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## **EU SANCTIONS HELPDESK**

SUPPORTING EU SMEs AND PARTNERS  
WITH SANCTIONS COMPLIANCE

# EU Sanctions Helpdesk

Supporting EU SMEs with sanctions compliance

*3 June 2025*

# Agenda

Time (CET)	Session	Speaker
10:00	Welcome, introductions and housekeeping	Ian Matthews, Team Leader, EU Sanctions Helpdesk
10:05	About the EU Sanctions Helpdesk	Ian Matthews, Team Leader, EU Sanctions Helpdesk
10:10	EU Sanctions: Targets, lists and ownership/control	Ian Matthews, Team Leader, EU Sanctions Helpdesk Eline Mooring, Advocaat, Agorax B.V.
11:00	Questions & Answers	Ian Matthews, Team Leader, EU Sanctions Helpdesk Eline Mooring, Advocaat, Agorax B.V. Eva Wever, Advocaat, Agorax B.V.
11:30	Training closes	



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# Housekeeping



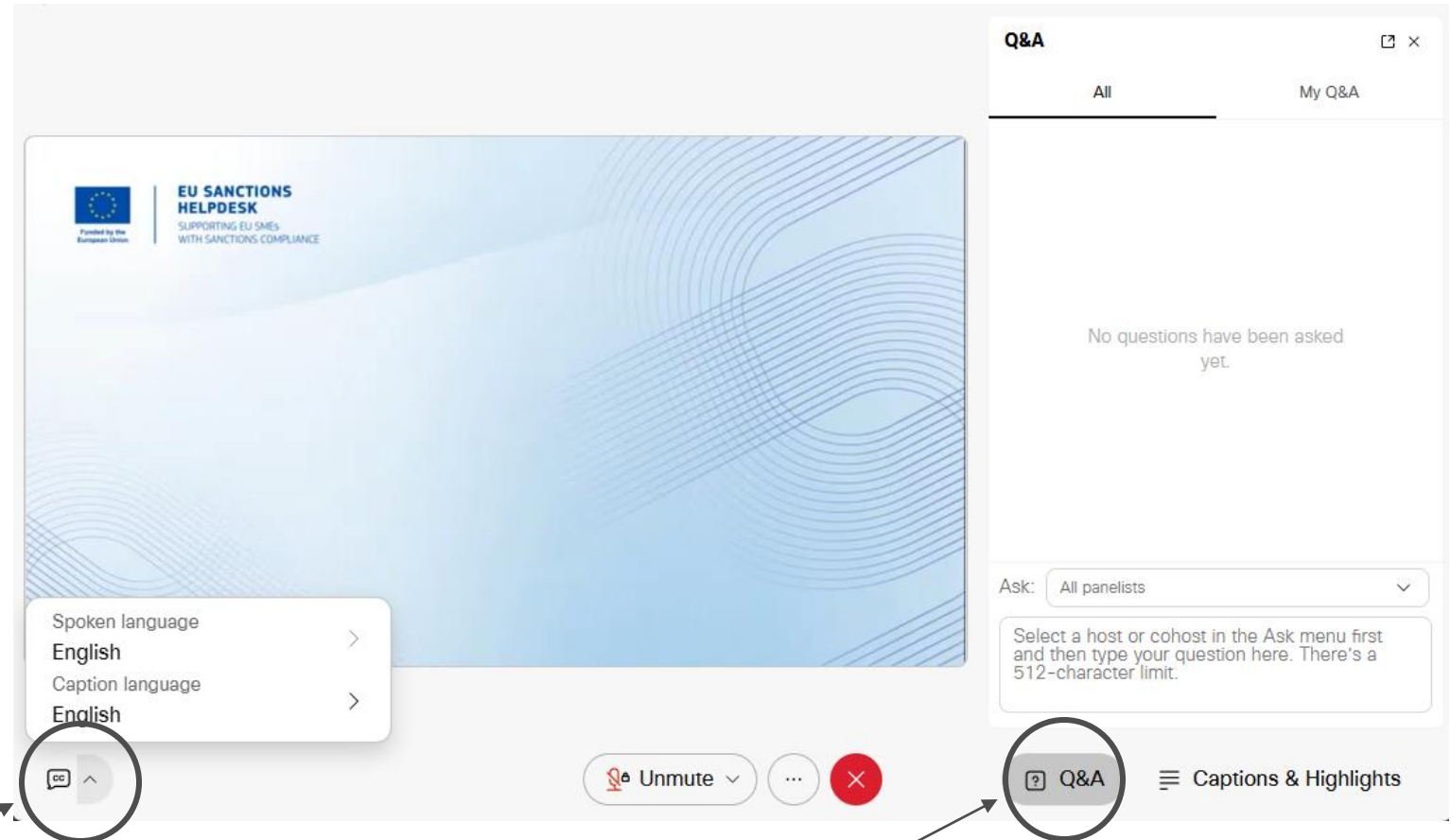
All attendee microphones will be muted throughout



