



Castellum.AI

2024

# SANCTIONS YEAR IN REVIEW

Data-driven insights into sanctions trends and what to expect in 2025.

[www.castellum.ai](http://www.castellum.ai)

# Executive Summary

We're excited to present the 4th Edition of Castellum.AI's Sanctions Year in Review—with deeper analysis and expert predictions for 2025. Our previous reports from 2023 and 2022 have empowered thousands of industry leaders with actionable, data-driven insights.

In 2024, sanctions expanded in scale and complexity. As global risks intensify, this report offers timely insights to help compliance professionals navigate the year ahead.

## Major Highlights

### The US

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

### Colombia

Colombia is open for business! There were 144 designations removed from the country, primarily related to narcotics trafficking and organized crime.

### China

China, despite having the lowest total number of sanctions, recorded the highest growth rate in 2024 at 96% (going from 102 to 200 designations).

### Russia

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

### Crypto

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.

### Terrorism

Terrorism-related sanctions saw a sharp rise in 2024, with 478 new designations, far surpassing human rights (257) and narcotics (139).

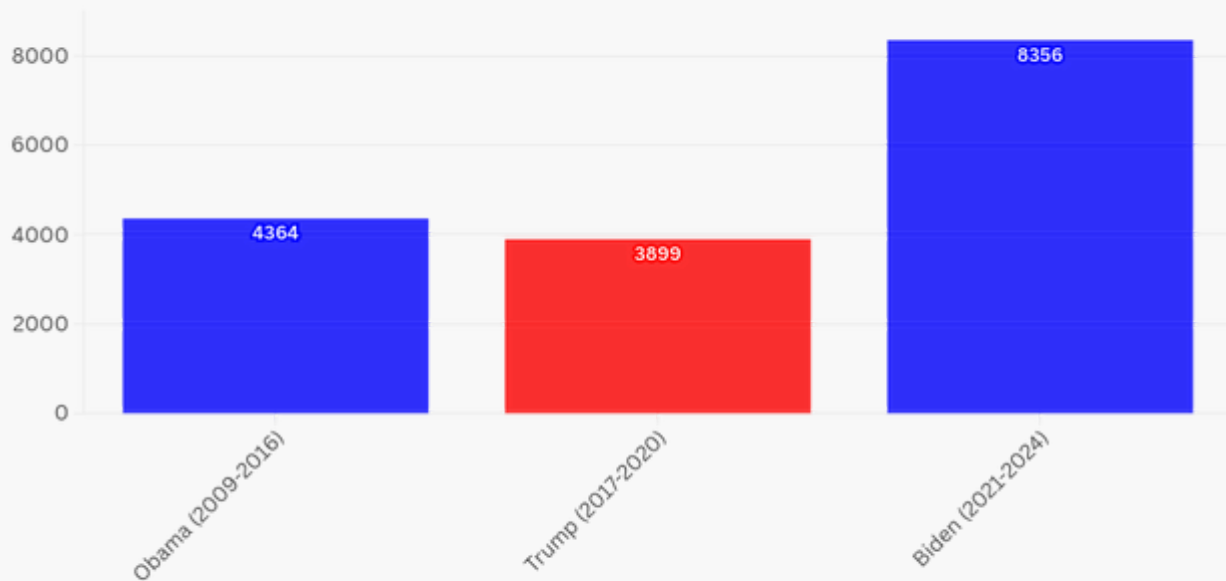
**Note:** This report is based on Castellum.AI's database of global sanctions programs which captures newly added sanctions and changes to sanctions lists every 5 minutes. Castellum.AI is known for its data accuracy, precision and timeliness. We regularly help governments correct mistakes in their sanctions data, including US OFAC, US BIS, Switzerland SECO, Thailand AMLO and others.





# Biden Issued More Sanctions than Obama or Trump

## Sanctions Issued Under Obama, Trump and Biden



Source: [Castellum.AI](#), [CNAS](#) • Obama- and Trump-era sanctions are based on research conducted by the Center for a New American Security (CNAS). Biden-era sanctions are based on sanctions data collected by Castellum.AI

The Biden Administration issued twice as many sanctions as Trump’s first administration. This is likely due to two reasons:

- Russia’s second invasion of Ukraine – which is over 50% of the Biden Administration’s actions, and
- OFAC’s machinery is so well oiled that Presidents increasingly rely on it as a potential solution, or at least a press release, for every problem.

