issues. Our work includes studies, white papers and submissions to policymakers and parliamentary bodies, alongside regular analysis of developments in policy, compliance and enforcement in our newsletter, the Purple Alert.

Pillar Four – Compliance Consultancy



We help organisations understand, assess and manage their sanctions and export control risk. Our work includes enterprise-wide risk assessments, compliance framework design and review, policy development, red-team testing and bespoke due diligence. We also provide strategic advice on licensing, regulatory reporting, investigations, and complex sanctions issues across different jurisdictions and sectors.



TRAINING

OVERVIEW

Standard Offerings

We offer a growing programme of specialist sanctions and export control training, delivered both in person and online. Our scheduled courses cover topics including Advanced Sanctions Compliance, Counter-Proliferation, Trade Sanctions & Export Controls, and Sanctions Investigations & Combatting Evasion.

We also offer a dedicated online sanctions course for professionals looking for flexible, self-directed learning.

Bespoke

Where organisations have specific training requirements, we can design a bespoke programme tailored to their staff, sector and sanctions risks.

We develop each programme in consultation with the client to ensure the content, level and format meet their requirements. Training can be delivered online or in person and, wherever appropriate, incorporates our signature immersive scenarios and practical exercises.

Briefings

We provide focused one-off or linked briefing sessions on specific sanctions developments, regulatory changes or specialist topics.

Briefings can be designed for sanctions and compliance professionals or for wider business audiences requiring a practical understanding of how sanctions developments affect their work. Sessions can be delivered online or in person, for groups of any size, and include opportunities for questions and discussion.

TRAINING

IMPORTANCE OF TRAINING CONTINUITY

Sanctions and their related laws and regulations, are amongst the most volatile in the world, regularly changing and developing.

In addition, the expectations and requirements around compliance continue to change and evolve. Therefore, we offer tailored continuous learning plans that take into consideration the specific needs of our clients, such as geographical risks and exposure, products and services and taking into account the latest developments in laws and regulations, regulatory guidelines and enforcement trends.

We actively seek and act on feedback. Therefore, it is important to us that we offer clients options for updates and reviews of training materials, including the creation of new materials, and test questions. For this reason, we always include in our proposal's options for follow-on reviews. Our training offering is constantly updated to optimally reflect the client's needs. We also see the development of training materials as a circular endeavour, as set out below. We believe by doing this we can contribute to the development of continuous learning for staff.

Implementation of learning for all staff to be undertaken annually.

Important training materials reviewed annually prior to the mandatory training being initiated.

Relevant training for staff to be completed at least annually. This training should include certification by a recognised training organisation, and can include an assessment.



Design of curriculum and full scoping of requirement and internal policies
Creation of training materials and test questions for staff.

Finalisation of materials and the incorporation of feedback into the materials to ensure all requirements met.



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WHY OUR TRAINING?

Sanctions SOS has been designing and delivering specialist sanctions and export control training since our founding. We have developed and delivered programmes for government departments, private-sector organisations and professional bodies, both in the UK and internationally.

Our expertise in sanctions education also extends beyond our own courses. We have worked with leading professional and academic organisations to develop, review and strengthen their sanctions training programmes. Highlights include:

- Reviewing the ACAMS Certified Global Sanctions Specialist (CGSS) qualification manual
- Contributing to the review and development of ACAMS CGSS examination questions
- Contributing sanctions content to the King's College London MA in International Affairs
- Creating and writing the manual for the ICA Diploma in Managing Sanctions Risk
- Designing and writing the immersive RIPPLE scenarios used within the ICA Advanced Certificate and Diploma in Managing Sanctions Risk
- Supporting UK Finance in the development of materials for the UK Finance Sanctions School
- Delivering sanctions training on behalf of organisations including the ICA and the Chartered Institute of Professional Certifications

Bespoke Training

Alongside our scheduled courses, we design bespoke training programmes tailored to our customers need, both in terms of sector, audience and sanctions risks involved.

Programmes can range from focused one-hour briefings and lunch-and-learn sessions to full-day or multi-day training programmes. All of these can be delivered either in-person or online. Our expertise covers a broad range of sanctions and export control topics, including geo-political developments, sanctions policy, compliance, investigations, sanctions evasion, counter-terrorism, proliferation finance, licensing, trade-finance, export controls, and enforcement.

Uniquely Immersive

Our signature strength is our immersive approach to sanctions training. We create realistic, evolving scenarios in which participants are placed in decision-making roles and required to respond to new information as it emerges. Through realistic injects, participants must identify, assess and manage sanctions risks, make decisions and consider the practical consequences of their actions.

This approach moves training beyond theory and gives participants the opportunity to practise applying sanctions knowledge in situations that reflect the complexity and uncertainty of real-world sanctions work.

OUR E-LEARNING PACKAGE

E-Learning

We have developed an easy to use e-learning course in the form of a powerpoint presentation. The presentation is in the form of slides with recorded videos, providing some real-life case studies, there are also ten multiple choice questions which can be completed by those taking the e-learning course.

Easy Usability

The e-learning being in the form of a powerpoint presentation makes it easily compatible with most LMS systems, although it can also be used in powerpoint format.