Materials and a recording will be shared



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Live captions are available in your language

Post questions or technical problems using Q&A



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# About the EU Sanctions Helpdesk



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# Sanctions compliance support for SMEs

- Resources to help SMEs understand their obligations
- Sanctions due diligence and compliance support
- Awareness-raising activities about EU sanctions and how to comply

# Get involved!



[Visit our website](#)



[Join one of our upcoming events](#)

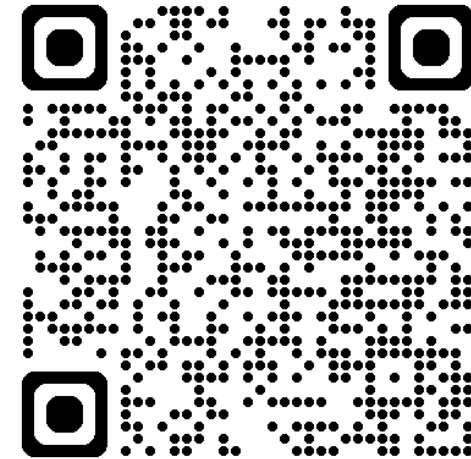


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# Next training event in this series



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# Targets, lists and ownership/control

Training module 3 | 3 June 2025



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# Today's team

**Trainer**



**Ian Matthews**

Team Leader | Key Expert EU Restrictive Measures  
EU Sanctions Helpdesk

**Trainer**



**Eline Mooring**

Attorney at law  
Agorax

**Moderator**



**Eva Weber**

Attorney at law  
Agorax



# What we will cover

1. Short introduction into EU sanctions
2. Who is targeted?
3. Sanctions lists
4. Extra-territoriality
5. Directly and indirectly sanctioned designated persons
6. Ownership
7. Control

# Short introduction to EU sanctions

- Political instruments
- Aim – direct, change or deter behaviour
- Goal – maintain or restore international peace and security
- Types of sanctions



# Short introduction to EU sanctions

EU sanctions apply:

- EU territory
- EU Nationality of natural or legal persons involved, and aircraft and vessels under EU member state jurisdiction
- Business done within the EU



**NB: EU parent companies have a role vis-à-vis non-EU subsidiaries.**



# Who can be targeted?

- Governments



- Individuals



- Groups



- Companies



- Sectors





# Sanctions lists

- [EU Consolidated Financial Sanctions List](#)
  - Also accessible through [EU Sanctions Map](#)
- National lists
- Some operators exposed to third country sanctions:
  - Overseas operations and subsidiaries
  - Foreign staff

# Audience poll

**Do you think the EU Consolidated Financial Sanctions List names all the entities subject to EU sanctions?**

**Choose the correct answer:**

- Yes
- No
- Don't know



# Extra-territoriality

- E.g. US Secondary Sanctions
  - Cuba, Iran
- EU Blocking Statute
  - Nullifies effect in EU of listed third country sanctions
  - Allows EU operators to recover damages

*“The European Union **does not recognise the extra-territorial application of laws adopted by third countries** and considers such effects to be contrary to international law.”*



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# Case study: EU Blocking Statute



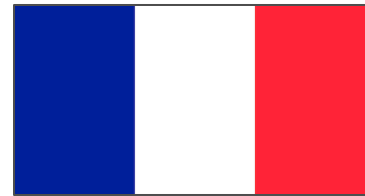
Company C

Acquires  
100% in 2019



Company A

Distribution  
Agreement  
since 1996



Company B



End-users

# Audience poll

Following its US acquisition, is the Dutch software company allowed to terminate the agreement with the French company, because of exposure to US sanctions?

Choose the correct answer:

- A. No**, this is contrary to the EU Blocking Statute.
- B. Yes**, because Company A qualifies as a US company since the acquisition.
- C. Yes**, because the circumstances qualify as *force majeure*.



