

Our Ref: HWRB/C4/2020

23 September 2020

## **TO THE MEMBERS**

Dear Sirs

### **U.S. – VENEZUELAN SANCTIONS**

By a Notice dated 25 June 2020, the Association prohibited any Owner from any dealings with the oil sector of the Venezuelan economy. This prohibition, made pursuant to Rule 14.1, took effect from 29 June 2020 (the “**June Prohibition**”).

Subsequently, by a Notice dated 19 August 2020, also pursuant to Rule 14.1, the Directors of the Association prohibited any Owner from conducting any trade with Venezuela, effective from 27 August 2020 (the “**August Prohibition**”). The August Prohibition superseded and revoked the June Prohibition. The August Prohibition extended to, but was not limited to, the loading of Venezuelan cargo, the import of goods to Venezuela, transshipment of Venezuelan origin goods, and the carriage of PdVSA Cargo.

The August Prohibition was subject to the following exemptions (the “**Exemptions**”):

1. That an Owner provided the Managers with a Special Licence issued by the U.S. Department of the Treasury’s Office of Foreign Assets Control (“**OFAC**”) which authorised the activity otherwise subject to the Prohibition.
2. That the activity was authorised by an OFAC General Licence.

The Membership are asked to take note that this Notice, in turn, supersedes and revokes the August Prohibition. Further, by this Notice, again pursuant to Rule 14.1, the Directors of the Association hereby prohibit any Owner from conducting any trade with Venezuela with immediate effect, whether or not subject to an OFAC Special or General Licence.

The Prohibition shall remain in force until further notice.

The Association’s cover remains strictly in accordance with the Association’s Rules at all times and attention is particularly directed to Rule 3.9 (Sanctions Exclusion and Limitation).

Members are reminded again of their obligation to conduct their own due diligence to ensure that they do not carry cargoes in breach of sanctions against Venezuela, Iran or other sanctioned states. This is especially important in the case of transshipment cargoes, where the true origin of the cargo may not be readily ascertainable without further enquiry.

The Managers would be pleased to answer any questions that may arise.

Yours faithfully

THOMAS MILLER (BERMUDA) LTD  
Managers

*Copies of this Circular and other publications, including the Association's Rules, can be viewed and downloaded from the Association's website at [www.hellenicwarrisks.com](http://www.hellenicwarrisks.com)*