

REGULATORY Global Sanctions Regulatory Landscape 2026

An authoritative review of sanctions programmes across all major jurisdictions — OFAC, EU, UK, UN, and emerging economies — with compliance implications for global organisations.

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1. Executive Summary

The global sanctions landscape in 2026 is characterised by unprecedented complexity, geographic breadth, and enforcement intensity. Sanctions are no longer the sole preserve of the United States — the European Union, United Kingdom, and a growing coalition of allied nations are deploying autonomous sanctions programmes in coordinated responses to geopolitical events, human rights violations, and state-sponsored malign activity.

For compliance professionals and the organisations they serve, this evolution demands a fundamental reassessment of sanctions risk management. The traditional approach of screening against a handful of key lists is no longer sufficient. Effective compliance now requires comprehensive multi-jurisdictional screening, deep understanding of secondary sanctions exposure, and the operational agility to respond to list changes that may occur with hours of notice.

40+	150,000+	12,000+	\$4.2B
Active national sanctions programmes	Total sanctioned entities globally	New designations in 2025	OFAC penalties issued since 2020

2. United States: OFAC and the SDN List

The Office of Foreign Assets Control (OFAC) administers the most extensive and rigorously enforced sanctions regime globally. OFAC

operates under both emergency powers (International Emergency Economic Powers Act, IEEPA) and statutory authority to implement UN Security Council resolutions. Its programmes encompass both country-based comprehensive embargoes and individual or entity-specific designations.

2.1 The Specially Designated Nationals (SDN) List

The SDN List is the primary U.S. sanctions list, containing thousands of named individuals, entities, vessels, and aircraft designated across multiple OFAC programmes. U.S. persons — and any entity processing U.S. dollar transactions globally — are generally prohibited from any transaction with SDN-listed parties. The 50% rule extends SDN restrictions to entities owned 50% or more in aggregate by SDN-listed parties, even if the entity itself is not separately designated.

2.2 Country and Territory Programmes

U.S. comprehensive embargoes currently target Cuba, Iran, North Korea, Syria, and specific regions of Ukraine (Crimea, Donetsk, Luhansk). Transactions with these jurisdictions are broadly prohibited absent a specific OFAC licence. The Consolidated Sanctions List also includes country-level restrictions under numerous country-specific executive orders.

3. European Union: Council Sanctions and CFSP

The European Union imposes sanctions through Council Regulations adopted under the Common Foreign and Security Policy (CFSP) framework. These regulations are directly applicable in all 27 EU member

states without national implementing legislation. EU sanctions are enforced by national competent authorities, with coordination provided by the European External Action Service (EEAS).

Following Russia's invasion of Ukraine in February 2022, the EU has adopted an unprecedented series of successive sanctions packages against Russia and Belarus, representing the most significant expansion of EU sanctions in the programme's history. As of 2026, these measures include asset freezes and travel bans on over 2,000 individuals and entities, sectoral restrictions on Russian energy, finance, and defence industries, and import/export controls spanning hundreds of product categories.

4. United Kingdom: Post-Brexit Autonomous Sanctions

Following the UK's departure from the EU, the UK established its own autonomous sanctions regime under the Sanctions and Anti-Money Laundering Act 2018 (SAMLA). The Office of Financial Sanctions Implementation (OFSI) within HM Treasury administers financial sanctions, while the Foreign, Commonwealth & Development Office (FCDO) leads foreign policy-driven designations.

UK sanctions frequently mirror EU and U.S. measures but are not identical. Following Brexit, divergence has grown as the UK exercises independent foreign policy judgement. In practice, this means global compliance programmes must screen against the UK list as a separate data source rather than assuming that EU or U.S. coverage is sufficient for UK regulatory purposes.

5. United Nations Security Council Sanctions

UN Security Council sanctions represent the global floor of sanctions compliance — measures adopted under Chapter VII of the UN Charter are binding on all 193 member states. Active UN sanctions regimes target: Al-Qaida and ISIL/Da'esh; the Taliban; the Democratic Republic of the Congo; Côte d'Ivoire; Guinea-Bissau; Iraq; Lebanon; Libya; North Korea; Somalia; South Sudan; Sudan; the Central African Republic; Yemen; and Mali.

6. Russia-Related Sanctions

Russia-related sanctions have become the single most complex and rapidly evolving compliance challenge facing global financial institutions. The coordinated response by the U.S., EU, UK, Canada, Australia, Japan, and numerous other allied nations following the February 2022 invasion of Ukraine has resulted in the broadest and deepest multi-jurisdictional sanctions regime ever deployed against a major economy.

Key compliance challenges in the Russia sanctions context include: the rapid pace of list updates (dozens of new designations per week at peak); the extensive use of corporate structures and intermediaries to obscure beneficial ownership; the scope of sectoral and trade controls affecting virtually every major Russian industry; and the significant secondary sanctions risk for non-U.S. entities that continue to engage with designated Russian parties.

10. Compliance Implications for Global Organisations

Organisations with global operations or customer bases must maintain a multi-jurisdictional sanctions screening capability that covers all relevant programmes. A minimum baseline for most financial institutions includes: OFAC SDN and all active country programmes; EU Consolidated Financial Sanctions List; UK HM Treasury Asset Freeze; UN Security Council Consolidated List; and applicable domestic national lists.

Ongoing monitoring of list changes is essential. Across all major sanctions programmes, significant list updates occur multiple times per week. Organisations that screen only at onboarding without ongoing monitoring risk unknowingly maintaining relationships with newly designated parties — a violation that is treated no less seriously by regulators than screening failures at onboarding.

PrimeGuardia aggregates 40+ sanctions lists from all major global authorities, updated within 15 minutes of any official publication. Our coverage includes OFAC, EU, HM Treasury, UN, DFAT, SECO, and more — accessible through a single unified API.