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## **EU SANCTIONS HELPDESK**

SUPPORTING EU SMEs AND PARTNERS  
WITH SANCTIONS COMPLIANCE

# Sanctions training series

## **Module 1: An introduction to EU Sanctions**

*20 May 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	An Introduction to EU Sanctions	Ian Matthews, Team Leader, EU Sanctions Helpdesk Ellen Hompesch, Advocaat, Agorax B.V.
10:45	Sanctions in action: Case-based learning	Ellen Hompesch, Advocaat, Agorax B.V.
11:00	Questions & Answers	Ian Matthews, Team Leader, EU Sanctions Helpdesk Ellen Hompesch, Advocaat, Agorax B.V. Eva Wever, Advocaat, Agorax B.V.
11:30	Training closes	



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# Housekeeping



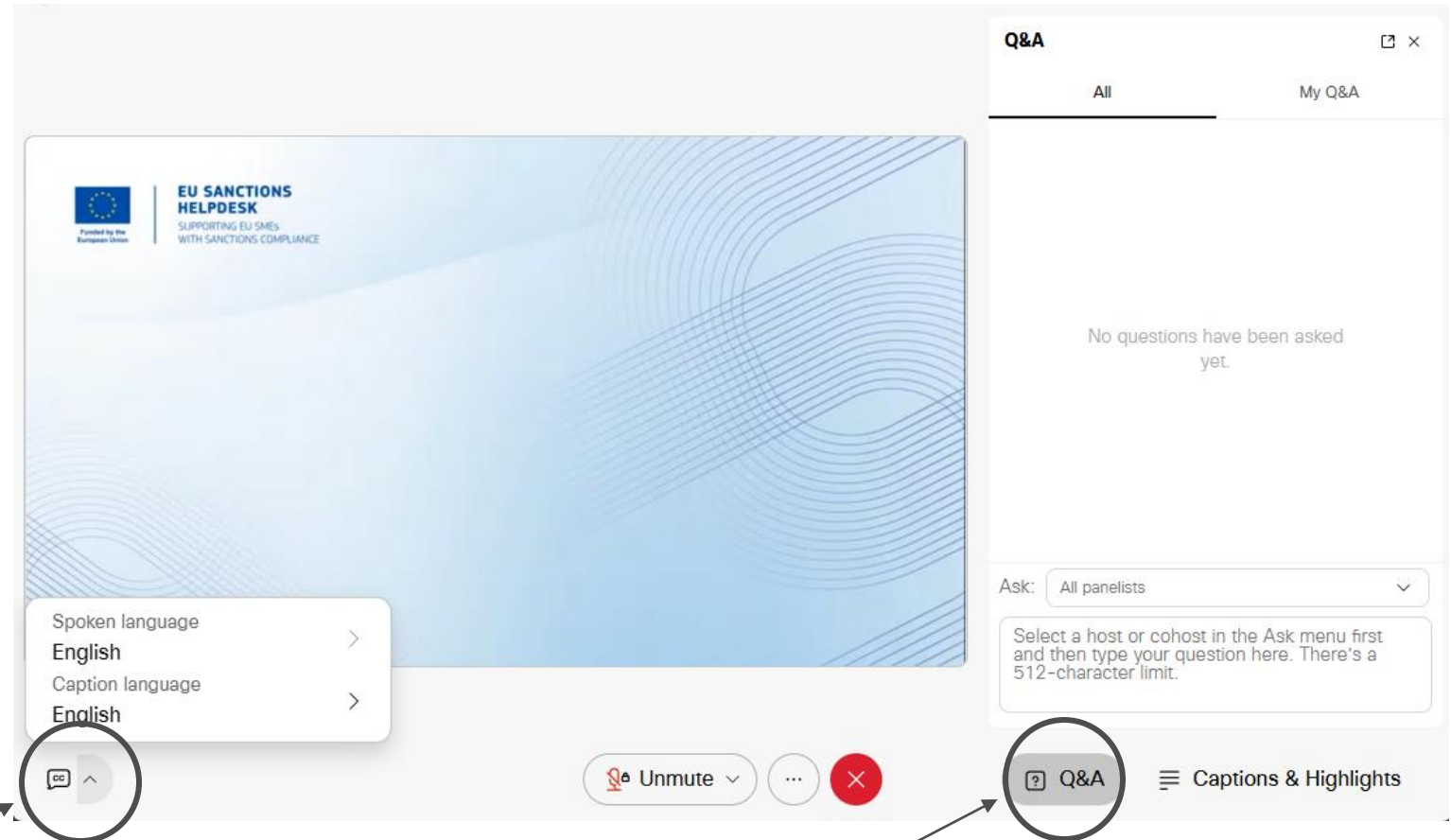
All attendee microphones will be muted throughout



