



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C.

LICENSE No. IA-2026-1516078-1

IRANIAN TRANSACTIONS AND SANCTIONS REGULATIONS

LICENSE

(Issued under the authority of one or more of 22 U.S.C. §§ 2349aa-9, 8501-51, 8701-85, 50 U.S.C. §§ 1601-51, 1701-06, Executive Orders 12957, 12959, 13059, 13599, 13846, and 31 C.F.R. Parts 501 and 560.)

**To: Iraqi Airways Company
Baghdad International Airport
Baghdad
Republic of Iraq
ATTN: Dr. Mustafa Talib, CEO, Iraqi Airways**

1. Based upon information otherwise available to the Office of Foreign Assets Control (the "Application"), the transactions described herein are hereby authorized.
2. This License is subject to the condition, among others, that the Licensee(s) comply with its terms and with all regulations, rulings, orders, and instructions issued under any of the authorities cited above.
3. This License **expires on the earlier of the completion of the authorized transaction(s) or October 28, 2026** and is not transferable. The transactions described in this License are subject to the authorities cited above and any regulations and rulings issued pursuant thereto. This License may be revoked or modified at any time. If this License was issued as a result of willful misrepresentation it may be declared void from the date of its issuance or from any other date.
4. This License does not authorize transactions prohibited by any law or regulation administered by the Office of Foreign Assets Control other than those listed above.
5. This License does not excuse the Licensee(s) from the need to comply with any law or regulation (including reporting requirements) administered by any other agency or the need to obtain any required authorization(s) from any other agency.

Issued on behalf of the Secretary of the Treasury:

OFFICE OF FOREIGN ASSETS CONTROL

By _____
Erik Grossman
Chief, Licensing Division

Attention is directed to, *inter alia*, 18 U.S.C. § 1001, 50 U.S.C. § 1705, and 31 C.F.R. § 560.701 for provisions relating to penalties.

SECTION 1 – AUTHORIZATION: Subject to the conditions and limitations stated herein, Iraqi Airways, its service providers, and all U.S. persons acting on behalf thereof (the “Licensees”) are hereby authorized to engage in all transactions ordinarily incident and necessary to operate Iraqi Airways passenger transportation services between the Republic of Iraq and the Islamic Republic of Iran that would be authorized pursuant to sections 560.522 and 560.529 of the Iranian Transactions and Sanctions Regulations (ITSR), 31 C.F.R. part 560, and General License J-1 of December 15, 2016 (“GL J-1”) absent the suspension of those regulations. OFAC will not consider Eligible Aircraft, as defined in GL J-1, or goods reexported to Iran pursuant to GL J-1 as having entered into Iranian commerce for the purposes of the definition contained at 31 C.F.R. § 560.306.

SECTION 2 – CONDITIONS: (a) The flights authorized by **SECTION 1** hereof must not carry, transport, or otherwise involve bulk cash in any currency; cargo intended for Iranian intelligence, military, or law enforcement; any blocked person, including persons affiliated with the Government of Iran; or any persons affiliated with Iranian aligned militia groups.

(b) The flights authorized by **SECTION 1** hereof may only depart from and return to Najaf International Airport in Iraq, may only carry cargo consisting of personal baggage and items necessary for flight safety, and may only carry Iranian national passengers who are religious pilgrims.

(c) Except as authorized in **SECTION 1**, this License does not authorize the exportation or reexportation to Iran of any goods, technology or software, including any goods, technology or software controlled by the United States Department of Commerce under the Export Administration Regulations (15 C.F.R. parts 730 et seq.), or by the United States Department of State under the International Traffic in Arms Regulations (22 C.F.R. parts 120 et seq.).

(d) The transactions authorized by **SECTION 1** hereof are subject to the conditions of 31 C.F.R. §§ 560.522 and 560.529, and GL J-1 as in effect prior to the suspension of those regulations.

(e) Any payment or transfer of funds through the U.S. financial system ordinarily incident and necessary to give effect to a transaction authorized by **SECTION 1** hereof must be effected in a manner consistent with 31 C.F.R. § 560.516 and may not involve the debiting or crediting of an *Iranian account*, as such term is defined in 31 C.F.R. § 560.320.

(f) Except for transactions that may be prohibited by section 8 of Executive Order 13846, this License does not authorize any transactions otherwise prohibited by Executive Order 13846.

SECTION 3 – WARNINGS: (a) Except as authorized in **SECTION 1** hereof, nothing in this License authorizes transactions prohibited by any laws or regulations administered by OFAC. In particular, this License does not authorize transactions or dealings involving persons designated pursuant to the Global Terrorism Sanctions Regulations (GTSR), 31 C.F.R. part 594, or Foreign Terrorist Organizations Sanctions Regulations (FTOSR), 31 C.F.R. part 597. Accordingly, the transactions authorized by **SECTION 1** hereof must not involve any persons designated pursuant to the GTSR or FTOSR or persons acting on behalf thereof.

(b) This License does not authorize any transactions that occurred prior to the date of its issuance.

(c) Any transfer of funds through the U.S. financial system pursuant to the authorizations set forth in **SECTION 1** hereof should reference the number of this License to avoid blocking or rejection of the transfer.

(d) OFAC may revoke or modify this License at any time and for any reason including, but not limited to, the Republic of Iraq's failure to uphold its commitment to restrict Iranian flights from entering or transiting Iraqi airspace, other than those flights authorized by **SECTION 1** hereof.

SECTION 4 – RECORDKEEPING AND REPORTING REQUIREMENTS: (a) The Licensees are subject to the recordkeeping and reporting requirements of, *inter alia*, 31 C.F.R. §§ 501.601 and 501.602, including the requirement to maintain records concerning the transactions undertaken pursuant to this License for a period of 10 years. Such records shall clearly demonstrate the applicability of the authorization set forth in **SECTION 1** hereof.

(b) Iraqi Airways must submit a report to OFAC within 10 business days of the expiration of this License detailing the total number of passengers flown by the flights authorized by **SECTION 1** hereof, along with passenger names and passport numbers, and total funds spent by Iraqi Airways in Iran for fuel, maintenance costs, and any other airport-related services.

(c) All reports required by this section must cite the license Case ID number and be submitted via email to OFACReport@treasury.gov.

SECTION 5 – PRECEDENTIAL EFFECT: The authorization contained in this License is limited to the transactions specified in the Application.
