

Deloitte "Legal Update" Webcast #12/2025

Update and Deep Dive: Financial and Economic Sanctions

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Overview | Your speakers



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**Topics |
Economic sanctions**

Overview

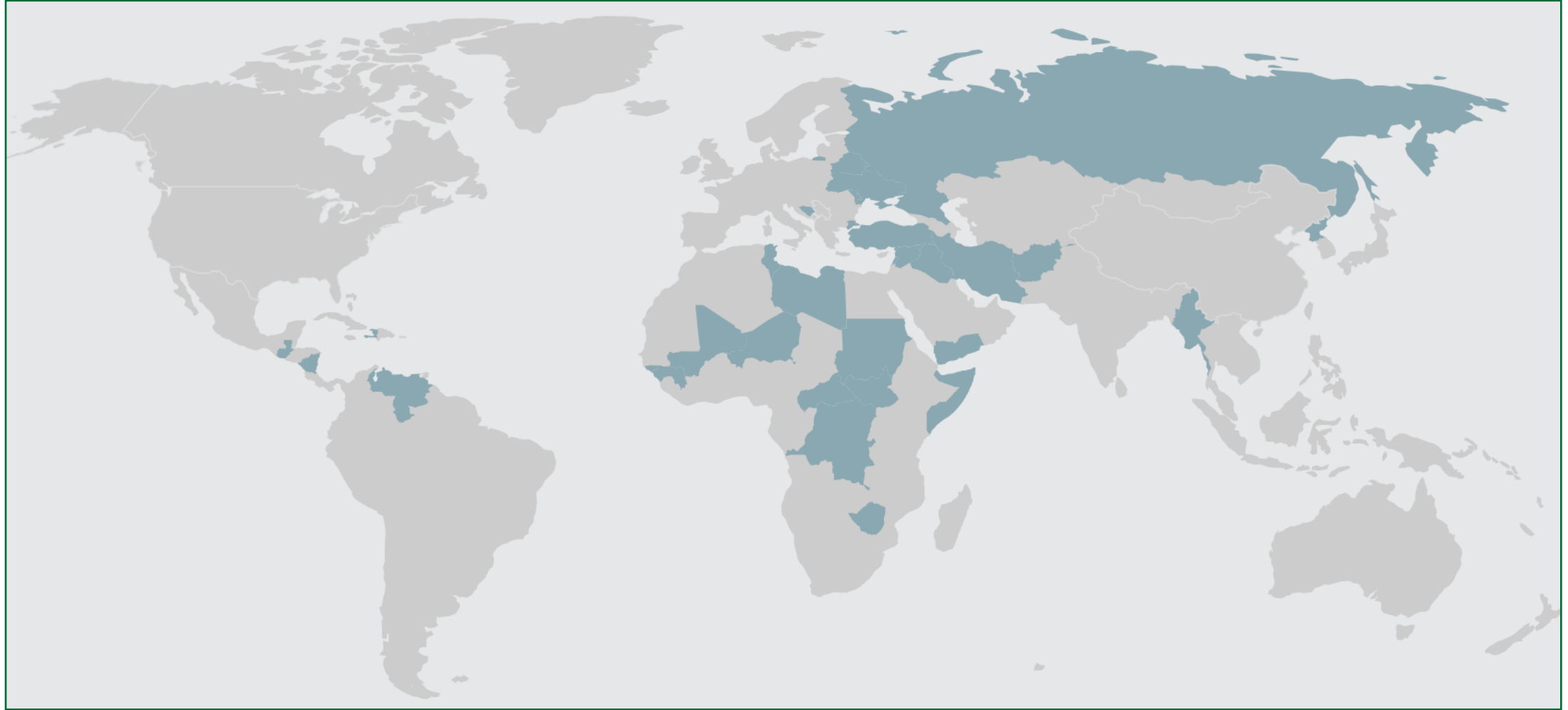
Financial and economic sanctions

Overview | Individual measures



Financial and economic sanctions

Overview | EU Sanctions Map



Financial and economic sanctions

Overview | Enforcement

Financial sanctions



Central Office for
Sanctions Enforcement



Bundesbank – Service
Center Financial
Sanctions

Economic sanctions



Bundesamt
für Wirtschaft und
Ausfuhrkontrolle

Federal Office of
Economics and Export
Control



The local
Customs authorities



Administrative measures
Seizures / searches / etc.