Materials and a recording will be shared



Please complete the feedback form following this event



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](#)



[Use our compliance support service](#)



[Sign up to our newsletter](#)

# Future training events in this series

 **EU SANCTIONS  
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**EVENT**

**EU Sanctions Helpdesk webinar series:  
Law and Guidance**

Tuesday 27 May 2025  
10:00 - 11:30 (CEST)  
Webinar

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**EVENT**

**EU Sanctions Helpdesk webinar series:  
Targets and Lists**

Tuesday 3 June 2025  
10:00 - 11:30 (CEST)  
Webinar

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**EVENT**

**EU Sanctions Helpdesk webinar series:  
Sanctions Compliance and  
Due Diligence**

Tuesday 10 June 2025  
10:00 - 11:30 (CEST)  
Webinar



**Register today!**



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# An Introduction to EU sanctions

Training module 1 | 20 May 2025



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# Today's team

**Trainer**



**Ian Matthews**

Team Leader | Key Expert EU Restrictive Measures  
EU Sanctions Helpdesk

**Trainer**



**Ellen Hompesch**

Attorney at law  
Agorax

**Moderator**



**Eva Weber**

Attorney at law  
Agorax

A woman and a man in business attire are seated at a desk, looking at a document together. The woman is on the left, wearing a light-colored blazer, and the man is on the right, wearing a grey blazer. They are both looking down at a document on the desk. The background is a blurred office setting.

# What we will cover

1. What are sanctions?
2. EU sanctions regimes
3. Who must comply
4. Types of sanctions
5. Circumvention
6. Case studies

# Polling question

How much of your working time is taken up with sanctions compliance?

- A. None
- B. A little
- C. A lot
- D. Sanctions is my life!



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# What are sanctions?

- Restrictive measures
  - Aim – direct, change or deter behaviour
  - Goal – maintain or restore international peace and security
- Not punitive, but preventive
- Targeted



# UN versus EU sanctions



- **THE UNITED NATIONS**
  - Sanctions imposed by the United Nations Security Council (UNSC)



- **THE EUROPEAN UNION**
  - implementation of UN sanctions
  - sanctions imposed by the EU independently

# EU sanctions regimes



## **GEOGRAPHICAL → Country-based**

- E.g. Russia, Belarus, Iran, North Korea, etc.



## **THEMATIC → Built around a particular issue**

- E.g. Terrorism, human rights violations, proliferation and use of chemical weapons and cyber attacks

# 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.**

# Types of sanctions



**ASSET  
FREEZE**



**TRADE  
RESTRICTIONS**



**FINANCIAL  
RESTRICTIONS**



**OTHER  
RESTRICTIONS**



# Types of sanctions | Asset freeze

## 1. You are obliged to freeze:

all funds or economic resources belonging to, owned, held or controlled by a designated person.

## 2. You are prohibited from making available:

any funds or economic resources, directly or indirectly, to or for the benefit of a designated person.



### Funds:

Cash, cheques, claims, credit, right of set-off, guarantees, deposits, securities, etc.



### Economic resources

All assets of any kind, whether tangible or intangible, movable or immovable, which are not funds but can be used to acquire assets, goods or services. This may also include **services!**



Two elements: an **obligation** and a **prohibition**



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# Polling question

**Which of the following do you think is an “economic resource”?**

*You can choose more than one option.*

- A. Work undertaken as an employee
- B. Promotional activity
- C. A luxury yacht chartered to a third party
- D. A bill of lading



# Types of sanctions | Trade restrictions

## Export bans in respect of certain goods and technologies

In respect of, for example:

- Military goods, dual-use goods
- Maritime industry
- Luxury goods
- Oil and gas / associated goods
- Goods that could contribute in particular to the enhancement of Russian industrial capacities.

