Sanctions and Restrictions Suspected Under Joint Plan of Action (JPOA)

- **Sanctions on:**
  - transactions with or in Iran’s energy sector, except for firms based in countries that “significantly reduce” purchases of Iranian oil (note: per JPOA, firms are only required to not increase purchases of Iranian oil);
  - exportation of Iranian petrochemicals;
  - dealings with the National Iranian Oil Co., National Iranian Tanker Co., and Naftiran Intertrade Co.;
  - provision of precious metals to Iran;
  - and provision of goods and services to Iran’s automobile industry.

- **Prohibitions on:**
  - foreign banks that process payments through Iran’s Central Bank from opening US accounts;
  - foreign banks that use or hold the rial from opening US accounts; and
  - US banks from maintaining a banking relationship with any foreign bank that conducts transactions with the Iranian Revolutionary Guard Corps (IRGC) or UN-sanctioned Iranian entities.

Sanctions and Restrictions To Be Suspended by “Implementation Day” and to Be Lifted by “Transition Day” Under Joint Comprehensive Plan of Action (JCPOA)

- **Sanctions on:**
  - transactions with or in Iran’s energy sector, except for firms based in countries that do not increase purchases of Iranian oil;
  - provision to Iran of goods, services, or insurance to Iran’s oil, gas, petrochemical, shipbuilding, and shipping sectors, of graphite, raw or semi-finished metals, semi-precious metals, precious stones or jewels, or US currency, and of software for integrating industrial processes;
  - investment in Iran’s energy sector, including in international oil pipelines and liquefied natural gas infrastructure;
  - and purchasing or facilitating the issuance of Iranian sovereign debt and government bonds.

- **Prohibitions on:**
  - importing goods to the US from sanctioned individuals;
  - payments or transfers of credit through any US financial institution by sanctioned entities;
  - and any firm that sells gasoline or other fuels to Iran, or helps Iran attain gasoline, from selling crude oil to the US Strategic Petroleum Reserve.

- **Blocks on US-based property of individuals that conduct transactions with sanctioned individuals.
- Reporting requirement on transactions with Iran through electronic payment systems (note: this contributed to Iran’s blockage from Europe’s SWIFT system).
- “Lock up” of Iranian oil revenue in local currency accounts (note: this forced Iran to trade oil for goods rather than dollars).
- Note: sanctions suspended under JPOA will also be lifted by “Transition Day.”

Sanctions and Restrictions NOT to be Suspended or Lifted

- **Sanctions on:**
  - foreign financial institutions that facilitate Iran’s support of foreign terrorist organizations;
  - individuals responsible for suppression of 2009 demonstrations, censorship, limiting freedom of assembly, or diverting food or medicine from the Iranian people;
  - foreign individuals and governments that provide Iran with goods, services, or technology related to weapons or missile proliferation;
  - and entities that provide technology to facilitate human rights abuses.

- **Prohibitions on:**
  - US firms from exporting to, importing from, or investing in Iran, and from knowingly exporting goods for incorporation into products destined for Iran (with an exception for non-US subsidiaries of US firms, and some exceptions for US firms dealing in food, medicine, carpets, and commercial aviation);
  - US banks from providing financial services to any sanctioned entity;
  - and US funding, foreign aid, Export-Import bank financing, and arms sales to the Iranian government, as well as assistance for commercial exports to Iran.

- **Blocks on US-based property of Iranian government and Iranian individuals sanctioned for human rights abuses.

CHEAT SHEET: TIMING OF US IRAN SANCTIONS RELIEF

Joint Plan of Action
Joint Comprehensive Plan of Action
UNSC Endorsement
Adoption Day
Implementation Day
Transition Day
Ongoing Sanctions

Sanctions and Restrictions Suspected Under Joint Plan of Action (JPOA)

Sanctions and Restrictions To Be Suspended by “Implementation Day” and to Be Lifted by “Transition Day” Under Joint Comprehensive Plan of Action (JCPOA)

Sanctions and Restrictions NOT to be Suspended or Lifted