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EU SANCTIONS HELPDESK

SUPPORTING EU SMEs AND PARTNERS
WITH SANCTIONS COMPLIANCE

Navigating Sanctions: Due Diligence in Practice

What: Restricted products and services

22 May 2026

Housekeeping



All attendee microphones will be muted throughout



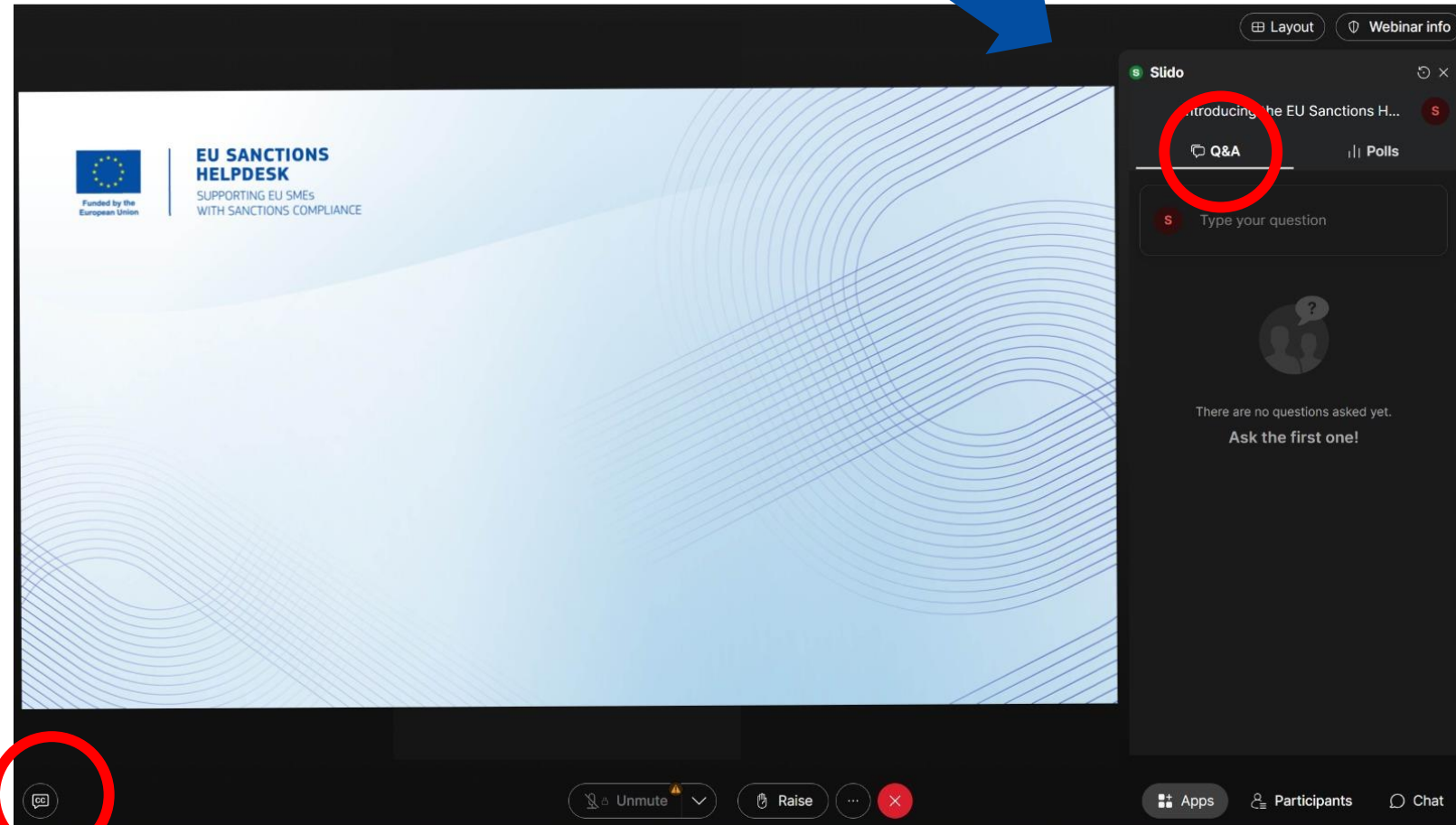
Materials and a recording will be shared