Topics covered:

The e-learning materials cover the following topics at a high level:

- Understanding what sanctions are and when they are used
- Understanding the different types of measures and sectors that can be affected by sanctions
- Being able to identify the differences between targeted, 'Smart', and Comprehensive sanctions
- Knowledge regarding the use of multilateral and autonomous sanctions
- Be able to create a sanctions compliance framework to manage sanctions risks
- Being able to identify high risk sanctions activities and jurisdictions
- Knowledge of the importance sanctions screening plays within a sanctions compliance framework
- Understanding of how licencing works and what the differences are between licence types.
- Understanding of regulatory reporting and its importance, including how to do this.
- Examination of some sanctions evasion typologies commonly utilised.

Pricing: see price list



OUR WEBINAR TRAINING

Focused 90-minute online training on complex sanctions topics. For those who cannot commit to a full day out of the office.

Launching in early 2027, our Training Webinars are designed for professionals who need a focused deep dive into a complex sanctions topic without committing to a full-day course.

Each 90-minute online session combines expert-led teaching with practical application, giving participants both the knowledge and the opportunity to put it into practice straight away.

How It Works

60 minutes – Focused Theory: A structured deep dive into the key legal, regulatory and practical issues surrounding the topic, led by an experienced sanctions practitioner.

30 minutes – Scenario-Based Exercise: Participants apply what they have learned through a practical scenario or exercise designed to reflect the types of decisions and challenges that arise in real-world sanctions work.

At a Glance

- 90 minutes (60 minutes of expert-led theory, 30 minutes of scenario-based learning)
- Delivered live online
- £30 per person
- Specialist topics like Sanctions Investigations, Combatting Evasion, Ownership & Control

Our Training Webinars are ideal for sanctions and compliance professionals looking to build their knowledge, refresh their understanding or quickly get to grips with a complex area of sanctions practice.

Launched in early 2027

Our first Training Webinars launch in early 2027. To register for Sanctions SOS Training Webinars keep an eye on LinkedIn and our company website for upcoming topics and dates, or add your name to the waiting list by emailing us at enquiries@sanctionssos.com to gain exclusive first access.



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OUR

IN-PERSON TRAINING PROGRAMME

Our In-Person Immersive Training Programme is a series of specialist one-day courses combining expert-led teaching with practical, scenario-based learning.

Theory and practice are interwoven throughout the day. Participants learn key concepts and frameworks before applying them immediately to an evolving scenario, responding to new information, assessing risks and making decisions as the situation develops.

Our Current Courses

- Sanctions Compliance
- Advanced Sanctions Compliance
- Sanctions Investigations & Combatting Evasion
- Proliferation Finance & Sanctions
- Trade Sanctions & Export Controls

Why In Person?

Sanctions work requires judgement, discussion, collaboration and the ability to respond to changing information.

Our in-person format allows participants to engage directly with trainers and one another, debate different approaches, work collaboratively through realistic scenarios and share experiences and best practice.

Proven Training Experience

Sanctions SOS has trained 500+ professionals across government, the private sector and other organisations. 100% of participants who have provided feedback on our In-Person Immersive Training have rated the experience as excellent, and often highlight the unique immersive scenario experience.

Who Is It For?

Our courses are designed for professionals working with sanctions and export controls, as well as those looking to deepen their knowledge. Participants come from government, multilateral organisations, financial services and the wider private sector, compliance, legal and risk functions, and academia.

Where We Deliver

Our scheduled courses are regularly delivered in Manchester and London, with delivery in other UK and international locations available where there is sufficient demand.

To discuss bringing one of our courses to your organisation or location, contact enquiries@sanctionssos.com.

Pricing see our price list



IN-PERSON: SANCTIONS COMPLIANCE

Course Description

The Sanctions Compliance Immersive Training is a one-day, in-person programme focused on the practical application of sanctions knowledge. Blending expert-led taught sessions with an evolving interactive scenario, the course brings sanctions to life, equipping public and private sector professionals with strategic, real-world compliance skills. Participants will examine geopolitical drivers, identify evasion tactics, develop horizon scanning strategies, and engage in focused, peer-to-peer discussions in a deliberately small-group setting.

Learning Outcomes

By completing this training day, you will be able to:

- Understand the foundations of sanctions and compliance frameworks
- Apply practical compliance skills in real-world scenarios
- Identify and respond to common sanctions evasion methods
- Recognise the significance of geopolitics and horizon scanning in sanctions regimes
- Share best practices through peer discussion and networking

Participants receive a certificate of attendance, Sanctions SOS credits, and access to all course materials.

Syllabus

Key topics	Learning points
Overview of Sanctions <i>Why sanctions are used, what they are, and how they become law.</i>	• Purpose and role of sanctions in foreign policy • Types of sanctions: multilateral vs. autonomous • Categories: comprehensive, targeted, and SMART sanctions • Key regimes: UN, EU, US, and UK • Common sanctions measures
Sanctions Compliance <i>Importance of an effective sanctions control framework.</i>	• Building an effective sanctions control framework • Importance of clear policies and procedures • Sanctions screening processes • Identifying ownership and control structures • Incident management and reporting obligations • Licensing procedures and humanitarian exemptions
Sanctions Evasion <i>Understanding sanctions evasion and how it occurs.</i>	• Common evasion tactics and typologies • Red flags in maritime activity • Risks related to cryptocurrency and ransomware • The role of enablers in sanctions breaches
Sanctions Risk Analysis <i>Horizon scanning and sanctions risk analysis.</i>	• Identifying high-risk jurisdictions • Conducting horizon scanning • Customer due diligence (CDD) and Know Your Customer (KYC) practices



Course Description

This course provides a practical introduction to proliferation finance and its relationship with sanctions and wider financial crime. Participants will explore key typologies and case studies, undertake risk assessments, examine investigative techniques and OSINT tools, and develop an understanding of relevant reporting obligations and enforcement frameworks.