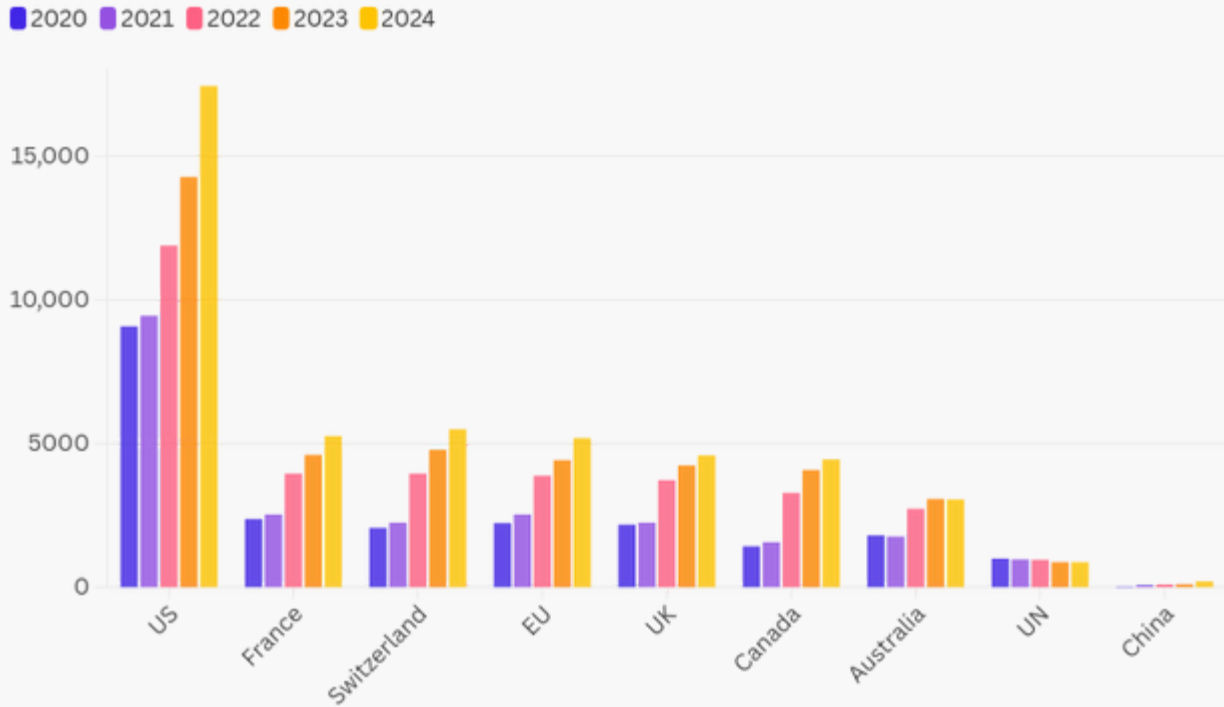
Biden issued more sanctions than any other President before him, *despite being a one term president.*





# US Leads with the Most Sanctions Issued in 2024

## Total Sanctions by Issuing Jurisdiction since 2020

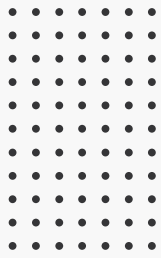


Source: [Castellum.AI](#)

**The US issued more sanctions in 2024 than all major sanctions issuing jurisdictions combined.**

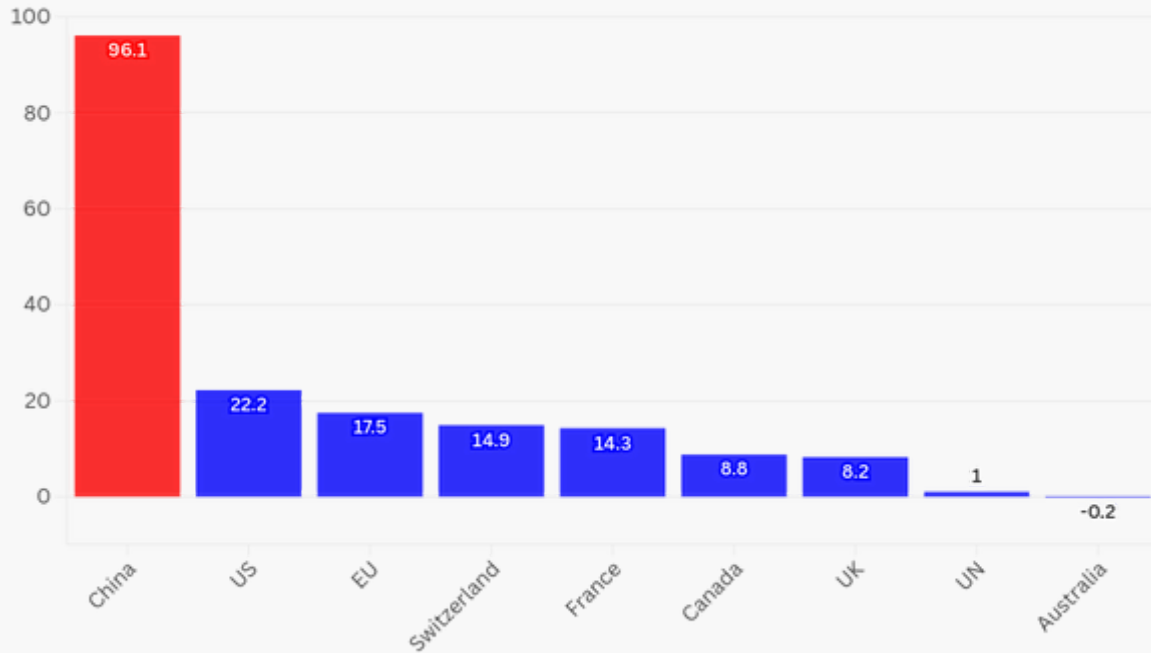
Meanwhile, the number of total UN sanctions grew for the first time in four years, reversing a trend in declining designations by the only global sanctions body.





## 2024: The Year China Learned to Love Sanctions

Growth in total sanctions by issuing jurisdiction in 2024.



Source: [Castellum.AI](#)

The divergence between the total number of sanctions and year-over-year growth rates highlights changing priorities and responses to global events in different jurisdictions. For instance:

- **China recorded the highest growth rate in 2024 at 96%** despite having the lowest total number of sanctions designations. This sharp increase signals a significant shift in China's approach. Beijing has adopted a more aggressive stance, targeting Western defense industry players and government officials for supporting Taiwan. China also took actions more frequently - with 98 actions in 2024 vs 10 in 2023.
- **Canada's sanctions list grew by only 9% in 2024** with 360 new designations. [This contrasts with 2023](#), when Canada had the largest growth in new sanctions among major issuing jurisdictions.
- **Australia's sanctions list shrank for the first time since 2021**, after two years of significant growth largely tied to sanctions targeting Russia over its invasion of Ukraine in 2022.