## Ban on related services

It is prohibited to, directly or indirectly:

- Provide "**technical assistance, brokering services or other services**" in relation to sanctioned goods and technology; or
- Provide "**financing or financial assistance**" in relation to sanctioned goods and technology.



# Types of sanctions | Trade restrictions

## Import bans

- Example: prohibition to import certain iron and steel products from Russia if they:
  - originate in Russia
  - have been exported from Russia
  - are located in Russia
- Evidence of the country of origin must be provided, unless imported from a partner country





# Types of sanctions | Trade restrictions





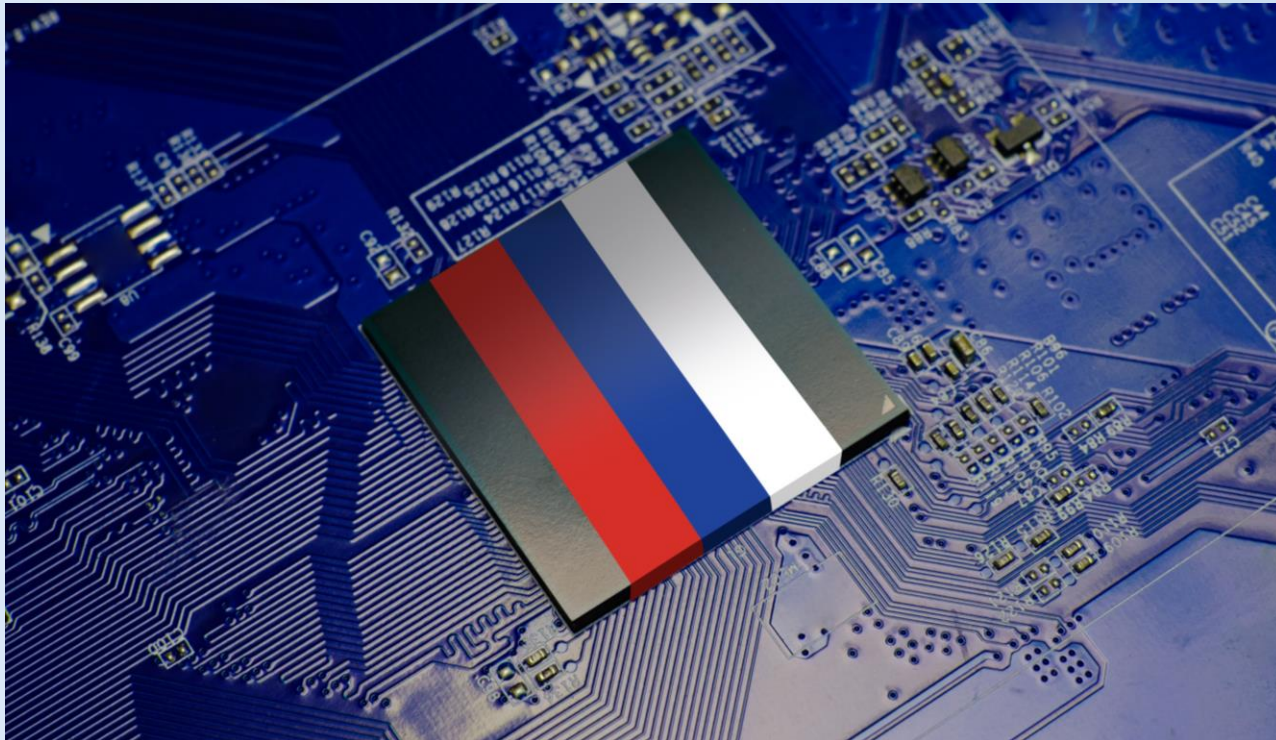
# Types of sanctions | Other restrictions

- Other financial restrictions
- Travel bans
- Port and overflight bans
- Professional and business services

## Dutch suspect evaded sanctions by exporting microchips to Russia through third countries

Dutch-Russian Dmitry K., suspected of exporting microchips and drones to Russia, managed to circumvent the European sanctions against the country by exporting the illicit goods through third countries. He is the first Dutch smuggler to be arrested for sanction evasion, the [Volkskrant](#) reports.

