



Republic of Yemen

**Resolution No. (68) of the year 1446 AH issued by the President of the Supreme Political Council regarding:**

**Sanctions Regulation on Perpetrators of Aggression against Yemen or Any Arab or Islamic State.**

**The President of the Supreme Political Council:**

Having consulted the Constitution of the Republic of Yemen,

And the Political Agreement signed on 28/7/2016 AD between Ansar Allah and their allies and the General People's Conference Party and its allies,

And the Proclamation issued on 6/8/2016 AD regarding the formation of the Supreme Political Council,

And the Supreme Political Council Resolution No. (1) of the year 2016 AD regarding the definition of the Council's functions and responsibilities,

And law No. (5) of 1445 AH regarding the designation of states, entities and persons hostile to the Republic of Yemen,

And the Supreme Political Council Resolution No. (95) of the year 1445 AH regarding the establishment of the Humanitarian Operations Coordination Center (HOCC).

**It is hereby decided that:**

**Chapter One: Title, Legal Basis and Definitions**

**Article (1)** This regulation is called the sanctions regulation on perpetrators of aggression against Yemen or any Arab or Islamic state and aims to organize the process of imposing sanctions on those designated as perpetrators of aggression against Yemen or any Arab or Islamic state and those who deal with them.

**Article (2)** This regulation is based on Article (5)-A-1-A-2 of Law No. (5) of 1445 AH on the designation of states, entities and persons hostile to the Republic of Yemen.

**Article (3)** The terms used in this regulation shall have the meanings indicated next to each of them:

**1. Perpetrators of aggression:** refers to states, entities or persons who engage in hostile acts that constitute aggression against the Republic of Yemen or any Arab or Islamic state, including, but not limited to:

## **1.1 Military and security aggression:**

- 1.1.1 Waging war or military invasion or carrying out direct or indirect military operations.
- 1.1.2 Occupying territory by military force or sending military forces.
- 1.1.3 Conducting military operations by air, land, or sea against civilian or military targets.
- 1.1.4 Violation of airspace or territorial waters.
- 1.1.5 Bombardment using aircraft, missiles, internationally banned weapons, or any other means that cause widespread destruction.
- 1.1.6 Conducting illegal intelligence operations, including espionage, sabotage, or assassination of prominent figures.
- 1.1.7 Imposing a naval or air blockade that prevents the delivery of humanitarian supplies or aid.
- 1.1.8 Using chemical, biological, or nuclear weapons.
- 1.1.9 Financing armed or terrorist groups and providing financial or logistical support.
- 1.1.10 Occupying border areas by military force.
- 1.1.11 Providing territory, airspace, or maritime space to another state to launch aggression.

## **1.2 Economic and financial aggression:**

- 1.2.1 Trade embargo and assets block.
- 1.2.2 Isolation from the global banking and financial system.
- 1.2.3 Implementation of a comprehensive or partial economic blockade that prevents the flow of essential goods or vital resources.
- 1.2.4 Imposing trade or financial sanctions to restrict economic activity.
- 1.2.5 Imposing a trade embargo and illegally disrupt the movement of trade.
- 1.2.6 Manipulating currencies and the exchange market and carrying out operations aimed at destabilizing the local currency.
- 1.2.7 Economic blackmail and the use of economic influence to exert pressure to achieve political objectives.
- 1.2.8 Pressuring subsidiaries or other states to withdraw their investments or cease economic cooperation.

### **1.3 Political and diplomatic aggression:**

- 1.3.1 Funding or training opposition groups for political destabilization.
- 1.3.2 Planning or supporting military coups to overthrow the existing government.
- 1.3.3 Direct interference in political or legislative decision-making.
- 1.3.4 Recognizing a separatist government or entities within the target state to undermine its sovereignty.
- 1.3.5 Violating national sovereignty by supporting separatist or insurgent movements.
- 1.3.6 Incitement against the government by supporting armed opposition movements.
- 1.3.7 Using hostile diplomacy, such as expelling diplomats or taking unjustifiably hostile diplomatic actions.

### **1.4 Media aggression:**

- 1.4.1 Launching misleading media campaigns aimed at tarnishing the image of the state or fomenting internal strife.
- 1.4.2 Manipulating social media platforms through fake accounts to spread chaos or influence public opinion.
- 1.4.3 Hacking local media outlets to broadcast misleading or inflammatory messages.