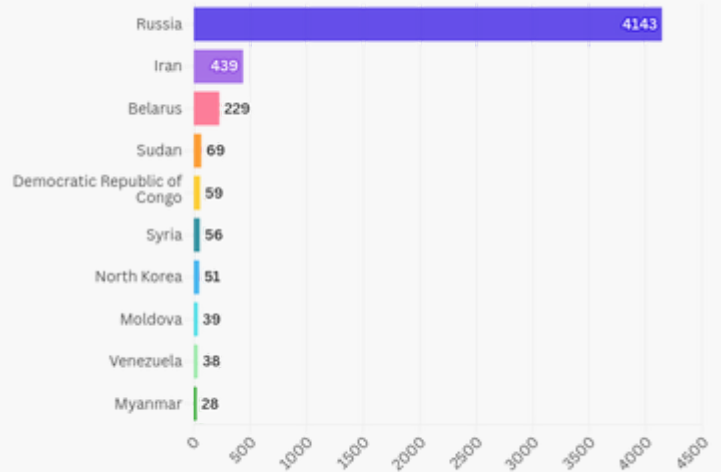


# Top Sanctions Targets in 2024

## Russia

Russia continues to be a sanctions hotspot, with nearly four times as many new designations as the rest of the top 10 most-sanctioned countries combined. The designations targeting Russia include sanctions against enablers who have facilitated Russia’s continued acquisition of arms and materiel to prosecute its war in Ukraine.

Russia Remains Top Sanctions Target in 2024



Source: [Castellum.AI](#) • Includes designations issued by EU, France, Switzerland, UK and US based on country-focused sanctions programs.

## Other key sanctions targets include:

### Iran

439 new sanctions targeting its support for Hamas, its supply chain to Russia fueling the war in Ukraine, backing of Houthi rebels in Yemen and human rights abuses.

### Belarus

Belarus is the third most sanctioned country, with 229 new designations, primarily tied to Lukashenko’s support for Russia’s war in Ukraine and oppression of domestic opposition.

### Sudan

Sudan ranks fourth with 69 new designations, targeting parties behind violence in Darfur, human rights abuses, and weapons proliferation.

### DRC

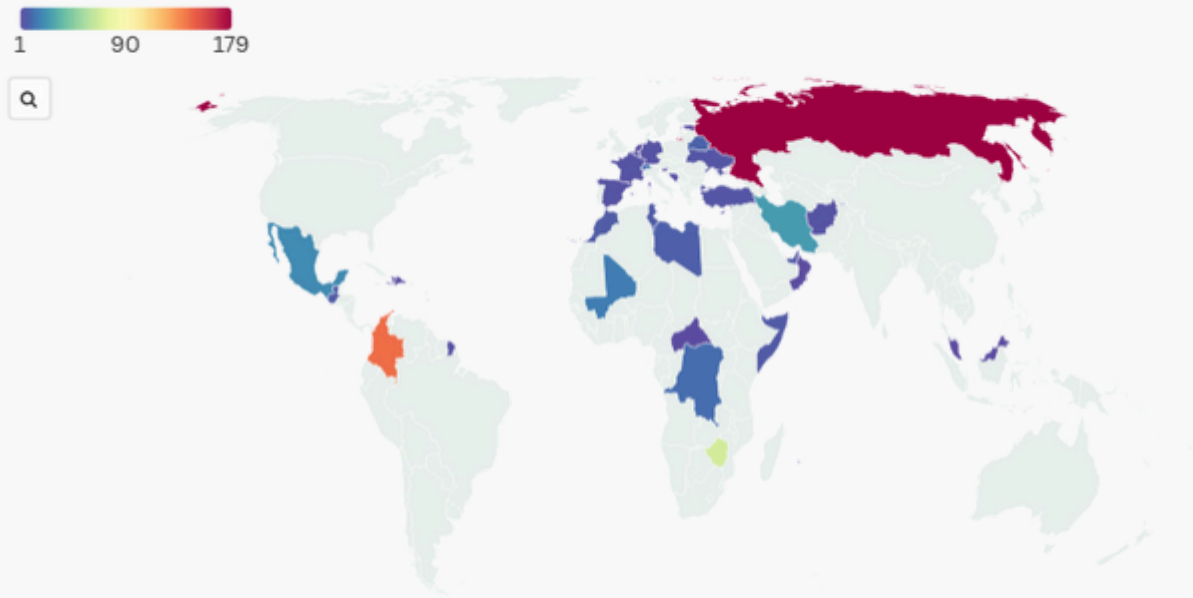
Democratic Republic of Congo faced 59 new sanctions this year. Most are linked to human rights abuses and ongoing violence in the east of the country.





# Sanctions Removed in 2024

## Sanctions Removed in 2024 by Location



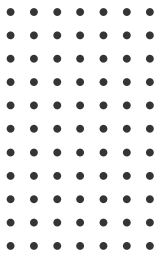
Source: [Castellum.AI](#) • Includes location-based data as provided by issuing authorities. Not all sanctions data includes location information.

**Russia** led in the total number of sanctions lifted in 2024, with 179 designations removed. However, the majority of Russia-related delistings appear to be issuing authorities removing duplicate entries (e.g. Australia DFAT had duplicate entries for the sanctioned company Alrosa).

