



## Sanctions and Export Control Case Studies

Human-led due diligence on high-risk counterparties is essential for sanctions compliance. PSA's investigative reporting provides context and experience-based insight that automated tools don't. These case studies illustrate how PSA's investigative due diligence works to uncover hidden risks or to validate the legitimacy of counterparties. Leveraging local knowledge, language skills, and tailored research methodologies, our research and reporting equip clients to navigate emerging regulations across multiple jurisdictions with confidence.

### Austria-Iraq Oil Technology

PSA identified concerning patterns of behavior when conducting due diligence on an Austrian company already acting as the client's agent in Iraq. The company had been a sales agent for a US oil technology firm for over 10 years and was cleared in 3 rounds of due diligence by a previous provider. Yet, PSA's on-the-ground inquiries identified that the company was entirely unknown in Iraq. Calls to references felt coached, and no tender or transaction history could be independently verified. PSA sought client permission to conduct supplemental research in Farsi. This identified products matching the client's specifications in Iran. Alarmed by these findings, the client instructed PSA to expand the investigation. It was ultimately determined that the agent had been using local Iraqi entities to transship client material into Iran for several years.

### Armenia-Iran-Russia Aircraft Parts

PSA was engaged following an unexplained spike in orders for small-value aircraft parts in Armenia. An immediate review of public tenders, statements by the company, and interviews with disclosed clients could only account for 5% of the total material delivered. The investigation progressed to online research in English, Russian, Armenian, and Farsi, along with records searches, and identified affiliated companies operating under separate names in Russia. Further research on the public VK (social media) accounts of company employees identified images of material with the client's logo being used on aircraft within comprehensively sanctioned countries.

### Russia Software Development

PSA was engaged to research a Russian-founded software developer serving a broad US client base. PSA was hired to investigate if the company had severed its ties to Russia. We discovered that while the company had initially maintained a 250-person office in Moscow, following the invasion of Ukraine, it ceased Russian operations, relocated staff out of country, and adopted comprehensive policies to ensure forthcoming sanctions compliance. Assured that there were no current Russia ties, the client continued working with this counterparty.

### Iran SaaS

A global software company engaged PSA to look at a prospective sales agent in the Middle East. Through site visits, on-site interviews, the collection of source commentary, and deep media research in English, Arabic, and Farsi, our team identified that the counterparty had a one-person operating presence in Dubai, no clients in the GCC, and a very active sales affiliate in Tehran.

### Singapore-India-Iran Petroleum

PSA was engaged to conduct due diligence on the Singaporean affiliate of an Indian oil trading company when the client suspected that the petroleum products originated in Iran. Working to understand trade patterns, PSA noted that the subject and its affiliates regularly sourced petroleum from regional ports known for their role in "cleaning" illegally sourced Iranian oil. In response, the Singaporean company claimed it was acting under an Indian government-approved program that permitted certain Indian companies to source and sell Iranian oil. The subject provided documentation to support this claim. PSA then conducted high-level interviews with traders in Dubai, Singapore, and New Delhi. Inquiries confirmed that a legal process for Iranian oil import existed but was tightly controlled. PSA was subsequently provided with the complete list of approved participants, but neither the subject nor its affiliates were on it. Based on this, the client terminated cooperation without penalty.

Disclaimer: To safeguard our clients and their interests, important details regarding our previous experience have been changed to intentionally obscure the nature of the assignments and the Parties involved. Similarities to any real person(s), companies, or events is purely a coincidence. In the event that we state a Party is guilty, it is understood that the Party rejects this assertion, and has refuted this statement.

**In 2023, PSA completed reports in 151 jurisdictions on 6 continents.**

PSA supports a truly global portfolio of 250+ multinational clients to mitigate risk in every corner of the world.



● Countries with completed reports in 2023.



## Pacific Strategies & Assessments

Established in 2000, PSA is a specialist risk consultancy delivering critical information to our clients through our Due Diligence, Investigations, and Advisory services. We operate where our clients do business, with regional offices staffed by investigators and responders who have extensive in-region experience gained from professional

backgrounds in corporate investigations, government intelligence and law enforcement. With a disciplined focus on information collection, we have a 23-year track record of supporting businesses in conducting assessments of complex operating environments.



### Due Diligence

Our DD products are tailored to our clients' needs and based in deep understanding of best practices and regulatory guidelines. We scale from desktop research to on-the-ground investigations with multiple process-based due diligence options.



### Investigations

PSA has a proven record in supporting companies in complex, international investigations. Our investigative abilities can be scoped to accommodate a variety of engagements, including whistleblower response, fraud investigations, and asset tracing.



### Advisory

PSA provides strategic guidance to firms to address specific concerns. We tailor services to support clients on a variety of complex issues, including complex disputes, country-specific operational risks, emerging regulatory issues, and point-specific human risks.