



S M A R T R A D E SM

Timely news and analysis of the latest developments in international trade law

President Biden Sanctions Nord Stream 2 AG as a Result of Russia's Invasion of Ukraine

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On February 23, 2022, President Joseph Biden released a **statement** announcing that the United States was imposing sanctions on Nord Stream 2 AG and its corporate officers. Effectively immediately, Nord Stream 2 AG has been designated and placed on the Department of Treasury's Office of Foreign Assets Control (OFAC) Specially Designated Nationals (SDN) List.

- NORD STREAM 2 AG (a.k.a. NEW EUROPEAN PIPELINE AG), Baarerstrasse 52, Zug 6300, Switzerland; Gotthardstrasse 2, Zug 6300, Switzerland; Bahnhofstrasse 10, Zug 6301, Switzerland; Identification Number CHE-444.239.548 (Switzerland); Business Registration Number CH-170.3.039.850-1 (Switzerland)

In addition, one Nord Stream 2 AG official has been added to the SDN List. See **OFAC SDN List Update**. With these designations to the SDN List, all property and interests in property of persons and entities identified above that are in the United States or in the possession or control of U.S. persons (or their foreign branches) are blocked and must be reported to OFAC. In addition, any entities that are owned, directly or indirectly, individually or in the aggregate, 50% or more by one or more blocked persons are also blocked.

Unless authorized by a general or specific license issued by OFAC, or exempt, all transactions by U.S. persons or within (or transiting) the United States that involve any property or interests in property of blocked persons are generally prohibited. For the purposes of winding down any ongoing transactions, OFAC has issued **General License No. 4** which authorizes all transactions that are ordinarily incident and necessary to wind down transactions involving Nord Stream 2 AG, or any entity in which Nord Stream 2 AG owns, directly or indirectly, a 50 percent or greater interest, through March 2, 2022.



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