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Taking the Pulse of Major Sanctions Lists

A look back on 2025 with predictions for 2026

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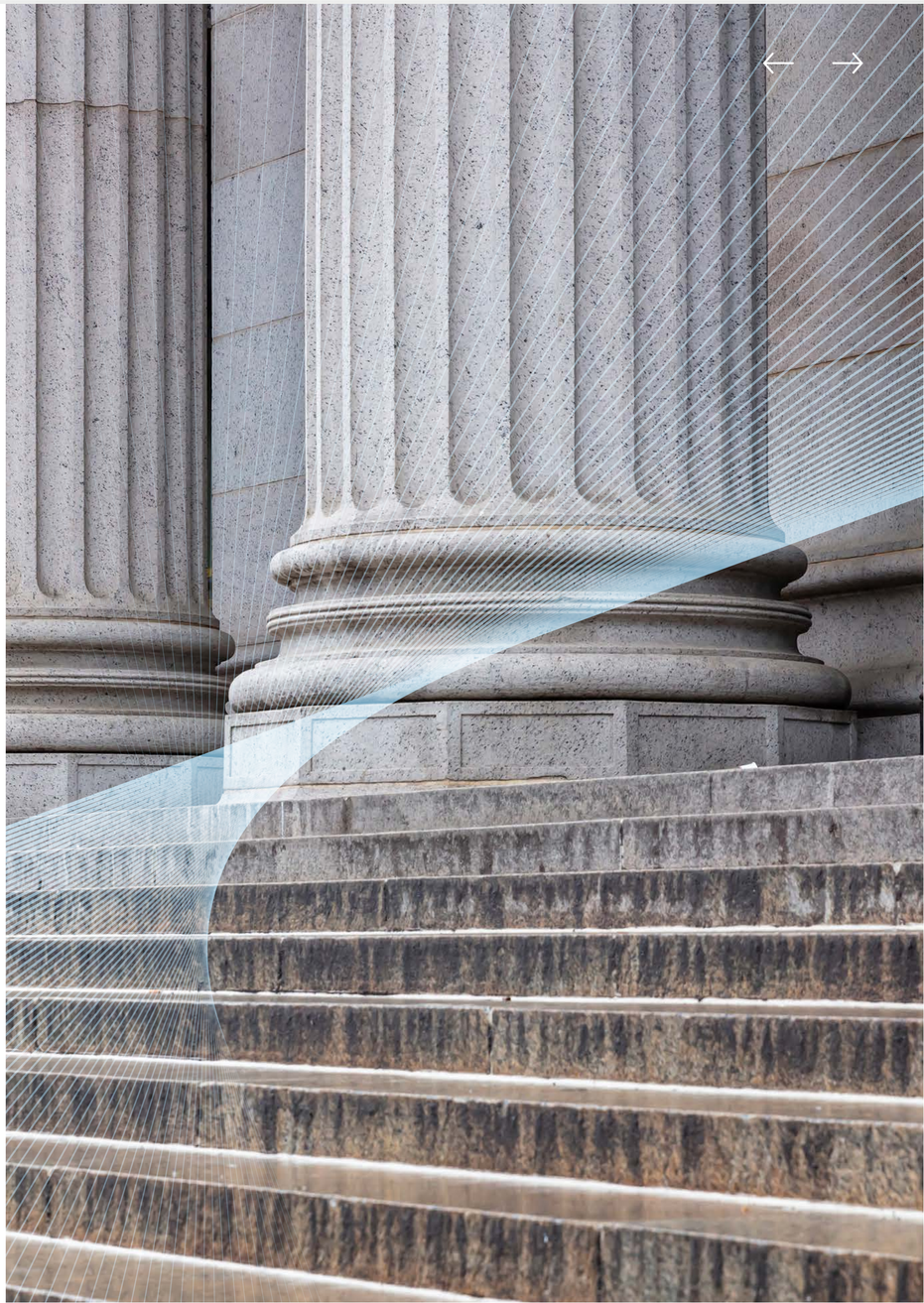
Introduction

This edition of the Sanctions Pulse from LexisNexis® Risk Solutions outlines the scale, pace and trends in global sanctions activity throughout 2025, exploring data from four core regulators: **the United Nations (UN), European Union (EU), Office of Foreign Assets Control (OFAC) and United Kingdom (UK).**

The findings can help global organizations inform effective sanctions compliance responses in a challenging geopolitical landscape.

Global sanctions trends in 2025 illustrate signs of emerging fragmentation and policy divergence across the core regulatory bodies. OFAC remains the largest sanctions issuer, yet sanctions activity shows significant acceleration in the EU and UK, adding 46% and 175% more targets respectively year-over-year (YOY).

The pace of sanctions change remained high, with 265 list updates and 3,858 net additions across the four lists in 2025. The majority of global sanctions policy continues to concentrate on Syria, Iran and Russia, albeit with varying degrees of focus.



*Please note this analysis was developed before the significant escalation in the Middle East as of 28 February 2026

How we measure sanctions activity for this report

Global sanctions activity: In this report, sanctions activity means targeted restrictions by the UN, EU, OFAC and UK. They may include asset freezes, specified financial or trade restrictions as well as targeted prohibition on services.

For the purposes of this report, sanctions activity is accounted for to the extent that measures are imposed on listed targets: individuals, entities or organizations, vessels or aircraft. Restricted goods or territorial sanctions (e.g. embargoes) are not in scope.

Date range: The data reflects UN, EU, OFAC and UK sanctions activity between January 1, 2025 to December 31, 2025.

Number of updates: We define number of updates by measuring any change to published sanctions lists from these regulatory bodies. Every published change is counted as an update including single profile amendments as well as the addition of multiple new targets.

Net designations added: This reflects the total number of new designations added by a regulatory body minus the number of designations removed during the date range of the report. This is calculated across each regulatory body's total number of published sanctions lists.

An overview of sanctions activity

Number of updates
(UN, EU, OFAC, UK)

2025 **265**
(down 4%)