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# Directly and indirectly designated persons

"1. All funds and economic resources **belonging to, owned, held or controlled** by [individual members of the Government of (country) and] any natural or legal person, entity or body [associated with them] as listed in Annex X shall be frozen.

2. No funds or economic resources shall be made available, **directly or indirectly**, to or for the benefit of natural or legal persons, entities or bodies listed in Annex X."

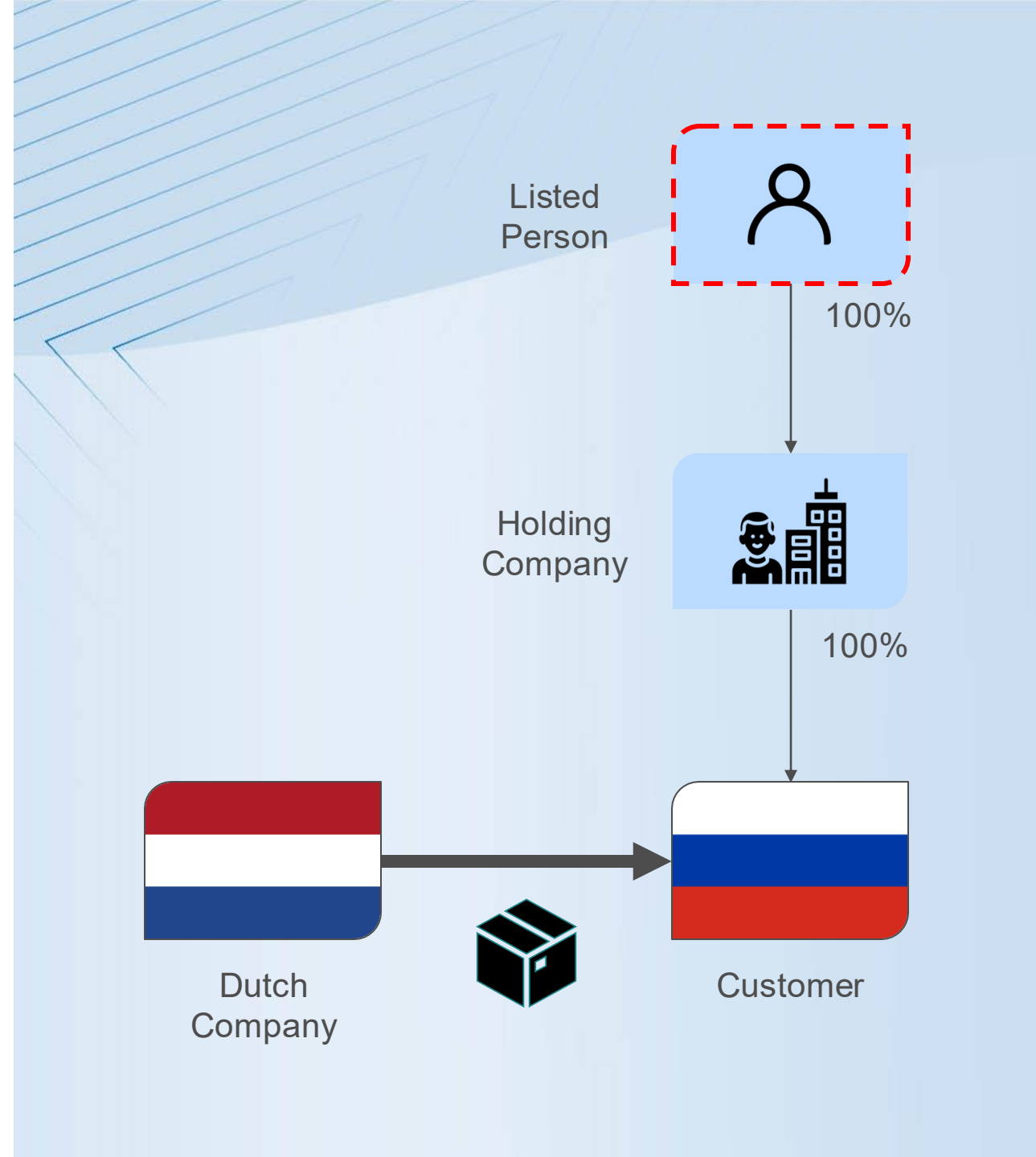
# Directly and indirectly designated persons

