

On 27 September 2025, the UN reapplied, via the "snapback" mechanism in UN Security Council resolution (UNSCR) 2231 (2015) ([here](#)), all provisions of UNSCRs 1696 (2006), 1737 (2006), 1747 (2007), 1803 (2008), 1835 (2008) and 1929 (2010) in the same manner as before 20 July 2015.

This followed the Security Council's failure, within 30 days of the EU Three's (E3's) notification, to adopt a resolution continuing sanctions relief. Under the reapplied resolutions' framework: arms-related transfers to and from Iran are restricted, subject to Security Council approval on a case-by-case basis; Iran is called upon not to undertake activities related to ballistic missiles designed to be capable of delivering nuclear weapons; nuclear-related transfers and activities are controlled via the procurement channel and member states must implement asset-freeze and travel-ban measures on persons and entities listed by the Security Council's Iran-related mechanisms. Earlier resolutions, notably Resolution 1929, also included robust banking, shipping and other vigilance provisions. As with all Chapter VII decisions, obligations bind all UN member states. The UN regime does not itself impose a general embargo on Iranian crude oil, gas or petrochemicals; such sectoral prohibitions are typically the subject of autonomous measures by regional blocs or states (e.g., EU, US and UK).

In response to the UN's weekend resolution, the EU and the UK announced on 29 September 2025, the "snapback" of their own Iranian sanction regimes.

The EU reimposed and updated its Iran regime ([here](#)); in addition to transposing UN measures, the EU reinstates: wide sectoral restrictions, including: a prohibition on the import, purchase or transport of Iranian crude oil and petroleum products, as well as related financing/insurance; restrictions covering natural gas and petrochemicals and key energy-sector equipment/technology as listed in Annexes; a ban on the sale/supply of certain gold, other precious metals and diamonds; an asset freeze on the Central Bank of Iran (CBI) and major Iranian commercial banks, with tightly-framed derogations and transport-sector restrictions (e.g., preventing Iranian cargo flights' access to EU airports and prohibiting servicing of Iranian cargo aircraft or vessels carrying prohibited goods). The EU has also specified a limited wind-down allowances for certain pre-existing contracts concluded before 30 September 2025 (e.g., specific energy-sector transactions), which extends until 1 January 2026.

Likewise, the UK activated its domestic Iran nuclear regime under the Sanctions and Anti-Money Laundering Act 2018 and updated the UK Sanctions List, as well as the OFSI Consolidated List, adding 71 entries now subject to asset freeze and travel ban. The Iran (EU Exit) Regulations 2019 (SI 2019/461) ([here](#)) provides the legal basis and also enables the UK autonomous trade, financial, and immigration measures beyond UN listings. This includes restrictions on specialized financial messaging services for designated persons and controls on missile, military, and nuclear-list goods, as well as certain software. The Office of Financial Sanctions Implementation (OFSI) notice serves to remind firms of their obligations to freeze the funds and economic resources of designated persons and, notably, to refrain from providing specialized financial messaging services to designated persons unless licensed, or an exception applies. A provision license has been announced, available until 12 November 2025.

If you think these developments may affect your business or contracts, please seek tailored legal advice. Sanctions are complex and fact-specific, and early guidance can reduce legal and commercial risk.

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