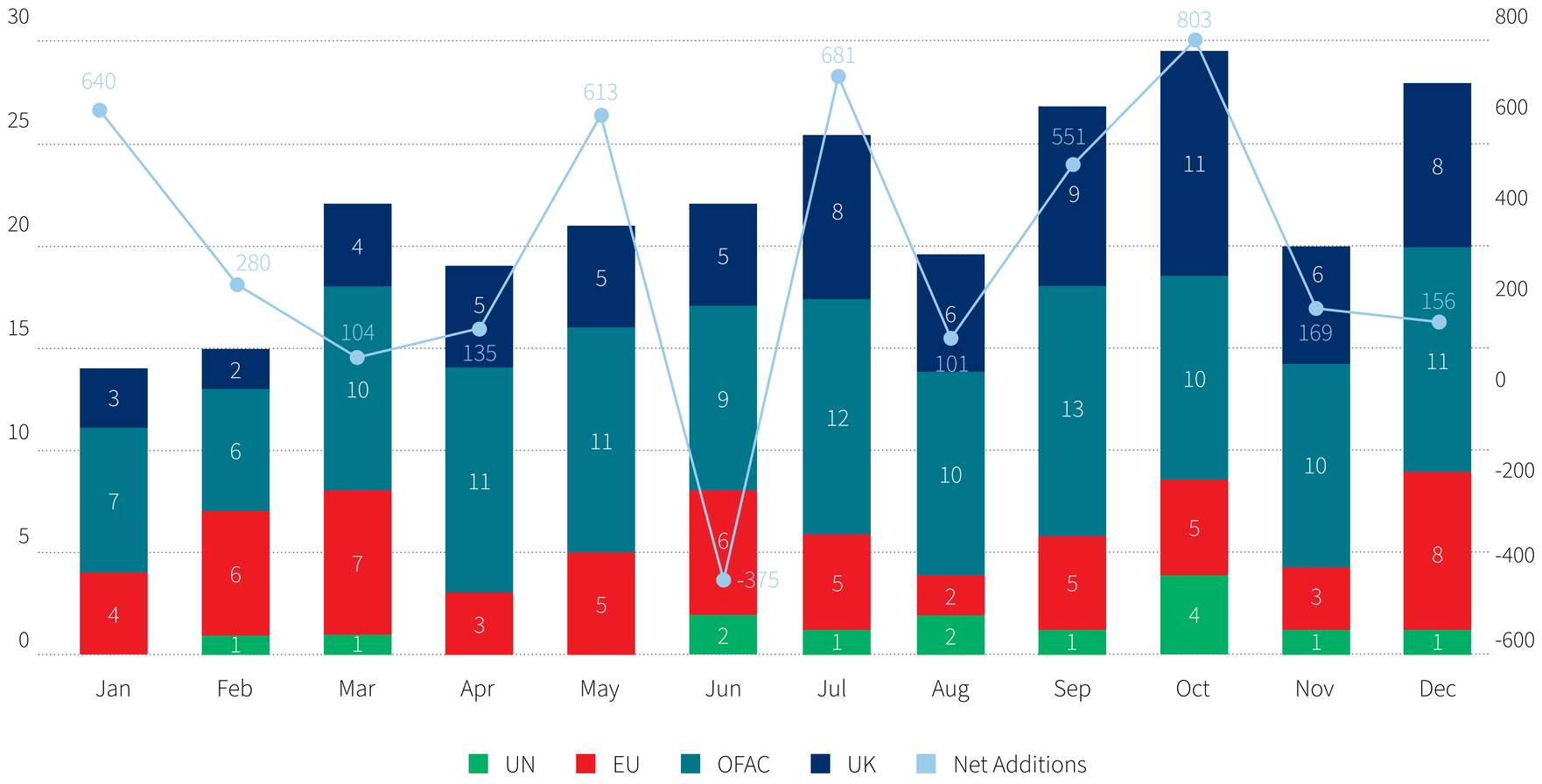
2024 **274**

Net designations added

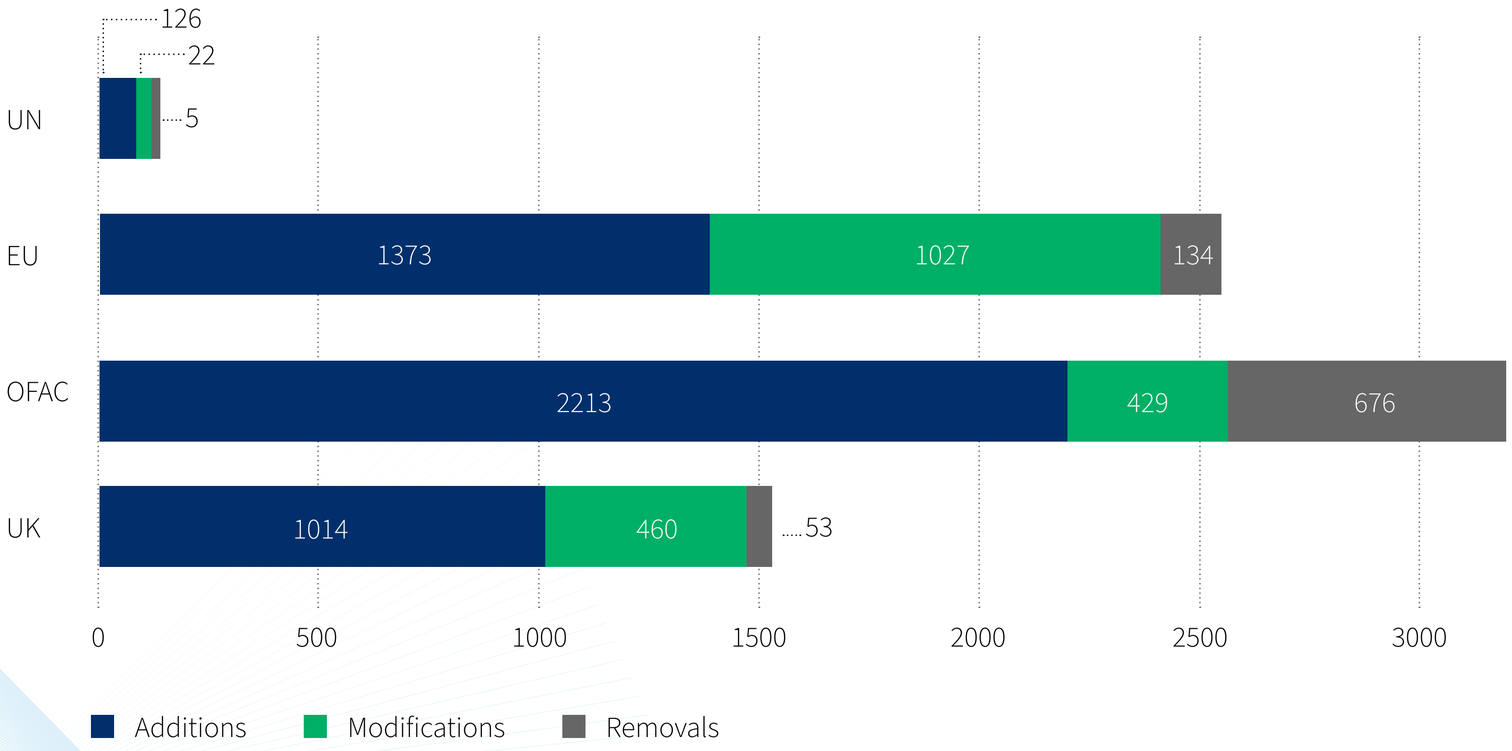
2025 **3,858**
(down 11%)

2024 **4,315**

Number of list updates per agency 2025



Overall global changes 2025



OFAC remains the largest sanctions issuer in 2025, despite significant growth in EU and UK sanctions

- In 2025, OFAC contributed 40% of all net designations (32% for the EU and 25% for UK).
- OFAC sanctions accelerated in H2 with 67% of yearly designations.
- 2025 additions were significantly larger for the EU and UK, adding 46% and 175% respectively more targets than in 2024.

2025 highlights – a year of contrast

Sustained sanctions activity, despite shifting policies

Despite a slight reduction from 2024, the pace of sanctions remains high:

- 265 list updates.
- -4% in the number of list updates vs. 2024.

The number of sanctions targets grew significantly, albeit slightly less than in 2024:

- 3,858 net additions across the four lists (4,724 added; 868 removed).
- -11% in net reductions vs. 2024.

Diverging YOY dynamics among regulators:

- While OFAC remained the largest sanctions issuer in 2025, its activity decreased sharply compared to last year (-50% in net additions YOY).
- The UN remained largely quiet in 2025, but the snapback of Iran sanctions resulted in a significant spike of activity in September (~13x more net designations YOY).
- The EU and UK intensified their sanctions activity significantly, with a strong focus on disrupting Russia's shadow fleet (EU +46% ; UK +175% in net designations YOY).

2025 highlights – a year of contrast

Sanctions on Russia remained front of mind for the EU and UK

- 41% of EU/UK list updates were related to Russian sanctions.
- 88% of net additions to the EU list; 66% net additions to the UK list.

OFAC and UN amplified pressure on Iran

- 121 individuals and entities were added back into the UN list, the most significant UN action in years.
- 48% of OFAC net additions were under Iran-related sanctions.

A year of major shifts in policies:

- The regime change in Syria prompted a major pivot in sanctions policy, with lasting measures retained in relation to the former regime and regional terrorist threats.
- The internal situation in Iran, continued nuclear developments and destabilizing activities in the region posed growing concern, resulting in expanding sanctions pressure applied internationally on Tehran.
- Western allies took diverging stances towards Russia, resulting in fragmented sanctions developments in relation to the ongoing war in Ukraine.

A closer look by agency: **UN**

With 14 updates in 2025, sanctions changes from the UN remained infrequent relative to other lists.

