

ELITE PARS

Law Firm



Introduction

Established in 2019, Elite Pars is a boutique law firm with professional lawyers and legal minds as its core team. Lawyers at Elite Pars render legal advice on a wide range of matters in parallel to dealing with various local, regional and international arbitration and litigation cases.

Elite Pars draws strength from its diversity. We recruit from a wide variety of backgrounds, seeking out the best and those with the highest potential and we invest in their development. Our profound knowledge of assorted legal areas, enables us to efficiently guide our clients through the most complex matters they are facing. Furthermore, our practical experience provides us with insights that help us assist our clients in achieving their legal goals.

In case you have any queries regarding this document or would like to inquire as to how we could serve you best, please feel free to contact our partners Dr. Navid Sato and/or Dr. Nima Nasrollahi via n.sato@elitepars.com and/or n.nasrollahi@elitepars.com.



LEGAL UPDATE: MARCH 2026

NEW GENERAL LICENSE AUTHORIZES SALE OF SPECIFIED IRANIAN CRUDE OIL AND PETROLEUM PRODUCTS

In A recent general license issued by the Office of Foreign Assets Control (OFAC) authorizes specific transactions related to the sale, delivery, or offloading of Iranian-origin crude oil and petroleum products. This license, effective March 20, 2026, provides a window until April 19, 2026, for these activities to take place.

The authorization covers transactions that are ordinarily incident and necessary to the sale, delivery, or offloading of these commodities, provided they were loaded onto vessels on or before 12:01 a.m. Eastern Daylight Time on March 20, 2026. This includes essential services for vessels such as safe docking, anchoring, crew health and safety, emergency repairs, environmental mitigation, and vessel management services including crewing, bunkering, piloting, registration, flagging, insurance, classification, and salvage.

This general license specifically applies to crude oil and petroleum products of Iranian origin produced by entities that might be subject to sanctions under various regulations, including the Iranian Transactions and Sanctions Regulations, Iranian Financial Sanctions Regulations, or the Global Terrorism Sanctions Regulations. Notably, the authorization also extends to the importation into the United States of these Iranian-origin crude oil and petroleum products, provided such importation is ordinarily incident and

necessary to the authorized sale, delivery, or offloading activities.

However, the license explicitly excludes transactions involving persons located in or organized under the laws of North Korea, Cuba, or specified covered regions of Ukraine. It also excludes transactions with entities owned or controlled by, or in a joint venture with, such persons. Furthermore, any other transactions or activities prohibited by different Executive orders or parts of 31 CFR chapter V not referenced in this general license remain unauthorized.

This regulatory action underscores the ongoing adjustments and specific provisions within the framework governing international trade and financial regulations, impacting key commodity sectors.

FOREIGN INVESTMENT IN FREE ZONES SKYROCKETS BY 268%

Recent reports indicate a significant surge in foreign investment within Iran's free zones, with figures climbing by an impressive 268% over the first 11 months of the current Iranian calendar year (March 21, 2025 - February 20, 2026). This brings the total foreign investment to approximately USD 1.025 billion during this period.

Alongside this foreign capital inflow, domestic investment within these zones also saw a healthy rise of 36% year-on-year. The value of exports from these zones also experienced a notable increase of 14%, reaching USD 1.322 billion over the same 11-month span.

These robust economic indicators highlight a period of significant development and activity

within the country's free trade and industrial zones. Officials emphasize that these zones are crucial for economic growth, facilitating production and trade, and playing a key role in diversifying trade routes and neutralizing economic pressures.

Utilizing legal exemptions and streamlined customs procedures, free zones are instrumental in reducing transaction costs and accelerating supply chains. Their strategic geographical locations across the country further enhance their role as vital nodes in the global trade network, ensuring continuity of service and economic dynamism even amidst challenging circumstances.

U.S. TREASURY GRANTS 30-DAY WINDOW FOR PURCHASE OF RUSSIAN CRUDE OIL AND PETROLEUM PRODUCTS

In a recent announcement, U.S. Treasury Secretary Scott Bessant revealed that countries are now permitted to purchase Russian crude oil and petroleum products currently at sea for a period of 30 days. This authorization comes in response to the significant surge in oil prices observed following recent international military actions impacting Iran.