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Future events



Due Diligence in Practice

Module 3:
High-Risk Countries and Circumvention



Friday 29 May 2026



10:00 – 10:45 (CET)



Due Diligence in Practice

Module 4:
End-Use and End-User Risks



Friday 5 June 2026



10:00 – 10:45 (CET)



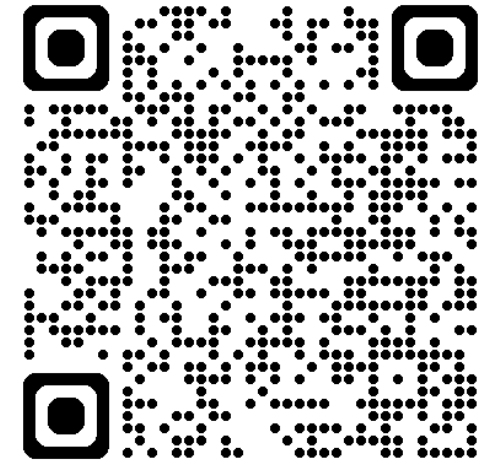
Using the EU Sanctions Helpdesk:
An introduction for SMEs



Wednesday 8 July 2026



10:30 – 11:00 (CET)



Register today!

Today's Team

HOST



Ian Matthews

Team Leader | Key Expert EU Restrictive Measures
EU Sanctions Helpdesk

TRAINER



Diederik-Jan Posthuma

Attorney at law
Agorax

MODERATOR

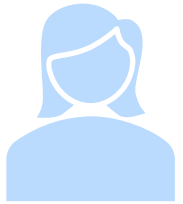


Eline Mooring

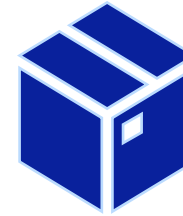
Attorney at law
Agorax

Recap: The Four Keys to Compliance

Navigating Sanctions: Due Diligence in Practice



Module 1: Who?
Counterparty due diligence



Module 2: What?
Restricted products and services



Module 3: Where?
High-risk countries and circumvention



Module 4: What for?
End-use and end-user risks

What You'll Learn in This Module

- 
- Scope of restricted goods and services
 - Key categories of restricted goods
 - How to determine if a product is restricted
 - Understanding "ex" codes and their impact
 - Restrictions on services and technical assistance
 - Evidence and documentation to support assessments

Why product screening matters



**Trade restrictions
under EU sanctions
may prohibit:**



• Export, sale, supply transfer of restricted goods



• Import or purchase from sanctioned country



• Provision of related services (technical assistance, financing, brokering)



• Provision of standalone services (IT, consultancy, engineering, etc.)



**You must
check both:**



WHO (counterparty)



WHAT (product or service)



A transaction may be prohibited even where the counterparty is not listed

Categories of restricted goods

Dual-use goods

Military goods

**Common High Priority
(CHP) items**

**Country specific
restrictions (e.g. Russia,
Belarus regimes)**

**Goods of strategic
importance**

Import-restricted goods

What are dual-use goods



What are dual-use goods?



Goods with both civilian and military applications



Listed in Annex I of Regulation (EU) 2021/821.



Export may require authorisation depending on destination



How to identify:



Compare technical specifications against [Annex I](#)



Consult your national competent authority where necessary



Consider requesting a binding classification



Russia context:

Dual-use goods are generally subject to a comprehensive export ban

Common High Priority (CHP) Items



What are CHP items?