The snapback of UN sanctions on Iran had an overwhelming impact on net changes. The situation in Haiti continued to raise concerns. On the other hand, we recorded a net decrease in designations under Terrorism and Iraq sanctions.

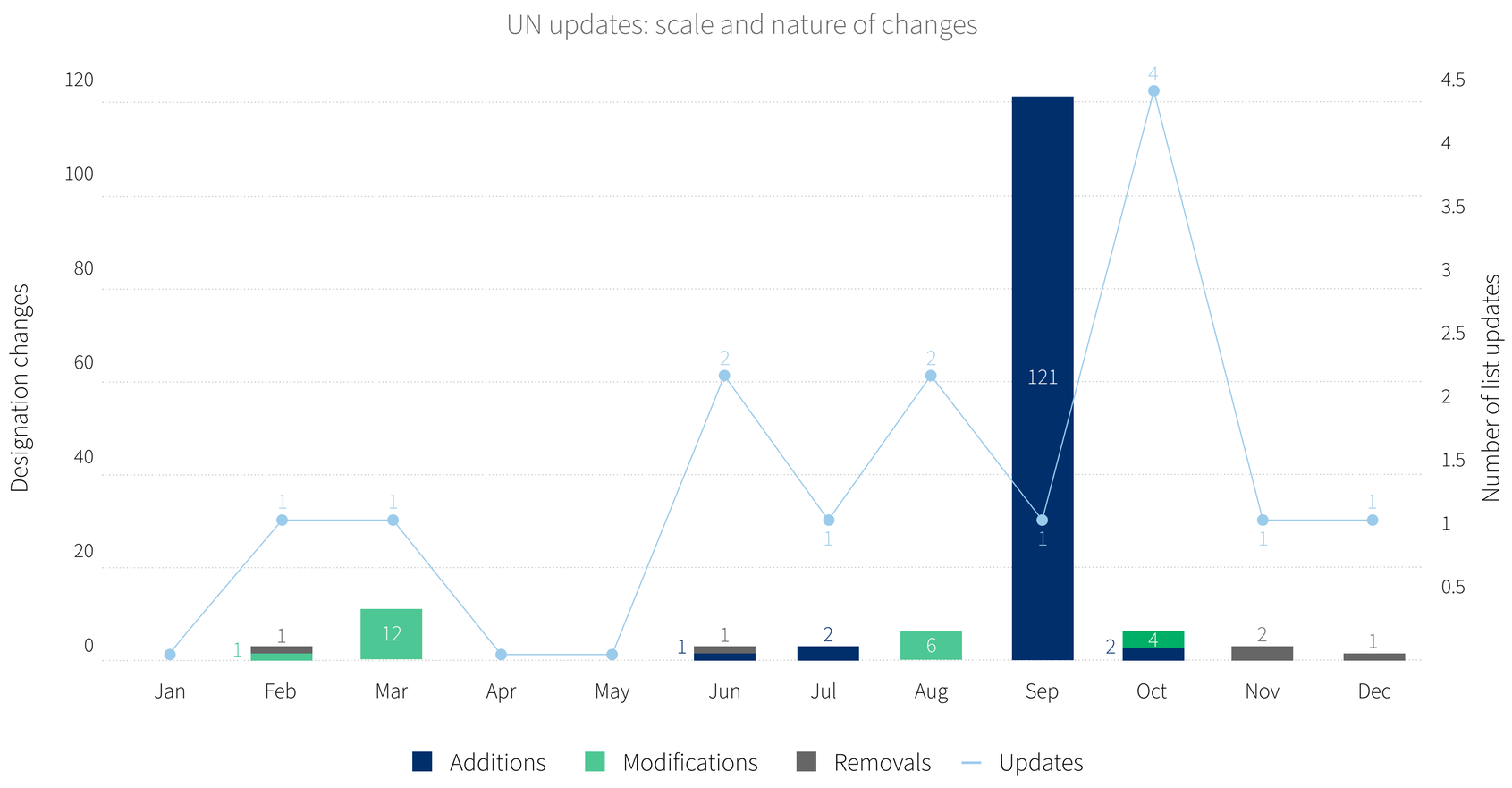
Activity:
153
designations added, modified or removed

through
14
updates

UN

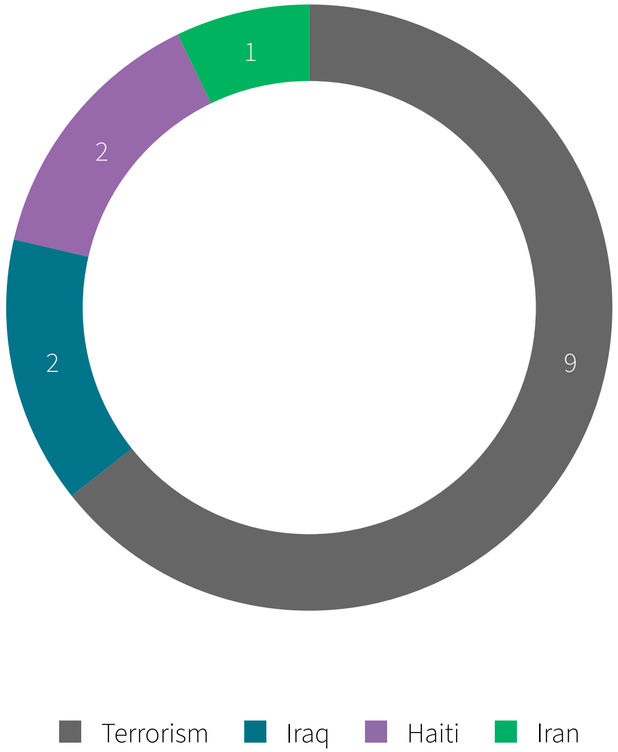
Resulting in
+ 121
net change of designations

A closer look by agency: **UN**

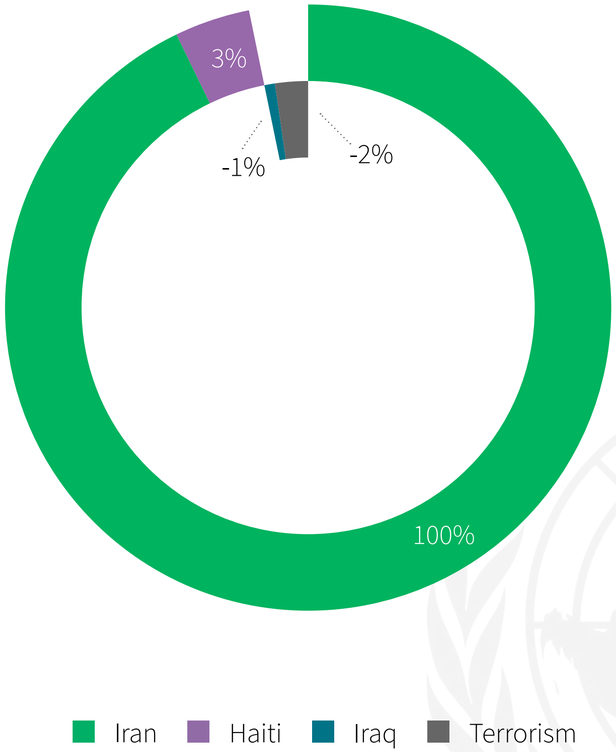


A closer look by agency: **UN**

Breakdown by number of updates



Share of net additions by designation



Key sanctions activity: **UN**

In 2025, updates to UN sanctions were applied under just four programs:

- Suspension of UN sanctions against Iran's nuclear program was terminated on September 29, resulting in the reimposition of targeted financial sanctions against 43 individuals and 78 entities involved in Iran's nuclear proliferation activities.
- Haiti sanctions were extended, with Resolution 2794 (2025) adding two individuals. The Haiti Sanctions Committee also designated two violent gangs involved in severe, repeated human rights violations in Haiti as documented in the Panel of Expert reports.