Learning Outcomes

By completing this training day, you will be able to:

- Explain counter-proliferation and proliferation finance
- Identify and assess proliferation-financing risks
- Conduct and apply proliferation-financing risk assessments
- Design and evaluate compliance controls
- Investigate suspected proliferation activity
- Engage in practical scenario-based learning to reinforce real-world decision-making

Participants receive a certificate of attendance, Sanctions SOS credits, and access to all course materials.

Syllabus

Key topics	Learning points
What is Proliferation Finance <i>Examining what is meant by Proliferation Finance, how this is defined and specifically FATF's role</i>	• ·What is meant by Proliferation Finance? • ·Why does Proliferation Finance matter? • ·What is the role of Proliferation Finance within different jurisdictions and across multilateral bodies • FATF's role on Proliferation Finance
Proliferation Finance Typologies Understanding the common proliferation finance typologies, and examining real-world case studies.	• ·Understanding different proliferation finance typologies. • ·Examining how finance and transactions can be caught in proliferation finance, including crypto. • ·Understanding some of the key trade/maritime and wider typologies. • Exploring a number of real-world proliferation finance case studies.
Proliferation Finance Risk Assessments Looking at the importance of jurisdictional risk assessments, and those completed by the private sector	• ·Understanding what a proliferation finance risks assessment is. • ·Exploring how a jurisdictional national risk assessment should be completed. • Examination of private sector proliferation finance risk assessments and where this overlaps with sanctions and wider financial crime concerns.
Proliferation Finance Investigations Deep-dive into how to undertake specific proliferation finance investigations and how to use OSINT in these.	• ·Different types of triggers for investigations. • ·Differences between structured and unstructured triggers. • ·Investigation life cycle. • ·OSINT tools and techniques. • Pulling an investigation together.
Proliferation Finance Reporting and Enforcement Understanding the importance of accurate reporting, including what the reporting obligations are. Examining enforcement of proliferation finance cases.	• ·Examining reporting obligations around proliferation finance. • ·Understanding how reporting should be completed. • ·Exploring the enforcement powers of relevant agencies in connection to proliferation finance. • Understanding enforcement of proliferation finance, and why this matters.



IN-PERSON: TRADE-SANCTIONS AND EXPORT CONTROLS

Course Description

The Trade Sanctions & Export Controls Immersive Training is a one-day, in-person programme offering a practical deep dive into trade-related sanctions and export controls, bringing the topic to life. Combining taught sessions with a developing scenario, the course allows attendees to tackle real-world compliance challenges as they unfold - gaining hands-on experience in licencing, risk management, and regulatory frameworks across key jurisdictions. Designed for professionals across trade, compliance, sanctions, and customs, this interactive session supports peer learning and dynamic discussion in a small-group setting.

Learning Outcomes

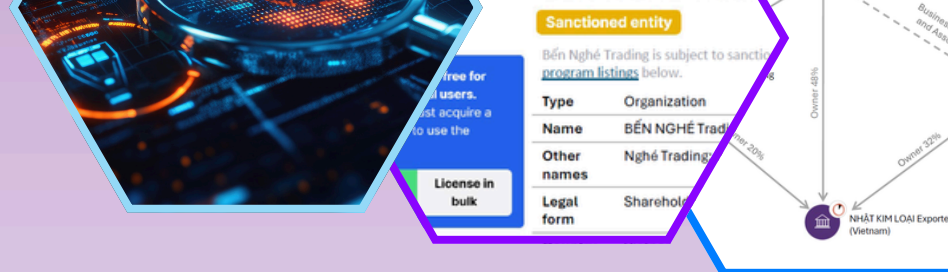
By completing this training day, you will be able to:

- Understand the structure and purpose of trade-related sanctions and export controls
- Navigate key export control regimes, including those of the UK, US, and EU
- Apply compliance and licensing processes in your operational environment
- Identify common methods of sanctions and export control evasion
- Engage in practical scenario-based learning to reinforce real-world decision-making

Participants receive a certificate of attendance, Sanctions SOS credits, and access to all course materials.

Syllabus

Key topics	Learning points
Overview of Trade Sanctions and Export Controls <i>Overview of trade-based sanctions, export controls, and their differences.</i>	• Define trade-based sanctions and their purposes • Explain export controls and how they differ from sanctions • Review key Export Control Regimes (e.g., MTCR, NSG, Wassenaar) • Understand Export Control Schedules and relevant broader factors
Identifying Goods, Managing Risks <i>Identifying and managing goods and risks: one of the biggest challenges in sanctions and export controls.</i>	• Importance of accurately identifying goods and applicable controls • Assess risks: geographic, terrorism, WMD proliferation • Consider transit and transshipment risks • Explore tools for risk management • Understand ownership/control impacts on trade • Paperwork, licensing, and humanitarian considerations
Sectoral Concerns <i>Examine how different sectors face unique risks that influence sanctions and export control practices.</i>	• Risks and nuances in key sectors ◦ Oil & Gas (including Russia oil price cap), Logistics, Maritime • Overview of the Common High Priority List • Trade finance considerations
Investigations and Enforcement <i>Focus on investigation methods, evasion tactics, and enforcement processes.</i>	• How to investigate/advise on sanctions and export controls cases • Roles of enforcement agencies and enforcement procedures • Risks and consequences of evasion activities



IN-PERSON: SANCTIONS INVESTIGATIONS AND COMBATTING EVASION

Course Description

This course is a one-day, in-person programme, offering a practical deep dive into carrying out sanctions investigations, understanding evasion typologies and how to combat these risks, bringing the topic to life. Combining taught sessions with a developing scenario, the course allows attendees to tackle real-world challenges as they unfold - gaining hands-on experience in structured investigations, identification and management of evasion risks, regulatory reporting and enforcement actions. Designed for professionals across compliance, sanctions, trade, maritime and government, this interactive session supports peer learning and dynamic discussion in a small-group setting.

