

ENFORCEMENT INFORMATION FOR JUNE 19, 2015

Information concerning the civil penalties process can be found in the OFAC regulations governing each sanctions program; the Reporting, Procedures, and Penalties Regulations, 31 C.F.R. part 501; and the Economic Sanctions Enforcement Guidelines, 31 C.F.R. part 501, app. A. These references as well as recent final civil penalties and enforcement information can be found on OFAC's Web site at www.treasury.gov/ofac/enforcement.

ENTITIES – 31 CFR 501.805(d)(1)(i)

John Bean Technologies Corporation (“JBT”) Settles Potential Civil Liability for Alleged Violations of Executive Order 13382 and/or the Weapons of Mass Destruction Proliferators Sanctions Regulations. JBT, of Chicago, Illinois, has agreed to pay \$391,950 to settle potential civil liability for alleged violations of Executive Order 13382 of June 28, 2005, “Blocking Property of Weapons of Mass Destruction Proliferators and Their Supporters” (E.O. 13382) and the Weapons of Mass Destruction Proliferators Sanctions Regulations, 31 C.F.R. part 544 (the “Regulations”).

Specifically, 1) from on or about April 8 to April 17, 2009, JBT appears to have violated E.O. 13382 and § 544.201(a) of the Regulations when goods that JBT sold to a Chinese company were shipped by Islamic Republic of Iran Shipping Lines (IRISL) aboard a blocked vessel from Spain to China, and trade documents related to the shipment were presented to a U.S. bank for payment pursuant to a letter of credit (“L/C”) in the amount of \$2,897,936; 2) from on or about May 8 to May 19, 2009, JBT appears to have violated E.O. 13382 and § 544.201(a) of the Regulations when it presented trade documents related to the IRISL shipment to Banco Santander, a Spanish bank, in the amount of \$2,897,936, in order to receive payment for the goods sold to CSA, after the U.S. bank declined to advise the L/C and the trade documents had been returned to JBT pursuant to an OFAC license; and 3) from on or about May 21 to July 9, 2009, JBT appears to have violated E.O. 13382 and § 544.201(a) of the Regulations when JBT reimbursed JBT AeroTech Spain for charges paid to its freight forwarder for the shipping services rendered by IRISL, and to Banco Santander for fees associated with negotiating the L/C in the amount of \$164,470.24 for those payments via inter-company transfer (collectively, the “Apparent Violations”).

OFAC determined that JBT did not voluntarily self-disclose the Apparent Violations, and that the Apparent Violations constitute a non-egregious case. The base penalty amount for the Apparent Violations was \$670,000.

The settlement amount reflects OFAC's consideration of the following facts and circumstances, pursuant to the General Factors under OFAC's Economic Sanctions Enforcement Guidelines, 31 C.F.R. part 501, app. A. OFAC considered the following to be aggravating factors: (1) With respect to counts 2 and 3, JBT management knew of the conduct resulting in the Apparent Violations; (2) economic benefit was conferred to a blocked entity, resulting in harm to the sanctions program objectives of the Regulations; and (3) JBT is a sophisticated entity that

conducts business throughout the world. OFAC considered the following to be mitigating factors: (1) JBT has not been the subject of a Penalty Notice or a Finding of Violation from OFAC in the five years preceding the transactions constituting the Apparent Violations; (2) JBT implemented some remedial measures to prevent a recurrence of the Apparent Violations, including employee training, enhancements to its compliance program, and enhanced party screening; and (3) JBT cooperated with OFAC's investigation, including, among other cooperation, by agreeing to toll the statute of limitations for 514 days.

For more information regarding OFAC regulations, please go to: www.treasury.gov/ofac.