- Direct – listed on sanctions lists
- Indirect – ownership or control
- Example: Chelsea FC

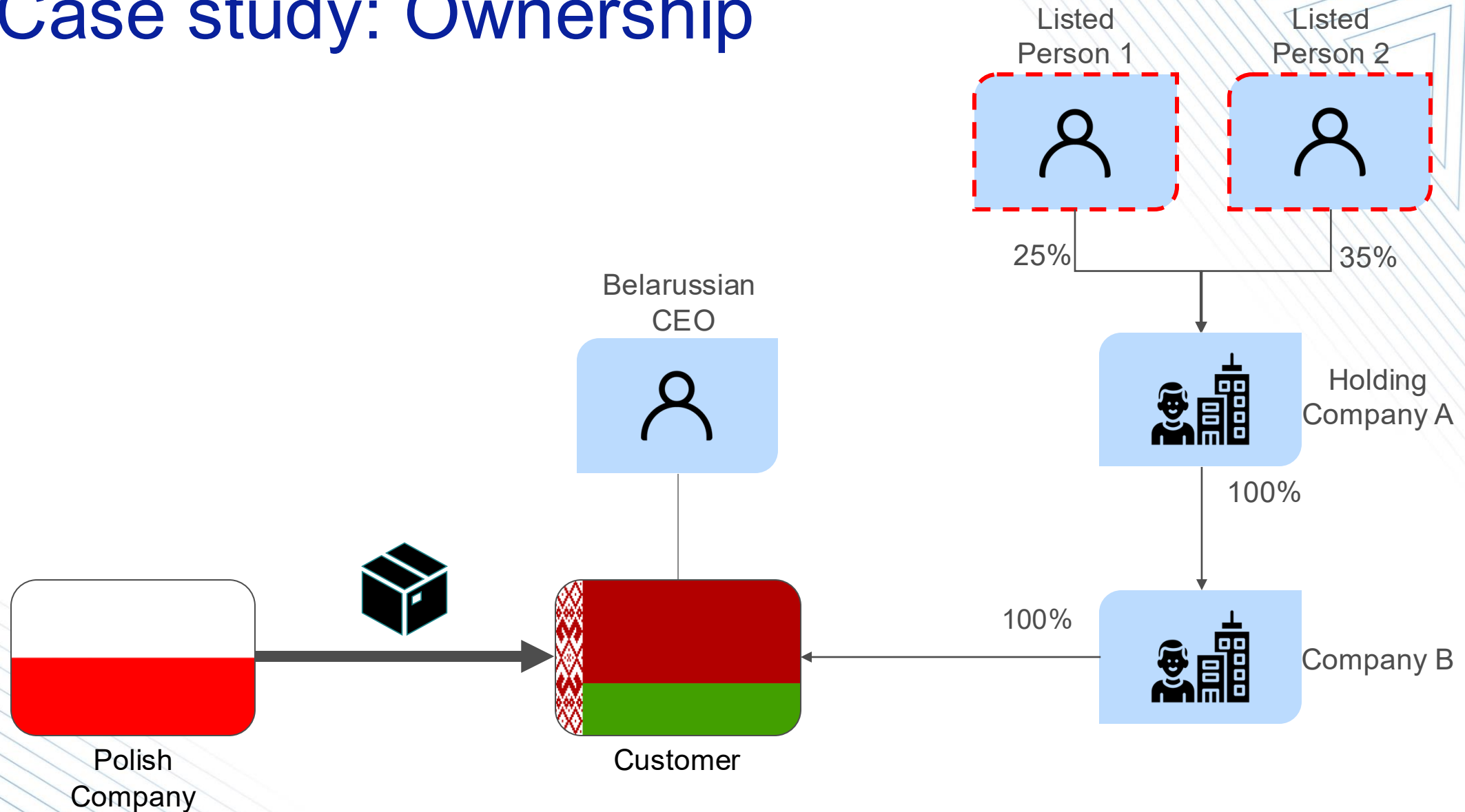


# Ownership

- The possession of 50% or more of the proprietary rights of an entity, or having majority interest in it
  - Sole
  - Aggregated ownership



