



**Issued by the Committee for Combating Extremism,
Terrorism and its Financing and Money Laundering**

**MINISTRY OF INTERIOR
KINGDOM OF BAHRAIN**

**NATIONAL ADVISORY ON THE
IMPLEMENTATION OF
SNAPBACK SANCTIONS**

December 2025



EXECUTIVE SUMMARY

This Advisory provides the national framework for implementing the re-application of United Nations Security Council sanctions concerning the Islamic Republic of Iran under Resolution 2231 (2015). It outlines the Kingdom of Bahrain's operational and regulatory obligations following the activation of the snapback mechanism established under paragraphs 11 and 12 of the resolution, which results in the automatic reinstatement of all sanctions measures previously adopted under Security Council Resolutions 1696 (2006), 1737 (2006), 1747 (2007), 1803 (2008), 1835 (2008), and 1929 (2010). These reinstated measures encompass wide-ranging obligations, including proliferation-related prohibitions, arms and missile restrictions, financial and banking measures, cargo-inspection requirements, maritime and aviation controls, travel-ban obligations, and asset-freeze measures applied to designated individuals and entities.

This Advisory sets out the responsibilities of competent authorities, supervisory bodies, financial institutions (FIs), and designated non-financial businesses and professions (DNFBPs) in implementing the reinstated measures in accordance with Decree-Law No. (29) of 2020, Cabinet Decision No. (12) of 2021, and Ministerial Decision No. (14) of 2023. It explains the national process for the circulation, acknowledgment, and execution of snapback-related obligations, including reporting deadlines, screening requirements, and the immediate freezing of funds or assets linked to designated persons and entities.

The Kingdom of Bahrain reaffirms its commitment to acting without delay in implementing binding Security Council decisions, maintaining the integrity of the national financial system, and preventing the misuse of domestic channels for proliferation-sensitive or sanctions-evasion activities. This Advisory ensures that all national stakeholders understand, apply, and report reinstated obligations consistently, transparently, and in full coordination with the Secretariat of the Committee for Combating Extremism, Terrorism and its Financing and Money Laundering.

INTRODUCTION

The Kingdom of Bahrain remains firmly committed to upholding international peace and security through full compliance with United Nations Security Council Resolutions adopted under Chapter VII of the Charter of the United Nations. Guided by the leadership of His Majesty King Hamad bin Isa Al Khalifa, the Kingdom continues to advance a comprehensive, coordinated, and risk-based approach to preventing proliferation-related activities and mitigating the associated financial, commercial, and security threats that arise from the misuse of global supply chains.

United Nations Security Council Resolution 2231 (2015) established the Joint Comprehensive Plan of Action (JCPOA) framework and introduced a mechanism permitting the re-application of previously terminated sanctions in the event of significant non-performance by any JCPOA participant. Under paragraphs 11 and 12 of the resolution, the transmission of a notification to the Security Council triggers the automatic reinstatement of all sanctions measures adopted under Resolutions 1696 (2006), 1737 (2006), 1747 (2007), 1803 (2008), 1835 (2008), and 1929 (2010), unless the Council decides otherwise within the prescribed period.

Activation of this mechanism results in the re-establishment of all operative measures contained in the earlier resolutions, including prohibitions relating to proliferation-sensitive items, missile-related and arms-related transfers, restrictions on financial services and correspondent banking, requirements to inspect and interdict cargo, controls over maritime and aviation activities, and the implementation of mandatory asset-freeze and travel-ban

obligations. The United Nations also re-activates the sanctions list maintained under Resolution 1737 (2006), comprising individuals and entities involved in Iran’s nuclear and ballistic-missile programmes, including subsidiaries of the Islamic Revolutionary Guard Corps (IRGC), industrial groups, financial institutions, and associated procurement networks referenced across the annexes of Resolutions 1737, 1747, 1803, and 1929.

This Advisory translates these re-applied international obligations into Bahrain’s national coordination, supervisory, and enforcement mechanisms, ensuring that all competent authorities, supervisory bodies, financial institutions (FIs), and designated non-financial businesses and professions (DNFBPs) implement the reinstated measures without delay. It clarifies the required procedures for screening, freezing, reporting, cargo inspection, interdiction, and prevention of financial or commercial activity that could contribute to proliferation-sensitive programmes or sanctions evasion. Through these measures, the Kingdom of Bahrain reaffirms its commitment to protecting the integrity of its financial system, fulfilling its binding obligations under the Charter of the United Nations, and upholding its responsibilities as part of the international community.

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1. LEGAL FRAMEWORK

The implementation of re-applied United Nations Security Council sanctions concerning the Islamic Republic of Iran under Resolution 2231 (2015) is grounded in the Kingdom of Bahrain's legislative and regulatory framework governing the execution of binding Security Council decisions. These national instruments ensure that all reinstated measures from Resolutions 1696 (2006), 1737 (2006), 1747 (2007), 1803 (2008), 1835 (2008), and 1929 (2010) are implemented promptly, consistently, and in accordance with international obligations.

