



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C.

November 22, 2022

**OFAC Guidance on Implementation of the Price Cap Policy
for Crude Oil of Russian Federation Origin**

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I. OVERVIEW OF THE DETERMINATION AND THE PRICE CAP

The United States is part of an international coalition, including the G7, the European Union, and Australia, that have agreed to prohibit the import of crude oil and petroleum products of Russian Federation origin (the “Price Cap Coalition”). These countries, home to many best-in-class financial and professional services, have also agreed to implement a policy with regard to a broad range of services as they relate to the maritime transport of crude oil and petroleum products of Russian Federation origin. This policy is known as the “price cap policy.” This document provides guidance on the implementation of the price cap policy for crude oil of Russian Federation origin (or “Russian oil”). OFAC anticipates publishing preliminary guidance on implementation of the price cap policy for petroleum products of Russian Federation origin in the near future.

The price cap policy is intended to maintain a reliable supply of oil to the global market while reducing the revenues the Russian Federation earns from oil after its own war of choice in Ukraine inflated global energy prices.

To implement the price cap policy for Russian oil, OFAC issued a [determination](#) pursuant to Executive Order (E.O.) [14071](#) (“Prohibitions on Certain Services as They Relate to the Maritime Transport of Crude Oil of Russian Federation Origin”) (the “determination”). The effect of the determination is to authorize U.S. persons to provide certain services as they relate to the maritime transport of Russian oil (the “covered services”), as long as that Russian oil is purchased at or below a certain price (the “price cap”). The covered services are:

- Trading/commodities brokering;
- Financing;
- Shipping;
- Insurance, including reinsurance and protection and indemnity;
- Flagging; and
- Customs brokering.

In short, the determination authorizes U.S. persons to provide covered services if the Russian oil is purchased at or below the price cap. As explained further in this document, OFAC has established a safe harbor process, so that U.S. service providers can provide covered services without concern that they will be penalized for inadvertently violating U.S. law or regulation. U.S. service providers that comply in good faith with this safe harbor process, as set forth in this document, will not face OFAC penalties.

For crude oil of Russian Federation origin, the determination takes effect at 12:01 a.m. eastern standard time on December 5, 2022.

As stated in the determination and further explained in Frequently Asked Question (FAQ) [1094](#), crude oil of Russian Federation origin that is loaded onto a vessel at the port of loading prior to 12:01 a.m. eastern standard time, December 5, 2022, and unloaded at the port of destination prior to 12:01 a.m. eastern standard time, January 19, 2023, is not subject to the determination. Consequently, U.S. service providers can continue to provide covered services with respect to crude oil of Russian Federation origin purchased at any price, provided that the crude oil is loaded onto a vessel at the port of loading for maritime transport prior to 12:01 a.m. eastern standard time, December 5, 2022, and unloaded at the port of destination prior to 12:01 a.m. eastern standard time, January 19, 2023.

The determination does not authorize the import of Russian oil into the United States, which is prohibited pursuant to E.O. 14066.

II. KEY COMPONENTS AND DEFINITIONS

The price cap

The price cap for Russian oil will be set after a technical exercise conducted by the Price Cap Coalition.

Shipping, freight, customs, and insurance costs are not included in the price cap and must be invoiced separately and at commercially reasonable rates. While shipping and insurance are covered services, these costs are distinct from the price cap on Russian oil. Please see below for guidance on when the price cap “starts” and “stops.” OFAC would view the billing of commercially unreasonable shipping, freight, customs, or insurance costs as a sign of potential evasion of the price cap.

The following is an example of a permissible transaction:

A U.S. trading company purchases Russian oil at or below the price cap from a Russian Federation company. The trading company arranges for maritime transport of that Russian oil to a refiner in a jurisdiction that has not prohibited the importation of Russian oil. The trading company prepares and maintains documentation showing that the Russian oil was purchased at or below the price cap and which lists separate and commercially reasonable shipping, freight, customs, and insurance costs. The refiner pays the trading company a total price not to exceed the price cap price plus the shipping, freight, customs, and insurance costs. To be afforded the “safe harbor,” the U.S. trading company retains the records related to this transaction for a period of five years.