### **1.5 Electronic aggression:**

- 1.5.1 Disrupting public services such as the Internet, telecommunications systems, etc.
- 1.5.2 Launching cyber-attacks on critical infrastructure, including financial institutions and government facilities.
- 1.5.3 Deploying malware or ransomware to encrypt data or disrupt systems.
- 1.5.4 Cyber espionage and hacking into state systems to obtain sensitive information.

### **1.6 Aggression against citizens and residents:**

- 1.6.1 Unlawful detention of citizens or residents without legal justification.
- 1.6.2 Attacking diplomatic missions, consulates or their employees.
- 1.6.3 Discrimination against Yemeni, Arab, or Muslim communities residing abroad through the imposition of arbitrary restrictions or practices.

## **1.7 Environmental aggression:**

- 1.7.1 Polluting the natural environment such as rivers, agricultural lands, etc.
- 1.7.2 Exploitation of natural resources without authorization or fair compensation.
- 1.7.3 Destruction of agricultural land or water sources through any military, industrial or other means.
- 1.7.4 The use of weapons or technologies that cause long-term environmental damage.

## **1.8 Any other form of aggression that threatens the security of citizens or the national security of the Republic of Yemen or any Arab or Islamic state.**

- 2      **Person**            Any natural or legal person.
- 3      **Entity**             It includes a partnership, association, subsidiary, organization, or any group of people united by a legal or ideological bond.
- 4      **Assets**             It includes all forms of property, whether tangible or intangible, movable or immovable, including national and foreign currencies, any documents of value regardless of form, and any income, proceeds, or other benefits derived therefrom.
- 5      **HOCC**             The Humanitarian Operations Coordination Center of the Office of the Supreme Commander of the Armed Forces.
- 6      **Designation**     A process by which a state, entity, or person is identified as posing a threat or engaging in prohibited activities.
- 7      **Transaction**     Any commercial or financial transaction involving the exchange of goods, services, funds, or any other type of economic transactions.
- 8      **Due diligence**    The investigation or examination process carried out by an entity or person before entering into an agreement or contract with another party, in order to ensure that he is not related to the perpetrators of the aggression against Yemen or any Arab or Islamic state and those who deal with them.
- 9      **Prohibited activities**    Those acts that are criminalized by the Yemeni laws in force, including the acts described in this regulation.
- 10     **Third party transactions**    Transactions that take place between two parties, one of which is not directly subject to sanctions, but involves the interests or assets of entities listed on the sanctions list.

- 11 **Compliance** Procedures that the HOCC imposes on parties to ensure compliance with laws and regulations relating to Yemeni sanctions.
- 12 **Administrative record** The set of documents and information relied upon by HOCC in making its regulatory decisions, including sanction listings, the imposition of sanctions, or the review of listing or delisting decisions.
- 13 **Court** Refers to the Specialized Criminal Court in Sana'a, a Yemeni court established by the judicial authorities to consider cases related to terrorism, state security, and major criminal cases.
- 14 **Effective date** The date on which a person or entity receives a notice at their authorized email address or on which it is published on the HOCC website.
- 15 **General license** An authorization issued by the HOCC that permits specific types of transactions that are originally prohibited, without the need to obtain a specific license for each case.
- 16 **Specific license** An authorization granted for a specific case or transaction that is subject to sanctions and requires prior approval from the HOCC.
- 17 **List of review and follow-up** It is the list that includes two types of designated parties: the first are those designated as enemies (states, entities, or persons) who cannot be removed from the designation, and the second are those subject to compliance measures.

**Article (4)** Relation of this regulation to other regulations:

1. This regulation is independent of other designation sanctions regulations.
2. Licenses issued under other regulations do not authorize any activity or action prohibited by this regulation, and vice versa.
3. Any license or exception issued under this regulation does not relieve the concerned parties from complying with other laws and regulations.
4. This regulation does not interpret, restrict or amend any other regulation, nor does it restrict or amend the scope of any law.

**Article (5)** If any part of this regulation is amended or any of the associated provisions or instructions are changed, references to them shall always refer to the most recent version of the amendments, and not to the original or previous version.