Goods identified in Russian military equipment recovered in Ukraine



Listed in Annex XL of Regulation 833/2014



Key obligations:



Apply enhanced due diligence



Request and verify end-user information



Take measures to prevent re-export to Russia or Belarus

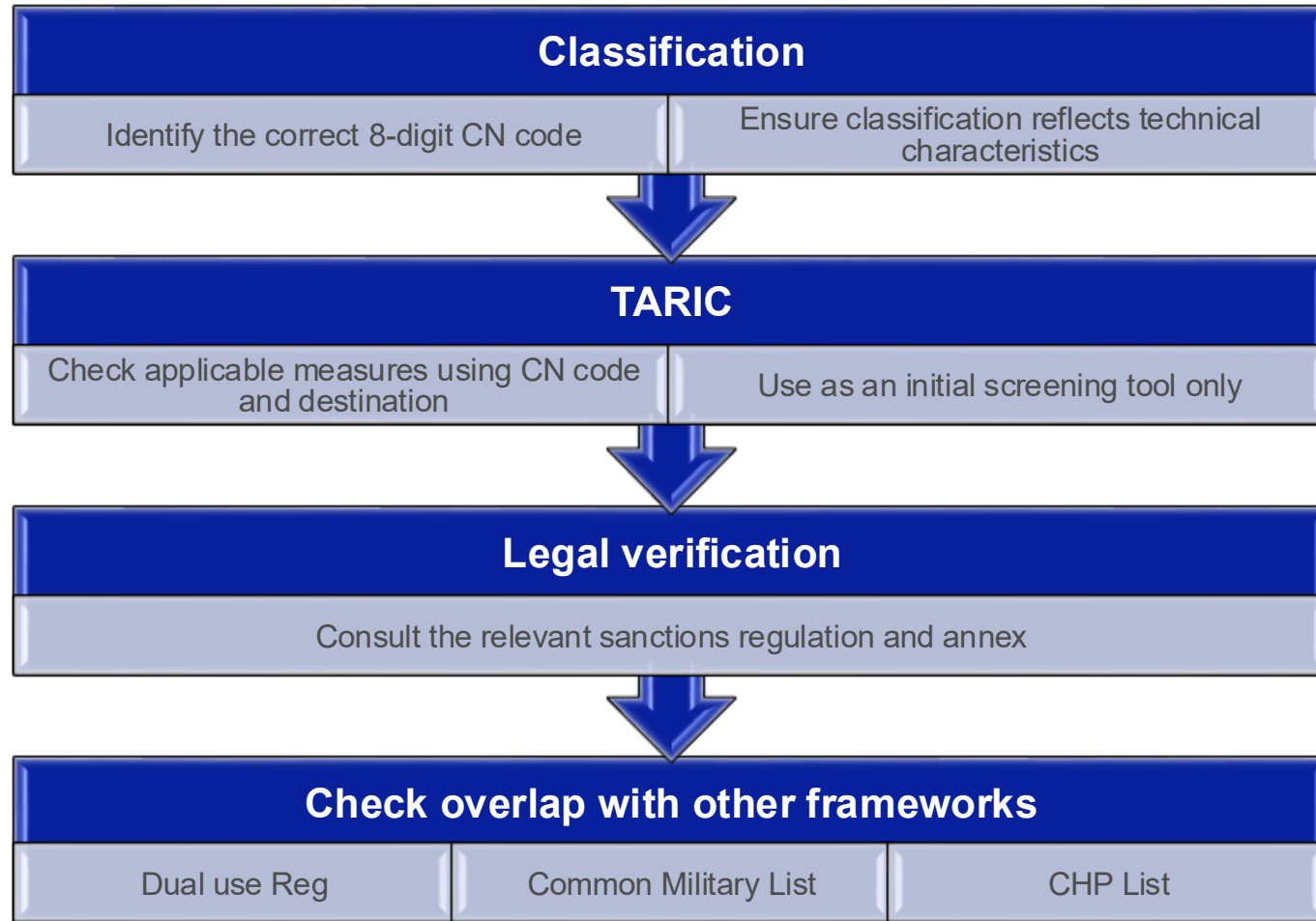


Mandatory requirement



Include a "No Russia" contractual clause in contracts with non-EU buyers

Checking product restrictions



Key points

- Correct CN classification is vital
- TARIC is only a starting point
- Annexes determine the legal scope
- Classification depends on technical specifications

The EU Sanctions Helpdesk can support this analysis

Understanding “ex” codes



What it means

- “Ex” indicates that only part of a CN category is restricted
- The CN code alone is not sufficient



Example

- "ex 8542 31 – Electronic integrated circuits: only those with a clock frequency exceeding 5 GHz"



What you must do

- Review the annex description carefully
- Compare technical specifications against the criteria
- Determine whether the product falls within scope



If uncertain

Seek technical input or guidance from your NCA

Knowledge check

You sell precision bearings (CN code 8482 10).