National Legislative and Executive Instruments

The national legal foundation for implementing the snapback mechanism comprises the following instruments:

- Decree-Law No. (29) of 2020, which affirms the Kingdom's binding obligation to implement all United Nations Security Council decisions without delay and establishes the legal mandate for immediate execution of sanctions-related measures.
- Cabinet Decision No. (12) of 2021, establishing the procedures for implementing Security Council resolutions adopted under Chapter VII of the Charter of the United Nations. This includes national requirements for circulating designations, managing listing and delisting processes, overseeing humanitarian exemptions, and ensuring transparent publication of sanctions decisions.
- Ministerial Decision No. (120) of 2021, which sets the mechanisms for reporting freezing actions, acknowledging receipt of sanctions communications, and managing frozen funds. It defines the obligations of competent authorities, financial institutions (FIs), and DNFBPs concerning the verification, notification, and execution of freezing measures.

- Ministerial Decision No. (14) of 2023, which establishes the national electronic mechanism for the circulation, acknowledgment, and implementation of United Nations Security Council decisions relating to targeted financial sanctions. It mandates real-time dissemination of designations, 24-hour reporting requirements, internal escalation within supervised sectors, and the maintenance of national audit trails.

These national measures operate alongside and give domestic effect to the reactivated obligations contained in the relevant Security Council resolutions. These resolutions collectively impose binding requirements relating to proliferation-sensitive items, arms and missile prohibitions, financial restrictions, cargo inspection duties, maritime and aviation controls, asset-freeze measures, and travel-ban obligations. The legal instruments above ensure the full and timely integration of these reinstated measures into Bahrain's national AML/CFT/CPF architecture.

Sectoral Regulations Supporting Targeted Financial Sanctions Implementation

To ensure uniform implementation of reinstated sanctions measures across all DNFBP sectors and civil society entities, the following ministerial resolutions operate alongside the national framework outlined above:

- Ministry of Justice, Islamic Affairs & Waqf
 - *Resolution No. (101) of 2025* on AML/CFT/ PF obligations for Waqf supervisors and administrators.
(Sanctions screening, freezing, reporting, beneficiary verification).
- Ministry of Social Development
 - *Resolution No. (78) of 2025* governing public fundraising entities and nonprofit organizations.
(Screening, sanctions compliance, reporting obligations).

- MOJ – Legal Professions
 - *Resolution No. (100) of 2025* on AML/CFT/ PF obligations for lawyers and foreign legal consultancy offices.
(Freezing obligations, sanctions screening, STR reporting).
- MOJ – Notaries
 - *Resolution No. (102) of 2025* governing notaries public.
(Sanctions screening before notarization, freezing obligations).

- Ministry of Industry & Commerce
 - *Resolution No. (105) of 2025* regulating gold and jewelry dealers and audit firms.
(Enhanced TFS obligations, reporting, compliance officer duties).

These sector-specific regulations provide the operational mechanisms through which DNFBPs and nonprofit entities implement the reinstated Security Council measures without delay, in accordance with Decree-Law No. (29) of 2020, Cabinet Decision No. (12) of 2021, and Ministerial Decision No. (14) of 2023.

2. NATIONAL MECHANISM FOR IMPLEMENTATION

Upon receipt of official notification from the United Nations Security Council concerning the activation of the snapback mechanism under Resolution 2231 (2015), all national authorities must implement the reinstated sanctions measures without delay and in accordance with the procedures established under Decree-Law No. (29) of 2020, Cabinet Decision No. (12) of 2021, and Ministerial Decision No. (14) of 2023. These measures ensure that Security Council decisions are circulated, acknowledged, and executed promptly, transparently, and consistently across all relevant sectors in the Kingdom of Bahrain.

Receipt and Authentication of UN Communications

- The Secretariat of the Committee for Combating Extremism, Terrorism and its Financing and Money Laundering receives official notifications issued by the United Nations Security Council or the United Nations Secretariat concerning the re-application of sanctions under Resolution 2231 (2015).
- The Secretariat authenticates the communication, records the date and time of receipt, and classifies

the notification within the national sanctions management system as a snapback activation requiring immediate national implementation.

- The communication is logged into the centralized electronic platform to ensure traceability, internal control, and supervisory review.

Circulation to Competent Authorities and Regulated Entities

To ensure uniform implementation of reinstated sanctions measures across all DNFBP sectors and civil society entities, the following ministerial resolutions operate alongside the national framework outlined above:

- Within 24 hours of receipt, the Secretariat circulates the notification, designations, annexes, and all accompanying information to:
 - competent authorities;
 - supervisory bodies;
 - financial institutions (FIs);
 - designated non-financial businesses and professions (DNFBPs).



- Circulation occurs exclusively through the secure electronic system, ensuring secure transmission, standardized communication, and national alignment.
- All recipients must acknowledge receipt through the electronic system within 24 hours in accordance with Ministerial Decision No. (14) of 2023.