When a new price cap for Russian oil is set, the Secretary of the Treasury, in consultation with the Secretary of State, will issue a new determination pursuant to E.O. 14071, to replace the previous determination, and publish it in the *Federal Register*. If the price cap changes, OFAC intends to authorize a period for covered services providers to complete the provision of services engaged for the maritime transport of Russian oil purchased in accordance with the previous price cap.

When does the price cap “start” and “stop”?

The price cap applies from the embarkment of maritime transport of Russian oil (e.g., when the crude oil is sold by a Russian entity for maritime transport) through the first landed sale in a jurisdiction other than the Russian Federation (through customs clearance).

This means that once the Russian oil has cleared customs in a jurisdiction other than the Russian Federation, the price cap does not apply to any further onshore sale.

If, however, after clearing customs, the Russian oil is taken back out on the water (i.e., using maritime transport) without being substantially transformed outside of the Russian Federation, the price cap still applies. This means any covered services, as listed in the determination, can only be provided by U.S. service providers if such Russian oil is sold at or below the relevant price cap.

However, once crude oil is substantially transformed (e.g., it is refined or undergoes other substantial transformation such that the product loses its identity and is transformed into a new product having a new name, character, and use) in a jurisdiction other than the Russian Federation, it is no longer considered to be of Russian Federation origin, and thus the price cap no longer applies (even if the refined oil is further exported using maritime transport). Thus, a refiner in a jurisdiction that has not banned the import of Russian oil can purchase crude oil at or below the price cap and rely on U.S. service providers for

services related to the maritime transport of that crude oil. In addition, such a refiner can subsequently refine the crude oil and then export the refined oil via marine transport, including with the use of U.S. service providers, without that refined oil being subject to the price cap.

OFAC does not consider blending of crude oil alone to be substantial transformation for the purpose of the determination.

OFAC would not consider crude oil to be of Russian Federation origin solely because it contains a *de minimis* amount of crude oil left over from a container or tank (e.g., a “tank heel,” or unpumpable quantity of substance that cannot be removed from the container without causing damage to the container).

For purposes of assessing whether crude oil is of Russian Federation origin, U.S. persons may reasonably rely upon a certificate of origin but should exercise caution if they have reason to believe such certificate has been falsified or is otherwise erroneous. Crude oil that transits through a pipeline in the Russian Federation that is loaded and certified with a certificate of origin verifying that the crude is of non-Russian Federation origin (e.g., Kazakh origin oil transported through the Caspian Pipeline Consortium or the Atyrau-Samara pipelines) would not be considered of Russian Federation origin and thus would not be subject to the determination.

Covered articles

For the purposes of the determination, “crude oil” means articles defined at Harmonized Tariff Schedule of the United States (“HTSUS”) subheading 2709.00.

Covered services

For the purposes of the determination, OFAC defines covered services according to the following descriptions as each relates to the maritime transport of crude oil of Russian Federation origin:

- **Trading/commodities brokering:** Buying, selling, or trading commodities and/or brokering the sale, purchase, or trade of commodities on behalf of other buyers or sellers.
- **Financing:** A commitment for the provision or disbursement of any debt, equity, funds, or economic resources, including grants, loans, guarantees, suretyships, bonds, letters of credit, supplier credits, buyer credits, and import or export advances. For the purposes of the determination, the term “financing” does *not* include the processing or clearing of payments by intermediary banks. *Please see below for more details.*
- **Shipping:** Owning or operating a ship for the purpose of carrying or delivering cargo and/or freight transportation; chartering or sub-chartering ships to deliver cargo or transport freight; brokering between shipowners and charterers; and serving as a shipping/vessel agent.
- **Insurance:** The provision of insurance, reinsurance, or protection and indemnity (“P&I”) services; satisfying claims related to underwriting insurance policies that protect policyholders against losses that may occur as a result of property damage or liability; assuming all or part of the risk associated with existing insurance policies originally underwritten by other insurance carriers, including the reinsurance of a non-U.S. insurance carrier by a U.S. person; and liability

insurance for maritime liability risks associated with the operation of a vessel, including cargo, hull, vessel, P&I, and charterer's liability.

- **Flagging:** Registering or maintaining the registration of a vessel with a country's national registry of vessels. This definition does not include the deflagging of vessels transporting Russian oil sold above the price cap.
- **Customs brokering:** Assisting importers and exporters in meeting requirements governing imports and exports. This definition does not include legal services or assisting importers and exporters in meeting the requirements of U.S. sanctions.