TARIC indicates restrictions apply.

What do you do next?



Select the correct
answer on the
right of your
screen

Restrictions on services and technical assistance

Services related to restricted goods:

- Technical assistance
- Financing and brokering
- Maintenance, repair, testing

Category 2 – Standalone service restrictions:

- Accounting, auditing, bookkeeping
- IT and consulting services
- Engineering and architecture
- Legal advisory services
- Tourism



Key point:

Service restrictions may apply independently of any goods transaction

Examples of standalone service restrictions

Under the Russia and Belarus sanctions regimes, provision of many standalone services are prohibited

Examples	Key rule
 IT support to a Russian subsidiary → prohibited	01 Applies to Russian entities or for use in Russia
 Audit of Russian entity → prohibited	02 Place of performance is irrelevant.
 Engineering services for a project factory in Russia (work performed in Germany) → prohibited	03 Intragroup arrangements are not exempt.
 Legal advisory services → prohibited	

Technical assistance

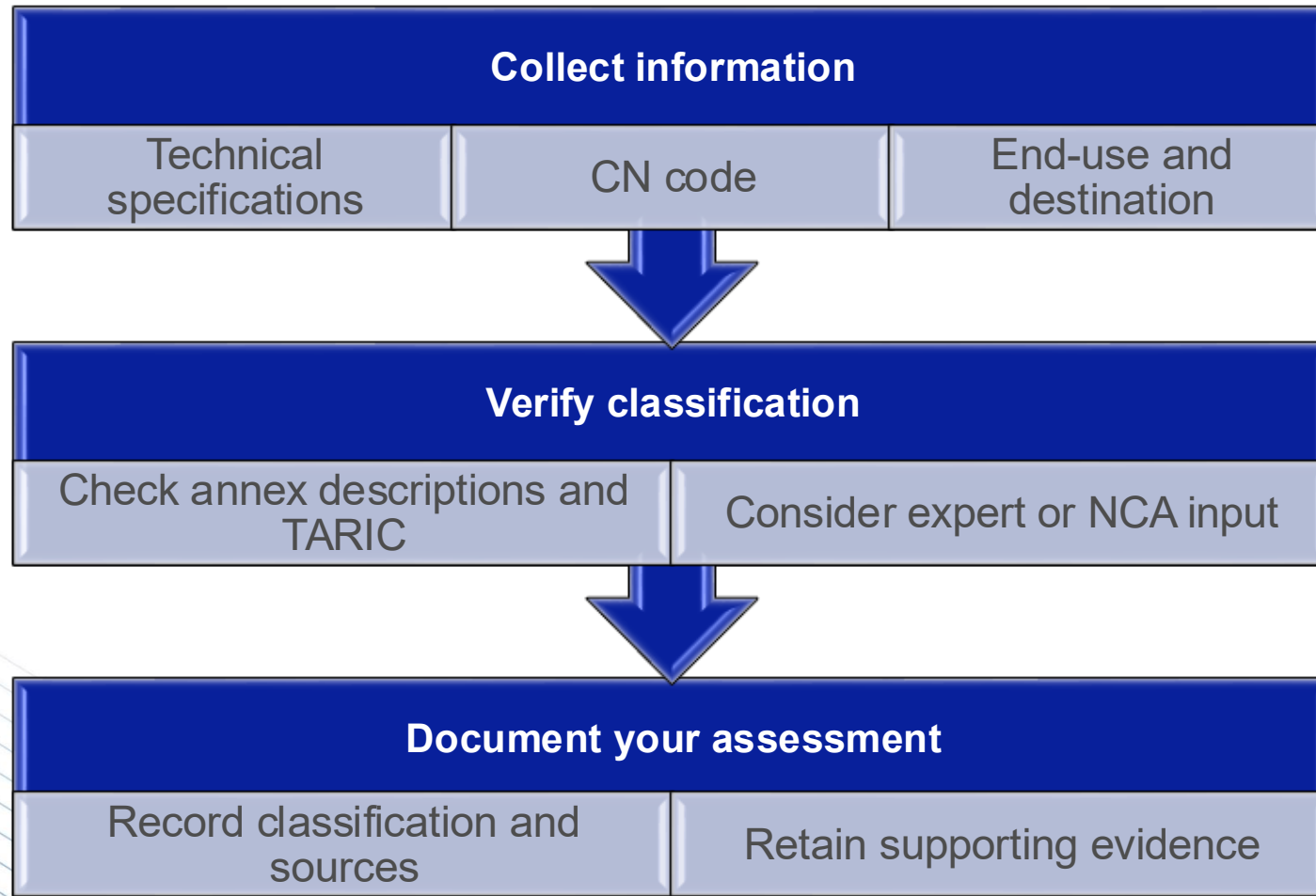
Technical assistance includes:

- | Support related to repair, development, manufacture, or testing
- | Training or transfer of technical knowledge
- | Technical consulting services

Practical implication:

Restrictions may apply even where the goods were supplied lawfully before the sanctions entered into force

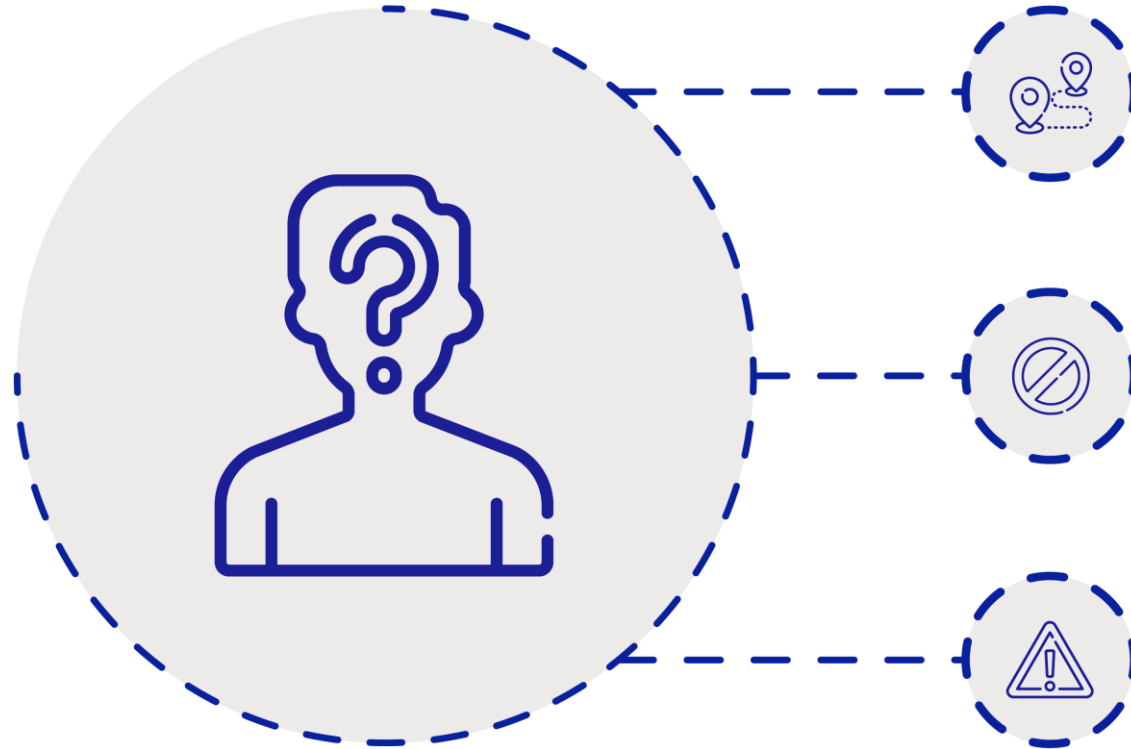
Corroborating evidence and documentation



Key point

Failure to verify classification is not a defence

Case study: The mis-classified component



Case:

A Dutch electronics distributor receives an order from a trading company in Turkey for 500 units of an electronic component.