# Case study: Ownership





# Control

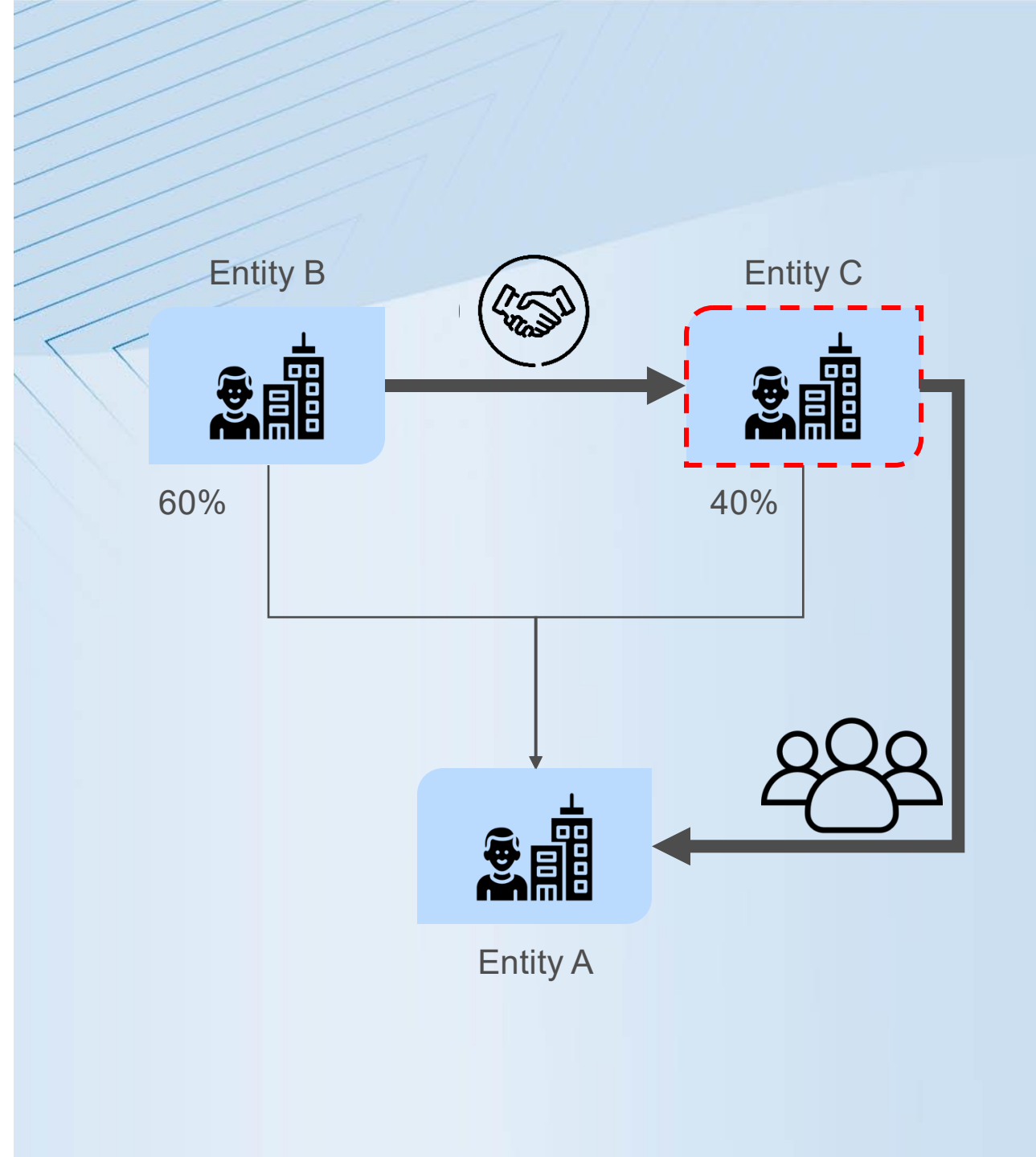
- Council of the EU – Eight examples of control
  - appoint or remove a majority of the members of leadership bodies (also by exercising voting rights);
  - controlling alone, a majority of shareholders' or members' voting rights;
  - exercise a dominant influence, either *de jure* or *de facto*;
  - use all or part of the assets;
  - managing the business on a unified basis, while publishing consolidated accounts;
  - sharing jointly and severally the financial liabilities or guaranteeing them.