Learning Outcomes

By completing this training day, you will be able to:

- Understand the theory of completing investigations, both structure and unstructured
- Identifying the relevant tools to investigate cases and possible sanctions evasion
- How to undertake Open-Source Intelligence and different elements such as geo-location
- Understanding some of the common sanctions evasion typologies
- The importance of completing reporting, and the enforcement actions taken by regulators

Participants receive a certificate of attendance, Sanctions SOS credits, and access to all course materials.

Syllabus

Key topics	Learning points
Overview of the theory of Sanctions Investigations <i>Examination of the key theories of undertaking sanctions investigations, including management involvement.</i>	• Define the life cycle of an investigation • Knowing why an investigation is being carried i.e. what will be done with findings • Understanding the three stages of an investigation: Identifications, Assessment, and decision making. • Understanding differences between structured and unstructured triggers
Best practices and tools for carrying out investigations <i>Identifying and utilising the best investigation tools, including common OSINT techniques.</i>	• Understanding the flow of an investigation and who is responsible for what • Determining what's happened, what's the impact and who needs to be informed, ensuring complexity does not impact clarity • Examining the tools and skills required to undertake an investigation, including paid for tools • Examining Open Source Intelligence (OSINT) techniques and how these can be incorporated into investigations
Evasion Typologies <i>Examine different evasion typologies including those specific to certain sectors and industries</i>	• Examination of common typologies and how to identify these: Professional Enables; Third Countries; Crypto; Foreign Workers; Mercenaries; and Complex Ownership. • Understanding how the maritime sector is vulnerable to evasion typologies and what these look like • Explore options for countering evasion
Reporting and Enforcement <i>Focus on investigation methods, evasion tactics, and enforcement processes.</i>	• Building an investigation case resulting in specific and actionable outcomes • The importance of both internal and regulatory reporting and how to do this • Examining the roles of key enforcement agencies and likely action taken by them



IN-PERSON: ADVANCED SANCTIONS COMPLIANCE

Course Description

This one-day, in-person immersive course provides an advanced examination of how organisations implement, govern and demonstrate an effective sanctions compliance framework. Combining expert-led teaching with a developing scenario throughout the day, participants will explore sanctions governance and risk appetite, enterprise-wide risk assessment, multi-jurisdictional challenges, ownership and control, advanced screening, licensing and enforcement readiness. Attendees will apply these concepts to practical decisions as new information and challenges emerge throughout the scenario.

Learning Outcomes

By completing this training day, you will be able to:

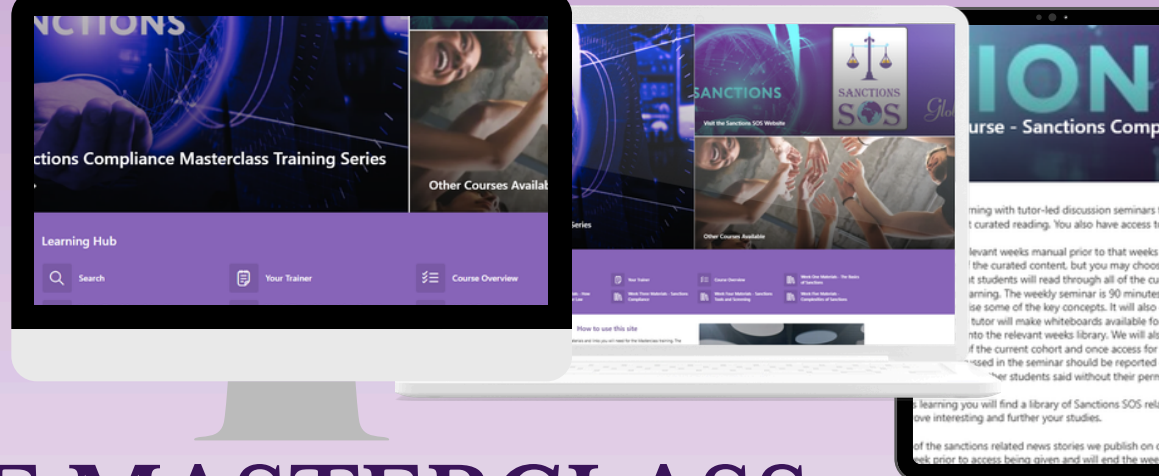
- Assess and strengthen sanctions governance, accountability and risk appetite
- Conduct effective sanctions risk assessments and map risks to appropriate controls
- Navigate complex multi-jurisdictional, ownership and control issues
- Assess the effectiveness of sanctions screening and regulatory change management
- Manage sanctions licensing and permissions effectively
- Test sanctions controls and respond appropriately to potential breaches and regulatory scrutiny

Participants receive a certificate of attendance, Sanctions SOS credits, and access to all course materials.

