

中華民國證券投資信託暨顧問商業同業公會 函

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受文者：

發文日期：中華民國109年7月17日

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速別：普通件

密等及解密條件或保密期限：

附件：如文

主旨：函轉金融監督管理委員會檢送美國財政部109年6月24日
新增與伊朗有關之制裁名單及相關資料一份，請 查照。

說明：依據金融監督管理委員會109年7月14日金管證券字第
1090349953號函辦理。

正本：本公會各投信會員公司、本公會各投顧會員公司

副本：

理事長 張 錫

檔 號：

保存年限：

金融監督管理委員會 函

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段7號18樓

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受文者：中華民國證券投資信託暨顧問商業同業公會（代表人
張錫先生）

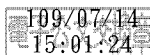
發文日期：中華民國109年7月14日

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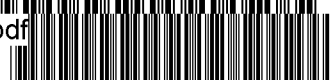
密等及解密條件或保密期限：

附件：如文(附件1 109UJ04737_1_14144734104.pdf)

主旨：檢送美國財政部109年6月24日新增與伊朗有關之制裁名
單及相關資料一份，請依說明辦理，請查照。說明：本案請轉知所屬會員，如發現疑似洗錢或資恐交易，請
向法務部調查局申報及注意該等交易之風險，併請副本
收文者配合辦理。正本：中華民國證券商業同業公會（代表人賀鳴珩先生）、中華民國期貨業商業同業
公會（代表人廩以雍先生）、中華民國證券投資信託暨顧問商業同業公會（代
表人張錫先生）、中華民國會計師公會全國聯合會（代表人黃奕睿先生）副本：臺灣證券交易所股份有限公司（代表人許璋瑤先生）、財團法人中華民國證券
櫃檯買賣中心（代表人陳永誠先生）、臺灣期貨交易所股份有限公司（代表人
吳自心先生）、臺灣集中保管結算所股份有限公司（代表人林修銘先生）、元
大證券金融股份有限公司（代表人黃廷賢先生）

中華民國證券投資信託暨顧問商業同業公會（代表

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Stopping the Flow of Iranian Gasoline to Venezuela:

- The Iranian regime uses its exports of refined petroleum products to fund terrorist groups, regional aggression, and military expansion. Accordingly, these Iranian exports are a major focus of our sanctions enforcement efforts.
- Troublingly, Iran began shipping refined petroleum products to Venezuela in support of the illegitimate Maduro regime in February 2020. According to reporting from Reuters, approximately 1.5 million barrels of Iranian gasoline were delivered to Venezuela on five Iranian tankers - the Fortune, Petunia, Forest, Faxon, and Clavel.
- The Fortune, Forest, and Faxon are identified on the List of Specially Designated Nationals and Blocked Persons (SDN List) as blocked property of the National Iranian Tanker Company (NITC), while the Petunia (formerly known as Hyundai Mipo 2657) and Clavel (formerly known as Hyundai Mipo 2655) are identified on the SDN List as blocked property of the Islamic Republic of Iran Shipping Lines (IRISL). Both IRISL and NITC are currently subject to sanctions under Executive Order (E.O.) 13599, among other authorities, and are included on the SDN List. As of June 8, 2020, IRISL has also been designated pursuant to E.O. 13382 (*WMD Proliferators and Their Supporters*).
- On June 24 the U.S. Department of the Treasury imposed sanctions pursuant to section 1(c) of E.O. 13599 on the captains of the vessels, Ali Danaei Kenarsari, Mohsen Gohardehi, Alireza Rahnavard, Reza Vaziri, and Hamidreza Yahyazadeh.
- Section 1(c) of E.O. 13599 blocks the property of individuals determined by the Secretary of the Treasury, in consultation with the Secretary of State, to be owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, any person whose property and interests in property are blocked pursuant to the order.
- Iranian support of Nicolas Maduro's illegitimate regime prolongs the suffering of the Venezuelan people under an incompetent authoritarian. Iranian gasoline cannot resolve Venezuela's deep economic crisis.
- The Iranian tankers arriving in Venezuela distract from the real problems facing Venezuela, and there is no reason to believe the regime will ensure fair and equitable distribution of these supplies beyond its more diehard supporters.
- These sanctions were imposed pursuant to E.O. 13599 and will add the ship captains to Treasury's SDN List. We will continue to impose consequences on the individuals who support the Iranian and Venezuelan regimes and their oppression.
- As a result, these captains' assets will be blocked. Mariners who are considering work with Iran and Venezuela should understand that aiding these oppressive regimes is simply not worth it. They should pursue an honest living instead of ferrying illicit cargoes.