### Other jurisdictions with removals in 2024 include:

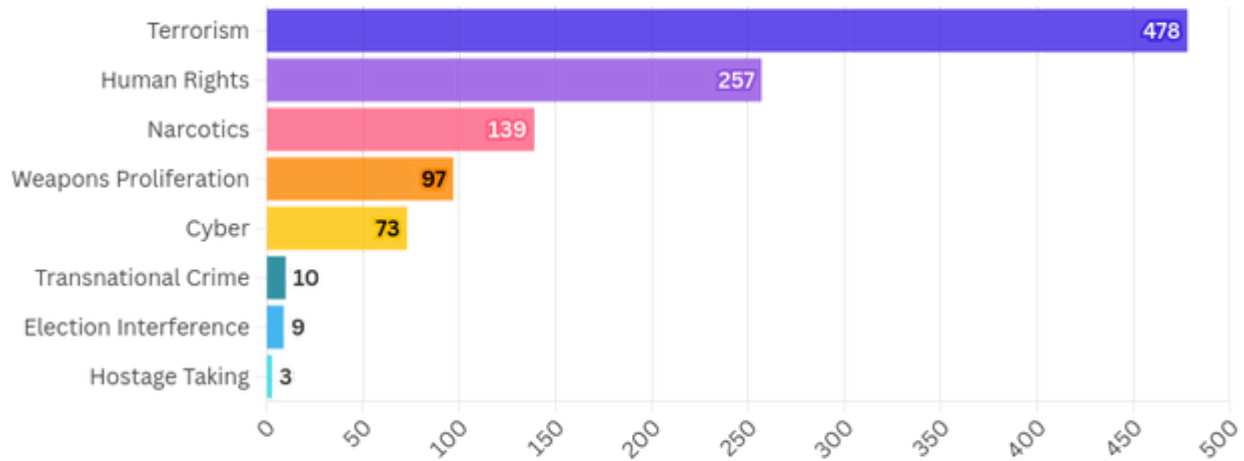
- **Colombia:** 144 designations, primarily related to narcotics trafficking and organized crime, were removed against individuals and entities in Colombia.
- **Zimbabwe:** Zimbabwe saw the removal of 67 sanctions, primarily due to OFAC's [Termination of Emergency With Respect to the situation in Zimbabwe](#) and the subsequent lifting of related sanctions designations.
- **Iran:** Iran's 25 delistings primarily related to the removal of designations around WMD proliferation by the EU.





# Most Prominent Thematic Sanctions

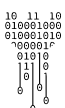
## Terrorism Leads Sanctions Themes in 2024



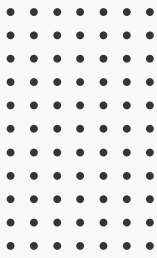
Source: [Castellum.AI](#) • Only designations under theme-specific sanctions programs are included. Designations under country-specific sanctions programs are excluded unless cross listed with a thematic sanctions program.

**Terrorism emerged as the dominant theme in sanctions issued in 2024, far outstripping all other categories.**

- Compared with 2023, most thematic sanctions (excluding cyber) saw a decline, while sanctions related to terrorism surged significantly. This increase primarily targeted terrorist activities linked to conflicts in the Middle East, including Gaza, Lebanon and Yemen – all of which involve parties backed by Iran.
- Furthermore, the 65% rise in cybercrime-related sanctions from 2023 highlights the increasing emphasis on digital threats as a critical aspect of global security.

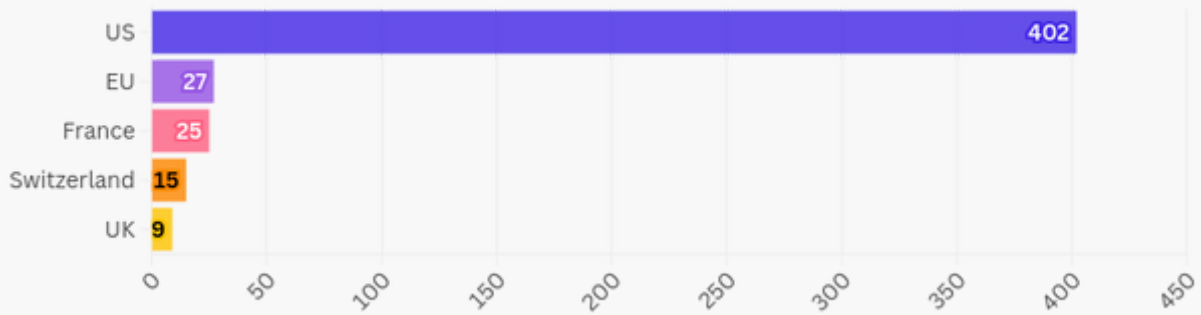






# Terrorism Sanctions

## Terrorism Sanctions in 2024 by Issuing Authority



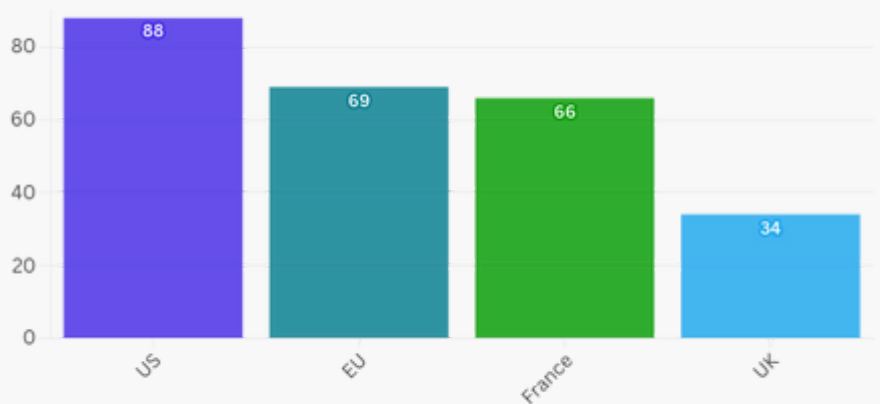
Source: [Castellum.AI](#)

As forecasted in our [2023 Year-in-Review](#), terrorism-related sanctions remain the largest thematic category in 2024 across multiple jurisdictions. The United States leads by a wide margin, accounting for 90% of all terrorism-related sanctions this year.