Immediate National Implementation

- Following circulation, all competent authorities and regulated entities must:
 - o activate internal alert mechanisms to ensure that operational, supervisory, and enforcement units receive the notification without delay;
 - o update internal lists and screening systems to reflect reinstated individuals, entities, and operational measures;
 - o implement all reinstated obligations immediately, including freezing actions, travel-ban enforcement, cargo-interdiction duties, financial restrictions, and commercial prohibitions;
 - o ensure that all proliferation-sensitive, missile-related, and arms-related prohibitions contained in UNSCRs 1696 (2006), 1737 (2006), 1747 (2007), 1803 (2008), 1835 (2008), and 1929 (2010) are operationalized within their respective mandates;
 - o coordinate internally to prevent any transfer, supply, procurement, financial transaction, or service that could contribute to proliferation-sensitive activities, sanctions evasion, or violations of reinstated UN measures.

Audit Trail and Verification

- The Secretariat maintains a comprehensive audit trail documenting:
 - o the date and time of UN communication receipt;
 - o the circulation to national authorities;
 - o acknowledgment of receipt by each authority;
 - o all implementation reports submitted by FIs, DNFBPs, and competent authorities.
- This audit trail forms part of Bahrain's verification framework and supports oversight, compliance monitoring, and reporting obligations to national and international bodies.
- The Secretariat may request additional information or clarification where required to ensure complete, accurate, and timely implementation.

Coordination With the Ministry of Foreign Affairs

- The Secretariat coordinates with the Ministry of Foreign Affairs on matters requiring communication with the United Nations, including reporting on freezing actions, exemptions, cargo inspections, seizures, and travel-ban enforcement.
- All external communications required under reinstated UNSCRs, such as notifications for humanitarian exemptions, cargo-interdiction reports, or travel-related notifications, are transmitted through established diplomatic channels.

3. REINSTATED MEASURES AND OBLIGATIONS

- The activation of the snapback mechanism under Resolution 2231 (2015) results in the full re-application of all measures adopted in United Nations Security Council Resolutions 1696 (2006), 1737 (2006), 1747 (2007), 1803 (2008), 1835 (2008), and 1929 (2010). These reinstated measures must be implemented without delay by all competent authorities, supervisory bodies, financial institutions (FIs), and designated non-financial businesses and professions (DNFBPs) in accordance with national laws and the procedures established under Ministerial Decision No. (14) of 2023.
- The obligations below consolidate the operative measures contained in the reinstated resolutions and translate them into the national implementation requirements applicable within the Kingdom of Bahrain.

Proliferation-Related Prohibitions

- Competent authorities, FIs, and DNFBPs must take the necessary measures to prevent the supply, sale, transfer, or procurement of any items, materials, equipment, goods, or technology that could contribute to:
 - o uranium-enrichment activities;
 - o reprocessing activities;
 - o heavy-water-related activities;
 - o the development of nuclear-weapon delivery systems.
- These prohibitions include the items listed in:
 - o INFCIRC/254/Rev.11/Part 1;
 - o INFCIRC/254/Rev.8/Part 2;
 - o S/2012/947;

- o any items subsequently identified by the Security Council or the Committee established under Resolution 1737 (2006).
- In addition:
 - o No entity may provide technical assistance, training, maintenance, financial assistance, investment, brokering, or other services related to prohibited items or technologies.
 - o No entity may procure prohibited items from Iran, whether directly or indirectly.
 - o All entities must apply heightened scrutiny to any activities involving dual-use goods, industrial equipment, laboratory technology, or engineering components that could contribute to prohibited programmes.

Arms and Missile-Related Restrictions

- Authorities must enforce all restrictions on arms and missile-related activities reinstated by the relevant resolutions, including:
 - o prohibition on the procurement of arms or related materiel from Iran;
 - o prohibition on the supply, sale, or transfer of major conventional weapons to Iran;
 - o prohibition on providing technical assistance, training, or financial services related to arms or missile systems;
 - o prohibition on any activity that could contribute to Iran's development of ballistic missiles capable of delivering nuclear weapons;
 - o prohibition on transferring missile-related technology or technical assistance to Iran.
- Enhanced vigilance must be applied to any activity connected to the Islamic Revolutionary Guard Corps (IRGC) and its associated industrial groups, including:



- o Shahid Hemmat Industrial Group (SHIG);
- o Shahid Bagheri Industrial Group (SBIG);
- o Aerospace Industries Organization (AIO);
- o Defence Industries Organization (DIO);
- o MODAFL subsidiaries.

