



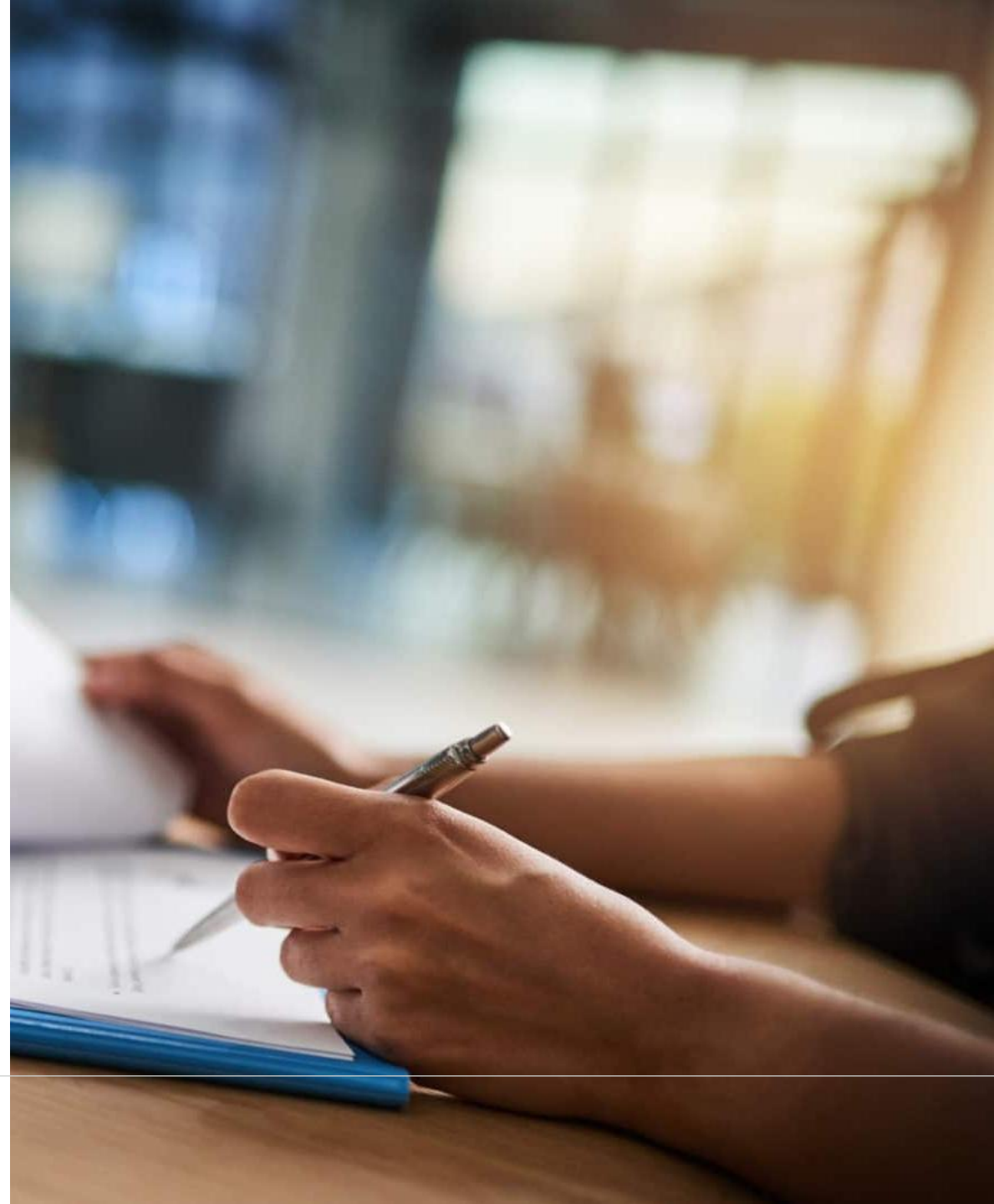
Federation of
Law Societies
of Canada

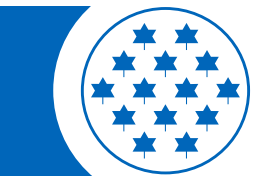
The role of legal professionals

Canada's Sanctions Regime

Federation of Law Societies of Canada

October 2025





CANADA'S SANCTIONS TOOLKIT

Multilateral Sanctions:

- [United Nations Act](#)

Autonomous Sanctions:

- [*Special Economic Measures Act*](#)
 - over 4,500+ listings
- [*The Justice for Victims of Corruption Foreign Officials Act*](#)
 - 80 listings



