



Alex Haines

Year of Call: 2007 (England & Wales); 2019 (New York); and 2020 (Ireland)

Direct Access: Yes

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Alex is a barrister called to both the English and Irish Bars and a US-qualified attorney admitted to the NY Bar. He is a dual national, fluent in French and Spanish, specialist in international law and sanctions with rare expertise in **international organisations** law.

Alex was appointed to the Attorney General's London B Panel in 2019 and as Sanctions Officer at the Caribbean Development Bank in 2020. His core practice areas are: (i) **business crime** including global investigations and Multilateral Development Banks (MDBs) debarment frameworks; (ii) **sanctions and export control**; (iii) international regulatory and disciplinary proceedings; (iv) institutional law of **international organisations** (IOs) including their immunities and international administrative law; (v) **international arbitration**; and (vi) **financial services** inquiries. He is ranked in Chambers and Partners for *Sanctions* (Band 2) and Legal 500 for *Business and Regulatory Crime (including global investigations)* (Tier 3).

Alex regularly litigates before international tribunals, mostly in Washington DC, New York City, London and the regional hubs for IOs such as Geneva, Vienna, Jeddah and Addis Ababa. The cases he has been instructed in have involved more than 35 IOs including the EBRD, EIB, IADB, IMF and UN (including its specialised agencies and funds). Between 2020 and 2022, Alex was successful before the International Administrative Tribunals of the World Bank, Organization of American States, Islamic Development Bank, African Union and UN (all reported).

In 2022, Alex was instructed by the Attorney General of a Crown Dependency on a multibillion-dollar sanctions matter, and by HM Treasury to advise on the sale of Chelsea FC and the proceeds thereof in light of the designation of its former owner under Russian sanctions. His unusual practice often leads to instructions on cross-over (and cross-border) issues involving economic sanctions, investigations, IOs and the anti-corruption regimes of MDBs.

He authored the new chapter on MDBs and their debarment systems in *Lissack and Horlick on Bribery and Corruption* (3rd ed., Lexis Nexis, 2020) and co-authored the chapter on UK, UN & EU sanctions in *Smith, Owen and Bodnar on Asset Recovery (Criminal Confiscation and Civil Recovery)* (OUP, 2019). He sits on the Bar Council International Committee and is registered for direct access and qualified for litigation. Before starting at the Bar, Alex worked as an intern at the International Criminal Court in the Office of the Prosecutor in The Hague.

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Areas of Expertise

Business Crime and Regulation

Alex's practice includes international fraud and corruption. He has an intricate understanding of MDBs and International Financial Institutions and their debarment systems. His practice consists of advocacy (written and oral), litigation, investigations and advisory work. He has represented companies and individuals before both the World Bank's Sanctions Board in Washington DC and the Asian Development Bank's Integrity Oversight Committee in Manila and, between 2014 and 2017, he was instructed by the Integrity and Anticorruption Department of the African Development Bank in a case jointly investigated by the US Securities and Exchange Commission. Alex authored the new chapter on the Sanctions Regimes of MDBs for *Lissack and Horlick on Bribery and Corruption* (3rd ed., Lexis Nexis, 2020). He is ranked in Legal 500 for *Business and Regulatory Crime (including global investigations)* (Tier 3).

In 2019, Alex was instructed by a UN specialised agency to lead an investigation into allegations of fraud in its regional office in South-East Asia. He has experience assisting with negotiated resolution agreements, voluntary disclosure issues, and the redesign of integrity compliance programmes to make them compliant with IFIs' Anti-Corruption Task Force guidelines. Alex assists with representing consultants in audits and investigations conducted by the World Bank and other MDBs, criminal referrals to national authorities, mitigating risks of cross-debarment under the Cross-Debarment Agreement, post-sanction assistance including representation before the MDBs' Integrity Compliance Office, and advising on privileges and immunities.