Asset Freeze Obligations

- All competent authorities, FIs, and DNFBPs must:
 - o conduct immediate screening against the reinstated designations from UNSCRs 1737, 1747, 1803, and 1929;
 - o freeze all funds, financial assets, and economic resources owned or controlled, directly or indirectly, by designated individuals or entities;
 - o prevent the movement, transfer, alteration, use, or disposal of frozen assets;
 - o prevent any funds, assets, or economic resources from being made available, directly or indirectly, to designated persons or entities.
- The asset freeze also applies to:
 - o persons or entities acting on behalf of, or at the direction of, a designated person;
 - o entities owned or controlled by designated persons or entities;
 - o entities that have assisted in sanctions evasion under reinstated UNSCRs.
- All freezing actions or nil returns must be reported to the Secretariat within 24 hours.

Financial and Banking Restrictions

- Financial institutions must implement the reinstated measures concerning Iranian financial institutions, including:
 - o enhanced monitoring of all activities involving Iranian banks, including Bank Sepah, Bank Melli, Bank Saderat, and the Central Bank of Iran;
 - o prohibition on opening new branches, subsidiaries, or representative offices of Iranian banks in the Kingdom of Bahrain;

- o prohibition on establishing new correspondent relationships with Iranian banks;
 - o prohibition on Bahraini financial institutions opening accounts, branches, or correspondent relationships in Iran where such activities could contribute to proliferation-sensitive programmes;
 - o prohibition on the provision of insurance, reinsurance, export credits, guarantees, or financial support that could contribute to proliferation-sensitive activities.
- All suspicious or prohibited transactions must be reported to the Secretariat without delay:

Maritime, Aviation, and Customs Controls

- Competent authorities responsible for ports, customs, aviation, and border operations must enforce the reinstated requirements relating to cargo inspection and interdiction, including:
 - o inspection of all cargo to and from Iran where reasonable grounds exist to believe it contains prohibited items;
 - o inspection of aircraft or vessels owned or operated by Iran Air Cargo or the Islamic Republic of Iran Shipping Lines (IRISL);
 - o seizure and disposal of prohibited items identified during inspections, in accordance with the requirements of reinstated UNSCR provisions;
 - o denial of port entry, refueling, bunkering, maintenance, or trans-shipment services to vessels suspected of carrying prohibited cargo;
 - o monitoring and reporting of any attempt to evade sanctions through vessel renaming, re-registration, or ownership changes.
- All inspections, seizures, interdictions, or denials of service must be reported to the Secretariat within 24 hours.

Travel Ban Implementation

- The Nationality, Passports & Residence Affairs Directorate must:

- o enforce the reinstated travel-ban measures by denying entry into or transit through the Kingdom of individuals listed in the annexes to Resolutions 1737, 1747, 1803, and 1929;
 - o update national border-control systems to reflect all reinstated travel-ban obligations;
 - o report all attempted entries or transits by designated individuals to the Secretariat without delay.
- Humanitarian or religious travel exemptions may be implemented only in accordance with the procedures and criteria established under the relevant UNSCRs.

Commercial and Industrial Restrictions

- Authorities and regulated entities must ensure that:

4. HUMANITARIAN AND EXEMPTION PROVISIONS

- The reinstatement of sanctions measures under United Nations Security Council Resolutions 1696 (2006), 1737 (2006), 1747 (2007), 1803 (2008), 1835 (2008), and 1929 (2010) preserves a limited and narrowly defined set of exemptions that allow designated individuals or entities to access certain funds or resources where required under specific humanitarian, legal, or technical circumstances. These exemptions must be processed strictly in accordance with the relevant Security Council provisions and the national procedures established under Cabinet Decision No. (12) of 2021 and Ministerial Decision No. (120) of 2021.

Basic Expenses

- Funds, financial assets, or economic resources belonging to designated persons or entities may be released for basic expenses where the following conditions are met:

- o Iran does not acquire commercial interests in uranium mining, nuclear-material production, or facilities involved in fuel-cycle activities;
- o no technology, services, or industrial support related to ballistic-missile development is transferred to Iran;
- o no Bahraini entity participates in commercial arrangements involving designated Iranian industrial, engineering, procurement, or logistics companies;
- o heightened vigilance is applied to all business relationships with entities incorporated in Iran, including IRGC and IRISL subsidiaries and front companies.

- o the expenses relate to food, rent or mortgage, medicines, medical treatment, taxes, insurance premiums, or public utilities;
- o payment relates to reasonable professional fees or reimbursement of expenses associated with legal services;
- o the request is submitted to the Secretariat, which notifies the Ministry of Foreign Affairs (MOFA) for transmission to the 1737 Committee;
- o the 1737 Committee does not object within five working days of notification.

(These provisions derive from paragraph 13(a) of Resolution 1737 (2006)).

Extraordinary Expenses

- A designated person or entity may access funds for extraordinary expenses only where:



- o therequestingpartyprovidesfulldocumentation supporting the nature, amount, and necessity of the expense;
- o the request is reviewed by the Secretariat and forwarded through MOFA to the 1737 Committee;
- o the Committee issues explicit approval prior to any release of funds.
(This requirement reflects paragraph 13(b) of Resolution 1737 (2006)).