**Article (6)** No amendment shall apply to this regulation retroactively on the violations and procedures that occurred prior to the enforcement of the amendment, unless otherwise stated, meaning that any legal procedure or investigation that began before the amendment shall not be repealed or suspended due to the new amendments.

## **Chapter Two: Designation**

### **First: Designation Authority:**

#### **Article (7):**

- A. States are designated as perpetrators of aggression against Yemen or any Arab or Islamic state by presidential decree.
- B. Entities or persons shall be designated as perpetrators of aggression against Yemen or any Arab or Islamic state by a decision of the HOCC, in consultation when needed with relevant authorities.
- C. In all cases, the designation decision must be published immediately upon issuance.

**Article (8)** States, entities or persons shall be designated as perpetrators of aggression against Yemen or any Arab or Islamic state in the following cases:

- 1. Conducting or participating in any of the prohibited activities stated in Article 3, Item 1.
- 2. Conducting or participating in any activity that poses a threat to the security of Yemeni citizens or citizens of any Arab or Islamic state.

**Article (9)** Upon issuing a designation decision, the HOCC shall establish an administrative record to document the reasons and evidence supporting the decision and the associated lists.

#### **Article (10):**

- A. The HOCC may assess the sensitivity of the information when making the designation decision, may refrain from disclosing information of a confidential nature, and must disclose it to the Court in a closed session when necessary.
- B. Anyone who, by virtue of their position, has access to classified information must refrain from disclosing it in any form whatsoever.

## **Second: Designation Period:**

### **Article (11):**

- A. The designation shall remain in effect until it is removed in accordance with the prescribed provisions in this regulation.
- B. The Designating Authority shall conduct a periodic review of all designation decisions every two years to determine whether the designation should be removed in accordance with Article (12).

## **Third: Rescission of Designation:**

**Article (12)** The designation of a state, entity, or person as a perpetrator of aggression against Yemen or any Arab or Islamic state may be automatically rescinded by a decision of the Designating Authority, when any of the following conditions are met:

- 1. The behavior of the designated (state, entity, person) has changed, and guarantees have been provided that the aggression will not be repeated in the future.
- 2. The circumstances that were the basis for the designation have changed in a manner that justifies the rescission.
- 3. The national security of the Republic of Yemen or any Arab or Islamic state requires rescission.

**Article (13)** The decision to rescind the designation shall come into effect from the date specified therein.

**Article (14)** The rescission of designation under Article (12) shall not affect:

- 1. Any legal or judicial procedure based on behavior or actions committed prior to the effective date of the rescission of designation.
- 2. Any equitable legal entitlements, including the right to claim the rights of victims or affected parties through justice or compensation, as well as the right to seek reparations for material or moral damages, or remedies for harm resulting from actions committed prior the rescission of designation.
- 3. Historical records of events are not erased, but must be documented for legal or historical purposes.

#### **Fourth: Review of Designation when Submitting a Petition:**

**Article (15)** Anyone who has been designated as a perpetrator of aggression against Yemen or any Arab or Islamic state may submit to the HOCC to petition for delisting within a maximum of 30 days from the effective date of the designation.

**Article (16)** The delisting petition must be submitted in person by the listed entity or person, using the prescribed form, and must be accompanied by all supporting evidence along with a certified Arabic translation.

**Article (17)** The petition for delisting must be based on one of the following reasons:

1. The invalidity of the reasons for designation.
2. The circumstances and facts that led to the designation have changed sufficiently to justify the delisting.
3. Exercising due diligence to comply and taking serious and effective steps and actions to avoid a future violation.
4. Offering a settlement and requesting a specific license.
5. Any other reasons that the petitioner believes should be taken into consideration.

**Article (18)** The petitioner must cooperate with the HOCC and provide explanations, data and documents requested by the HOCC within 10 days of the request, and in case of failure to do so, the HOCC shall make its decision based solely on the information provided in the petition.

**Article (19)** The HOCC must make its decision on the delisting petition within 30 days of receiving it, and notify the petitioner of the decision at the email address indicated in the petition.

**Article (20)** The HOCC may include in its decision to accept the petition procedures that the petitioner must comply with, and it shall be included in the list of review and follow-up. In case of laxity or non-compliance, the HOCC may re-designate him and include him on the sanctions list, and its decision to re-designate him shall be final.