The police arrested K., from Gorssel in Gelderland, in September last year. According to the Public Prosecution Service (OM), he [exported hundreds of thousands of euros worth of microchips and drones](#), and similar parts were later found on the battlefield in Ukraine. K. does not deny the allegations against him, the OM said during the first hearing against him in December. He considers himself a small link, an interchangeable player, in the chain of tech products heading to Russia, the OM said.



## Circumvention

EU sanctions prohibit the act of **knowingly and intentionally** participating in activities that have the purpose or effect of circumventing the sanctions.

# Summary

## Always ask yourself

- WHO is involved in the transaction?
- WHAT is the object of the transaction?
- WHERE are the goods going and how will they get there?
- WHY does the end-user want the goods or services (end-use)?



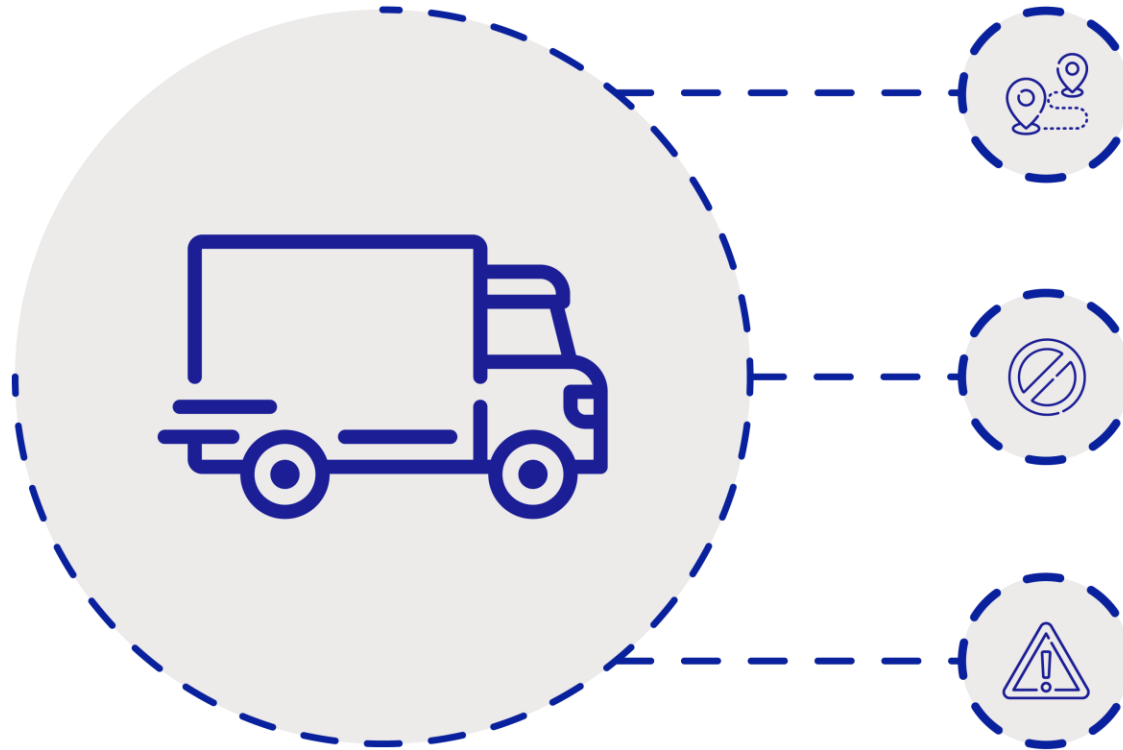
**Only proceed with the transaction when the answers to these questions are clear and make sense**

# Sanctions in action: Case-based learning



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# Case study: road transport



## Case:

A Dutch forwarding company received a request to transfer a (stopped) container with carbon fiber from Antwerp to St. Petersburg.