Syllabus

Key topics	Learning points
Governance, Risk Appetite, Control Frameworks <i>Examine how sanctions risk should be governed and translated into a proportionate/defensible control framework.</i>	• Understanding board, senior-management and sanctions officer accountability • Defining responsibilities, escalation routes, decision-making authorities • Translating sanctions risk appetite into customer, product, and jurisdictional decisions • Designing effective Enterprise-Wide Risk Assessment methodologies • Mapping identified sanctions risks to controls and assessing residual risk • Using risk assessment findings to inform resources, systems, control improvements
Multi-Jurisdictional Sanctions, Ownership and Control <i>Understand how to make defensible decisions where sanctions regimes, corporate structures and jurisdictional requisites seem complex.</i>	• Establishing applicable jurisdictional and transactional nexus • Managing UK, EU, US, UN and relevant local sanctions requirements • Addressing conflicting sanctions obligations, blocking measures and group policies • Calculating direct, indirect and aggregated ownership across complex structures • Assessing control through voting rights, governance, financing and de facto influence • Documenting reasonable ownership & control decisions where information is incomplete or conflicting
Screening and Change Management <i>Examine how organisations identify sanctions exposure, respond to regulatory change and manage controls</i>	• Determining who and what should be screened and assessing screening effectiveness • Managing aliases, transliteration, fuzzy matching, thresholds and data quality • Responding to new designations, regulatory developments and changing sanctions restrictions • Identifying restrictions that require analysis beyond list-based screening • Understanding change management processes within a sanctions context, and ensuring that controls remain effective
Licensing <i>permissions for activity that would otherwise be restricted.</i>	• Determining when a licence is required and preparing effective applications • Understanding when multiple licences may be necessary, including across jurisdictions • Using General Licences and how to ensure compliance • Translating licence conditions into operational controls, monitoring and reporting requirements
Assurance, Incidents and Enforcement Readiness <i>Test whether the sanctions framework works in practice and preparing the organisation to respond effectively when potential breaches or control failures arise.</i>	• Assessing control design and operating effectiveness through risk-based assurance • Testing screening systems, manual controls and sanctions-list implementation • Identifying systemic weaknesses and tracking remediation • Managing containment, escalation and decision-making following a potential sanctions issue • Conducting root-cause analysis, lookbacks and regulatory reporting • Preparing for regulatory scrutiny and maintaining an enforcement-ready evidence record

OUR ONLINE MASTERCLASS SERIES



What is the Online-Masterclass training programme and why on-demand?

Our Online Masterclass series is a series of online courses that combines self-study with tutor-led seminars and access to a dedicated learning-hub. Designed for professionals at every level, the online courses cover significant materials across the relevant topics divided into five key focus areas. Participants come from government, multilateral organisations, financial services and the wider private sector, compliance, legal and risk functions, and academia.

By being on

Length of time

Our Online Masterclass courses are designed to take six months, providing flexibility given the challenges of modern busy lives. However, we recommend devoting between three to six months to complete an Online Masterclass Course, this should allow students time to work through all materials and attend both of the two tutor-led sessions students are required to attend to complete the course.

Structure

Our Online Masterclass Courses are broken down into five key focus areas looking at specific topics key to understanding the course. Each of these focus areas is supported by a Study Manual, Slide-pack, and video of our tutors talking through the Slide-pack, bringing it to life with real-world examples.

The course is accessed via the relevant courses Learning Hub. This Learning Hub also provides students with access to curated relevant content, wider Sanctions SOS materials, articles by Sanctions SOS employees and affiliated experts, and our back catalogue of webinars. The Learning Hub also provides a forum for students to interact with each other and ask questions and have discussion not just with our tutors but also other students.

As part of the course students are expected to attend two tutor-led seminars during the course, these are scheduled routinely to allow students flexibility in attending and completing them.

The first of the seminars to attend is the introduction and overview session for the course. This should be completed within the first two months of signing up to the course. This allows students to engage with one of our tutors directly, asking any questions about the course and its content. The session will also cover a basic introduction to course topics, and provide some real-world examples.

The second tutor-led seminar is focussed more specifically around sanctions evasion typologies, risk management and introduces an immersive scenario for students to work through together in their groups. Again, students will be able to bring any questions they may have from wider-course materials, or more generally to this session. This session should be completed once students have worked through all of the Manuals, and pre-recorded presentations.

Students maintain access to the Learning Hub for the full six months even if they have completed the course in a shorter timeframe so they can revisit materials and benefit from all of the content.

Currently we offer:

- Sanctions Policy, Compliance and Evasions

We will be launching out second online masterclass in 2027 which will be:

- Trade, Sanctions and Export Controls

Pricing see our price list



ONLINE MASTERCLASS SERIES: SANCTIONS POLICY, COMPLIANCE AND EVASION

Course Description

The Sanctions: Policy, Compliance and Evasion Masterclass is our signature online offering. The course is a mix of self-taught and tutor-led training. The course is available on-demand, with students expected to complete the course over a six month period. During this time they will work through five modules, which are supported by a manual, powerpoint slides, and a video presentation. Students will be expected to attend a 60 minute tutor-led seminar within the first two months of starting the course, which focuses on the basics of sanctions and real-world examples. They will be expected to complete a second tutor-led seminar towards the end of the course which will involve our signature immersive fictitious scenarios.