**Article (21)** The designated party shall be included on the sanctions list permanently, and any correspondence from it shall be ignored, in case of repeated violations.

## **Fifth: Amendments to a Designation:**

**Article (22)** The HOCC may amend the designation of a legal person if it finds that he has changed his name, adopted a new pseudonym, dissolved himself and then reconstituted under a different name or names, or merged with another legal person.

## **Sixth: Appeal against the Designation Decision:**

**Article (23)** Designated entities or persons whose petitions for delisting have been denied may appeal the decision of denial before the Court, in accordance with the legally prescribed procedures, within (30) days from the date of notification of the denial.

**Article (24)** The appellant may appoint a licensed Yemeni attorney to represent them in all proceedings related to the appeal before the Court. The authorized attorney has the right to obtain copies of relevant documents, except for confidential documents, and to present legal defenses, attend hearings, and negotiate any settlement or agreement related to the case, as permitted by applicable laws and regulations.

**Article (25)** The Court shall consider the procedures followed by the HOCC, as well as the evidence relied upon in the designation decision and the decision to deny the petition for delisting, through a clarifying summary derived from the official administrative record. The Court shall have access to all information, including that which is classified as confidential, provided that this is done in a closed session.

**Article (26)** The Court shall consider and adjudicate the appeal in accordance with the procedures applicable to expedited judicial proceedings. The judgment issued by the Court shall be final, conclusive, and not subject to appeal by any way.

## **Chapter Three: Prohibited Activities**

**Article (27)** Upon the issuance of a decision to designate any state, entity or person as a perpetrator of aggression against Yemen or any Arab or Islamic state, states, entities and persons are prohibited from dealing with it in any form, including transactions that fall under the following:

1. Financial and commercial transactions and activities, including all forms of commercial exchange, whether directly or indirectly.
2. Logistical and technical services, and institutional and commercial cooperation in any field.

3. Concluding commercial transactions, including import and export, and the supply of goods and services in any form.
4. Financial and commercial investments, including the acquisition of assets, stocks, bonds, or any other financial instruments.
5. Participation in investment funds or any investment activities.
6. Financing and credit facilities, including loans, financial guarantees, or letters of credit.
7. Providing commercial, marine, aviation or any other insurance services.
8. Intellectual property rights and licenses, including the sale and purchase of licenses and the transfer of technology and knowledge by any means.
9. Contracts and general supplies, including tenders, bids, projects, purchase and sale contracts or supply of any goods or services.
10. Any activity or transaction, whether directly or indirectly, that may benefit the designated party.

**Article (28)** It is hereby prohibited to:

1. Using agents or intermediary subsidiaries to complete prohibited transactions on behalf of the designated party.
2. Any transaction for the purpose of evasion or circumvention or any of the prohibitions stipulated in this regulation.
3. Any attempt to violate the prohibitions stipulated in this regulation in any way.
4. Any conspiracy formed for the purpose of engaging in a prohibited transaction.

**Article (29)** Any attempt to circumvent the prohibitions set forth in Article (27), or to engage in any of the acts specified in Article (28), shall be deemed a violation that subjects the perpetrator to the penalties prescribed under these regulations.

**Article (30)** Any transaction or commercial relationship established by (state, entity, person) with a designated party shall result in their inclusion on the sanctions list.

**Article (31)** All subsidiaries that are owned, directly or indirectly, by a designated party by 50 percent or more are automatically subject to sanctions, in accordance with the 50 percent rule.

**Article (32)** Any transactions made after the effective date are null and void, and may not be the basis for the assertion or recognition of any interest, right, compensation or privilege.

**Article (33):**

- A. It is prohibited for any entity or person within the Republic of Yemen to enable any designated state, entity, or person to access, transfer, convert, dispose of, or otherwise deal with any assets or funds in their possession or under their control, whether directly or indirectly, except with prior authorization from HOCC.
- B. Except as permitted by regulations, orders, directives, provisions, instructions, licenses , etc., no ordinary or legal person, on or after the effective date, who knows or has reasonable cause to know that a (state, entity, person) is designated under this regulation as perpetrators of aggression against Yemen or any Arab or Islamic state, may not engage in a transaction with it.