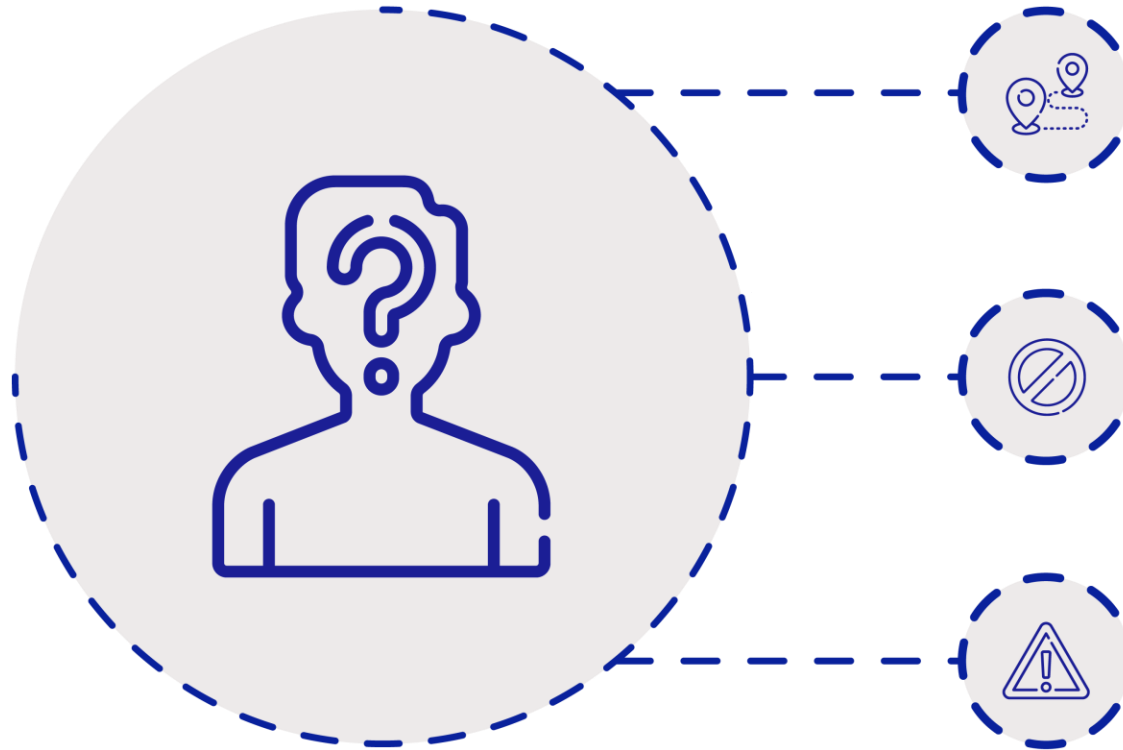
## Relevant sanctions:

- ✓ Prohibition to sell, supply or transfer sanctioned goods to Russia;
- ✓ Prohibition to sell, supply, transfer or export dual-use goods and technology to Russia; and,
- ✓ Asset freeze.

## Risks:

- ✓ Consignee appears to be active in the Russian nuclear industry and appears to be majority state-owned.
- ✓ Goods are potentially dual-use goods.

# Case study: unknown end-user



## Case:

A French supplier of yacht equipment received a request to deliver parts from a yacht broker to a yacht currently located in Dubai.

## Relevant sanctions:

- ✓ Prohibition to sell, supply or transfer sanctioned goods to Russia; and,
- ✓ Asset freeze.

## Risks:

- ✓ Customer refuses to provide information on the owner of the yacht.
- ✓ Unknown where the yacht will sail to.

# Any questions?

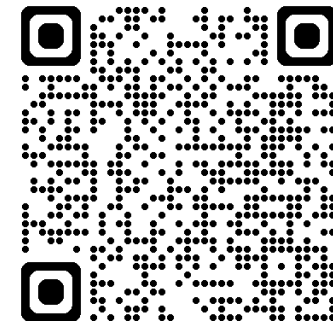


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# Future events

- Please remember to register for the next modules
- Each Tuesday from 20 May to 10 June





Thank you for attending.

Please complete the event feedback!



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# Annex: Resources referred to in presentation

- European Civil Protection And Humanitarian Aid Operations (DG ECHO):  
[Working With DG Echo Sanctions | 2021 – 2027](#)
- Consolidated list of persons, groups and entities subject to EU financial sanctions:  
[Access to data file \(EULogin required\). Update alerts available.](#)
- European Commission FAQs on 'Best Efforts' Obligation:  
[FAQs on Article 8a of Council Regulation 833/2014 \(and others\)](#)
- European Commission FAQs on the provision of services:  
[FAQs on Article 5n of Council Regulation 833/2014](#)