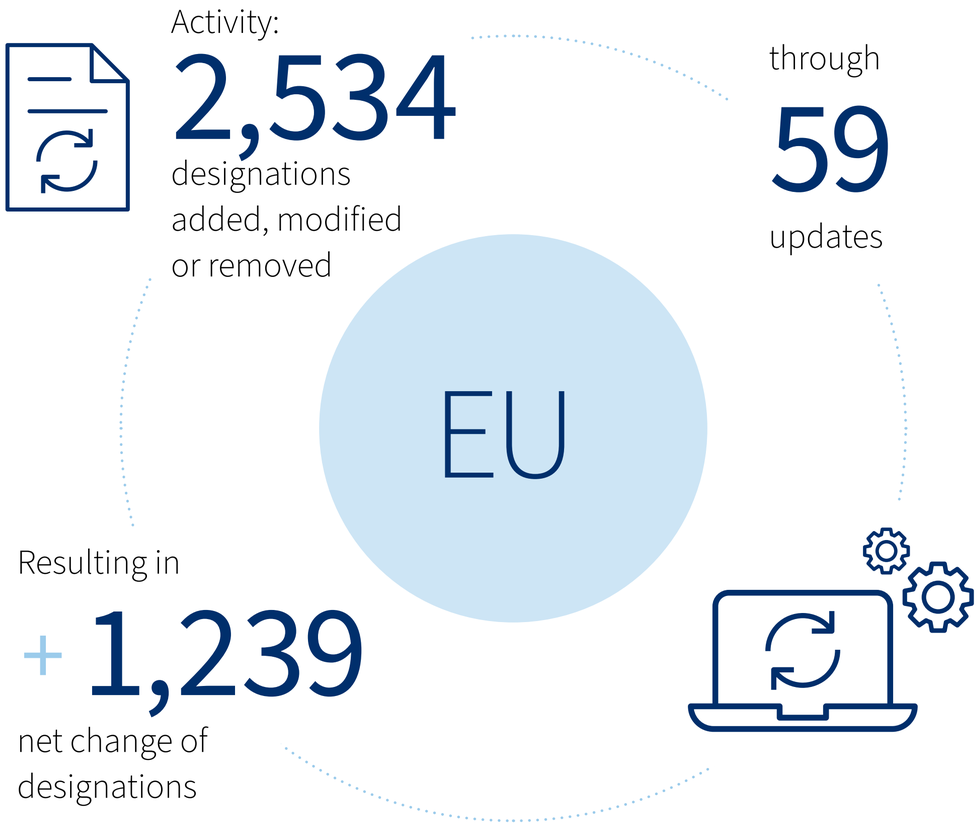
Further UN sanctions activity was overwhelmingly driven by updates under the ISIL (Da'esh) and Al Qaeda sanctions program:

- One (1) Ugandan national was listed for supporting ISIL's activities in East and Southern Africa.
- 21 persons and entities were modified.
- Four (4) records were removed, including Syria's Transitional President and Minister of Interior on November 6.

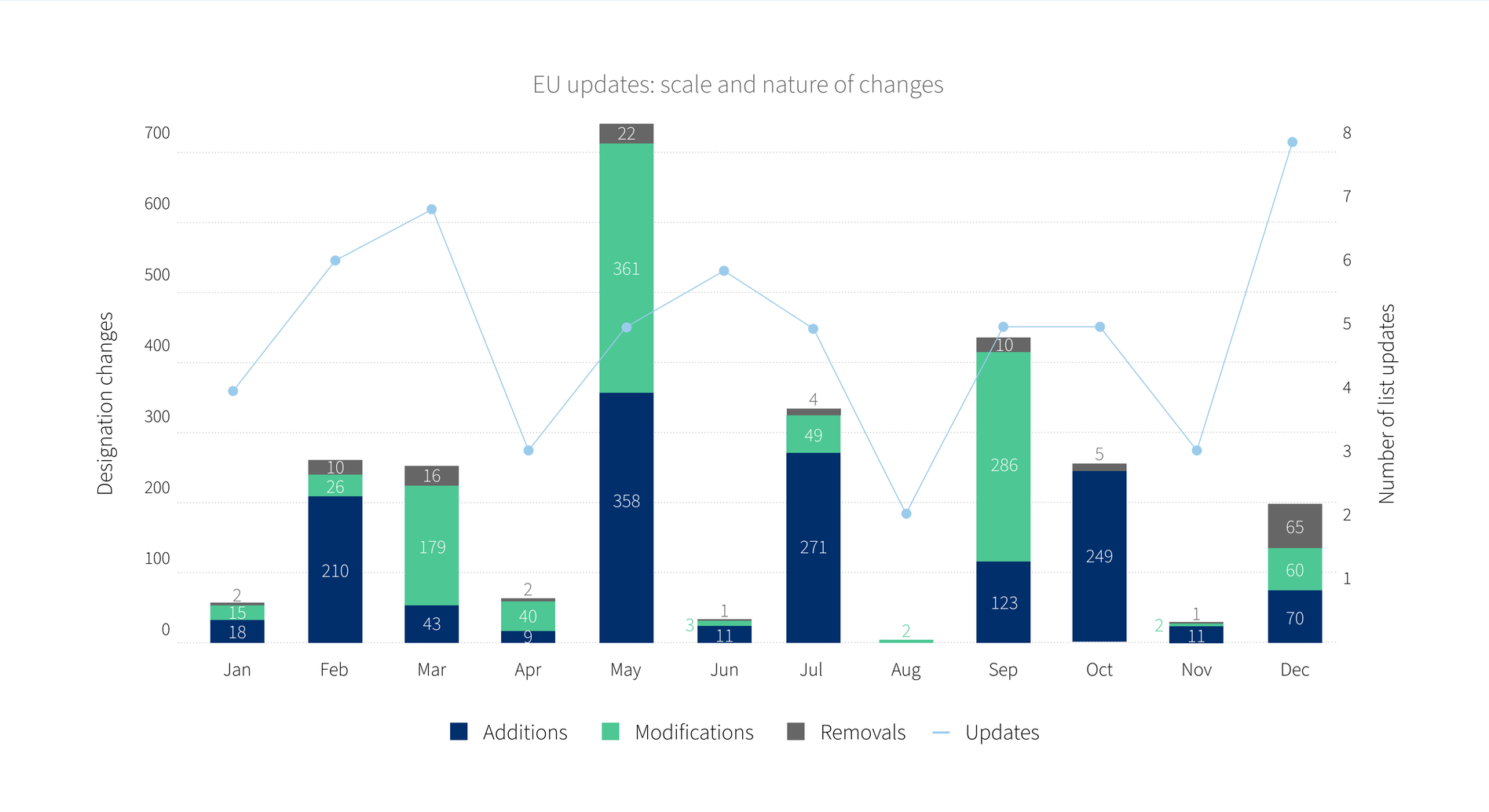
A closer look by agency: **EU**

The European Union maintained high sanctions activity in 2025, adding 46% more targets than in 2024.

Russia-related sanctions remained the overwhelming driver, through the implementation of four additional sanctions packages. EU sanctions activity also related to a range of countries facing instability and human rights issues, particularly in Africa and Latin America. 2025 was marked with significant sanctions shifts, with the easing of many of the long-lasting sanctions imposed on Syria and the re-imposition of sanctions on Iran's nuclear program.