**Article (34):**

- A. All Yemeni government agencies, entities and persons, when designating any state, entity or person as perpetrators of aggression against Yemen or any Arab or Islamic State, and have previous transactions with the designated party, must carry out all the following procedures:
  - 1. Immediate reporting of all previous transactions with the designated party within a maximum period of 10 days from the effective date of the designation.
  - 2. Immediately block all assets owned by the designated party and disclose them to HOCC.
  - 3. Provide HOCC with a detailed report on all past and effective date transactions, including their current status, supply chain, and any suggestions or recommendations related to the possibility of issuing a general or specific license, along with a full copy of the transaction documents with a certified translation into Arabic.
  - 4. Provide HOCC with evidence that they have carried out compliance procedures through the relevant departments.
  - 5. Adhere to any procedures determined by HOCC for compliance.
- B. Failure to comply with any of the duties set forth in paragraph (A) or partial breach of any of them shall result in penalties in accordance with Article (41) of this regulation.
- C. All agencies, entities and persons referenced in Paragraph (A) shall regularly update the data of entities and persons listed on the various sanctions lists published on or through the HOCC's website. They must also continuously verify the information of the entities and persons they engage with, compare such data against the names on the lists, and take the prescribed measures in the event of any match.

**Article (35)** The HOCC shall include those designated as perpetrators of aggression against Yemen or any Arab or Islamic state along with their assets and all those who dealt with them in the perpetrators of aggression against Yemen or any Arab or Islamic state sanctions list (PAYAIS) pursuant to this regulation.

**Article (36)** The HOCC may consider self-reporting of potential sanctions violations before they are discovered as a reason to mitigate the penalties imposed on the violator, at its discretion, and taking into account the non-repetition of the violation.

#### **Chapter Four: Penalties and the Consequences of the Violation**

##### **Penalties:**

**Article (37)** States, entities or persons shall be designated as perpetrators of aggression against any Arab or Islamic state, and consequently sanctions shall be imposed on them, if the Arab or Islamic state submits a request for support from the Republic of Yemen, and the request is submitted to the President of the Republic, and a presidential decree shall be issued thereon.

**Article (38)** The state, entity or person designated as perpetrators of aggression against Yemen or any Arab or Islamic state shall be penalized with one or all of the following penalties depending on the nature of the situation and the level of effect:

- A. Taking action against assets in areas under the jurisdiction or authority of the Republic of Yemen.
- B. Imposing restrictions on maritime transportation.
- C. Imposing restrictions on aircraft movement in airspace.
- D. Deprivation of any privilege in all investment sectors in the Republic of Yemen.
- E. Blocking and confiscating existing assets and privileges in the Republic of Yemen (if any).
- F. Total prohibition or imposing restrictions and burdens on all imports into Yemen of products and services that it provides or benefits from through raw materials, intellectual property and patents.
- G. Restrictions on the transit of assets from Yemeni territorial waters and airspace.
- H. Any other penalties.

**Article (39)** In addition to the persons and entities designated as perpetrators of aggression against Yemen or any Arab or Islamic state, the penalties may be extended to include:

- A. Spouses and first-degree relatives of the listed natural persons.
- B. Senior executives or actual owners of the listed entities.
- C. Entities in which the listed natural persons hold senior administration positions.
- D. Entities in which listed natural persons control or participate in their establishment and administration.
- E. Entities in which any of the entities referred to in Paragraphs (c) and (d) of this Article hold a stake or contribute.

**Article (40)** The level and type of penalties imposed on those included on the sanctions list shall be determined according to:

- A. Repeated violations or multiple violated activities.
- B. The extent of its effect on those listed on the sanctions list.
- C. The nature of the violation, its gravity and the degree of its effectiveness in confronting it.
- D. The degree of danger and harm of the violation to the Yemeni people or the people of any Arab or Islamic state.
- E. Any other factors are taken into consideration.

**Article (41)** Any party that engages with any designated parties as perpetrators of aggression against Yemen or any Arab or Islamic state shall be subject to penalties proportionate to the nature and degree of such engagement, in accordance with the controls set forth in Article (40).

**Article (42)** A third party in violation of the provision set forth in Article (28) shall be subject to penalties proportionate to the nature of the situation, subject to the controls set forth in Article (40).

**Article (43)** Yemeni entities and persons who commit one of the acts mentioned in Paragraph (1) of Article (3) shall be subject to the Crimes and Penalties Law No. 12 of 1994.