Criminal consequences
Imprisonment for up to five years
(in special cases even higher)



Administrative offenses
Administrative Fines
of up to EUR 500,000

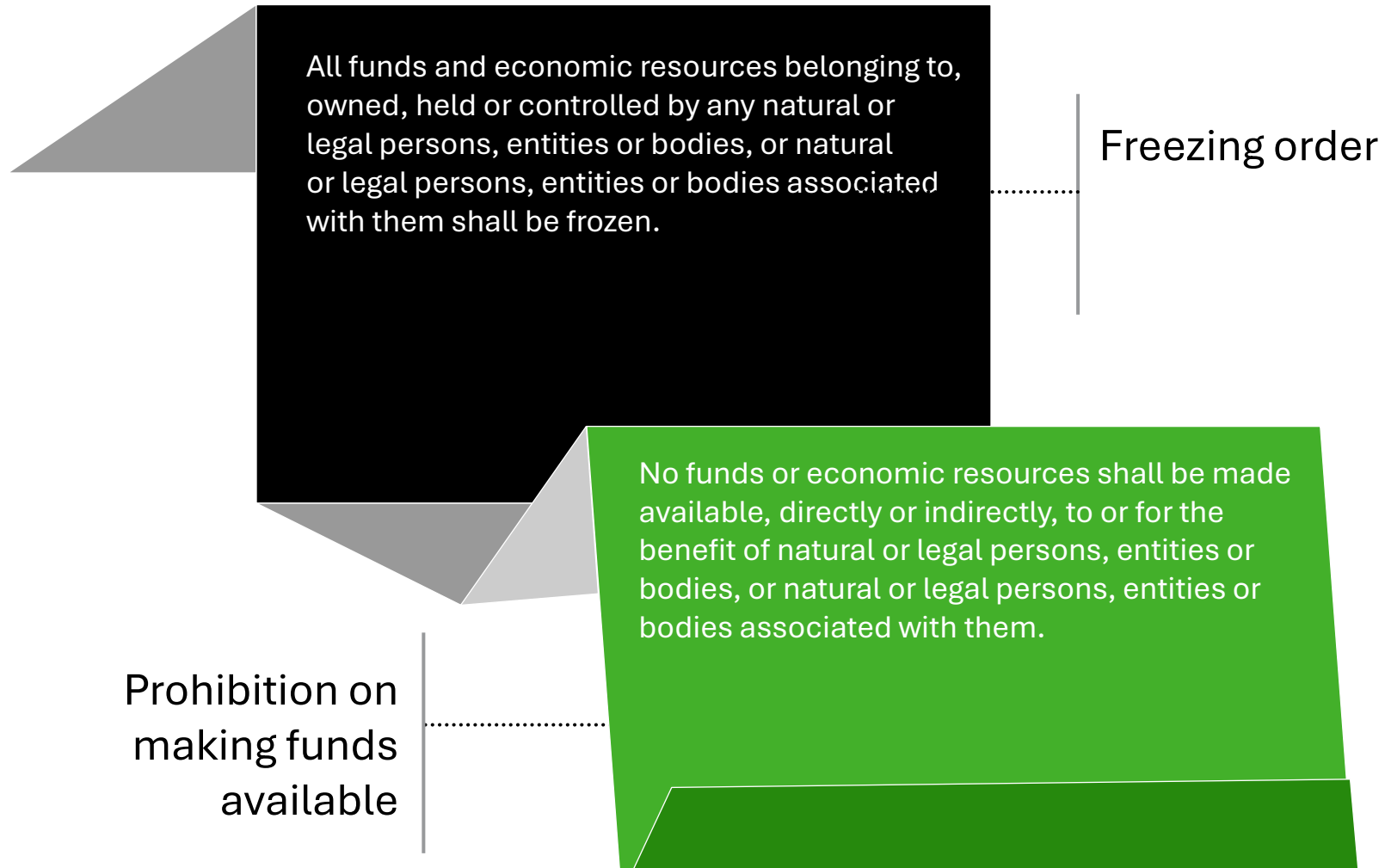


**Reputational and business
damage**
Loss of business partners

Topics from the field of financial sanctions

Financial sanctions

Overview | How financial sanctions work



Financial sanctions

Overview | Prohibition on making funds available

Applies to individuals within the EU, to EU nationals (regardless of location) and to **companies** established or registered under the law of a Member State within and outside the EU

Persons, organizations, or entities (POE) are listed in the annexes to specific sanctions regulations and are thus listed (sanctioned).