No restrictions are shown in TARIC database.

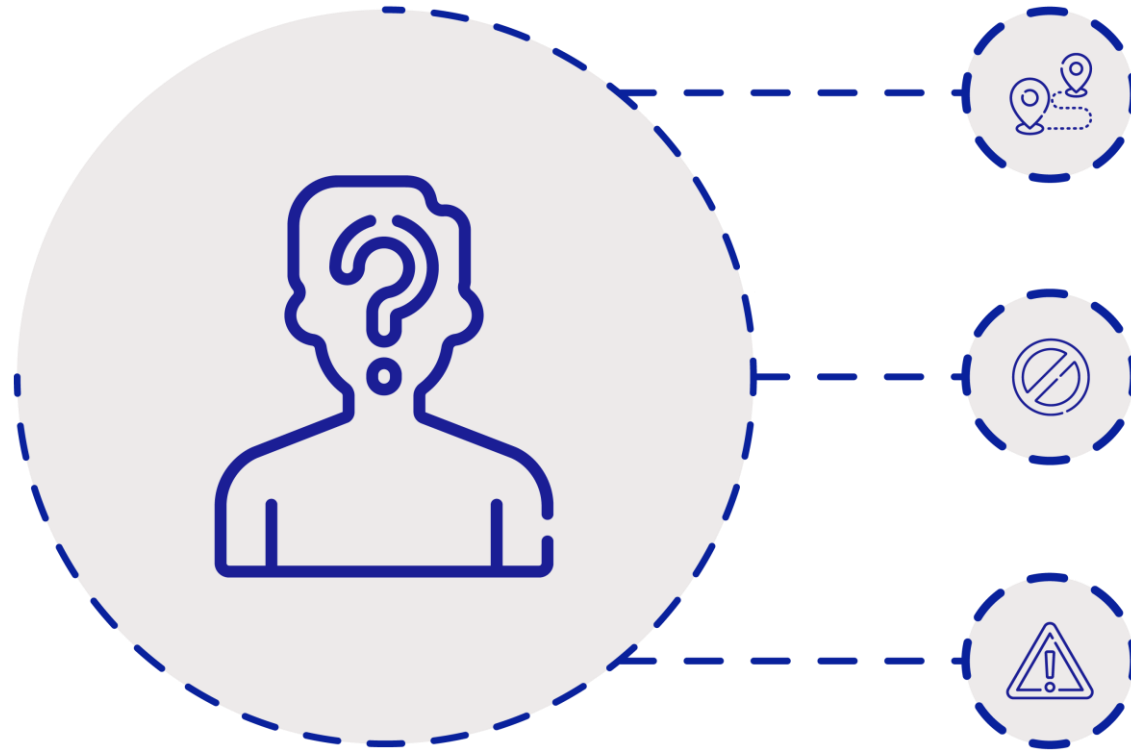
But then...

✓ Six months later, the components are found in Russian military equipment.

Questions:

- ✓ What went wrong?
- ✓ What should the Dutch distributor have done?
- ✓ What is its potential liability?

Case study: the service provider



Case:

An Italian management consulting firm is approached by a Russian state-owned energy company to provide strategic advice on its European operations.

Relevant sanctions?

✓ Article 5n of Regulation 833/2014 – prohibition on services.

Questions:

- ✓ Can the Italian firm accept the engagement?
- ✓ Does it matter that no goods are involved?
- ✓ What checks should the firm carry out?

Key lessons and pitfalls

✓ Lessons

- Product screening = separate check
- Multiple frameworks may apply
- Use full 8-digit CN code
- “Ex” codes require analysis
- Services can be restricted
- “No Russia” clause is mandatory
- Document everything

✗ Pitfalls

- Relying only on TARIC
- Wrong or incomplete CN codes
- Ignoring annex descriptions
- Overlooking service restrictions
- Failing to document decisions

The golden rule:

Proceed **only** when you are satisfied that the goods, technology and services are not restricted

Questions & answers





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