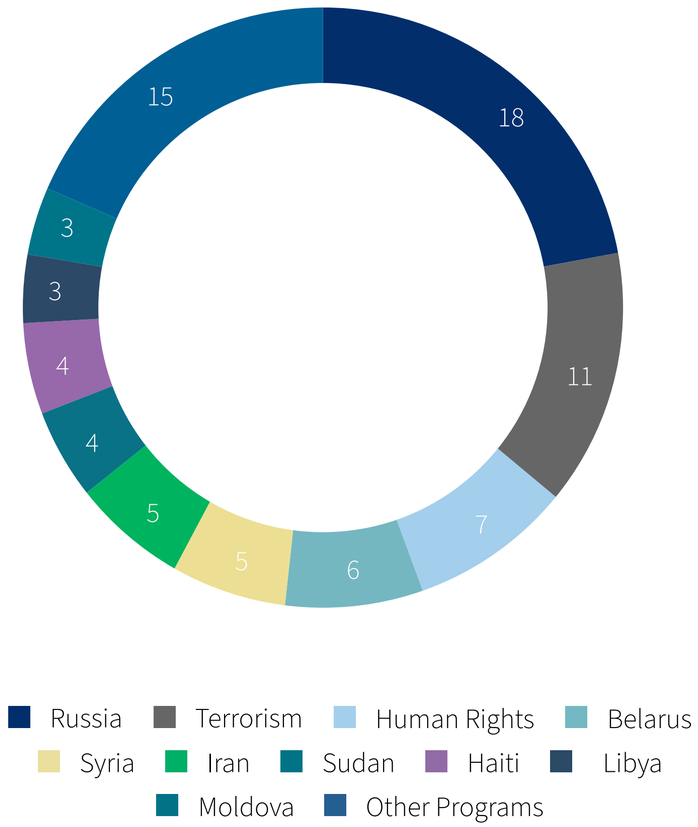


A closer look by agency: **EU**

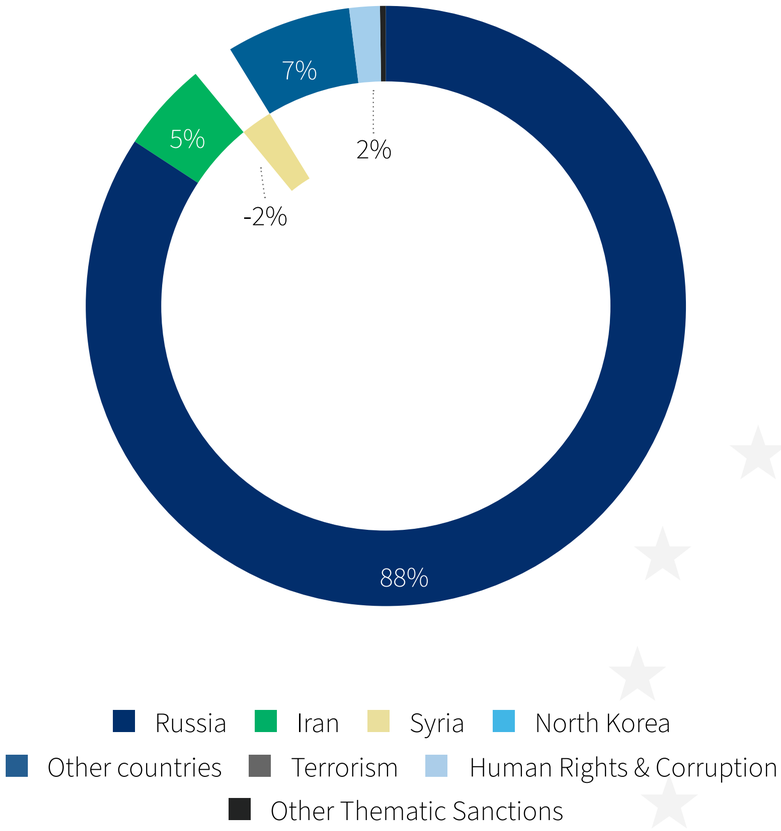


A closer look by agency: **EU**

Breakdown by number of updates



Share of net additions by designation



Key sanctions activity: **EU**

Sanctions activity relating to the Russia/ Ukraine conflict

The EU implemented four sanctions packages against Russia in 2025:

- Extending targeted export restrictions, with an increased focus on entities operating from third countries.
- Adding hundreds (519) of Russian shadow fleet vessels subject to a ban on maritime services.
- Intensifying efforts to isolate the Russian financial sector and their facilitators, both by extending measures and by designating more financial institutions.

Weight of Russian sanctions in overall EU sanctions activity:

- 30% of list updates (18).
- 88% of net designations (1,096).

Other key sanctions developments

Country sanctions:

- Iran: Five (5) list updates, adding 63 net designations. These actions related to Iran's military support to Russia, to the human rights abuses and internal repression perpetrated by the regime and in relation to Iran's nuclear proliferation activities.
- Belarus: Six (6) list updates, adding 49 net designations. Belarus continues to be a key supporter of Russia's full-scale invasion of Ukraine, and the EU has continued to extend several measures applied against Russia to its Belarusian neighbor.

- African countries drove substantial sanctions activity from the EU in 2025: 15 sanctions updates affecting eight (8) African countries:
  - Democratic Republic of the Congo: 10 persons and entities associated to the M23 armed group, amid sustained instability and insecurity in the region.
  - Sudan: Five (5) persons and entities were designated for their involvement in the dramatic escalation of violence in Darfur and in severe human rights violations throughout the country.
  - Further activity included updates to EU sanctions applied in relation to the situation in: Burundi, Guinea-Bissau, Libya, Mali and Zimbabwe.

Key sanctions activity: **EU**

Central & Latin America: Eight (8) sanctions updates affecting four (4) countries:

- Venezuela: Two (2) updates adding 15 individuals for obstructing the electoral process and restoration of democracy.
- Haiti: Four (4) updates adding 11 persons, in a context of escalating gang violence undermining the peace stability and security of Haiti. The EU supplemented UN measures with autonomous designations.
- Guatemala & Nicaragua: The internal situation and human rights abuses in both countries continued to cause concerns for the EU. Three (3) individuals and one (1) entity were sanctioned under Guatemala sanctions, over continued attacks on elected representatives, public servants and member of civil society.

Substantial easing of Syria sanctions:

- The EU lifted sectoral sanctions implemented against Syria since 2013, while re-calibrating the list of targets to focus on members of the former Al-Assad regime.

Thematic sanctions:

- Global human rights: Six (6) list updates, adding 21 persons and entities (vs. 62 in 2024). Key drivers in 2025 included measures against transnational proxies for the Iranian regime (+9), arbitrary killings of civilians in Syria (+10) and serious human rights violations in Crimean detention centers (2).
- Terrorism: 11 list updates, removing two designations overall. Sanctions activity was largely driven by UN decisions.

A closer look by agency: **OFAC**

OFAC's 2025 activity reflects clear shifts in foreign policy priorities in the US

In their final weeks in office, the previous US administration imposed sweeping sanctions against Russian oil and financial sectors, including the designation of a large set of shadow fleet vessels. The new administration applied high sanctions pressure on Iran, as well as other priorities such as the fight against drug cartels and global terrorist threats. Several other notable shifts materialized, including a termination of West Bank sanctions, the designations of several individuals associated to the International Criminal Court and a wide-ranging re-purposing of Syria-related sanctioning authorities against individuals and entities involved with the now-fallen Assad regime. The scale of OFAC designations accelerated in H2: 65% of net designations occurred in the second half of the year.