# Human Rights Sanctions

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.

## Human Rights & Corruption Sanctions by Issuing Country

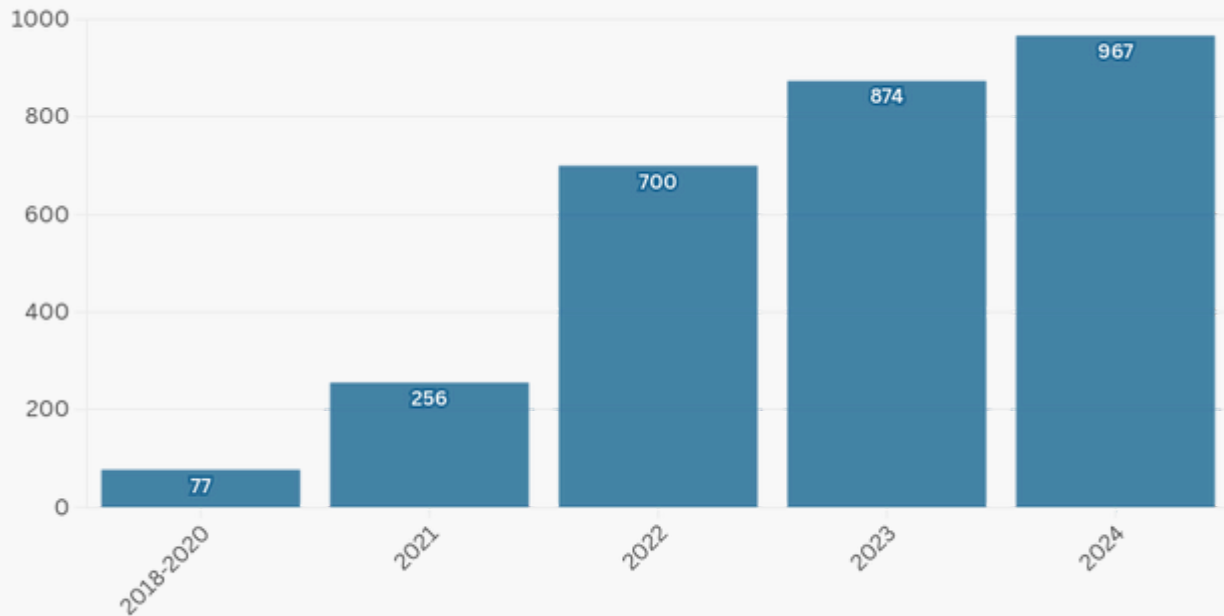


Source: [Castellum.AI](#) • Based on designations under Global Magnitsky or similar thematic sanctions programs targeting human rights abuses or corruption.



# Crypto Sanctions

## Total Sanctioned Crypto Addresses by Year



Source: [Castellum.AI](#)

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.

### Two major trends stand out over the years:

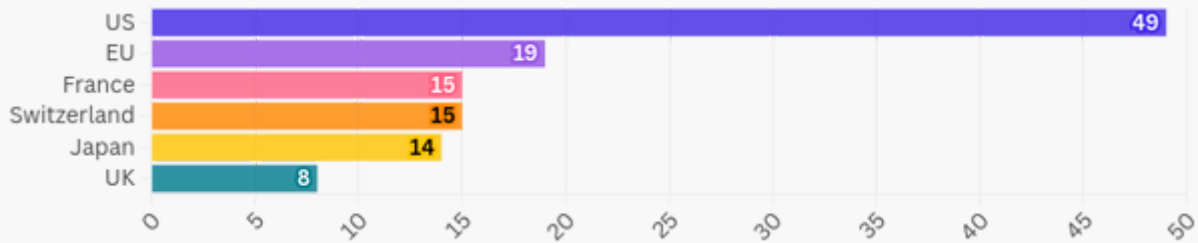
- Exponential sanctions growth in early years:** The sharp increase from 256 sanctions in 2021 to 700 in 2022 signals a growing global recognition of the need to regulate crypto activities, particularly to prevent its use in illicit activities such as money laundering and fraud.
- Stabilizing growth rate in recent years:** On the contrary, the growth rate from 2022 to 2024 has slowed, suggesting that while new sanctions continue to be issued, the initial surge to close regulatory gaps may have stabilized.





# Hamas and Israel Sanctions

## Hamas-Related Sanctions in 2024



Source: [Castellum.AI](#) • Includes Hamas-related sanctions based on issuing authorities' sanctions program titles or available location-based data.

