

Guidance for Vessel Captains¹⁵

Seafarers may wish to consider implementing the following due diligence practices to the extent they deem such practices appropriate and helpful in assessing and mitigating sanctions risks.

- ☐ Understanding, and ensuring your deck officers are aware of, the IMO required AIS regulations, which include consistently broadcasting AIS transmissions consistent with SOLAS.
- ☐ Practicing awareness of the IMO circulated guidance in relation to illicit shipping.
- ☐ Communicating to ship owners and charterers that the ship you are operating/crewing will be monitored for AIS disablement, and instances of AIS disablement will be investigated.
- ☐ Researching your vessel's AIS history to help determine whether the vessel may have been involved in illicit activities.
- ☐ Ensuring that vessel captains conducting ship-to-ship transfers in high risk areas for sanctions evasion are aware of the potential for blocked vessels or vessels carrying cargo the transport of which is prohibited by U.S. and UN sanctions to use deceptive practices to hide their identities, including by using false vessel names or IMO numbers. To the extent appropriate, vessel captains should ensure that they have verified the vessel name, IMO number, and flag prior to engaging in such a transfer and ensure there is a legitimate business purpose for the ship-to-ship transfer.
- ☐ Circulating information about an award offered through the Rewards for Justice (RFJ) program that offers rewards of up to \$5 million for information that leads to the disruption of financial mechanisms of persons engaged in certain activities that support North Korea, including illicit shipping activities, money laundering, sanctions evasion, cyber-crime, or weapons of mass destruction (WMD) proliferation. For more information, or to submit a tip, visit www.rewardsforjustice.net or e-mail northkorea@dosinfo.com.
- ☐ Circulating information about an award offered from the RFJ Program of up to \$15 million for information leading to the disruption of the financial mechanisms of Iran's Islamic Revolutionary Guard Corps (IRGC) and its branches, including the IRGC-Qods Force (IRGC-QF). For more information, or to submit a tip, visit <https://rewardsforjustice.net/english/irgc.html>.

¹⁵ This guidance is not intended to be, nor should it be interpreted as, comprehensive or as imposing requirements under U.S. law or otherwise addressing any particular requirements under applicable law.