# Control

## Example 1

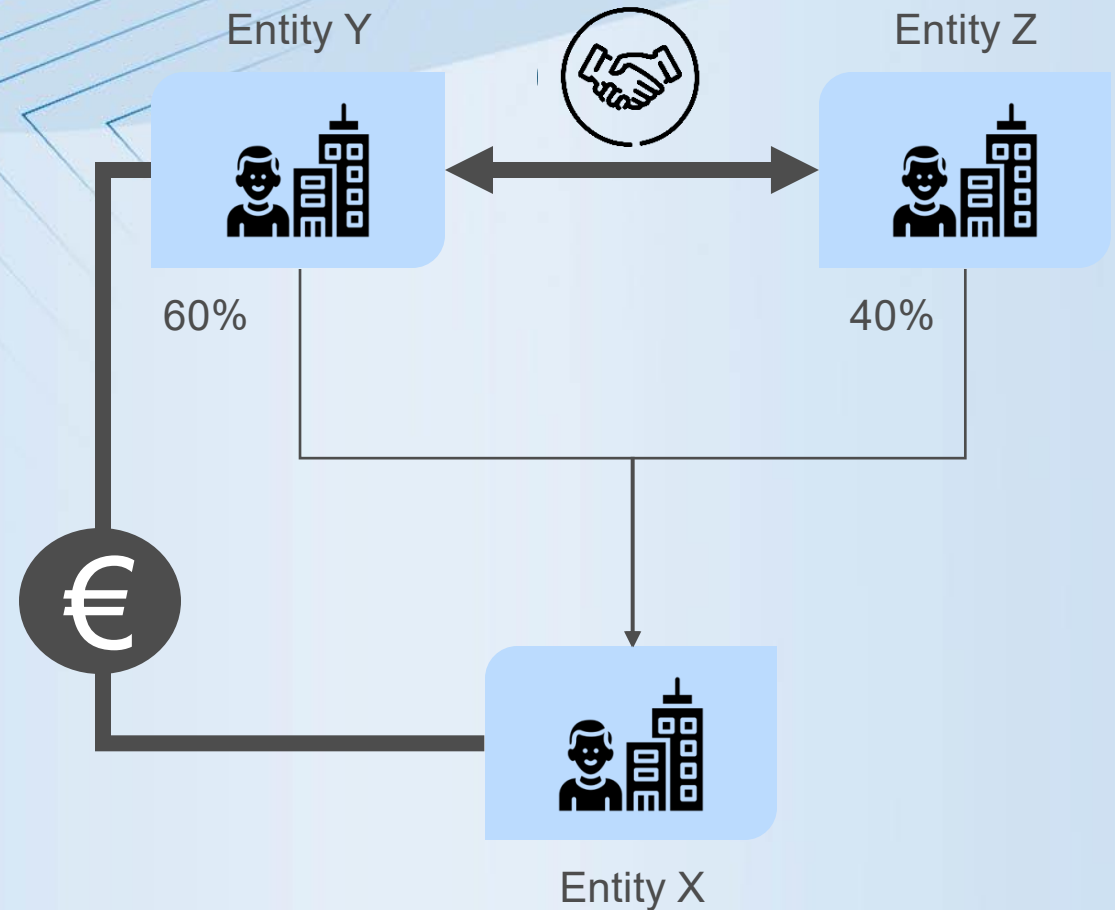
- *Entity A* is owned:
  - 60% by *Entity B*
  - 40% by *Entity C*
- *Entity B* and *Entity C* have agreed that *C* will exclusively appoint *A*'s board of directors.



# Control

## Example 2

- *Entity X* is owned 60% by *Entity Y* and 40% by *Entity Z*.
- *Entity Y* contractually controls the assets of *X*, and proposes plans to *Z*. *Z* will comment and make suggestions on the plans.
- *Y* has final say and carries financial liability.



# Audience poll – revisited

**Do you think the EU Consolidated Financial Sanctions List names all the entities subject to EU sanctions?**

**Choose the correct answer:**

- Yes
- No



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# Any questions?

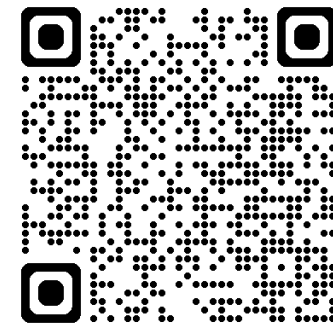


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# Future events

- Please remember to register for the next module: 10 June







Thank you for attending.

Please complete the event feedback!



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