The following services are not covered by the determination:

- Medical evacuation or other emergency services for crew members.
- Health, travel, or liability insurance for crew members.
- Classification, inspection, bunkering, and pilotage.

If a service provider is unsure whether its services are covered by the determination, that service provider should contact the OFAC Compliance Hotline at 1-800-540-6322 or email OFAC_Feedback@treasury.gov.

Processing, clearing, or sending of payments by intermediary banks

The processing, clearing, or sending of payments by banks is not included in the definition of "financing" for the purposes of the determination where the bank (1) is operating solely as an intermediary and (2) does not have any direct relationship with the person providing services related to the maritime transport of the Russian oil (i.e., the person is a non-account party) as it relates to the transaction. Thus, the determination does not impose any new prohibitions or requirements related to the processing, clearing, or sending of payments by intermediary banks.

Similarly, services with respect to foreign exchange transactions and the clearing of commodities futures contracts are outside the scope of "financing."

In addition, Russia-related General License (GL) [8D](#) authorizes certain transactions related to energy involving certain designated Russian financial institutions, including the Central Bank of the Russian Federation.

III. SAFE HARBOR

Overview of safe harbor

This guidance establishes a safe harbor from OFAC enforcement for U.S. service providers that comply in good faith with a recordkeeping and attestation process. This recordkeeping and attestation process allows each party in the supply chain of Russian oil shipped via maritime transport to demonstrate or confirm that the Russian oil has been purchased at or below the price cap. U.S. persons providing covered services must ensure that refiners or other purchasers in third countries that have not prohibited the import of Russian oil provide documentation showing that the Russian oil was purchased at or below the relevant price cap.

Service providers are generally divided into three “tiers” of actors. To be afforded the safe harbor, actors must comply with the following:

- **Tier 1 Actors:** Actors who regularly have direct access to price information in the ordinary course of business, such as commodities brokers and oil traders, are “Tier 1 Actors.” To be afforded the safe harbor, Tier 1 Actors must retain documents showing that Russian oil was purchased at or below the relevant price cap. Such documentation may include invoices, contracts, or receipts/proof of payment.
- **Tier 2 Actors:** Actors who are sometimes able to request and receive price information from their customers in the ordinary course of business, such as financial institutions, ship/vessel agents, and customs brokers, are “Tier 2 Actors.” To be afforded the safe harbor, Tier 2 Actors must, to the extent practicable, request and retain documents that show that Russian oil was purchased at or below the relevant price cap. When not practicable to request and receive such information, Tier 2 Actors must obtain and retain customer attestations, in which the customer commits that for the service being provided, the Russian oil was purchased or will be purchased at or below the relevant price cap.
- **Tier 3 Actors:** Actors who do not regularly have direct access to price information in the ordinary course of business, such as insurers, P&I clubs, shipowners, and flagging registries, are “Tier 3 Actors.” To be afforded the safe harbor, Tier 3 Actors must obtain and retain customer attestations, in which the customer commits that for the service being provided, the Russian oil was purchased or will be purchased at or below the relevant price cap, for example as part of their annual insurance policy renewal process or updates to their insurance policies. This can be done through a sanctions exclusion clause written into or already included in policies or contracts.

This “safe harbor” for service providers through the recordkeeping and attestation process is designed to shield such service providers from strict liability for breach of sanctions in cases where service providers inadvertently deal in the purchase of Russian oil sold above the relevant price cap owing to falsified or erroneous records provided by those who act in bad faith or make material misrepresentations. For example, where a service provider without direct access to price information reasonably relies on a customer attestation, and retains the attestation, that service provider will not be held liable for sanctions violations attributable to those acting in bad faith who cause a violation of the determination or an evasion of OFAC sanctions.

To be afforded the safe harbor, U.S. service providers must retain relevant records for five years, in accordance with 31 CFR § 501.601.

U.S. persons providing covered services are required to reject participating in an evasive transaction or a transaction that violates the determination, and report such a transaction to OFAC, in accordance with 31 CFR § 501.604.