Funds means financial assets and benefits of every kind including, but not limited to cash, deposits with financial institutions or other entities and balances on accounts

Economic resources means assets of every kind, whether tangible or intangible, movable or immovable, which are not funds but may be used to obtain funds, goods or services

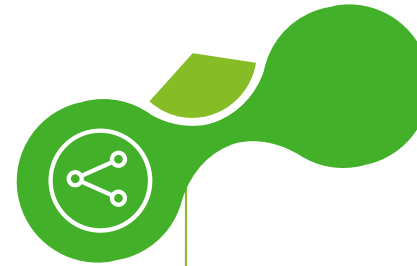
Financial sanctions

Sanctions list screening and indirect prohibition on making funds available



Sanctions list screening

- Check direct business partners, end users, suppliers, other service providers, and your own employees for listings
- Perform checks not only at specific times but ideally on an ongoing (automatic) basis



Indirect prohibition

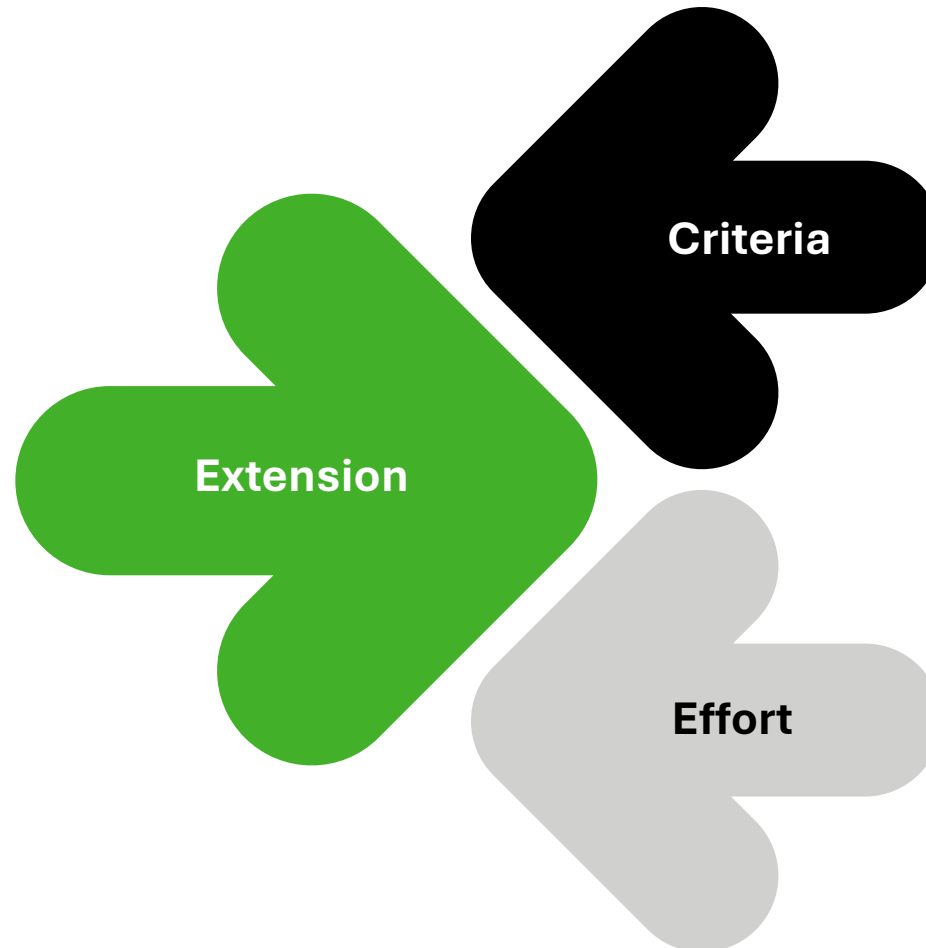
- How to deal with corporate structures – ownership and control
- Whether such additional checks are to be carried out is determined on the basis of a risk-based approach
- Simple sanctions list screening may not be sufficient under certain circumstances! Further steps have to be taken

Financial sanctions

New compliance obligation within a corporation

New compliance obligation for EU companies under Article 15a of Regulation (EU) No. 269/2014 and Article 8a of Regulation (EU) No. 833/2014.

According to this, EU companies should prevent - endeavour to prevent - their foreign subsidiaries from "undermining" the effects of EU sanctions.



Consideration of individual circumstances

- Country of establishment of the subsidiary
- Business sector
- Type of business activity of the subsidiary
- Relevant circumstances, in particular the actual degree of effective control over the subsidiary
- No legal success needed
- But proof that the parent company made every effort to the best of its knowledge and belief.