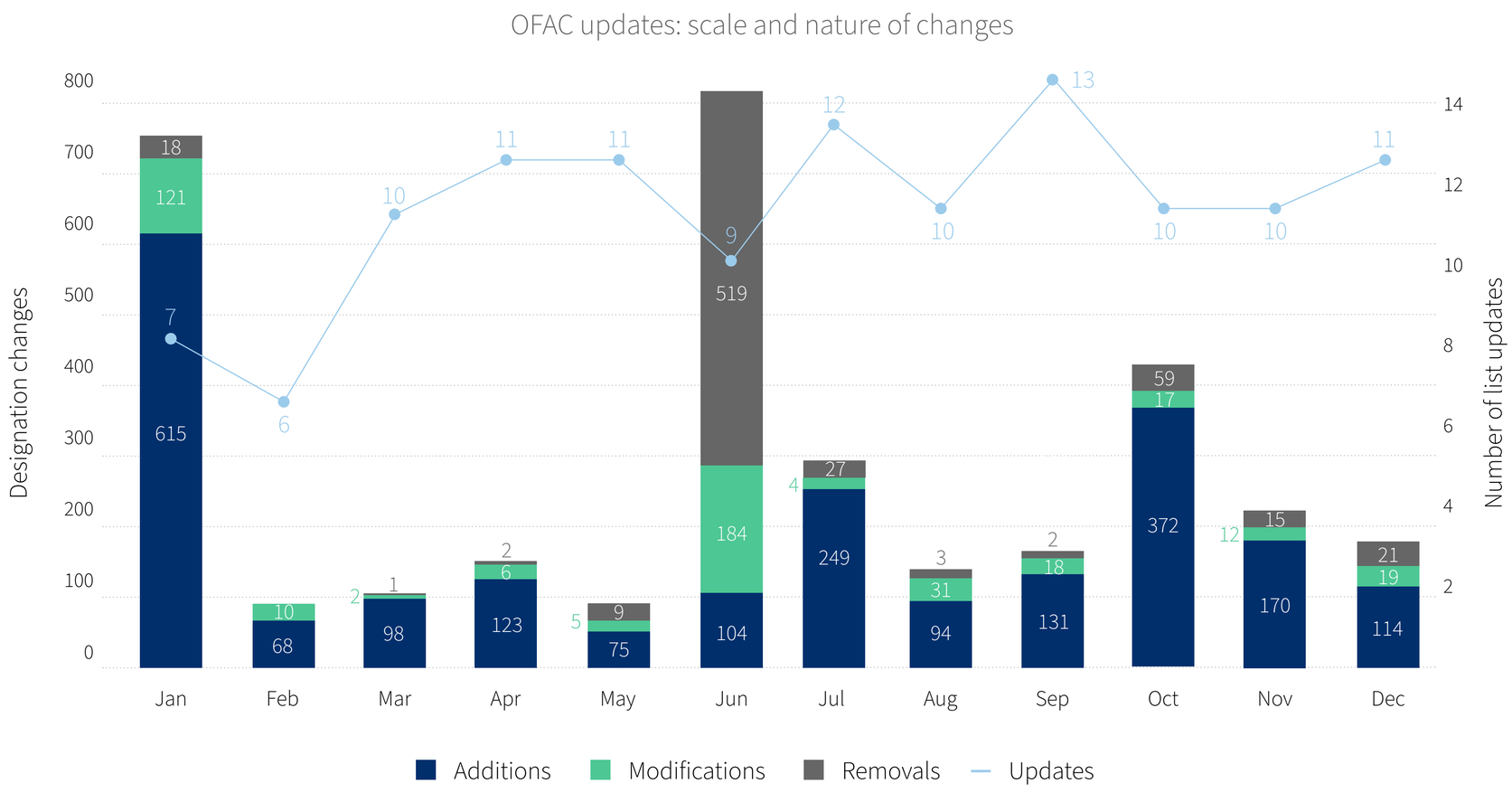
OFAC

Activity:
3,318
designations added, modified or removed

through
120
updates

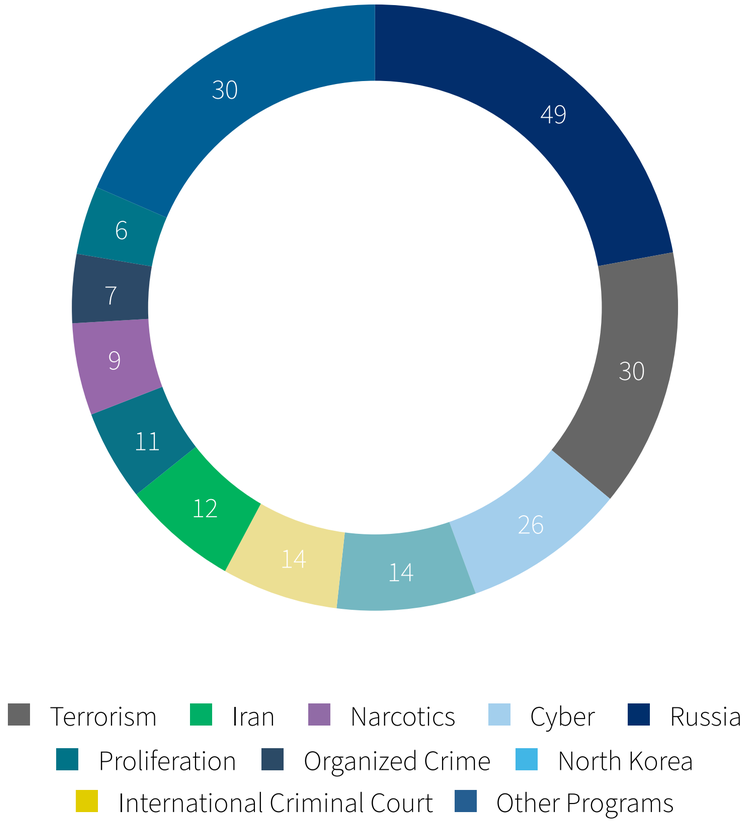
Resulting in
+ 1,537
net change of designations

A closer look by agency: **OFAC**

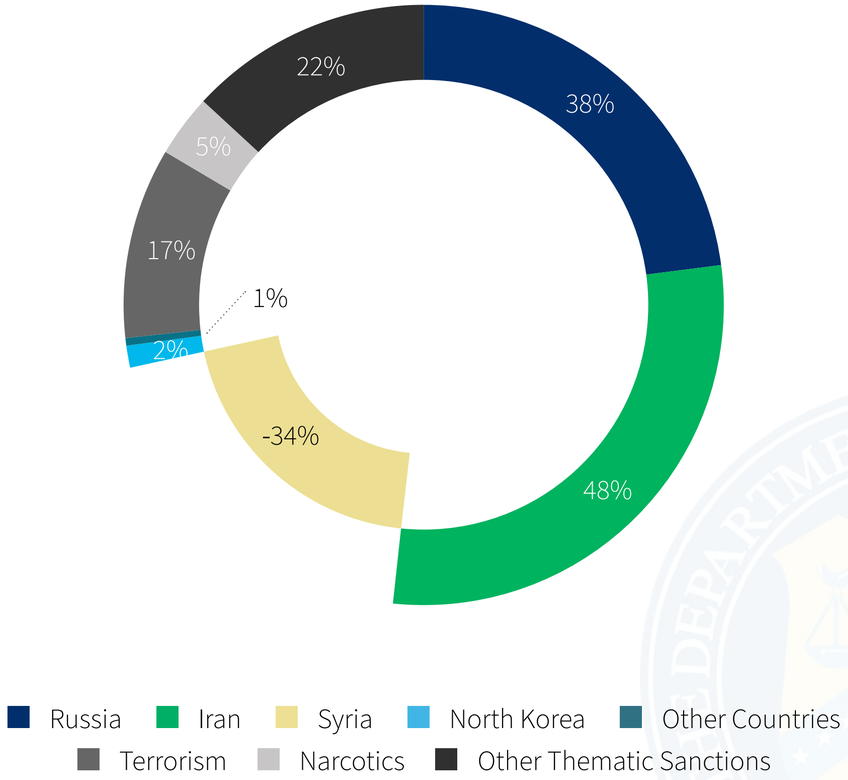


A closer look by agency: **OFAC**

Breakdown by number of updates



Share of net additions by designation



Key sanctions activity: **OFAC**

In 2025, Iran-related sanctions dominated OFAC's activity taking over from Russia-related actions for the first time since 2022.

Sanctions implemented to disrupt Tehran's ability to export oil, develop its nuclear program or conduct its regional destabilization activities contributed significantly:

- 14% of list updates (30).
- 48% of net designations (742).

Other key sanctions developments

Country sanctions:

- Russia: With three (3) updates in January, OFAC added a net 569 designations under Russian sanctions. Measures targeted the energy sector, as well as financial intermediaries facilitating sanctions evasion. For the remainder of the year, OFAC issued 10 Russia-related updates, mostly adjusting or removing designations. Landmark action was made on October 22, with the designation of Russia's top two oil companies and 34 related entities.
- Iran: 30 updates adding 709 designations. OFAC's focus was overwhelmingly around disrupting Iran's ability to export its oil. Shipping networks including vessels, importers and financial intermediaries facilitating Iran's oil export were particularly targeted, along with entities involved in Iran's defense sector: manufacturing or exporting missiles and UAVs. Targeted designations were issued in relation to Iran's nuclear program and activities developing weapons of mass destruction.