Learning Outcomes

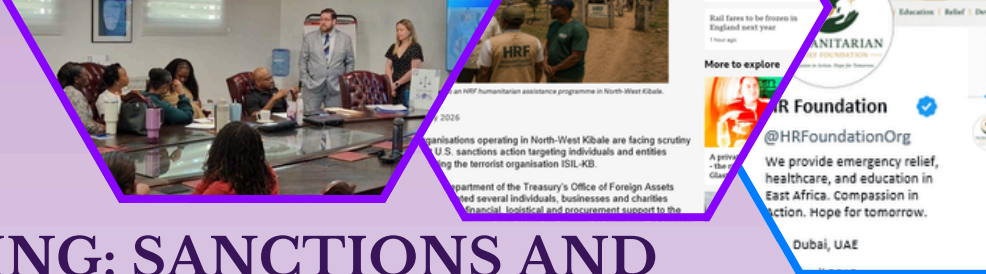
By completing this masterclass, you will be able to:

- Understand sanctions regimes and their implications
- Identify and manage sanctions risks
- Recognise the role of geopolitics and horizon scanning
- Use key compliance tools like licensing, ownership control, and screening
- Detect sanctions evasion red flags
- Collaborate effectively through group discussions

Participants receive a certificate, Sanctions SOS credits, and access to all course materials and recordings.

Syllabus

Module	Seminar Subject	Learning points
Module 1	Basics of Sanctions <i>Overview of sanctions basics, including their purpose and types of measures.</i>	• Purpose and role of sanctions in foreign policy • History and evolution of sanctions • Multilateral vs. autonomous sanctions • Comprehensive, targeted, and smart sanctions • Types of sanctions measures
Module 2	How Sanctions Become Law <i>Exploration of the legal frameworks that establish sanctions.</i>	• UN sanctions framework • EU sanctions regulations • US autonomous sanctions • UK autonomous sanctions
Module 3	Sanctions Compliance <i>Focus on sanctions compliance best practices and control frameworks.</i>	• Building an effective control framework • Importance of sanctions policies and procedures • Identifying high-risk jurisdictions
Module 4	Sanctions Tools & Screening <i>Review of tools and systems for managing sanctions risks, including licensing.</i>	• Sanctions screening processes • Incident management and reporting • Licensing and humanitarian exemptions • Customer Due Diligence (CDD) and Know Your Customer (KYC) • Horizon scanning techniques
Module 5	Complexities of Sanctions <i>Examination of complex sanctions issues like ownership and control.</i>	• Ownership and control considerations • Common sanctions evasion typologies • Red flags in maritime sanctions • Procedures for lifting sanctions



CAPACITY BUILDING: SANCTIONS AND COUNTER-TERRORISM DESIGNATION TRAINING

Course Description

Designed specifically for governments, this one-day, in-person immersive course provides a practical examination of how sanctions and counter-terrorism designations are developed, investigated and supported by robust evidence.

Combining expert-led teaching with a developing immersive scenario, the course examines the legal basis and thresholds for designation, the government decision-making process, designation investigations and evidence gathering, and the use of Open-Source Intelligence (OSINT). Participants will also explore how designation information can be shared with partner jurisdictions and how decisions can be prepared to withstand scrutiny and challenge. The course is designed to strengthen government capability to implement targeted financial sanctions effectively and support stronger outcomes against relevant FATF standards and through future Mutual Evaluation processes.

Learning Outcomes

By completing this training day, you will be able to:

- Understand the legal basis and evidentiary thresholds for sanctions and counter-terrorism designations
- Understand the government process, responsibilities and decision-making required to make a designation
- Structure and conduct investigations to build a robust designation case
- Identify, assess and use appropriate sources of intelligence and evidence
- Apply OSINT techniques to support designation investigations
- Prepare designation information for decision-making, information sharing and potential legal or regulatory challenge

Syllabus

Key topics	Learning points
Legal Basis, Thresholds and the Designation Process <i>Examining the legal foundations for designation and how these translate into an effective government decision-making process.</i>	• Understanding the purpose and effect of sanctions and counter-terrorism designations • Identifying the relevant legal powers available to designate individuals, entities and other parties • Understanding the legal and evidentiary thresholds that must be met • Mapping departmental responsibilities and identifying appropriate decision-makers • Examining ethical and procedural considerations involved in investigating potential designees • Building a clear and defensible process from initial identification through to designation
Designation Investigations and Building the Case <i>Understanding how to structure an investigation and assemble the evidence required to support a robust designation decision.</i>	• Structuring a designation investigation from initial trigger to final recommendation • Defining investigative questions and identifying information requirements • Gathering and assessing different forms of evidence and intelligence • Evaluating the reliability, relevance and limitations of available information • Using structured forms and evidence packs to present findings clearly • Creating a documented evidential trail capable of supporting government decision-making
Open-Source Intelligence and Advanced Techniques <i>Using publicly available information and investigative techniques to identify, corroborate and develop intelligence relevant to potential designations.</i>	• Understanding the role and limitations of OSINT within designation investigations • Identifying relevant online, corporate, financial and other public sources • Assessing source reliability and corroborating information across multiple sources • Using advanced search and investigative techniques to identify connections between actors • Applying techniques including metadata analysis and geolocation • Capturing and recording OSINT in a way that can support a structured designation case
Designation Decisions, Information Sharing and Challenges <i>Bringing the designation case together and considering how decisions are communicated, shared and defended.</i>	• Bringing legal, investigative and intelligence findings together into a clear designation recommendation • Assessing whether the available evidence meets the relevant designation threshold • Managing internal review, escalation and final government decision-making • Identifying opportunities to share designation intelligence with partner jurisdictions • Preparing information to support or recommend designations by other jurisdictions • Understanding how designations may be challenged and ensuring decisions are appropriately evidenced and documented



OUR BESPOKE TRAINING OFFERING

Training designed around your organisation - anywhere, anytime, online/in-person/hybrid.