Topics from the field of economic sanctions

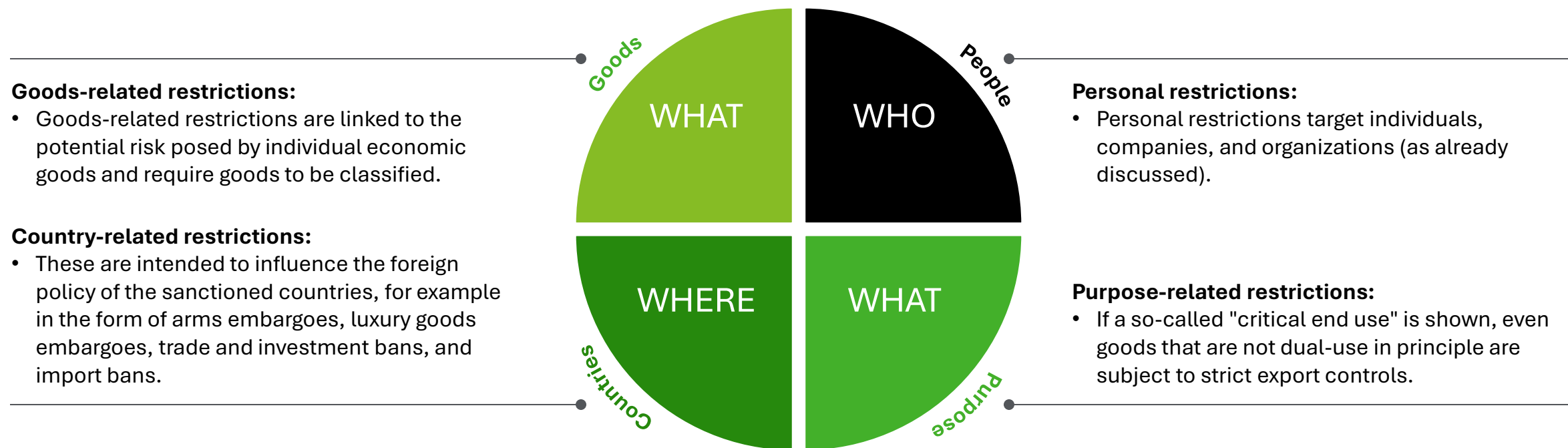
Economic sanctions

Overview | Level of measures



Economic sanctions

Overview | Restrictions



Economic sanctions

Overview | Restrictions

Listed goods



- Embargo regulations
- Dual-use regulation
- Export List AWW
- Firearms Regulation
- Anti-Torture Regulation
- US (Re-)Export Control

Catch All



- Unlisted Goods + Critical End Use
 - ABC Weapons and Delivery Systems
 - Military end use in embargo countries
 - Civilian nuclear power use

Listed software/technology – embodied

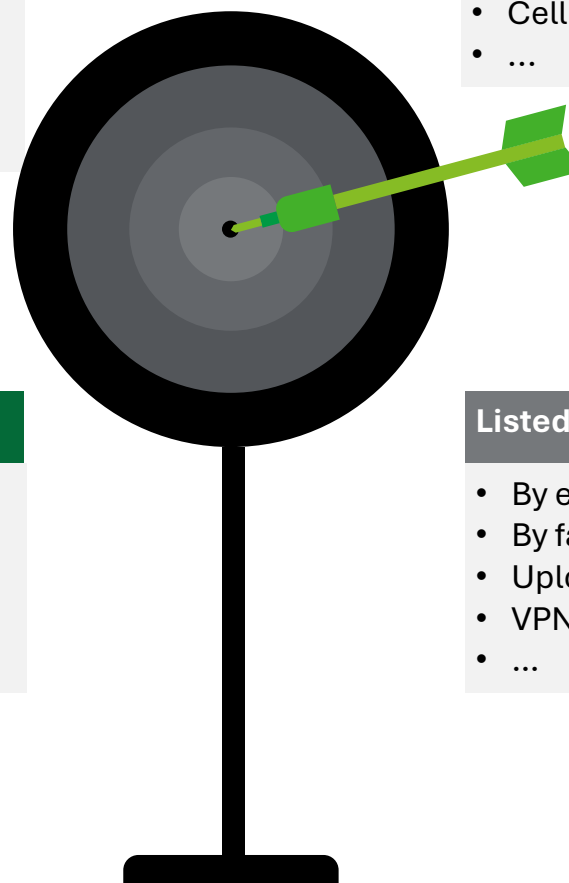


- Printed data
- Data carriers
- Cell phone/laptop
- ...

