



# EU Sanctions

## Dos and don'ts

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# Navigating sanctions

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# Russian sanctions

Council Regulations  
Law of 19 December 2020  
CJEU case law



Commission Guidelines  
Guidance Ministry of Finance  
Best practices Council

## Asset freeze

- Listed business partner?
- Listed board member / shareholder?
- Ownership v. Control?
- Suspend financial transactions?
- Suspend contracts?
- Due diligence?



# Deposit restriction

- 100 000 EUR
- Targets Russian nationals
- Notion of “deposits”
- Technical impossibility?



## Securities + UCI units

- Exposure to EU-currency securities
- Units providing exposure
- Pre-existing situations?
- Screening on asset-side?



## Import / Export restrictions

- Prohibitions v. prior authorisation
- Financing and financial assistance
- Insurance and reinsurance
- Other services



## Service restrictions

- Services for listed entities
- Financial services
- Investment services
- Services for trusts
- Consulting services





# Due diligence

- Prevention
- Screening
- Monitoring
- Action and Reporting
- Forensics
- Transparency



## In case of a breach?

- No gatekeeper principle
- Anti-circumvention provision
- Criminal prosecution
- Large fines
- Liability?



# Q&A

## Contact us

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