Every organisation faces different sanctions risks. Our bespoke training is designed around your people, your sector and the issues that matter most to you. We work with organisations anywhere in the world to develop tailored training on any sanctions or export control topic, from foundational awareness through to complex specialist issues.

Training can be delivered in person, online or in a hybrid format, and can range from focused briefing sessions to full-day or multi-session programmes.

Built Around Your Needs

We work with you to tailor the:

- Topic and learning objectives
- Level of technical detail
- Audience and sector
- Length and format of the programme
- Jurisdictions and regulatory issues covered
- Exercises, case studies and immersive scenarios

Where appropriate, we incorporate realistic scenarios based on the types of sanctions challenges your organisation may encounter, allowing participants to put theory into practice.

Proven Bespoke Experience

We have already designed and delivered bespoke sanctions training for 10+ organisations, working with clients across different sectors, jurisdictions and levels of sanctions experience.

Whether you need to train a specialist sanctions team, brief senior decision-makers or build sanctions awareness across a wider organisation, we can create a programme around your requirements.

Discuss Your Training Requirements

Speak to us about creating a bespoke programme for your organisation: enquiries@sanctionssos.com

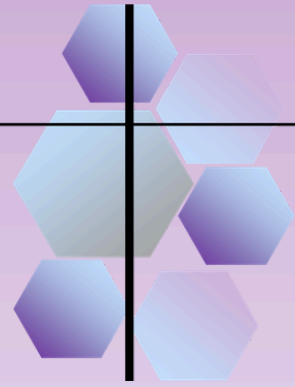
WHAT OUR CLIENTS SAY



LIZZIE PAWLOWSKI,
AVP SANCTIONS

"I reached out to Sanctions SOS to get some bespoke training for myself and to upskill my team in the Second Line of Defence. I was so pleased to work with Ian Bolton from Sanctions SOS again in this way, having worked with him in the past.

Sanctions SOS and Ian did not disappoint. The training focussed on trade-based sanctions and export controls. All participants found the training enlightening and beneficial to their work. Thank you!"



KHARON

FREYA PAGE
GLOBAL OUTREACH DIRECTOR

"The one-day training course with Sanctions SOS in London was a fantastic learning experience that provided a comprehensive understanding of sanctions. The course delved into the fundamental principles and the foreign policy logic driving sanctions, as well as the geopolitical events that have shaped various regimes.

What sets this course apart is its unique approach, blending insights from UK Government, academia, and private sector banking experiences. This provided a well-rounded, holistic perspective that is rarely found in other sanctions training programs.

The trainers' deep expertise and engaging delivery made complex topics both accessible and relevant. I highly recommend this course for anyone either beginning their career in sanctions or looking to deepen their knowledge of this subject area and its global impact."

Nordea

LOUIE VARGAS
LEAD COMPLIANCE OFFICER
(SANCTIONS AND SCREENING)

"I completed the Sanctions Compliance Online Masterclass Course. This course was incredibly in-depth, amazing value for money and allowed all who took part to not only build their sanctions knowledge but also grow their network of sanctions professionals. The materials from the course and curated documents have proven invaluable in my day-to-day role.

One of the best things about the Sanctions SOS training is the insights from government, private sector, and academia. Anyone looking to learn about sanctions for the first time or those looking to enhance and/or refresh their sanctions knowledge should do this course!"



NatWest Group

ANILA HALEEM
GROUP SANCTIONS LEAD

"Sanctions SOS's immersive training provided an excellent overview of what we need to know about sanctions, their practical application across both the public and private sectors, and a forward look at how the sanctions landscape is evolving.

One of the unique benefits of the course was bringing together participants from such different professional backgrounds, including colleagues from banking, government and NGOs.

Learning alongside people with different perspectives made the discussions especially valuable and helped us connect the dots between policy, compliance and implementation.

The day provided plenty of food for thought and gave us a much broader understanding of sanctions and the issues organisations need to be thinking about."



JOHN HOSIE
HEAD OF BUSINESS ACCEPTANCE

"The Sanctions Investigations & Combatting Evasion training course was excellent. Small groups with people from other industries really enabled in-depth discussions and opened my eyes to this complicated area and how it impacts other industries.

The immersive scenario really brought the topics to life and helped me understand how to adapt the learning to my day-to-day work.

Delivered by real experts in this area, it was invaluable."



WHY CHOOSE SANCTIONS SOS?

EXPERTISE AND EXPERIENCE



Sanctions SOS features unparalleled expertise in navigating the intricate landscape of sanctions regimes worldwide. With a comprehensive understanding of diverse jurisdictions, we seamlessly bring together a unique ability to ensure compliance and understanding across all fronts. We understand every facet of sanctions across multiple jurisdictions and multilateral bodies. Our experience and expertise cover all sectors, private, public and academic. Our expertise includes sanctions compliance, from meticulous screening to thorough investigations. Finally, we excel in every aspect of sanctions policy and management, providing tailored solutions to specific needs.