Judicial, Administrative, or Arbitral Liens

- Access to frozen funds may be permitted for the satisfaction of a judicial, administrative, or arbitral lien or judgment where:
 - o the lien or judgment was entered into prior to the individual or entity's designation;
 - o the payment is not made to, or for the benefit of, a designated person or entity;
 - o the request is notified to the 1737 Committee in accordance with paragraph 13(c) of Resolution 1737 (2006).

IAEA-Related Technical Cooperation

- Certain activities directly related to IAEA-supervised technical cooperation may be exempt where they concern:
 - o equipment for light-water reactors;
 - o low-enriched uranium incorporated in assembled fuel elements for such reactors;
 - o items and services required for technical projects authorized by the IAEA under humanitarian, safety, medical, agricultural, or basic scientific programmes.
(Such exemptions reflect paragraphs 3(b) (i)–(ii) and 16 of Resolution 1737 (2006), and the notified activities referenced in Resolution 1803 (2008)).

Humanitarian Goods and Assistance

- The reinstated measures do not prohibit the provision of humanitarian goods or services necessary for:
 - o food and agriculture;
 - o medical, pharmaceutical, or public health needs;

- o safety-of-life items;
- o disaster relief or emergency humanitarian operations.
- In all cases, regulated entities must ensure that:
 - o the goods are not diverted to designated persons or entities;
 - o no funds or resources are made available to designated individuals;
 - o appropriate due diligence and documentation accompany all such transactions.
(These safeguards are derived from the humanitarian carve-out provisions set forth in the relevant UNSCRs and maintained post-snapback).

Humanitarian or Religious Travel Exemptions

- Travel-ban exemptions may be granted on humanitarian grounds, including for religious obligations, only where:
 - o the request is submitted through the Secretariat;
 - o the 1737 Committee evaluates and authorizes the exemption on a case-by-case basis;
 - o all conditions attached to the exemption are strictly observed.
(These provisions reflect paragraph 3 of Resolution 1747 (2007) and paragraph 6 of Resolution 1803 (2008)).

Notification Requirements

- All exemption requests must be submitted to the Secretariat, which will:
 - o verify the completeness and accuracy of the request;
 - o prepare required notifications and supporting documentation;
 - o coordinate with the Ministry of Foreign Affairs for transmission to the 1737 Committee;
 - o ensure that all decisions are recorded in the national sanctions database.
- No exemption may be applied without confirmation from the Secretariat that required notifications have been submitted and that the relevant Committee has not objected or has expressly approved the request, as applicable.

5. REPORTING AND VERIFICATION

Reporting and Verification

- Effective implementation of the re-applied sanctions under United Nations Security Council Resolution 2231 (2015) requires timely, accurate, and comprehensive reporting by all competent authorities, supervisory bodies, financial institutions (FIs), and designated non-financial businesses and professions (DNFBPs). The reporting obligations outlined below reflect the national requirements established under Ministerial Decision No. (14) of 2023 and Ministerial Decision No. (120) of 2021, as well as the specific reporting duties reinstated under Resolutions 1737 (2006), 1747 (2007), 1803 (2008), and 1929 (2010).

Immediate National Reporting Requirements

- All competent authorities, FIs, and DNFBPs must report the following to the Secretariat within 24 hours of detection or implementation:
 - o screening results, including positive matches and nil returns;
 - o asset-freezing actions, including the type, value, and location of assets frozen;
 - o attempted or completed transactions involving designated individuals or entities;
 - o interdictions, including inspections, seizures, or cargo holds;
 - o denials of services, including bunkering, refueling, or port-entry refusals;
 - o sanctions-evasion attempts, including suspicious routing, renaming, re-registering, or concealment efforts;
 - o correspondent banking or trade-finance alerts involving Iranian FIs or IRGC/IRISL-linked entities.

- All reports must be submitted exclusively through the national electronic platform.

Cargo Inspection Reporting

- Where inspections are conducted under the reinstated obligations of Resolutions 1803 (2008) and 1929 (2010), authorities must:
- submit an initial written report to the Secretariat within 24 hours, containing:
 - o the reasons for inspection;
 - o description of cargo;
 - o vessel, aircraft, or transport details;
 - o any cooperation or refusal encountered.
- follow with a subsequent detailed report where prohibited items are discovered, including:
 - o origin and intended destination;
 - o nature, quantity, and technical characteristics of the prohibited items;
 - o method of disposal used;
 - o enforcement actions taken.

(These reports fulfil Bahrain's obligation to produce documentation consistent with the requirements of UNSCR 1929 (2010)).

Reporting of Freezing Actions

- All freezing actions taken in accordance with reinstated obligations must include:
 - o identifying information of the designated person or entity;
 - o all impacted accounts, assets, or economic resources;
 - o dates and times of freezing actions;
 - o supporting documentation confirming ownership or control;
 - o any attempted withdrawals, transfers, or issued prior to the freeze.

- The Secretariat reviews all freezing actions for completeness, accuracy, and timeliness.

