



In partnership with Castellum.Al

What to expect in 2025, based on trends and insights from 2024.

2025 Global Trade Compliance Report

Executive Summary

In 2024, we saw global trade compliance expand in scale and complexity, and we are already seeing a continuation (perhaps even an acceleration) in 2025 with sanctions headlines including Iranian oil, continued pressure on Russia, and halted negotiations with Colombia.

As global risks proliferate and risks intensify, this report offers insights to help compliance professionals navigate the year ahead.



Key Trends

The United States

The US issued more sanctions in 2024 than all other major countries combined, with **3,165** new sanctions.

China

China recorded the highest growth rate in 2024 at **96%**, primarily targeting U.S. and Western officials, businesses, and entities.

Russia

Russia remains a sanctions hotspot, with nearly **4x** as many new designations as the next nine most-sanctioned countries combined.

Iran

In early 2025, the US issued sanctions on Iran's oil exports. Terrorism-related sanctions surged in 2024, with 478 new designations primarily targeting **Iran-backed** conflicts.

Colombia

In January 2025, Colombia narrowly avoided new US sanctions by agreeing to accept deportation flights of illegal immigrants. 144 designations were removed in 2024.

Crypto: AML & Fraud

Crypto wallet sanctions surged from 256 in 2021 to 967 in 2024, highlighting the growing recognition of crypto as a fast, global method for moving value.

Global Trade Compliance Forecast for 2025

1

Trump will continue to prioritize sanctions throughout the rest of the year.

Despite claims early in his first term that he would not use sanctions, he issued nearly as many designations in his first term as Obama did during his two terms in office. In 2025, Trump has already demonstrated his readiness to leverage sanctions and tariffs as a primary tool to foreign policy.

The new administration will focus designations on countries identified as both security and economic adversaries. This includes:

- Increasing sanctions on Russia and using the prospect of sanctions removals as a carrot to entice **Moscow** to the negotiating table to end the conflict in Ukraine.
- Expanding the use of **thematic sanctions** to target foreign adversaries engaged in terrorism, illicit drugs and organized crime, and human rights violations.
- Pairing sanctions designations with export controls or other trade restrictions as part of the **Trump Administration's** efforts to pursue an America First policy.

Applying "maximum

pressure" on Iran.

2

The US will continue to deploy efforts to drive Iranian oil exports to zero and impose sanctions throughout the Middle East to discourage Tehran from obtaining nuclear weapons.

Sanctions have already been imposed on Iranian oil export to China.

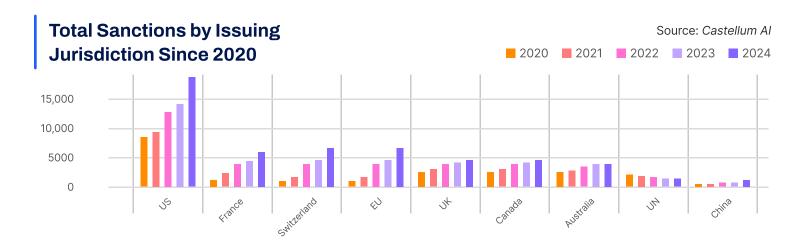
3

China responds to western sanctions activity.

In response to elevated diplomatic and trade tensions with the US, China will continue to significantly expand the number of sanctions targeting US and other Western officials and private sector parties perceived as operating against Beijing's interests, particularly in Taiwan.



US Led 2024 in Sanctions, Strong Signals of Continuation in <mark>2025</mark>



The US issued more sanctions in 2024 than all major sanctions issuing jurisdictions combined. Meanwhile, the number of total UN sanctions grew for the first time in four years, reversing a trend in declining designations by the only global sanctions body.

Global Response: China Leads the Charge

100% 80% 60% 40% 20% 8.8% 8.2% 1% -0.2% 0% Switzerland AUSTRIIO China canada France S ŝ t. R

2024: The Year China Learned to Love Sanctions

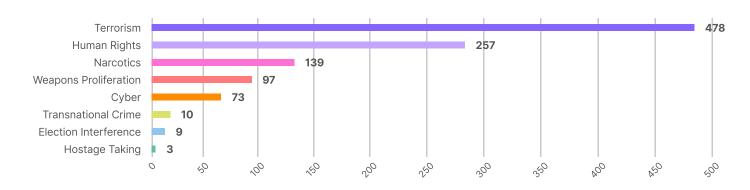
Growth in total sanctions by issuing jurisdiction in 2024 (percent). China nearly doubles sanctions imposed in one year.