This special 30-day exemption was initially issued to India on March 5th, allowing New Delhi to acquire Russian oil that was reportedly adrift at sea. The move by the U.S. Treasury appears to be a measure to stabilize the global oil market amidst heightened geopolitical tensions.

The price of Brent crude oil, a key global benchmark, has surpassed USD 100 per barrel

for the first time in four years, attributed to the escalating conflict and its impact on the region. The Treasury's decision to allow these purchases of Russian oil aims to mitigate the impact of these price increases and ensure a degree of market stability.

reports suggest that Iran has potentially earned approximately USD 8.7 billion from its oil sales following the outbreak of recent regional conflicts, according to insights from the Kepler Institute. This estimated profit stems from a substantial increase in oil prices, reportedly around USD 47 per barrel, during the period of conflict.

Data indicates that Iran's current holdings of oil, both on vessels and in transit, amount to roughly 187 million barrels. This volume represents a significant portion of global supply, equivalent to about one and a half days of worldwide consumption.

While external intelligence agencies have historically expressed skepticism regarding Iran's ability to unilaterally influence oil sales due to its own export dependencies, recent developments suggest a shift in regional oil market dynamics. Reports indicate that Iran's management of its oil sales and transit routes, particularly through the Strait of Hormuz, has become a critical factor influencing regional oil market stability. Other international players appear to be navigating these sales with an increasing awareness of Iran's managed influence over the flow of oil through this vital maritime passage.

IEA CONSIDERS MAJOR OIL RESERVE RELEASE TO COUNTER RISING PRICES

Amidst escalating tensions in the Middle East and the resulting energy crisis, the International Energy Agency (IEA) has put forth a proposal for the largest-ever release of oil from its member countries' strategic reserves. The aim is to rein in the surging crude oil prices.

Member countries of the IEA are scheduled to make a decision today, Wednesday, on whether to tap into their oil reserves. This move is a direct response to the significant price hikes in crude oil, which have been further inflamed by recent geopolitical events.

Sources suggest that this proposed release would be the most substantial in the IEA's history, exceeding the 182 million barrels released in 2022 following Russia's actions in Ukraine. The proposal was circulated during an emergency session, and its implementation is expected unless any member country voices an objection.

It's worth noting that global oil prices have reportedly climbed by as much as 40% since the conflict involving the U.S. and Israel against Iran began on February 28th. This proposed drawdown of reserves is seen as a critical measure to stabilize the market.



Dr. Navid Rahbar Sato

Managing Partner

Dr. Navid Rahbar Sato is a founding partner and the managing director of Elite Pars Law Firm. He is a qualified international and domestic lawyer in the Iranian market with a primary focus on cross border transactions and oil and gas law. With several years of experience, he has extensive comprehension of the national, regional and international commercial legal systems. He also handles litigation and arbitration cases where he sets out the legal strategies and heads the team in the process. He particularly advises clients on energy law, foreign direct investment, incorporation, mergers and acquisitions as well as import and export regulations in the region including sanctions' compliance matters.

Navid holds an SJD from Washington College of Law and is a Vanderbilt LL. M. graduate of NYU School of Law and an International Trade Law LLM graduate of the American University of Washington D.C. He is an assistant professor at Shahid Beheshti University of Tehran. Navid speaks fluent Farsi and English, as well as basic French and Japanese.

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Dr. Nima Nasrollahi Shahri

Partner

Dr. Nima Nasrollahi Shahri is a founding partner at Elite Pars Law Firm and heads the energy, investment law and arbitration practices of the firm. He is a seasoned lawyer in the field of oil and gas and renewable energies and has advised major international oil companies with respect to their participation in Iranian oil and gas projects. He holds a PhD in International Investment Law and has completed the LL. M. program of University of Dundee in Petroleum Law and Policy. He has a long list of Persian and English publications and is currently the director of oil and gas law LL. M. program at the

University of Science and Culture in Tehran where he is now supervising several dissertation theses, mostly related to the same field as well as commercial arbitration. Nima regularly does pro bono educational activities. He speaks Farsi, fluent English and intermediate French and Arabic.

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