TRAINING EXCELLENCE

We are distinguished by our collaboration with renowned institutions like the ICA, ACAMS and various other leading financial trainers. We have been responsible for designing sanctions training for these trainers and more widely as sanctions apply to the wider world through work for King's College London. We stand as the go-to company for training in the sanctions world. We provide training, qualifications, and networking opportunities for sanctions professionals, no matter what sector they work in, including designing and delivering bespoke training packages.



TAILORED



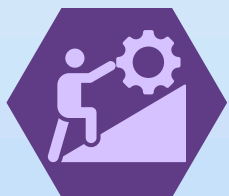
We tailor all of our work and solutions for every scale, having worked with organisations of all size from small law firms to international businesses and government entities like the UK's Foreign, Commonwealth and Development Office. In the realm of compliance regardless of your company's scale, we offer comprehensive services specific to your needs. From Enterprise-Wide Risk Assessments to creating and reviewing policies, procedures, and delivering bespoke training. We are also able to perform audits of existing sanctions management frameworks.

UNIQUE AND EXTENSIVE RELATIONSHIPS

We have unique range of relationships cultivated across diverse sectors, including esteemed partnerships with UK Finance, Kharon, the UK Government, EU Commission, and the US State department. These unique networks afford us unparalleled access to insights and intelligence, empowering us to deliver solutions tailored to your needs. We are also ideally placed to work with governments discreetly where the need arises.



PASSION AND DEDICATION



At the heart of Sanctions SOS is a deep passion and unwavering dedication to enhancing the understanding and implementation of sanctions. We believe in the importance of enhancing their effectiveness and fostering a deeper comprehension with organisations. Our commitment extends beyond compliance, we strive to empower businesses to navigate the complexities of sanctions compliance, reducing the risk of inadvertent non-compliance. Trust in our advocacy and tireless efforts to safeguard your operations and elevate industry standards.

MEET

OUR CORE TEAM



Ian Bolton, Founder & CEO

It was Ian's dream to create a specialist sanctions consultancy that brings together sanctions expertise from across governments, industry and academia. He is one of the world's leading sanctions expert and has over 18 years of unparalleled experience in managing sanctions and policy & public affairs. He has served as the Editor of the prestigious WorldECR publication FISC journal, which provided sanctions knowledge and expertise aimed at the financial sector, customers and advisors. During his decade of service at the Foreign, Commonwealth, and Development Office (FCDO) in the UK, Ian led the country's efforts to interdict materials and goods under sanctions, whilst also serving as the UK's lead on the Proliferation Security Initiative. He routinely engaged with international partners on a range of sanctions and counter-proliferation topics, performing a crucial role in shaping the future of the UK's sanctions architecture. He played an instrumental role in the drafting of the Sanctions and Anti-Money Laundering Act (2018). He brings unparalleled skills, knowledge, and experience to any organisation seeking to navigate the complex world of sanctions compliance.

Mathilde Gerritsma, Associate

Mathilde focuses on Outreach and Policy at Sanctions SOS, combining her strategic business acumen with a passion for international relations. She leads on our business development and compliance work. Mathilde's work within Sanctions SOS has a heavy focus on CT, CP and the roles of Russia and China. She also jointly leads on our Myanmar work. Her expertise enables her to contribute to the development of sanctions compliance frameworks, risk analysis, and thought leadership in the field. Mathilde is fluent in English, Mandarin, and Dutch, and proficient in French, German, and Russian. Mathilde leverages her multilingual skills to engage effectively with global stakeholders, fostering cross-cultural understanding and international collaboration.

Visiting Expert and Freelance Cadres

We also have two cadres of additional staff that we can deploy on specific projects and work. This allows us to utilise their additional expertise, experience and resource to assist in our delivery.

- The Visiting Experts cadre includes leading sanctions, counter-terrorism and counter-proliferation experts. These experts are leaders in their respective fields and give us additional insights and capabilities.
- Our Freelance Cadre gives us additional highly skilled resource we can leverage to deliver projects. In particular they have expertise in research, OSINT, Security and Sanctions.

EXECUTIVE SUMMARY

The second episode of the Sanctions SOS webinar series on the 17 June 2024 was hosted by Chloe Giasemidis, three esteemed speakers - Ian B. ... and CEO of Sanctions SOS, Freya Page, Director of Global Outreach, ... Kharon, and David Wolber, Of Counsel at Gibson Dunn - gathered to delve into the intricate issues surrounding ownership and control within the sanctions frameworks of the EU, UK, and US. Through detailed case studies, they provided valuable insights into the complexities of ownership and control structures and aggregation challenges.

SANCTIONS SOS UPDATE



In the "Five Minutes with Sanctions SOS," Ian provided a comprehensive overview of global sanctions developments since the inaugural webinar. He highlighted significant advancements in Russia sanctions across the EU, UK, and US, targeting entities involved in evasion and on critical sectors such as metals. Ian also discussed the challenges in designating entities and applying secondary sanctions in countries such as Turkey, UAE, and Kazakhstan. He noted expectations for a 14th

On 13 June 2024 the UK designated two organisations under the Central African Republic sanctions regime. The two companies are: Diemville, Wood International Group SARL, ... Both companies have been designated because of their associations with the Russian mercenary company the Wagner Group, which has been involved in the commission of human rights abuses.

Myanmar Staff Payments Licence Update



The Evolution of Sanctions to the Endemic Threat from Global Terrorism

By Ross Savage
06 March 2024



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Registered in England and Wales.
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