Source: Castellum AI

Most Prominent Thematic Sanctions: Terrorism and Forced Labor

Terrorism Leads Sanctions Themes in 2024

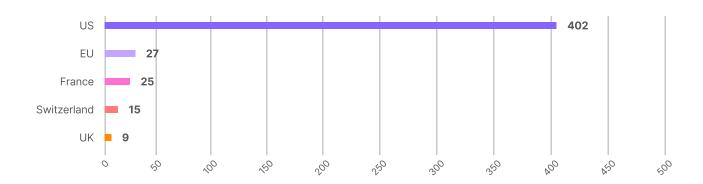
Source: Castellum Al



Only designations under theme-specific sanctions programs are included. Designations under country-specific sanctions programs are excluded unless cross listed with a thematic sanctions program.

Source: Castellum Al

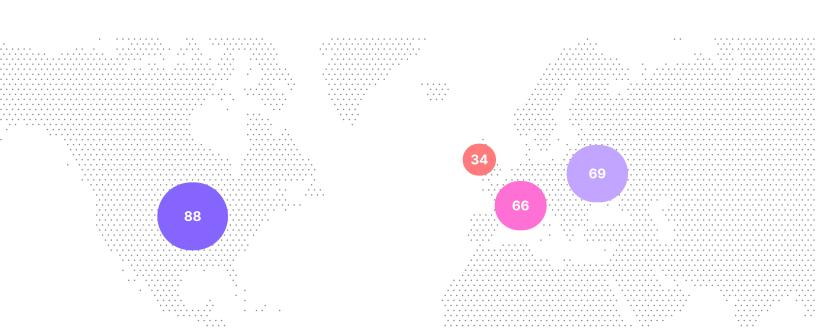
Terrorism Leads Sanctions in 2024 by Issuing Authority



Growth in total sanctions by issuing jurisdiction in 2024 (percent).

Human Rights & Corruption Sanctions, by Issuing Country

Western-aligned jurisdictions continued collaborating on human rights and corruption sanctions in 2024, with the US leading efforts. Notable joint actions included targeting Georgian officials involved in violent crackdowns on protestors following the country's parliamentary and presidential elections.

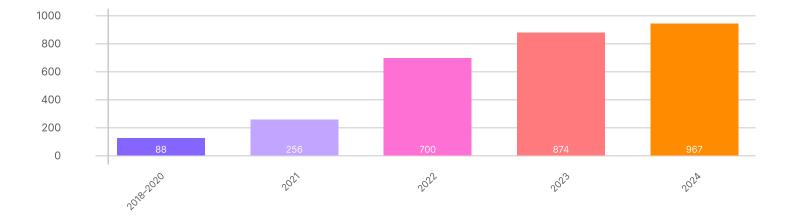


Source: Castellum Al

Crypto & Digital Assets: AML & Fraud

Total Sanctioned Crypto Addresses by Year

Source: Castellum Al



The number of crypto-related sanctions has steadily risen from 2021 to 2024, with the US maintaining a dominant role. In 2024, the US issued 90% of all crypto-related sanctions via OFAC.

Two Major Trends Over the Years:



Turning Insights into Action

2

1

Invest in Technology & Compliance Automation

Given the increasing complexity and scope of sanctions, modern compliance teams are investing in automated, technology-driven compliance solutions that provide real-time monitoring, automated due diligence, and risk-based flagging.

These solutions empower global compliance teams to manage risk at scale, enabling compliance professionals to focus their time and resources on the highest priority risks.

Strengthen Sanctions Screening and Risk Assessments

With the surge in thematic sanctions (e.g., terrorism, human rights, cybercrime), compliance teams must expand their screening capabilities to fortify their existing coverage as well as protect against emerging risks.

This includes regularly updating watchlists, conducting ongoing third party due diligence, and integrating with the most up-to-date third party data providers.

3

Build New Resilience for Global Regulatory Shifts

The global trade compliance landscape is highly dynamic, with evolving policies on Russia, Iran, China, and cryptorelated activities. Compliance teams must be prepared to proactively track geopolitical developments, anticipate regulatory changes, and adjust their compliance frameworks quickly.

Engaging with external experts and partnering with industry-leading data providers are core components to staying compliant amidst these emerging risks.





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