Key sanctions activity: **OFAC**

Thematic sanctions:

- Cyber-enabled fraud: Seven (7) updates adding 192 net designations. Targeting organized crime groups and enablers for large scale fraud schemes, primarily operated out of Myanmar or Cambodia was a key trend for OFAC in 2025. This culminated with a joint action with the UK against Prince Group on October 14, adding 146 designations.
- Narcotics trafficking and terrorism: 10 updates adding 59 net designations. OFAC leveraged several authorities to intensify pressure on South American cartels involved in narcotics trafficking, among other criminal activities. Cartels and their members were designated, inter alia, under Organized Crime, Narcotics and Global Terrorism authorities. Some actions targeting cartel laundering networks also included other mechanisms administered by FinCEN, such as Special Measures under Part 311 of the Patriot Act, and Geographic Targeting Orders.

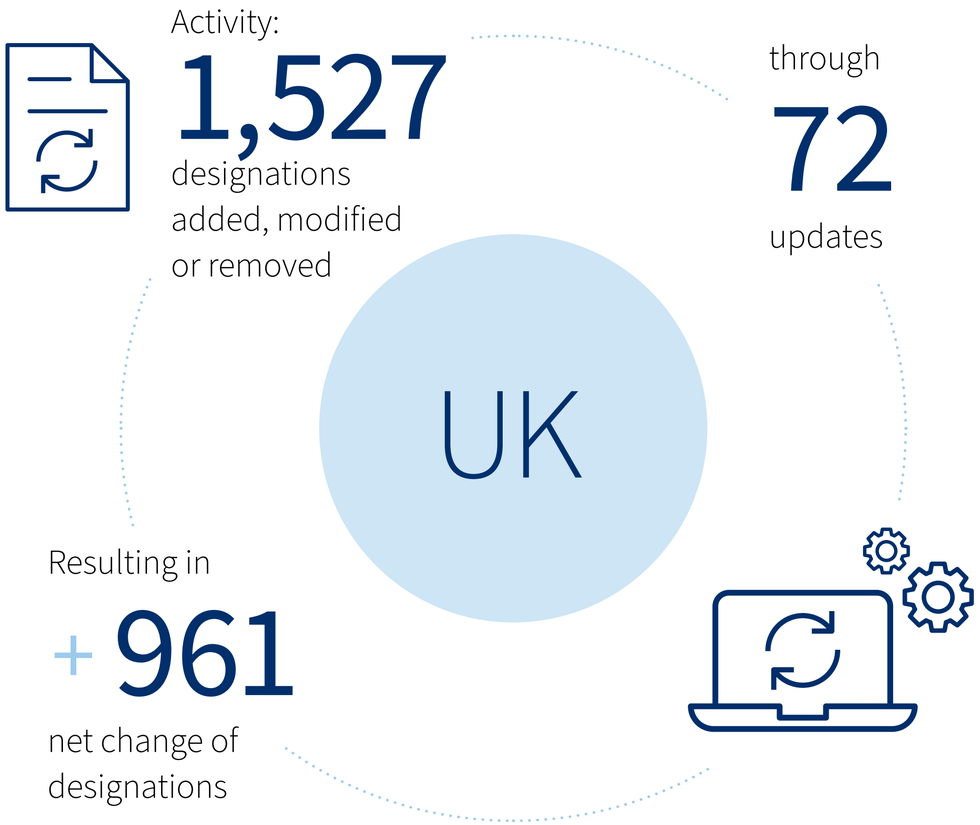
Key policy shifts:

- [Pivoted] Syria: The revocation of Syria Sanctions Regulations on June 30 came with the implementation of “Promoting Accountability for Assad and Regional Stabilization Sanctions (PAARSS)”. 113 individuals and 61 entities remained on the SDN list under this new program.
- [Reimposed] International Criminal Court: Six (6) list updates, adding 15 net designations.
- [Terminated] West Bank: On January 24, 2025, the US President terminated the national emergency in relation to the situation in the West Bank lifting sanctions on 33 persons and entities.

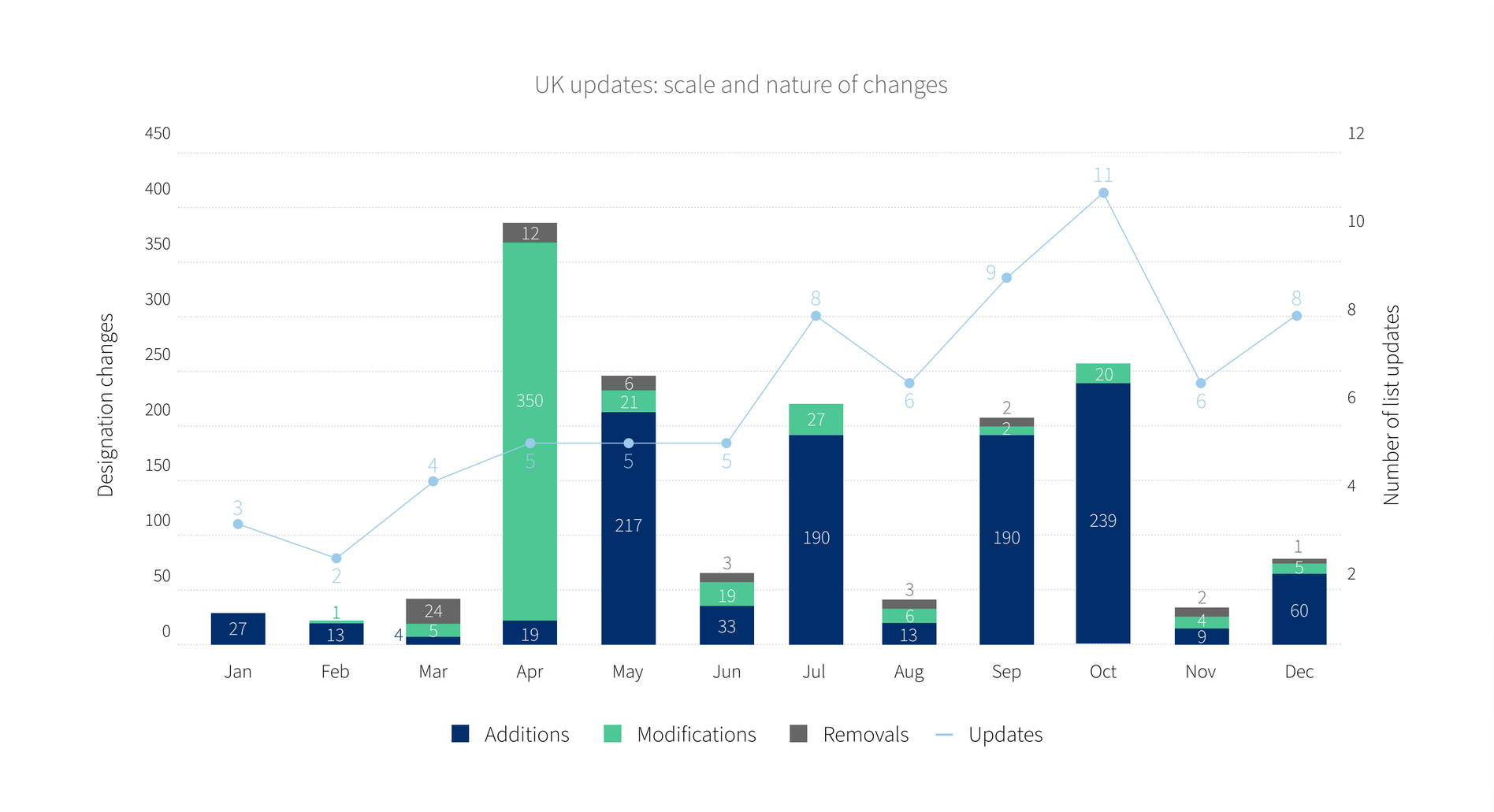
A closer look by agency: **UK**

The UK leveraged sanctions fully in 2025. Net additions grew 175% compared to 2024, with a clear focus on Russia, Iran and key global issues.