Reporting of Attempted Travel by Designated Individuals

- The Nationality, Passports & Residence Affairs Directorate must report:
 - o all attempted entry or transit by designated individuals;
 - o use of fraudulent or secondary travel documents;
 - o any required humanitarian or religious travel exemptions.

(These reports support obligations under Resolutions 1747 (2007) and 1803 (2008).)

Reporting of Exemption Requests

- All exemption requests (basic expenses, extraordinary expenses, humanitarian purposes, judicial liens, or IAEA-related cooperation) must be:
 - o submitted to the Secretariat with all supporting documents;
 - o reviewed for completeness and accuracy;
 - o transmitted through the Ministry of Foreign Affairs for onward submission to the 1737 Committee.
- The Secretariat maintains a record of all exemptions requested, authorised, denied, or pending.

Verification Dossiers

- For each snapback-related communication, the Secretariat compiles a verification dossier that includes:
 - o the original UN notification;
 - o circulation records;
 - o acknowledgment receipts from all entities;
 - o freezing reports;
 - o inspection and interdiction reports;
 - o travel-ban reports;
 - o exemption-request records;
 - o any follow-up correspondence with domestic

authorities or the United Nations.

Quality Assurance and Follow-Up

- The Secretariat:
 - o verifies the timeliness and completeness of all reports;
 - o requests clarification where reports appear incomplete or inconsistent;
 - o ensures corrective measures are taken by the originating authority;
 - o produces internal oversight summaries to support the Committee and the National AML/CFT/CPF Committee.
- Failure to submit timely, accurate reports constitutes a breach under Decree-Law No. (29) of 2020 and may lead to supervisory, administrative, or enforcement actions.

6. PUBLICATION AND SYSTEM UPDATES

- The effective implementation of reinstated United Nations Security Council sanctions requires immediate and transparent dissemination of all relevant information to competent authorities, supervisory bodies, financial institutions (FIs), and designated non-financial businesses and professions (DNFBPs). This section sets out the obligations for publishing, updating, and maintaining sanctions lists and related operational data in accordance with Decree-Law No. (29) of 2020, Cabinet Decision No. (12) of 2021, and Ministerial Decision No. (14) of 2023.

Publication of Reinstated Designations and Measure

- The Secretariat shall ensure that:
 - o all reinstated designations and measures under Resolutions 1696 (2006), 1737 (2006), 1747 (2007), 1803 (2008), 1835 (2008), and 1929 (2010) are published on the Committee's official website;
 - o the designations posted reflect the official United Nations Security Council lists, including the re-activated 1737 Sanctions List and all individuals and entities contained in the annexes to the relevant resolutions;
 - o any updates, amendments, corrections, or supplementary guidance received from the United Nations are published without delay.
- Publication must occur concurrently with national circulation to ensure that all regulated sectors have immediate access to authoritative, up-to-date information.

Synchronisation With the United Nations Consolidated List

- The Secretariat shall maintain continuous alignment between:

- o the national sanctions list;
 - o the United Nations Consolidated List, which reflects all reinstated measures following snapback;
 - o lists issued by the Committee established under Resolution 1737 (2006).
- Any discrepancy between the national list and the United Nations list must be corrected immediately, and a notice must be circulated to all stakeholders through the secure electronic platform.

Publication of Reinstated Designations and Measure

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 - o the national sanctions list;
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 - o lists issued by the Committee established under Resolution 1737 (2006).
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 - o the national sanctions list;
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- Any discrepancy between the national list and the United Nations list must be corrected immediately, and a notice must be circulated to all stakeholders through the secure electronic platform.

Updating Internal Systems and Screening Tools

- All competent authorities, FIs, and DNFBPs must:
 - update internal screening systems, watchlists, compliance tools, and automated monitoring platforms immediately upon receipt of updated designations;
 - ensure that name-matching logic, fuzzy-matching thresholds, and transliteration variations reflect the reinstated lists, including multiple aliases, alternative spellings, and historical identifiers commonly used by designated persons or entities;
 - verify that third-party screening vendors have integrated all reinstated designations and measures into their systems without delay.
- Entities must confirm completion of system updates through the national electronic platform within 24 hours of publication.

Withdrawal of Inconsistent or Superseded Material

- Upon snapback activation:
- any pre-existing guidance relating to the termination of sanctions under Resolution 2231 (2015) must be withdrawn from internal systems;
 - JCPOA-specific permissions, relief clauses, or expired carve-outs must be removed from screening guidance, risk assessments, and operational procedures;
 - regulated entities must ensure that legacy exemptions or outdated interpretations do not remain in internal manuals, compliance programs, or screening engines.
- The Secretariat may issue supplementary instructions where additional national clarifications are required.