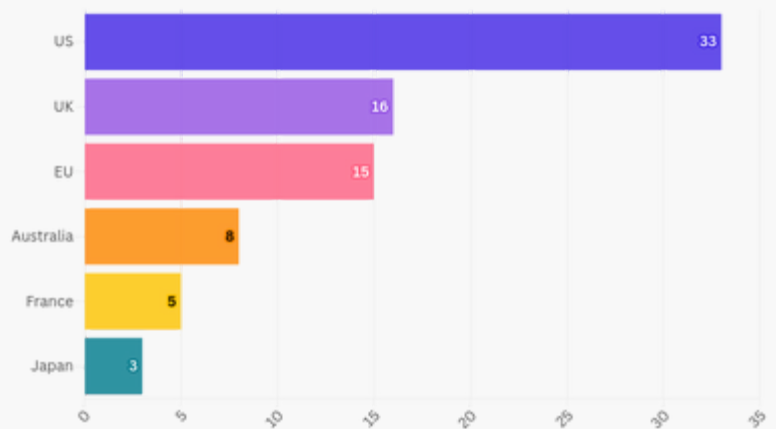
120 sanctions targeted individuals or organizations associated with or enabling Hamas' terrorist activities in 2024, a 40% increase over the number of Hamas-related sanctions issued in 2023 following the 7 October terrorism attacks.

Sanctions targeting Hamas were limited in 2024 compared with other sanctions developments, in large part because Gaza, Hamas' stronghold, is occupied by Israel and the region was already economically and politically isolated prior to the conflict.

Sanctions targeting Israeli activities since the start of the Israel-Hamas War have focused on non-state actors accused of extremist settler violence against Palestinians in the West Bank.

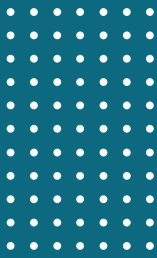
In February 2024, the Biden Administration issued Executive Order 14115 targeting destabilizing activities in the West Bank, with similar actions by the UK, Canada and EU under existing human rights sanctions.

## Sanctions Targeting Extremist Settlers



Source: [Castellum.AI](#) • Includes designations targeting violent settlers under existing human rights-related sanctions programs or dedicated sanctions programs.





# Countries Under Continued Sanctions Pressure in 2024

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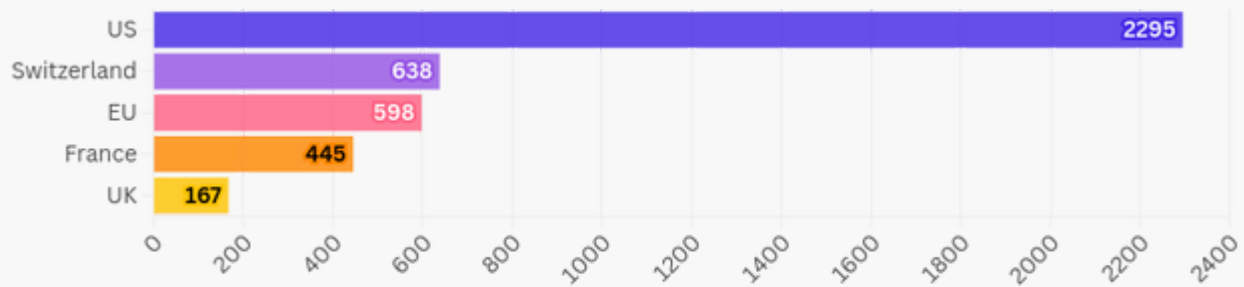
Russia  
China  
Iran  
Syria





# Russia Remains the Most Sanctioned Country Globally

## Sanctions Targeting Russia in 2024 by Issuing Country

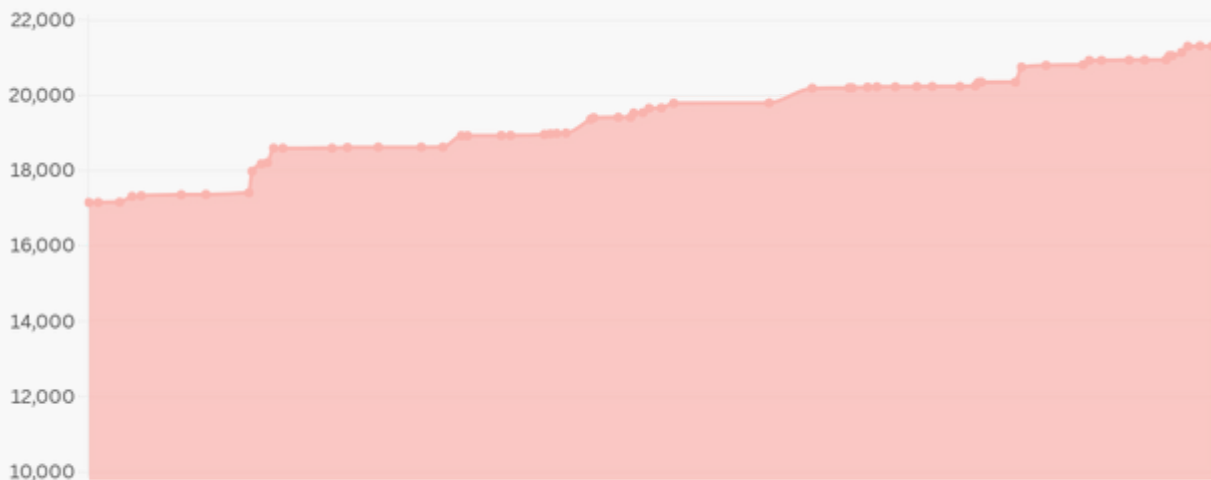


Source: [Castellum.AI](#)

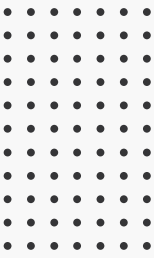
The US has levied 2,295 sanctions against Russia in 2024, significantly surpassing other jurisdictions. This overwhelming lead highlights the US's aggressive stance, driven by ongoing geopolitical tensions and a strategic focus on countering Russian efforts to evade existing sanctions, continue exporting energy to third countries and access critical materiel to continue its war in Ukraine.