For all persons providing covered services, a customer’s or counterparty’s refusal or reluctance to provide the necessary documentation or attestation should be considered a red flag that may indicate the entity has purchased Russian oil above the relevant price cap.

Due diligence

As part of the safe harbor, OFAC expects that U.S. service providers will continue to implement and perform the standard due diligence practices that are customary for their industry and for their role in a particular transaction.

Specific guidance per tier

Tier 1:

- **Traders and commodities brokers:** To be afforded the safe harbor, traders and commodities brokers must maintain and retain information showing that Russian oil for maritime transport was purchased at or below the relevant price cap. This could take the form of invoices, contracts, receipts/proof of payment, or other documentation that shows price information.

Tier 2:

- **Financial institutions:** To be afforded the safe harbor, U.S. financial institutions providing financing related to the maritime transport of Russian oil must request and retain price information (to the extent practicable) or a signed attestation from their customers (when direct receipt of price information is not practicable).
 - *Transaction-Specific Financing:* Financial institutions providing transaction-specific trade finance related to the maritime transport of Russian oil should implement appropriate and reasonable risk-based policies and procedures within sanctions compliance programs to confirm that the price does not exceed the relevant price cap. Financial institutions providing trade finance routinely collect trade documentation to manage financial and compliance risks. Such information may contain trade or transaction information showing the origin of articles, date, and unit price. If obtaining such documentation is not practicable in the ordinary course of business, financial institutions must obtain and retain signed attestations from their downstream customers or subcontractors that the Russian oil was purchased at or below the relevant price cap to be afforded the safe harbor.
 - *General Financing:* Financial institutions providing customers with non-transaction specific financing related to the maritime transport of Russian oil should also implement appropriate and reasonable, risk-based policies and procedures within sanctions compliance programs to confirm that the price does not exceed the relevant price cap. Financial institutions must obtain and retain signed attestations from their downstream customers or subcontractors that for the service being provided, the Russian oil was or will be purchased at or below the relevant price cap to be afforded the safe harbor.
- **Ship/vessel agents:** To be afforded the safe harbor, ship/vessel agents must request and retain price information (to the extent practicable) or a signed attestation from their customers (when direct receipt of price information is not practicable). If, in the ordinary course of business, a ship/vessel agent has access to or can request price information, then the ship/vessel agent must request and retain that information to be afforded the safe harbor. If obtaining such information is not practicable in the ordinary course of business, ship/vessel agents must obtain and retain signed attestations in which the customer commits that for the service being provided, the Russian oil was or will be purchased at or below the relevant price cap to be afforded the safe harbor.

- For example, a ship/vessel agent representing the interests of a shipowner (who is a Tier 3 actor) may not in the ordinary course of business have access to or be able to request price information, and thus must obtain and retain an attestation to be afforded the safe harbor.
- **Customs brokers:** To be afforded the safe harbor, customs brokers must request and retain price information (to the extent practicable) or an attestation from their customers (when direct receipt of price information is not practicable). If, in the ordinary course of business, a customs broker has access to or can request price information, then the customs broker must request and retain that information to be afforded the safe harbor. If obtaining such information is not practicable in the ordinary course of business, customs brokers must obtain and retain signed attestations in which the customer commits that for the service being provided, the Russian oil was or will be purchased at or below the relevant price cap to be afforded the safe harbor.

Tier 3:

- **Shipowners/carriers:** Shipowners or other carriers who perform the transportation of cargo (who do not in the ordinary course of business have information regarding the pricing of the underlying cargo) must obtain and retain an attestation from their customer/contractual counterparty regarding compliance with the price cap to be afforded the safe harbor.
- **Insurers/reinsurers/P&I clubs:** Insurers, reinsurers, and P&I clubs can be afforded the safe harbor through the use of sanctions exclusion clauses in policies or contracts, including pre-existing sanctions exclusion clauses. Alternatively, or in addition to sanctions exclusion clauses, these actors can be afforded the safe harbor through the use of clauses that exclude coverage for activities related to the maritime transport of Russian oil purchased above the price cap. These actors can also use signed attestations, should they so choose.
 - Although these actors may wish to update their policies to include price-cap-specific clauses, this is not required to be afforded the safe harbor. A standard sanctions exclusion clause is sufficient to be afforded the safe harbor, per the guidance in FAQ [102](#).
 - An insurer, reinsurer, or P&I club may in the ordinary course of business, such as a claims investigation, request additional information from customers, including additional attestations or price information. A party's refusal to provide such information should be considered a red flag for potential sanctions evasion.
- **Flagging registries:** Flagging registries can be afforded the safe harbor through the use of contractual terms with or signed attestations from their customers. For example, flagging registries can require by contract, regulation, or other enforceable means that their customers will be de-flagged if they violate the determination.