Dissemination and Awareness

- Competent authorities and supervisory bodies must ensure that:
 - all supervised entities receive updated lists and guidance in a timely manner;
 - sector-specific circulars or notices are issued where reinstated measures impose unique operational implications (e.g., maritime shipping, aviation, customs enforcement, insurance, correspondent banking);
 - regulated entities are informed of any changes to reporting channels, deadlines, or formats required under reinstated UNSCRs.
- The Secretariat shall maintain a log of all dissemination actions as part of the national audit trail.

Archiving and Historical Record Keeping

- The Secretariat maintains:
 - an archive of all designations, list updates, and publication records related to reinstated measures;
 - a historical record of all superseded versions of sanctions lists for supervisory inspection and post-implementation review;
 - system timestamps documenting when each version of the lists was published, circulated, or updated.
- These records ensure transparency, traceability, and compliance with national and international audit requirements.

7. RECORD KEEPING

- All competent authorities, supervisory bodies, financial institutions (FIs), and designated non-financial businesses and professions (DNFBPs) must maintain complete, accurate, and time-stamped records of all actions taken to implement the reinstated sanctions under United Nations Security Council Resolution 2231 (2015) and the re-applied Resolutions 1696 (2006), 1737 (2006), 1747 (2007), 1803 (2008), 1835 (2008), and 1929 (2010). These records form a critical component of Bahrain's compliance framework and support national oversight, supervisory review, and cooperation with international bodies.

Minimum Record-Keeping Requirements

- Each relevant entity must retain the following:
- screening logs, including all positive matches, false positives, and nil returns;
- frozen-asset records, including the nature, value, and location of all frozen funds or economic resources;
- documentation of any attempted transactions, transfers, or activities by designated persons or entities;
- records of cargo inspections, interdictions, seizures, and port-entry denials arising from maritime, aviation, and customs controls;
- records of travel-ban enforcement, including attempted entries or transits by designated individuals;
- copies of exemption requests, including supporting documents and Committee responses;
- internal communications, escalation notes, and decision-making logs related to sanctions implementation;
- international notifications, including any reports transmitted through the Ministry of Foreign Affairs to the relevant United Nations Committees

Retention Period

- All records must be retained for a minimum period of five years from the date of their creation. Records relating to frozen assets must remain available for as long as the asset-freeze remains in effect, even where this exceeds the five-year minimum.
- Where investigations, supervisory actions, or legal proceedings are ongoing, records must not be destroyed until the matter is formally concluded.

Format and Accessibility

- Records must be:
 - stored in a form that allows immediate retrieval by supervisory authorities;
 - protected against unauthorized alteration, deletion, or loss;
 - maintained in a manner that ensures integrity, completeness, and traceability;
 - accessible for inspection by competent authorities upon request.
- Electronic records must include:
 - timestamps;
 - user logs;
 - system-generated audit trails;
 - full identification of the individual or department responsible for each action.

Records Required for Verification Dossiers

- The Secretariat compiles verification dossiers for each snapback-related communication. Entities must ensure their records support:
 - confirmation of timely screening and freezing actions;
 - evidence of inspections, interdictions, or enforcement measures;
 - documentation of reporting timelines and content;

- o details of any sanctions-evasion attempts;
 - o internal decisions relating to exemptions or denials of service;
 - o compliance with obligations under Resolutions 1737 (2006), 1747 (2007), 1803 (2008), and 1929 (2010).
- Entities must provide any additional material required by the Secretariat to complete verification and national oversight reports.

Cooperation With Supervisory Authorities

- Competent authorities and supervisory bodies may request access to records at any time for supervisory, compliance, or enforcement purposes. Entities must:
 - o provide requested records promptly;
 - o ensure that records are complete and unaltered;
 - o cooperate fully with supervisory reviews and assessments;
 - o notify supervisory authorities immediately if any gaps, inconsistencies, or deficiencies in record-keeping are identified.



8. ANNEX I

Summary of Reinstated Measures Under UNSCR 2231 (2015) Snapback Mechanism
(Based on re-applied UNSCRs 1696 (2006), 1737 (2006), 1747 (2007), 1803 (2008), 1835 (2008), 1929 (2010).

A. Proliferation-Related Measures			
Measure	Description of Reinstated Obligation	UNSCR Basis	Exemptions
Prohibition on supply, sale, or transfer of proliferation-sensitive items	All items that could contribute to enrichment, reprocessing, heavy-water production, or nuclear-weapon delivery systems are prohibited. Includes INFCIRC/254/Rev.11/Part 1, INFCIRC/254/Rev.8/Part 2, S/2012/947 items.	1737 (2006) paras. 3–5; 1747 (2007) para. 4; 1803 (2008) paras. 8–10; 1929 (2010) paras. 13–17	Limited exemptions for IAEA technical cooperation and JCPOA-related activities (see UNSCR 1737 para. 3(b), 1803 para. 8(a), 2231 para. 21).
Prohibition on procurement of proliferation-sensitive items from Iran	States must prevent procurement of any items listed in INFCIRC/254 documents or determined contributory to prohibited nuclear activities.	2231 (2015) para. 21–23	None.
Prohibition on technical assistance and services	No technical assistance, training, financial assistance, brokering, or services may be provided relating to prohibited items or to activities contributing to nuclear or missile programs.	1737 (2006) paras. 3(b), 5; 1803 (2008) para. 8(a)	Same exemptions as above for authorized IAEA cooperation.
Prohibition on commercial acquisition by Iran	Iran, entities incorporated in Iran, or persons acting on their behalf may not acquire commercial interests involving uranium mining, nuclear materials, heavy-water activities, or missile-related technology.	2231 (2015) paras. 21–23	None.



