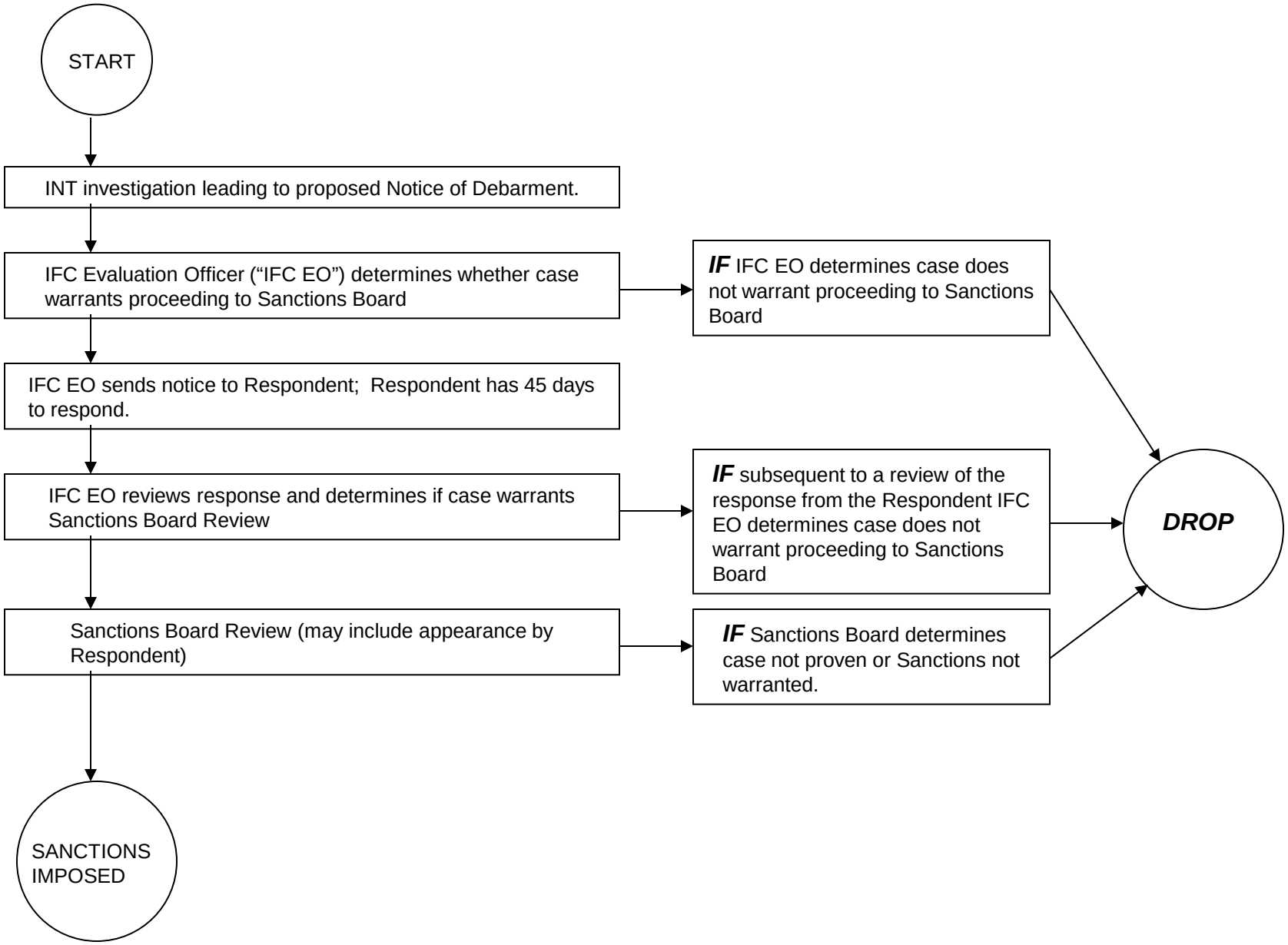IFC Sanctions Process - Procedure