Table of safe harbor documentation

Category	Actors	Requirement to be afforded safe harbor	Examples of information or documentation	Recommendations for risk-based measures for compliance
Tier 1 — Actors with direct access to price information	Commodities brokers/traders	Retain price information and provide information/attestation to Tier 2 or Tier 3, as needed	Invoices, contracts, receipts/proof of payment	Updating terms and conditions of contracts, updating invoice structure to include itemized price for oil purchase (excluding shipping, freight, customs, and insurance costs), providing guidance to staff
Tier 2 — Actors sometimes able to request price information	Financial institutions providing trade finance, customs brokers, ship/vessel agents	Request and retain price information (to the extent practicable) or attestation from Tier 1 or customer/counterparty (when direct receipt of price information is not practicable)	Invoices, contracts, receipts/proof of payment; price cap attestation	Providing guidance to trade finance department/relationship managers/compliance staff, updating requests for information (RFIs) or sanctions questionnaire templates
Tier 3 — Actors without direct access to price information	Insurers, reinsurers, P&I clubs, ship owners /carriers, flagging registries	Receive attestation from Tier 1 or Tier 2 or customer/counterparty regarding compliance with the price cap	Sanctions exclusion clause within policy, clause within policy that excludes coverage for activities related to the maritime transport of Russian oil purchased above the price cap, price cap attestation	Updating policies and terms and conditions, providing guidance to staff

Sample attestation

Service providers are not required to use a particular form of attestation to be afforded the safe harbor. For certain service providers, such as insurers, the safe harbor can also be afforded through the use of a sanctions exclusion clause within an annual policy, or a clause excluding coverage for activities related to the maritime transport of Russian oil purchased above the price cap.

As an example, an attestation could include some variation on the following language, signed by an authorized representative of the customer/counterparty:

[Party to the contract/service] confirms that for [the service being provided], [party to the contract/service] is in compliance with the Russian price cap framework and any other restrictions on oil of Russian Federation origin applicable to [party to the contract/service].

[Party to the contract/service] attests that:

[Party to the contract/service] has received and retained price information demonstrating that the oil of Russian Federation origin is/was purchased at or below the cap; or

Where not practicable to request and receive such information, [party to the contract/service] has obtained a signed attestation that the oil of Russian Federation origin is/was purchased at or below the cap; or

[Party to the contract/service] has received a signed attestation that the purchase of oil is/was done pursuant to a license or a derogation.

[Signature of the Customer]

IV. COMPLIANCE

The recordkeeping and attestation process described above is intended to create a “safe harbor” from strict liability for violations of the determination in cases where service providers, owing to falsified or erroneous records provided by illicit actors or other deceptive tactics, inadvertently violate the determination by providing covered services for Russian oil purchased above the relevant price cap.

OFAC would not pursue a penalty against a U.S. service provider that reasonably relies on the documentation or attestations described above, unless the U.S. provider knew or had reason to know that such documentation was falsified or erroneous or that the Russian oil was purchased above the relevant price cap. For example, where a U.S. service provider without direct access to price information reasonably relies in good faith on a customer attestation, that service provider will not be penalized for potential sanctions breaches attributable to the conduct of an actor who causes that U.S. person to unknowingly violate the determination.

To be afforded the safe harbor, U.S. service providers must retain relevant records for five years, in accordance with 31 CFR § 501.601.

Any person who evades, avoids, causes a violation of, or attempts to violate the determination is likewise in violation of the prohibition and could be subject to civil or criminal enforcement action. For example, persons that make purchases of Russian oil above the price cap and that knowingly rely on U.S. service providers who provide covered services, or persons that knowingly provide false information, documentation, or attestations to such a service provider will have potentially violated the determination and may be a target for an OFAC enforcement action. Other such examples could include using side

deals to obfuscate the “real” purchase price paid by an intermediary or the ultimate consignee, or otherwise engaging in deceptive activity to deal in Russian oil purchased above the relevant price cap.