SANCTIONS PROFILE

UNA Sanctions

Al-Qaida
and Taliban
CAR
DRC

Lebanon
Somalia
Yemen

Haiti
Iran

Libya
North Korea

South Sudan
Sudan

SEMA Sanctions

Belarus
China
Guatemala
Moldova
Myanmar

Nicaragua
Russia
Sri Lanka
Syria
Venezuela

Zimbabwe
Hamas
Extremist
Israeli Settlers



Asset
freeze



Export and
Import
Restrictions



Financial
Prohibitions



Arms
Embargo



Technical
Assistance
Prohibitions

JVCFOA Sanctions

✓ 30
individuals
linked to the
murder of
Sergei
Magnitsky

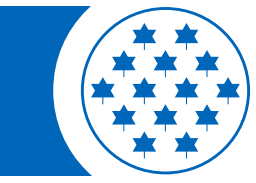


✓ Dozens of
others
from
Myanmar,
South
Sudan,
Venezuela
and
Lebanon

✓ 17
individuals
linked to
the murder
of Jamal
Khashoggi



Asset freeze



EXCEPTIONS, PERMITS AND CERTIFICATES

EXCEPTIONS include:

- ✓ Humanitarian Activities
- ✓ Fulfill prior contracts
- ✓ Diplomatic relations

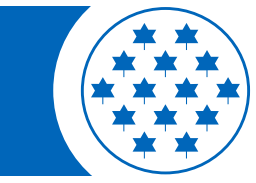
Minister of Foreign Affairs may issue:

✓ PERMIT

- ✓ to authorize specific activities otherwise prohibited by **SEMA** and **JVCFOA**

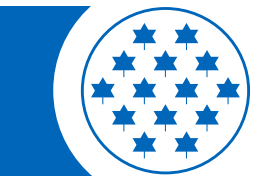
✓ CERTIFICATE

- ✓ To authorize specific activities otherwise prohibited by **UN Sanctions**



Why does sanctions compliance matter?

- Adhere with sanctions legislation
- Prevent money laundering by sanctioned individuals and entities
- Prevent illegal transactions
- Protect your reputation
- **Remain compliant with law society rules and professional conduct obligations**



Sanctions screening and due diligence

- ☐ **Subscribe** to the Global Affairs Canada Sanctions Bureau [distribution list](#)
- ☐ **Verify** if any client you plan to deal with is listed under any of the following sanctions lists:
 - [Consolidated Canadian Autonomous Sanctions List](#)
 - [Consolidated UN sanctions list](#)
- ☐ **Consult** the [sanctions legislation and associated regulations](#) implemented by Canada against the countries of individuals or entities you plan on dealing with
- ☐ **Document** your assessment process, decisions or legal advice.



Questions to consider...

- ☐ **Are there any indirect associations** between my client and sanctioned persons? For example, **any indirect dealings** with a sanctioned person through associates, family members, subsidiaries, parent/holding company, intermediary bank, etc?
- ☐ Does the activity involve the **import** or the **export** of prohibited goods?
- ☐ Does the activity involve the **provision** of prohibited services to a sanctioned individual or entity (even indirectly), and/or the **provision** of prohibited technical assistance or technical data?
- ☐ Am I in any way **facilitating** a sanctions contravention?



Enforcement

- Contravening sanctions is a **criminal** offence
- Sanctions must be respected by all persons in Canada or abroad
- **Penalties** for contravening sanctions:

SEMA and JVCFOA maximum penalties

- Summary conviction - \$25,000 fine / 1-year prison term
- Conviction on indictment – 5-year prison term

UNA maximum penalties

- Summary conviction - \$100,000 fine / 1-year prison term
- Conviction on indictment – 10-year prison term



MORE INFORMATION

Canadian sanctions: https://www.international.gc.ca/world-monde/international_relations-relations_internationales/sanctions/index.aspx?lang=eng

Current sanctions imposed by Canada – list of countries under Canadian sanctions:
https://www.international.gc.ca/world-monde/international_relations-relations_internationales/sanctions/current-actuelles.aspx?lang=eng

Consolidated Canadian autonomous sanctions list – full list of persons designated under the SEMA and JVCFOA: https://www.international.gc.ca/world-monde/international_relations-relations_internationales/sanctions/consolidated-consolide.aspx?lang=eng

Consolidated UN sanctions List - full list of persons designated under UN sanctions:
<https://www.un.org/securitycouncil/content/un-sc-consolidated-list>

Information on **Permits and Certificates:** https://www.international.gc.ca/world-monde/international_relations-relations_internationales/sanctions/certificates_permits-certificats_permis.aspx?lang=eng

Frequently asked questions - https://www.international.gc.ca/world-monde/international_relations-relations_internationales/sanctions/faq.aspx?lang=eng#a11

Contact Global Affairs Canada with any questions: sanctions@international.gc.ca