## **Prepenalty Notice:**

**Article (44)** If the HOCC has information indicating a possible violation of any provision of this regulation, the suspect shall be notified of the HOCC's intention to impose penalties if the violation is proven.

**Article (45)** The notified entity or person shall have the right to personally respond to the prepenalty notice by submitting a written and signed statement to the HOCC within 10 days. Failure to submit a response within this period shall be deemed a waiver of the right to respond.

**Article (46)** The written response is not required to follow a specific format; however, it must contain sufficient information to indicate that it is a response to the prepenalty notice. It must address the allegations set forth in the notice and state the reasons why the suspected violator believes the penalty should not be imposed.

**Article (47)** After reviewing the suspected violator's response to the prepenalty notice and any relevant facts, the HOCC shall determine whether there is a violation, and thus issue a penalty notice to the violator, or there is no violation.

## **Imposing Penalty or Withdrawing it:**

### **(1) No Violation and Withdrawal of Penalty**

**Article (48)** If, after reviewing any response to the prepenalty notice and any relevant facts, the HOCC determines that the suspected violator has not committed any violation as stated in the prepenalty notice, the HOCC shall issue a notice confirming that no violation has occurred, canceling the proposed penalty and discontinuing any associated measures.

### **(2) Existence of Violation and Refusal to Comply**

**Article (49)** If, after reviewing any written response to the prepenalty notice, or in the absence of a response, and based on any relevant facts, the HOCC determines that the suspect has committed a violation as stated in the prepenalty notice, and refuses to comply or pledge non-repetition, the HOCC shall be entitled to issue a notice to the violator specifying the nature of the violation and confirming the imposition of the prescribed penalty.

### **(3) Existence of a Violation with an Obligation to Comply**

**Article (50)** If, after reviewing any response to the prepenalty notice and any relevant facts, the HOCC determines that the violator has committed a violation, but has pledged in writing not to repeat the violation and to comply with current and future regulations, the HOCC may suspend the implementation of the penalty, include him in the review and monitoring list and subject him to a monitoring mechanism for a specified period of time, to ensure continuous compliance, and in case of a repeated violation, he shall be included on the sanction list permanently and ignore any subsequent correspondence from him.

### **Chapter Five: Licenses and Exceptions**

**Article (51)** The Designation Authority may issue a specific license to grant specific exceptions on its own or upon a request from the concerned parties, and the license must be clear, precise, detailed and include all its conditions.

**Article (52)** The Designation Authority may issue general licenses to grant exceptions for specific types of transactions.

**Article (53)** The license may include the exclusion of any state, entity, person, assets or any category thereof from its scope or the privileges it grants.

### **Chapter Six: General Provisions**

**Article (54)** The designation of the American and British enemies as hostile states to the Republic of Yemen shall remain in place at all times. In addition, the designation of the usurping Zionist entity as a foreign terrorist organization (FTO) hostile to the Republic of Yemen shall remain in place at all times. If any of the entities or persons affiliated with it or under its control or any category of them are delisted from the sanctions lists, due to the change of circumstances that led to their inclusion therein, or the national security of the Republic of Yemen or the interest of the Yemeni people requires their delisting, this shall not apply to the designation in any way, and they shall be transferred to the review and follow-up list.

**Article (55)** All relevant Yemeni authorities must cooperate with the HOCC and undertake all necessary measures to ensure the implementation of the provisions of these regulations, each within the scope of its respective responsibilities.

**Article (56)** The HOCC shall be responsible for issuing the decisions, directives, and periodic circulars that complement these regulations and are necessary for their implementation.

**Article (57)** In all cases, HOCC shall publish, on its official website, designation decisions, sanctions lists, the review and follow-up list, decisions approving delisting requests, general licenses, and all related decisions, directives, and periodic circulars.

**Article (58)** This regulation shall be effective from the date of its issuance and shall be published in the Official Gazette in both Arabic and English.

**Issued by the Presidency of the Republic in the capital, Sana'a**

On 26 Ramadan 1446 AH

26 March 2025 AD

**Mahdi Muhammed Al-Mashat**

**President of the Supreme Political Council**

**Note:**

The English translation of this text has been prepared for informational purposes and to facilitate understanding for non-Arabic speakers. The original Arabic version shall prevail for legal application, interpretation, and reference.