Targeting the Iranian Metals Sector:

- The Iranian regime uses revenue from its metals industry to fund the Islamic Revolutionary Guard Corps and its malign activities.
- On June 24, the United States designated eight entities connected with Iran's metals industry and one entity that transferred a material to Iran that is critical to Iran's metal manufacturing plants.
- The United States designated Tara Steel Trading GMBH, Metil Steel, Pacific Steel FZE, Better Future General Trading Co. LLC, Tuka Metal Trading DMCC, South Aluminum

Company, Sirjan Jahan Steel Company, and Iran Central Iron Ore Company pursuant to section 1(a) of E.O. 13871, and added them to the SDN List.

- These entities were designated for their affiliation to Iranian entity Mobarakeh Steel Company, whose property and interests in property are currently blocked pursuant to E.O. 13871, and/or for operating in the iron, steel, and aluminum sectors of Iran.
- The United States also designated Global Industrial and Engineering Supply Ltd. pursuant to Section 1245 of the Iran Freedom and Counter-Proliferation Act.
- In 2019, Global Industrial and Engineering Supply Ltd., an entity with addresses in mainland China and Hong Kong, knowingly transferred 300 metric tons of graphite to IRISL, an Iranian entity on the SDN List, as a part of shipping this graphite to Iran. Graphite is a critical material for Iran's metals industry.
- We reiterate that any individual or entity doing business with IRISL, or conducting prohibited transfers of graphite to Iran, risks sanctions.
- We hope that you will advise commercial industry in your jurisdiction of section 1245 of the Iran Freedom and Counter-Proliferation Act and E.O. 13871 so that commercial stakeholders can avoid sanctions risks.
- As part of the maximum pressure campaign, the President signed E.O. 13871 on May 8, 2019 to further expand sanctions on the iron, steel, aluminum, and copper sectors of Iran.
- E.O. 13871 blocks the property and interests in property of any person determined by the Secretary of the Treasury, in consultation with the Secretary of State, to meet one of more of the criteria outlined in section 1(a):

- ~~To be operating in the iron, steel, aluminum, or copper sector of Iran, or to be a~~ person that owns, controls, or operates an entity that is part of the iron, steel, aluminum, or copper sector of Iran;
- To have knowingly engaged, on or after the date of this order, in a significant transaction for the sale, supply, or transfer to Iran of significant goods or services used in connection with the iron, steel, aluminum, or copper sectors of Iran;
- To have knowingly engaged, on or after the date of this order, in a significant transaction for the purchase, acquisition, sale, transport, or marketing of iron, iron products, aluminum, aluminum products, steel, steel products, copper, or copper products from Iran;
- To have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services in support of any person whose property and interests in property are blocked pursuant to this order; or
- To be owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, any person whose property and interests in property are blocked pursuant to this order.
- Section 1245 of the Iran Freedom and Counter-Proliferation Act of 2012 (IFCA) makes sanctionable any knowing sale, supply, or transfer of graphite, raw or semi-finished metals, coal, or software for integrating industrial processes to or from Iran if:
 - The material involved is to be used in connection with the energy, shipping, or shipbuilding sectors of Iran or any sector of the economy of Iran determined to be controlled directly or indirectly by the IRGC, such as Iran's construction sector; or,

- The material is sold, supplied, or transferred to or from an Iranian person (entity or individual) included on the SDN List, other than certain Iranian financial institutions.
- As our government has said publicly, the phrase “raw or semi-finished metals” in section 1245 of IFCA includes, but is not limited to, the following 74 metals (including all types of such metals and all alloys or compounds containing such metals): Aluminum, Americium, Antimony, Barium, Beryllium, Bismuth, Boron, Cadmium, Calcium, Cerium, Cesium, Chromium, Cobalt, Copper, Dysprosium, Erbium, Europium, Gallium, Gadolinium, Germanium, Gold, Hafnium, Hastelloy, Inconel, Indium, Iridium, Iron, Lanthanum, Lithium, Lead, Lutetium, Manganese, Magnesium, Mercury, Molybdenum, Monel, Neodymium, Neptunium, Nickel, Niobium, Osmium, Palladium, Platinum, Plutonium, Polonium, Potassium, Praseodymium, Promethium, Radium, Rhenium, Rhodium, Ruthenium, Samarium, Scandium, Silicon, Silver, Sodium, Steels, Strontium, Tantalum, Technetium, Tellurium, Terbium, Thallium, Thorium, Tin, Titanium, Tungsten, Uranium, Vanadium, Ytterbium, Yttrium, Zinc, and Zirconium.
- We ask your government to disseminate information about the designated entities to domestic commercial sector entities that may be involved in the maritime industry as well as the import, export, or production of metal products to avoid exposure to U.S. sanctions against Iran.

The following individuals have been designated by the U.S. Department of the Treasury pursuant to E.O. 13599 and added to OFAC's SDN List.