Moreover, EU sanctions against Russia surged from 247 in 2023 to 598 in 2024 which reflects a unified effort by member states to respond to Russian actions.

## Growth of Sanctions Against Russia in 2024

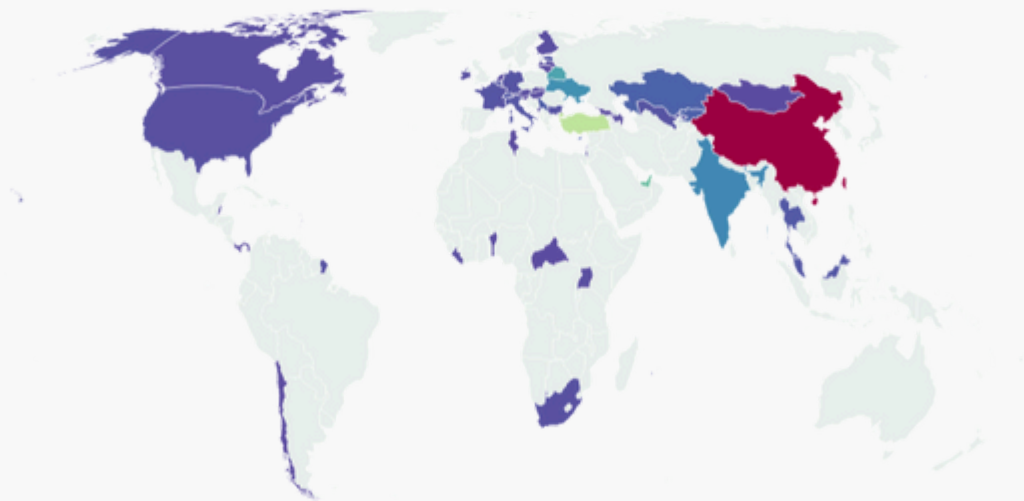


Source: [Castellum.AI](#) • Includes designations targeting Russia issued by the EU, France, Switzerland, UK and US. Designations that are cross-listed under multiple sanctions programs (e.g. a party is designated under both Iran and Russia sanctions programs) are included.



# One Third of Russia Sanctions Target Parties Outside Russia

## Russia-Related Sanctions Outside Russia



Source: [Castellum.AI](#) • Based on available location data for designations under Russia-related sanctions programs. Not all designations include location data.

Nearly 33% of Russia-related sanctions issued in 2024 target entities, individuals and vessels outside Russia, underscoring the global reach of these measures and efforts to crack down on sanctions evasion through third countries.

China stands out as a major hub for Russia-linked sanctions evasion and support, and accounts for 36% of Russia-related sanctions targeting parties outside Russia. This follows the [US Treasury's focus](#) on dismantling transnational networks involved in procuring ammunition and other materials for Russia, aiding Russian oligarchs and others evade sanctions.

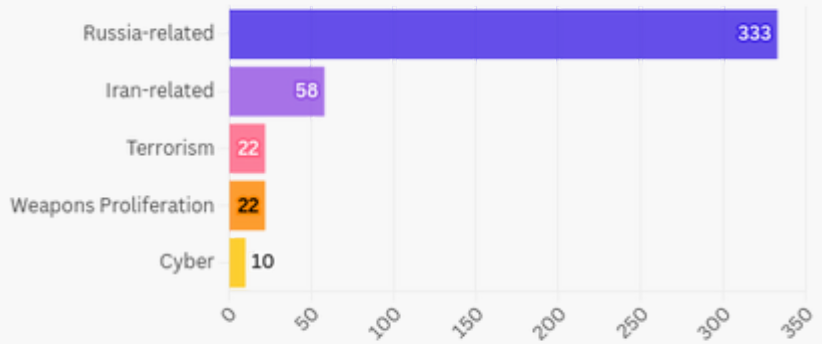




## China Targeted over Support for Russia, Iran

As we anticipated in our [2024 forecast](#), China continues to be a key hub for sanctions evasion, with individuals and organizations facilitating the flow of supplies to Russia, fueling the war in Ukraine. Other reasons for sanctions against parties in China include support for Iran and enabling Iran-backed terrorist groups, weapons proliferation and cyber-related activities.

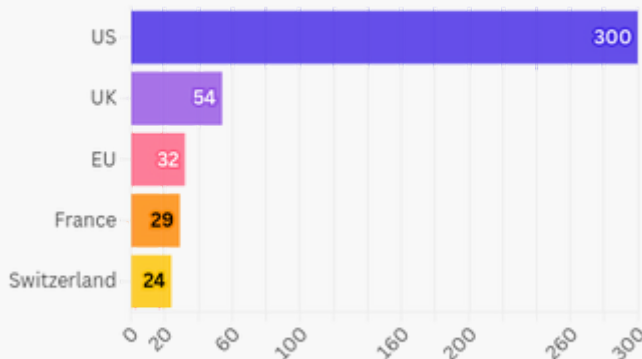
### Top 5 reasons for China-located Sanctions



Source: [Castellum.AI](#) • Includes designations with address data located in China. Not all designations include location data.

