



International Trade & Sanctions

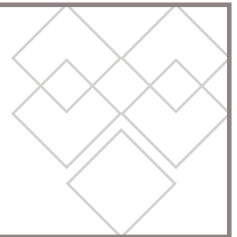
2026



PROFILED:

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Milbank LLP



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International Trade & Sanctions



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★ 2026
★ 2024

PERSONAL BIOGRAPHY

Bijan Ganji is a partner in the global risk and national security practice at Milbank LLP. He advises clients operating, trading or investing across borders on global commerce and foreign investment matters, including economic sanctions administered by the US Department of the Treasury, Office of Foreign Assets Control and the US Department of State, Office of Economic Sanctions Policy and Implementation, export controls administered by the US Department of Commerce, Bureau of Industry and Security and the US Department of State, Directorate of Defense Trade Controls, and national security investment reviews conducted by the Committee on Foreign Investment in the US.

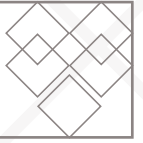
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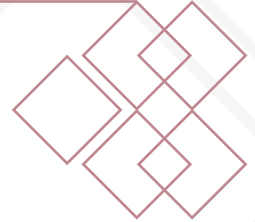


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Q&A WITH BIJAN GANJI



**Could you describe your approach to tackling complex legal challenges?
What principles or philosophies guide your work?**

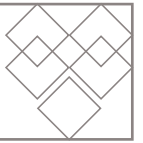
◆ Our global risk and national security practice advises clients on compliance and risk management in the context of complex cross-border investment, financing, trade and other commercial transactions, as well as engagement with governmental authorities, whether for licensing or in relation to inquiries or disclosures. In guiding our clients on compliance and supporting in the development of optimal risk management strategies, we take into account considerations as to both the prevailing and expected direction of applicable law, policy, enforcement disposition, formal and informal interpretive guidance and relevant geopolitical developments, as well as client-specific risk tolerance, internal policies and procedures and strategic interests. Our objective is to help our clients achieve and maintain compliance with applicable laws and regulations, while also balancing risk management, on the one hand, against successful execution of transactions and advancement of business objectives, on the other.

What role do you play in your firm's community outreach or pro bono initiatives? How has this involvement impacted you personally and professionally?

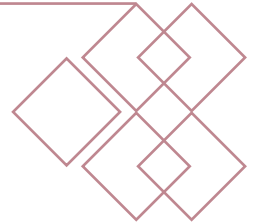
◆ I strive to maintain a diverse pro bono practice, with involvement across a variety of contexts, from human rights to diplomacy to post-war reconstruction. Each year, I lead several pro bono matters, with support from the firm and our dedicated team members. I have had the privilege of working on numerous meaningful, rewarding engagements, with wonderful clients. Earlier this year, I was recognised for my pro bono efforts in 2024, when I was named to the Capital Pro Bono Honor Roll by District

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of Columbia Courts. I value our pro bono work at Milbank – it affords me and our team members special professional opportunities that keep us grounded, expand our multidisciplinary horizon and deepen our sense of fulfilment in the practice of law.



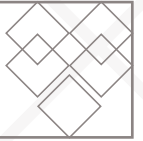
**Looking ahead, what are your predictions for this area of the market?
What key developments are on the horizon?**

◆ Significant advances in technology, particularly in the development and application of chips and artificial intelligence (AI), are producing profound economic and social changes. Although we are still in the early stages of this evolution, legal frameworks are struggling with the dual challenge of catching up to the new technology economy and anticipating how it will progress. As observed with the saga of the AI Diffusion Rule – issued in the waning hours of the Biden administration and rescinded in the first months of the Trump administration – there is intense philosophical debate, and a corresponding policy divide, on how US sanctions, export controls and other legal frameworks must adapt to protect and promote national security, while balancing numerous other interests. The resulting uncertainty and the prospect for innovation in relevant laws and regulations have yielded a complex but exciting legal environment, with the potential for dramatic growth and change in the coming years. ■

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CORRESPONDING POLICY DIVIDE, ON HOW US SANCTIONS,
EXPORT CONTROLS AND OTHER LEGAL FRAMEWORKS MUST
ADAPT TO PROTECT AND PROMOTE NATIONAL SECURITY, WHILE
BALANCING NUMEROUS OTHER INTERESTS.”**

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REPRESENTATIVE ENGAGEMENTS

- ◆ Advised several trading and investment conglomerates on specific licensing with the Office of Foreign Assets Control (OFAC) of the US Department of the Treasury for restructuring of a \$1.5bn debt financing.
- ◆ Advised an AI hyperscaler and cloud services provider on US export controls compliance and risk management matters, including in connection with a \$1.1bn series B funding round.
- ◆ Advised a former head of state and senior government official in delisting petitions to OFAC.
- ◆ Advised a prominent commodities trading business with respect to an internal investigation and remedial measures relating to sanctionable transactions and related protocols.
- ◆ Advised an integrated platform of leading aviation businesses with respect to various US sanctions and export controls compliance and risk management matters.
- ◆ Advised a major steel producer on US sanctions compliance in the context of its commercial transactions, including supply chain risk management.