Alex has lectured on the sanctions proceedings of MDBs to a number of institutions including the Brazilian Bar Association, British Chamber of Commerce, Korean Bar Association, Shanghai Bar Association, English Law Week in Mexico, and he was a panellist at the 35th International Symposium on Economic Crime at Jesus College, Cambridge. His work on debarment has continued through his efforts with Transparency International's Suspension and Debarment Taskforce and *Oxford International Organizations* (OUP) as a rapporteur.

Sanctions Law

In 2022, Alex was instructed by the Attorney General of a Crown Dependency on a multibillion-dollar sanctions matter. As a member of the UK Attorney General's London B Panel, he is also regularly instructed by HM Treasury and FCDO to advise on sanctions matters, including the sale of Chelsea FC in the first part of 2022 and the proceeds thereof in light of the designation of its former owner under Russian sanctions. Alex also advises companies on all aspects of sanctions law across the UN, EU, US and UK frameworks, particularly in the context of financial sanctions and export control. He was recently instructed by a US law firm to represent an Eastern European engineering company in relation to its sanctions designation under UK legislation, as well as a US-owned company accused of violating export licensing requirements under the Export Control Order 2008/3231.

In 2019, Alex co-authored the chapter on UK, UN & EU sanctions in *Smith, Owen and Bodnar on Asset Recovery* (OUP). In 2018 and 2019, Alex was retained by a UK law firm to advise on the effect of the EU Blocking Statute on US secondary sanctions against Iran following its withdrawal from the JCPOA. Alex is one of the few barristers ranked for sanctions (Chambers and Partners Band 2).

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International Disciplinary Law

Alex represents international civil servants accused of and investigated for sanctionable practices (*i.e.*, fraud, corruption, collusion and coercion) and other misconduct including sexual offences throughout the investigatory framework of IOs. He has represented employees facing internal disciplinary proceedings before disciplinary committees at dozens of institutions including the World Bank Group, PAHO, UN, EPO, EBRD and IMO.

Alex's instructions include oral hearings before disciplinary tribunals as well as strategic advice and written advocacy. He also advises on referrals made from IOs to criminal and regulatory domestic bodies including the scope and potential impact of such a referral.

International Administrative Law

Alex regularly appears and litigates before International Administrative Tribunals on behalf of both international civil servants (class actions, individuals seeking relief from administrative decisions, and whistleblowers who have been retaliated against for coming forward and shedding light on reprehensible practices) and IOs themselves.

He has acted as counsel to the Black Sea Trade and Development Bank in Thessaloniki and was previously instructed by the Commonwealth Secretariat before its Arbitral Tribunal in London. He has appeared before the following International Administrative Tribunals:

- African Union Administrative Tribunal (AUAT)
- Asian Development Bank Administrative Tribunal (AsDBAT)
- Black Sea Trade and Development Bank Administrative Tribunal (BSTDBAT)
- Commonwealth Secretariat Arbitral Tribunal (CSAT)
- Court of Justice of the European Union (General Court)
- European Bank for Reconstruction and Development Administrative Tribunal (EBRDAT)
- Inter-American Development Bank Administrative Tribunal (IADBAT)
- International Labour Organisation Administrative Tribunal (ILOAT)
- International Monetary Fund Administrative Tribunal (IMFAT)
- Islamic Development Bank Administrative Tribunal (IsDBAT)
- Organization of American States Administrative Tribunal (OASAT)
- United Nations Appeals Tribunal (UNAT) and Dispute Tribunal (UNDT)
- World Bank Administrative Tribunal (WBAT)

Alex also represents victims of harassment and employees who find themselves in difficulties in field missions (in particular the UN). He has an interest in the rights of women having represented several victims of sexual harassment and maternity discrimination. In the wake of the investigations into a culture of impunity at the beginning of 2018, Alex represented Oxfam survivors and assisted journalists from the Guardian and New York Times in their investigations. Alex has worked with the charities Penal Reform International and Advocates for International Developments specifically on the rights of female abuse victims convicted of violent crime against their abusers.

Alex has lectured on international administrative law and the immunities of IOs at the universities of Exeter, City of London, Brasilia, Hong Kong, La Sorbonne, and King's College, and on the application of international human rights law to IOs at the ICJ and Stockholm Centre for International Law and Justice, as well as on the appeals systems of IOs at the

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Council of Europe in Strasbourg.