OFAC has broad authority to take action against actors that evade the price cap. As this guidance makes clear, good-faith actors, including shipowners and other service providers, can use attestations to be afforded the safe harbor, so that they will not face penalties if someone causes them to inadvertently violate the determination. Safe harbor from enforcement against violations of the determination will be afforded to shipowners and service providers that act in good faith. OFAC intends to focus its enforcement responses on those actors who willfully violate or evade the price cap.

V. LICENSING

General Licenses

Sakhalin 2

[GL 55](#) authorizes, through 12:01 a.m. eastern daylight time September 30, 2023, all transactions prohibited by the determination related to the maritime transport of crude oil originating from the Sakhalin-2 project (“Sakhalin-2 byproduct”), provided that the Sakhalin-2 byproduct is solely for importation into Japan.

EU derogations

[GL 56](#) authorizes certain transactions related to the importation of Russian oil into the Republic of Bulgaria, the Republic of Croatia, or landlocked European Union member states as described in Council Regulation (EU) 2022/879 of June 3, 2022.

Specifically, Council Regulation (EU) 2022/879 contains three derogations:

- As of 5 December 2022 until 31 December 2024 for Bulgaria, to execute contracts concluded before 4 June 2022, or of ancillary contracts necessary for the execution of such contracts, for the purchase, import or transfer of seaborne crude oil (CN 2709 00) and of petroleum products (CN 2710) originating in Russia or exported from Russia.
- As of 5 February 2023 until 31 December 2023 for Croatia, to purchase, import or transfer of vacuum gas oil falling under CN 2710 19 71 originating in Russia or exported from Russia, if no alternative supply of vacuum gas oil is available and Croatia has notified the European Commission, which has not objected.
- As of 5 December 2022 for a landlocked EU Member State, if the supply of crude oil by pipeline from Russia is interrupted for reasons outside the control of that EU Member State, for seaborne crude oil from Russia falling under CN 2709 00 to be imported into that EU Member State, until the supply is resumed or until the Council of the EU decides to terminate this exemption with regard to that EU Member State, whichever is the earliest.

U.S. persons engaging in transactions described in these derogations in Council Regulation (EU) 2022/879 do not need to seek a separate OFAC license, as GL 56 authorizes such activity.

As with all OFAC GLs, GL 56 only authorizes against authorities administered by OFAC. GL 56 only authorizes activity otherwise prohibited by section 1(a)(ii) of E.O. 14071. GL 56 does not relieve those relying on the general license of any requirements of any other Federal law or regulation, or laws or regulations of other jurisdictions. Persons seeking further guidance about the scope of the derogations of

Council Regulation (EU) 2022/879 listed above, or whether those derogations are in effect, should consult with EU or relevant Member State authorities.

Emergency services for vessels

[GL 57](#) authorizes all transactions prohibited by the determination that are ordinarily incident and necessary to address vessel emergencies related to the health or safety of the crew or environmental protection, including safe docking or anchoring, emergency repairs, or salvage operations.

This GL only authorizes the offloading of Russian oil if that offloading is ordinarily incident and necessary to address vessel emergencies as described in GL 57. It does not authorize any transactions related to the sale of Russian oil in violation of the determination.

Specific licensing

In the event that a U.S. person becomes aware that they are providing a covered service related to Russian oil that was purchased above the relevant price cap, the U.S. person must stop providing the covered service and contact OFAC. Persons subject to other jurisdictions that have imposed prohibitions on services related to the maritime transport of Russian oil should seek appropriate guidance and/or authorization in those jurisdictions.

In certain cases, U.S. persons who comply with the attestation process may subsequently discover that someone has caused them to inadvertently provide covered services for Russian oil purchased above the relevant price cap. U.S. persons that seek to continue to provide covered services prohibited by the determination should contact OFAC and request a specific license to continue providing covered services. To apply for a specific license, please go to OFAC's [License Application Page](#). Specific license requests will be considered on a case-by-case basis.

If you have additional questions, we encourage you to contact the OFAC Compliance Hotline at 1-800-540-6322 or email OFAC_Feedback@treasury.gov.