Irene Polieri

Associate Attorney

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London



Irene Polieri is an associate in the London office of Gibson, Dunn & Crutcher and a member of the firm's International Trade and White Collar Defense and Investigations practice groups. Irene is also a fellow in the War Studies Department at King's College, London.

Irene advises on compliance with UK, EU and U.S. sanctions and export control regulations, trade policy, as well as other aspects of international trade at the intersection of foreign policy and national security. Irene has substantive experience advising companies across different sectors including energy, manufacturing, banking and financial institutions. Irene's acts on matters before His Majesty's Treasury's Office of Financial Sanctions Implementation (OFSI), His Majesty's Revenue and Customs (HMRC), the Department for Business & Trade's Office of Trade Sanctions Implementation (OTSI), and the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC), and her practice ranges from regulatory and compliance advisory, advice in the context of transactions, to investigations and voluntary self-disclosures.

Irene is recognized by *The Legal 500 UK* 2024 for Regulatory Investigations and Corporate Crime, and is recognized by *The Legal 500 UK* 2026 as the firm's key contact for EU and UK sanctions and export controls.

Irene is a qualified attorney in New York and England & Wales, and is registered on the Roll of Solicitors in the Republic of Ireland.

Representative Engagements

- Regularly advising a European oil and gas supermajor on compliance with EU, UK and U.S. sanctions, including on sensitive matters subject to executive committee review.
- Led a team advising a French multinational manufacturing corporation in relation to a UK and U.S. export controls investigation due to a regulatory disclosure mandated by HMRC and successfully negotiating a 75% reduction in penalty.
- Advised a global industrial manufacturing corporation with European operations on all aspects of its divestment from Russia, including obtaining licenses in various European Member States.
- Regularly advise a bulge bracket investment bank on compliance with EU, UK and U.S. sanctions, including frequent engagement with government agencies in various jurisdictions, including OFAC and OFSI.
- Regularly advise a S&P 100 technology and media conglomerate on EU and UK sanctions and export controls.
- Advised a non-profit organization on the implications of U.S. sanctions on the International Criminal Court.

Capabilities

International Trade Advisory and Enforcement

Energy and Infrastructure

National Security

Oil and Gas

Sanctions and Export Enforcement

White Collar Defense and Investigations

Credentials

Education

University of Law - 2020 LPC MSc in Law, Business and Management

University of Oxford - 2019 BA (Hons) Jurisprudence

King's College London - 2016 Bachelor of Arts

Admissions

England & Wales - Solicitor

New York Bar

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- Conducting and internal investigation and responding to an OFAC subpoena related to compliance gaps for a U.S.-based financial institution.
- Regularly advise a global healthcare manufacturer on compliance with EU, UK and U.S. trade sanctions and export controls, obtaining licenses in France and Luxembourg.
- Advised a S&P 100 financial services and payment processing corporation on an internal review of its UK export controls and customs compliance processes.

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