UK sanctions activity in 2025 was largely driven by Russia/shadow fleets and a range of global thematic issues ranging from cyber threats to human trafficking.

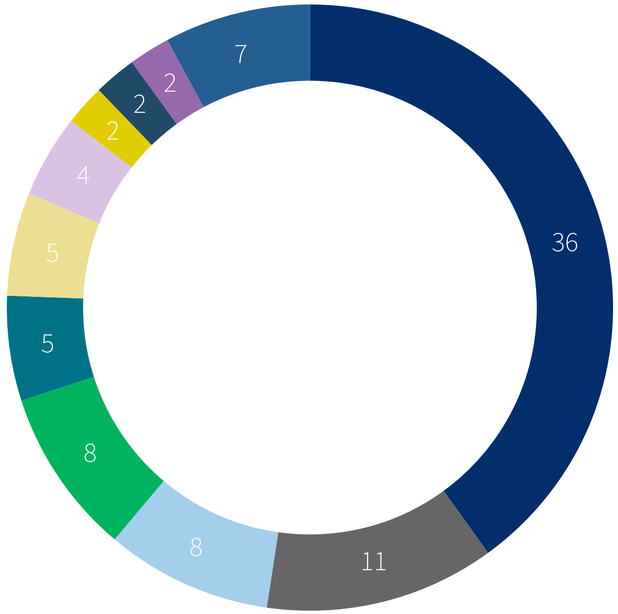


A closer look by agency: **UK**



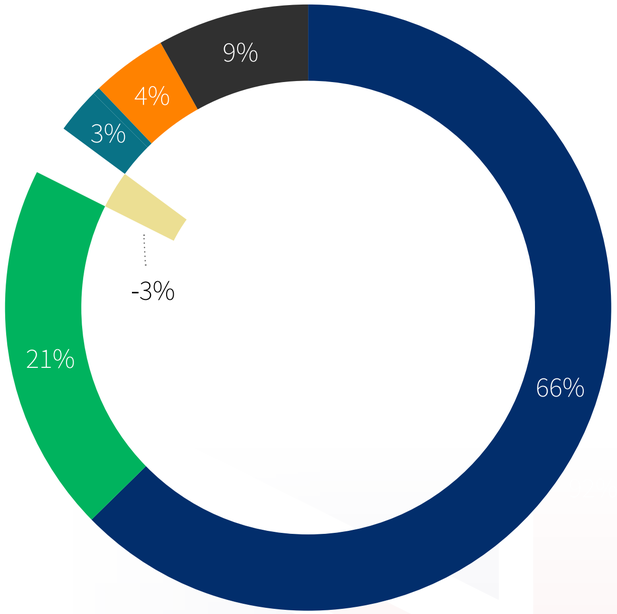
A closer look by agency: **UK**

Breakdown by number of updates



Russia | Terrorism | Cyber | Iran | Global HR | Syria | Irregular Migration | Chemical Weapons | Global Corruption | Haiti | Other Programs

Share of net additions by designation



Russia | Iran | Syria | North Korea | Other Countries | Terrorism | Narcotics | Human Rights & Corruption | Other Thematic Sanctions

Key sanctions activity: **UK**

Sanctions activity relating to the Russia / Ukraine conflict

UK sanctions against Russia accelerated significantly compared to 2024, largely driven by shadow fleet designations:

- In 2025, the UK added 636 net designations under Russia-related sanctions vs. 164 in 2024 (+288%).
- Designating 435 ships for being part of Russia's shadow fleet, the UK has been at the forefront of Western efforts to disrupt Russia's ability to export their oil.
- The UK's stance towards Russia has been consistent with EU sanctions developments.

Weight of Russian sanctions in overall UK sanctions activity:

- 40% of list updates (36).
- 66% of net designations (636).

Other key sanctions developments

Country sanctions:

- Iran: 10 list updates, adding 200 net designations. Activity was overwhelmingly driven by the UN snapback, which were suspended as part of the Joint Comprehensive Plan of Action (JCPoA).
- Venezuela: 15 net additions over electoral irregularities. The UK's actions were similar to the EU's and the US, targeting individuals involved in obstructing the restoration of democracy after the 2024 election.

Thematic sanctions:

- Cyber Sanctions: Eight (8) list updates, adding 41 net designations. The use of cyber sanctions was on the rise in 2025, primarily targeting Russian military intelligence groups conducting malicious cyber activities, or providing cyber infrastructure to conduct criminal activities such as ransomware. Chinese cybercrime syndicates were also sanctioned.
- Global Human Rights & Corruption: Eight (8) list updates, adding 41 net designations. Activity remained consistent with 2024. Various global issues were targeted through these measures, including designations made in cooperation with the US targeting an organized crime group involved in human trafficking to execute large scale fraud schemes (Prince Group). Other actions targeted individuals and entities involved in destabilization activities in Georgia, Guatemala and Moldova, as well as former members of a violent Sri Lankan group.

New sanctions programs

- Irregular Migration & Human Trafficking: Four (4) list updates, adding 36 net designations. The UK Government swiftly leveraged this new thematic program implemented in 2025, targeting individuals and entities involved in people smuggling, from small-boat suppliers in Asia, to hawala money movers in the Middle East and gang leaders in the Balkans and North Africa.

Global sanctions outlook: **What to expect in 2026**

At the time of writing, the geopolitical situation in the Middle East remains highly volatile, and Iran sanctions will likely continue to shape the agenda in 2026, albeit with possibly different approaches from different regulators.

Russia sanctions will likely continue to drive designations from the EU and UK, to disrupt oil exports and sanctions evasion networks. The US stance towards Russia is harder to anticipate, but absent meaningful progress on the diplomatic front to end hostilities, the US will likely be tempted to apply more sanctions pressure and resume closer cooperation with European partners.

Sanctions targeting the shadow fleet and evasion networks supporting oil exports and other trading activities benefiting sanctioned countries are likely to continue, raising compliance challenges on financial institutions and operators in the shipping and energy sectors.

Large scale fraud schemes and other malign cyber activities continue to grow as a global issue. In 2025, we observed a range of landmark sanctions developments, with coordination among the US, UK and other international partners against organized crime groups operating scam compounds in South-East Asia, fueling a global “fraud epidemic”. More similar actions are likely in 2026, and the EU could expand its existing sanctions instruments to address these threats as well, along with its international partners.

Navigating increasingly fragmented sanctions guidance:

The complexity of the current geopolitical climate comes at a time when we are already seeing an evolving, more fragmented sanctions outlook. This dynamic environment underscores the need for global organizations to maintain a real-time understanding of the scope and expectations of sanctions guidance to help preserve business integrity and proactively mitigate exposure to potential operations delays and reputational damage tied to enforcements. Leveraging real-time sanctions screening intelligence that reflects the immediate scope and specificity of current sanctions requirements is essential to fueling well-informed, timely decisions.

Optimizing the real-time responsiveness of your sanctions strategy can help simplify and strengthen your compliance stance across diverging sets of sanctions guidance.

How we can help

LexisNexis® Risk Solutions offers a suite of accurate, up-to-date data and advanced technology solutions that enable financial institutions and other organizations to mitigate sanctions-related risks.

Our advanced analytics and real-time data effectively screen individuals, entities and transactions against global sanctions lists to help organizations comply with regulations and reduce the potential for costly compliance violations. Make informed decisions about business operations with confidence.

Contact us to learn more about how the advanced tools and technology from LexisNexis® Risk Solutions can dramatically improve sanctions screening and protect your organization.

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