International Arbitration and ADR

In 2019, Alex was instructed in three international arbitrations administered by the London Court of International Arbitration (LCIA) using the UNCITRAL Rules against one of the largest IOs in the UK. Alex's experience is particularly sought after when it comes to issues touching on the cross-over between IOs and their immunities, international human rights law, and international arbitration. In 2020, he was instructed on behalf of the Respondent in an LCIA international commercial arbitration worth over £115 million. The dispute was between two parties in a former Soviet Republic involving high value commodities.

Alex is regularly instructed in mediations, conciliations and settlement negotiations with an international dimension. He is experienced in class action mediations having been instructed in a complex case against an MDB headquartered in the US. His 140 clients were employees from ten Regional Offices in Central America, South America and the Caribbean, and the mediation sessions were held in both Spanish and English.

Throughout 2018, Alex was instructed by the Staff Association of the EIB in Luxembourg to represent its interests on a Conciliation Board. He has also represented employees of European institutions before various panels, the sessions of which were held in both English and French.

Financial Services Inquiries

Alex has been instructed as part of the evidence review team in the Dame Linda Dobbs Review since May 2019. The Review was set up to investigate whether issues relating to HBOS Reading were investigated and appropriately reported to authorities following Lloyds Banking Group's acquisition of HBOS.

Memberships

- Appointed as Sanctions Officer at the [Caribbean Development Bank](#) (since 2020)
- Called to the Irish Bar (2020)
- Appointed to the Attorney General's London B Panel (from 2019 to 2024)
- Admitted to the New York Bar (2019)
- Member of the [Bar Council International Committee](#) (since 2014)
- Rapporteur for [Oxford International Organisations](#) (OXIO), Oxford University Press
- UN Office of Staff Legal Assistance (OSLA) volunteer lawyer
- Diplomas from the International Institute of Humanitarian Law, Sanremo, on the Law of Armed Conflict: 152nd International Military Course (2013) and 34th Advanced Course on IHL (2017).

Languages

- French (native)

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- Spanish (fluent)
- Italian (basic)

Publications

- Co-authored the chapter on UK, UN and EU Sanctions in Smith, Owen, and Bodnar on Asset Recovery (Criminal Confiscation and Civil Recovery), OUP.
- Authored the new chapter on the Sanctions Regimes of Multilateral Development Banks for Lissack and Horlick on Bribery and Corruption (3rd edition, Lexis Nexis).
- The International Administrative Law Centre of Excellence Legitimacy Index (all five editions: 2014-2018 – www.ialcoe.org/legitimacy-index).
- Sanctions Procedures of the African Development Bank Group, OXIO 101, OUP (opil.ouplaw.com/home/OXIO).
- Statute of the Administrative Tribunal of the Inter-American Development Bank Group, OXIO 152, OUP (opil.ouplaw.com/home/OXIO).
- World Bank Sanctions Procedures, OXIO 41, OUP (opil.ouplaw.com/home/OXIO).
- Appeals Procedures of the Administrative Tribunal of the European Bank for Reconstruction and Development, OXIO 200, OUP (opil.ouplaw.com/home/OXIO).
- Statute of the Administrative Tribunal of the International Monetary Fund, OXIO 348, OUP (opil.ouplaw.com/home/OXIO).
- Enforcement Policy and Procedures of the European Bank for Reconstruction and Development, OXIO 349, OUP (opil.ouplaw.com/home/OXIO).
- The Nature of the Beast – A Comparison Between International Administrative Tribunals, Federation of International Civil Servants' Associations, 'Focus on FICSA', 2018 Edition.

Awards

- Hardwicke Scholar (Lincoln's Inn)
- Scholarship for International Law Placement (Lincoln's Inn)
- Pupillage Award (Lincoln's Inn)
- Florida Advocacy Course Scholarship (South Eastern Circuit)
- Bar Council business development mission grant to Brazil (UKTI)
- Grant for Bar Council mission to Seoul and Shanghai (CBA)

Recommendations

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