1. **Danaei Kenarsari, Ali**
Date of Birth: 19 May 1977
Place of Birth: Shemiran, Iran
Passport Number: K41818536
2. **Gohardehi, Mohsen**
Date of Birth: 14 Sep 1985
Place of Birth: Sary, Iran
Passport Number: E52807849
3. **Rahnavard, Alireza**
Date of Birth: 21 Mar 1980
Place of Birth: Shiraz, Iran
4. **Vaziri, Reza**
Date of Birth: 05 Mar 1967
5. **Yahya Zadeh, Hamidreza**
AKA: YAHYAZADEH, Hamidreza
AKA: YAHYAZADEH, Hamid Reza
Date of Birth: 12 Oct 1961
National ID: 4431472851
Address: Bandar Abbas, Iran

The following entities have been designated by the U.S. Department of the Treasury pursuant to E.O. 13871 and added to OFAC's SDN List:

1. **TARA STEEL TRADING GMBH**

Address: Grafenberger Allee 151, 40237 Duesseldorf, Germany

Address 2: Grafenberger Allee 151, Dusseldorf, Nordrhein-Westfalen, 40237, Germany

National ID: 40227B33411 (Germany)

V.A.T. Number⁴: DE812137575 (European)

Website: www.tarasteel.com

2. **METIL STEEL**

AKA: Metil Steel Company

Address: No. 69, Vahid Dastgerdi Street, Shariati Avenue, Tehran, Iran

Address 2: Tehran, Iran, 1911834713

Registration Number: 85760 (Iran)

Website: www.metilsteel.ir

3. **PACIFIC STEEL FZE**

Address: Office Number LB16610, P.O. Box 261027, Jebel Ali Free Zone, Dubai,

~~261027 United Arab Emirates~~

Address 2: Lb16, Jebel Ali, Dubai, UAE

Address 3: P.O. Box 261027, Dubai, UAE

Business License Number: 4736 (UAE)

Economic Registration Number: 11444102

Registration Number 2: 87726 (UAE Chamber of Commerce)

4. **BETTER FUTURE GENERAL TRADING CO (L.L.C.)**

Address: Al Masraf Tower (AKA Arbit Tower), Beniyas Road 51,

Rigga (AL), Dubai, UAE

Address: P.O. Box 4358, Dubai, UAE

Business License Number: 561490 (UAE)

National ID: 90960 (UAE Chamber of Commerce)

5. **TUKA METAL TRADING DMCC**

Address: One JLT Tower, Dubai, UAE

Business License Number: DMCC-30419 (UAE)

6. **SOUTH ALUMINUM COMPANY**

AKA: SALCO

Address: No. 35, 13th, Asadabadi Av., Tehran, Iran

Address 2: Lamerd Special Economic Zone for Energy Intensive

Industries, 8th km, Lamerd-khonj Road, Lamerd City, Fars Province, Iran

Website: <http://salcocompany.com>

7. **SIRJAN JAHAN STEEL COMPLEX**

AKA: SJSCO

AKA: Jahan Foolad Sirjan

AKA: Jahan Foolad Steel Company

AKA: Sirjan Jahan Foolad

Address: 6th Bokharest Alley Bokharest Ave., Tehran, Iran

Address 2: No. 2, Zhubin Alley, Shahidi Street, Haghani Highway, Vanak Square
Tehran, Iran

Address 3: Cross of Gol Gohar Mining and Industrial Co. Shiraz Road 50 Km, Sirjan,
Iran

Commercial Register Number: 3191 (Iran)

Website: www.sjsco.ir

8. IRAN CENTRAL IRON ORE COMPANY

Address: Bafq Old Rd, Yazd 8975136748, Islamic Republic of Iran

Address 2: Mohammad Deheshan Bafghi Boulevard, Yazd, 8975136748, Iran

Address 3: P.O. Box 111, Tehran, Iran

National ID: 49 (Iran)

Website: www.icioc.ir

The following entity has been designated by the U.S. Department of State pursuant to section 1245 of the Iran Freedom and Counterproliferation Act and added to OFAC's SDN List:

9. Global Industrial and Engineering Supply Ltd.

AKA: Global Industrial and Engineering Supply Limited AKA: GIES GROUP

Address: Unit 04, Bright Way Tower, No. 33, Mong Kok Road Kowloon, Hong Kong

Address 2: 603-3-3, Miyun Road, Nankai District, Tianjin, China

Address 3: Unit 902, 9/F, Technology Park, 18 On Lai Street, Shatin, N.T., HongKong

Website: giesgroup.com

Additional information about Iran sanctions can be found here:

https://www.treasury.gov/resource-center/faqs/Sanctions/Pages/faq_iran.aspx

U.S. Department of State Advisory on the Export of Metals Products to Iran can be found here:

<https://www.state.gov/state-department-advisory-on-the-export-of-metals-products-to-iran/>

The full SDN List is available here: <https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>