B. Arms and Missile-Related Measures			
Measure	Description of Reinstated Obligation	UNSCR Basis	Exemptions
Arms embargo (import)	States must prohibit procurement of arms or related materiel from Iran.	1747 (2007) para. 5; 1929 (2010) para. 8	No exemptions.
Arms embargo (export to Iran)	States shall prevent the supply, sale, or transfer of major conventional weapons and related materiel to Iran.	1929 (2010) paras. 9–11	None.
Restrictions on missile technology and training	States shall prevent transfers of missile-related technology or assistance contributing to Iran's development of ballistic-missile capability.	1929 (2010) paras. 13–14	None.
Vigilance over all other arms transfers	States urged to exercise vigilance and restraint on all other arms.	1747 (2007) para. 6	Not specified.

C. Asset Freeze and Financial Restrictions			
Measure	Description	UNSCR Basis	Exemptions
Freeze of funds and economic resources	Freeze assets of designated individuals and entities associated with Iran's nuclear and missile programs.	1737 (2006) paras. 12–15; 1929 (2010) para. 19	Basic expenses, extraordinary expenses, legal fees, liens (1737 paras. 13–15; 2231 para. 28).
Prohibition on making funds available	No funds, assets, or resources may be made available to designated persons or entities.	1737 (2006) para. 12; 1929 (2010) para. 19	Same exemptions as above.



Restrictions on Iranian banks	Vigilance over activities of Iranian banks, including Bank Melli, Bank Saderat, Bank Sepah, and CBI. Prohibition on establishing new correspondent relationships or branches.	1929 (2010) paras. 21–24	None.
Restrictions on financial support for trade	States urged not to provide new grants, financial assistance, or concessional loans; urged to limit public export credits and guarantees.	1747 (2007) para. 7; 1929 (2010) para. 21	Not specified.

D. Maritime, Aviation, and Cargo Inspection Measures			
Measure	Description	UNSCR Basis	Exemptions
Cargo inspections	Inspect all cargo to or from Iran if there are reasonable grounds to believe it contains prohibited items.	1929 (2010) para. 14	None.
Seizure and disposal of prohibited items	Prohibited items must be seized and disposed of safely (destroyed, rendered inoperable, etc.).	1929 (2010) para. 15	None.
High-seas inspections	States may request inspections of Iranian vessels on the high seas with flag-State consent.	1929 (2010) para. 17	None.
Bunkering restrictions	No provision of bunkering services (fuel, supplies, maintenance) to Iranian vessels suspected of carrying prohibited cargo.	1929 (2010) para. 18	None.
Information sharing	States must share information on attempts to evade sanctions via renamed aircraft, re-registered vessels, or cargo transfers.	1929 (2010) para. 19	None.



E. Commercial & Industrial Restrictions			
Measure	Description	UNSCR Basis	Exemptions
Prohibition on Iranian participation in uranium and nuclear-related commercial activity	Prevent any Iranian acquisition of interests in nuclear-related commercial activity, including uranium mining and heavy-water technology.	2231 (2015) para. 21–23	No exemptions.
Due diligence on IRGC and IRISL-linked entities	Vigilance required when doing business with IRGC companies, IRISL subsidiaries, or companies acting as fronts (e.g., SHIG, SBIG, DIO, AIO, KAA).	1929 (2010) paras. 9, 20, 22	None.
Restrictions on specialized teaching and training	Prevent specialized training of Iranian nationals in fields contributing to prohibited nuclear or missile activities.	1929 (2010) para. 22	None.

F. Travel-Ban Measures			
Measure	Description	UNSCR Basis	Exemptions
Entry and transit ban	All designated individuals under reinstated lists may not enter or transit through any Member State.	1929 (2010) para. 10	Humanitarian or religious exemptions on a case-by-case basis (1803 (2008) para. 6).

G. Reporting and Notification Measures		
Measure	Description	UNSCR Basis
Reporting inspections and seizures	States must report inspections, seizures, and cooperation outcomes to the 1737 Committee within 5 working days.	1929 (2010) para. 15
Notification obligations for exemptions	States must notify the Committee of basic expenses, extraordinary expenses, liens, or approved transactions.	1737 (2006) paras. 13–15; 2231 (2015) para. 28
Notification for technical cooperation	Ten-day advance notifications for certain IAEA-approved transfers.	1803 (2008) para. 8(a); 2231 (2015) para. 21