## Iran Faces Continued International Pressure

### Sanctions Targeting Iran in 2024 by Issuing Country



Source: [Castellum.AI](#)

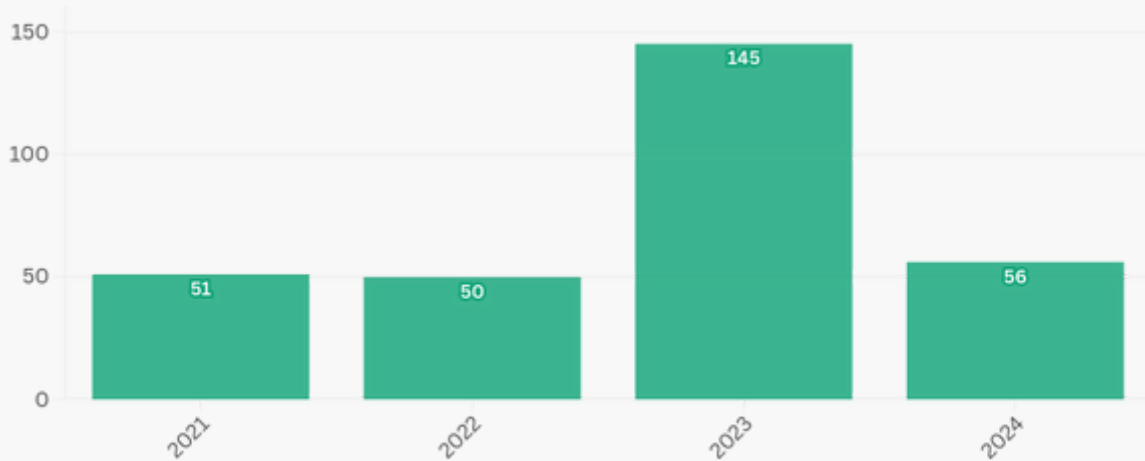
New sanctions targeting Iran in 2024 nearly halved from the previous year, when 751 designations were adopted by the US, UK, EU, France and Switzerland. The drop off in sanctions targeting Iran is likely a reflection of the already significant sanctions pressure on Tehran over its continued support for terrorist organizations like Hamas and Hezbollah, cooperation with Russia on evading sanctions, and existing sanctions against Iran’s oil industry.





# Decline in New Sanctions on Syria

Sanctions Targeting Syria: 2021-2024



Source: [Castellum.AI](#)

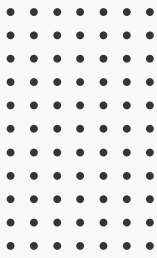
New sanctions against Syria dropped in 2024 after a 2023 spike driven by Syria-Russia ties and efforts to target facilitators enabling the Assad government. The shift reflects a redirected focus toward Russia-related sanctions evasion and broader terrorism concerns.

The Assad regime’s sudden fall in early December points to the opportunity for some sanctions to be lifted on humanitarian grounds in 2025, evidenced by OFAC’s [January 2025 General License](#) easing sanctions restrictions.

Additional delistings, including delisting the Hay'at Tahrir al-Sham group that led the overthrow of Assad, is dependent on whether the new regime is willing to disassociate itself with its terrorist past and implements the foundations for a new democratic process in Syria.







# Sanctions Forecast for 2025

## 1) Trump will continue to prioritize sanctions during his second term.

Despite claims early in Trump's 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, and famously tweeted "[Sanctions are coming](#)" with a picture of himself.

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

- Increasing sanctions pressure on Iran as part of any diplomatic engagement intended to reduce tensions between the two countries;
- 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; and
- Pairing sanctions designations with export controls or other trade restrictions as part of the Trump Administration's efforts to pursue an America First policy.

## 2) The reversal of sanctions targeting Syria will be slow.

Hay'at Tahrir al-Sham (HTS), which overthrew the Assad regime, and its leader, Abu Mohammed al-Jolani, are sanctioned by all major jurisdictions. Sanctions relief hinges on engagement with global powers, respect for human rights, and commitment to democratic elections.

## 3) China's sanctions program will become even more active.

In response to elevated diplomatic and trade tensions with the US, China will 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.





# Methodology

The data used in this analysis is based on sanctions designations implemented by Australia, Canada, China, EU, France, Switzerland, UK, UN and US and covers 1 January 2024 through 31 December 2024. This analysis includes sanctions additions and removals by major sanctions issuing authorities where available.

**Note:** The report excludes embargo-type sanctions programs which target an entire industry or country.

Location data is based on information available in the list source and is enriched based on Castellum.AI's proprietary enrichment process. The location data may constitute a residence or registered address.

For example, a designated company with an address in the UK may be registered at that address but subject to sanctions for activities outside of the UK's jurisdiction.

In the case of designations by China, the government has not developed a unified sanctions list as of the time of writing. Sanctions are announced ad hoc in press statements by the Chinese Ministry of Foreign Affairs, which Castellum.AI captures and enriches.





# About Castellum.AI

Castellum.AI is the most accurate, reliable and fastest compliance screening solution in the market that identifies global risk across sanctions, PEPs, adverse media, high-risk ownership, export controls and other data categories.

We eliminate 88% of the false positives that slow down compliance teams at banks, fintechs and global companies. Our platform is designed to meet the evolving needs of compliance teams, enabling seamless integration into KYC/KYB onboarding, real-time monitoring, transaction screening and supply chain compliance processes.

Castellum.AI uses proprietary Jgram matching algorithm and a patented, AI-driven data process to collect, standardize and enrich large volumes of unstructured financial crime risk data in real-time. The result is fewer false positives and significant time savings for compliance teams—hundreds of hours each year.

Learn more at [Castellum.AI](https://Castellum.AI)

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