Listed software/technology – non-embodied



- By email
- By fax
- Upload/download
- VPN – Remote access
- ...



Economic sanctions

Overview | Checking scheme

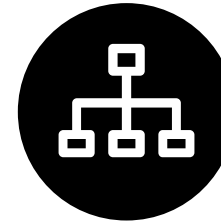
Testing scheme



Listed goods

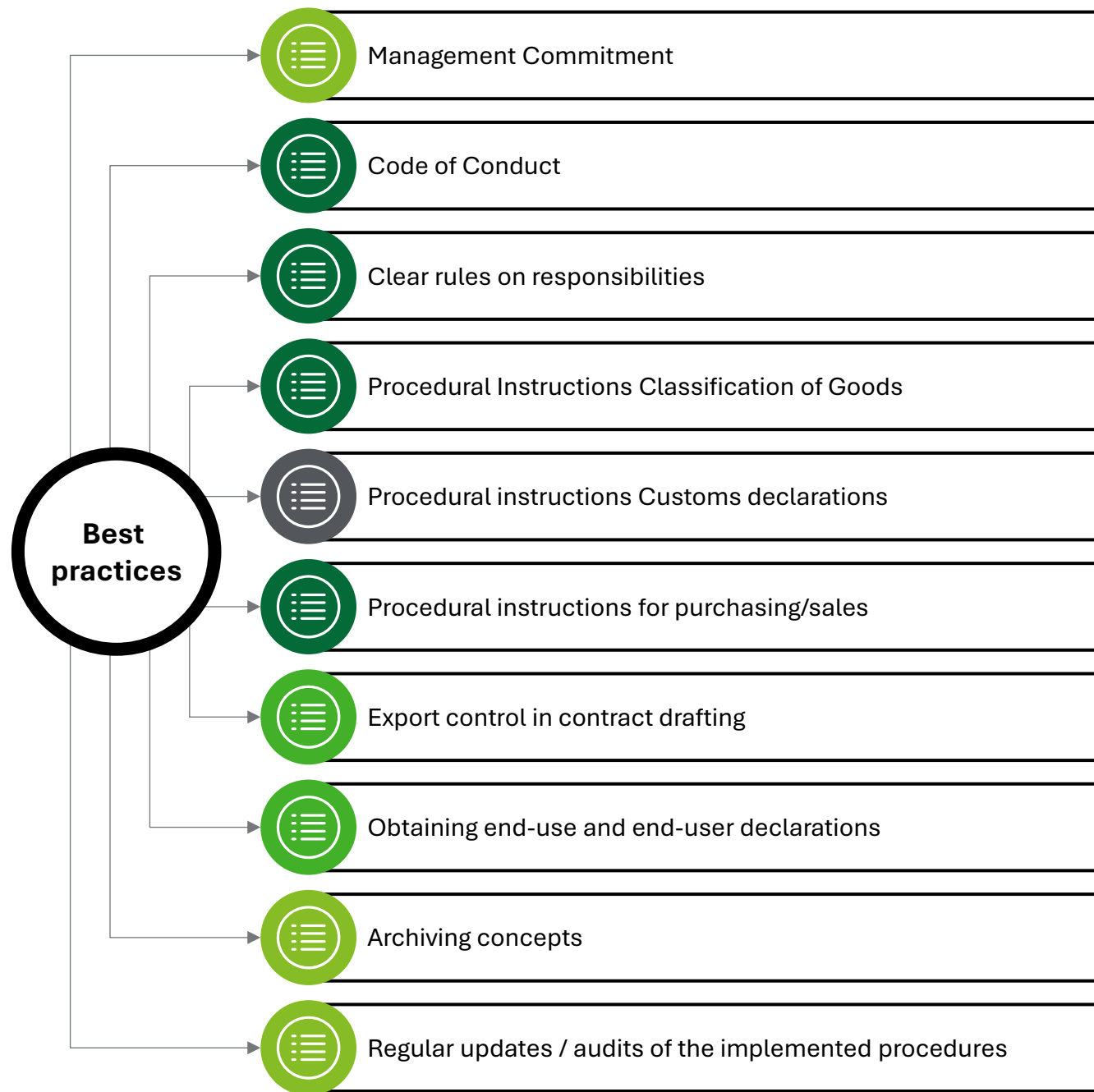


Export / Transfer



Licensing requirement

Best practice approaches



Questions and answers



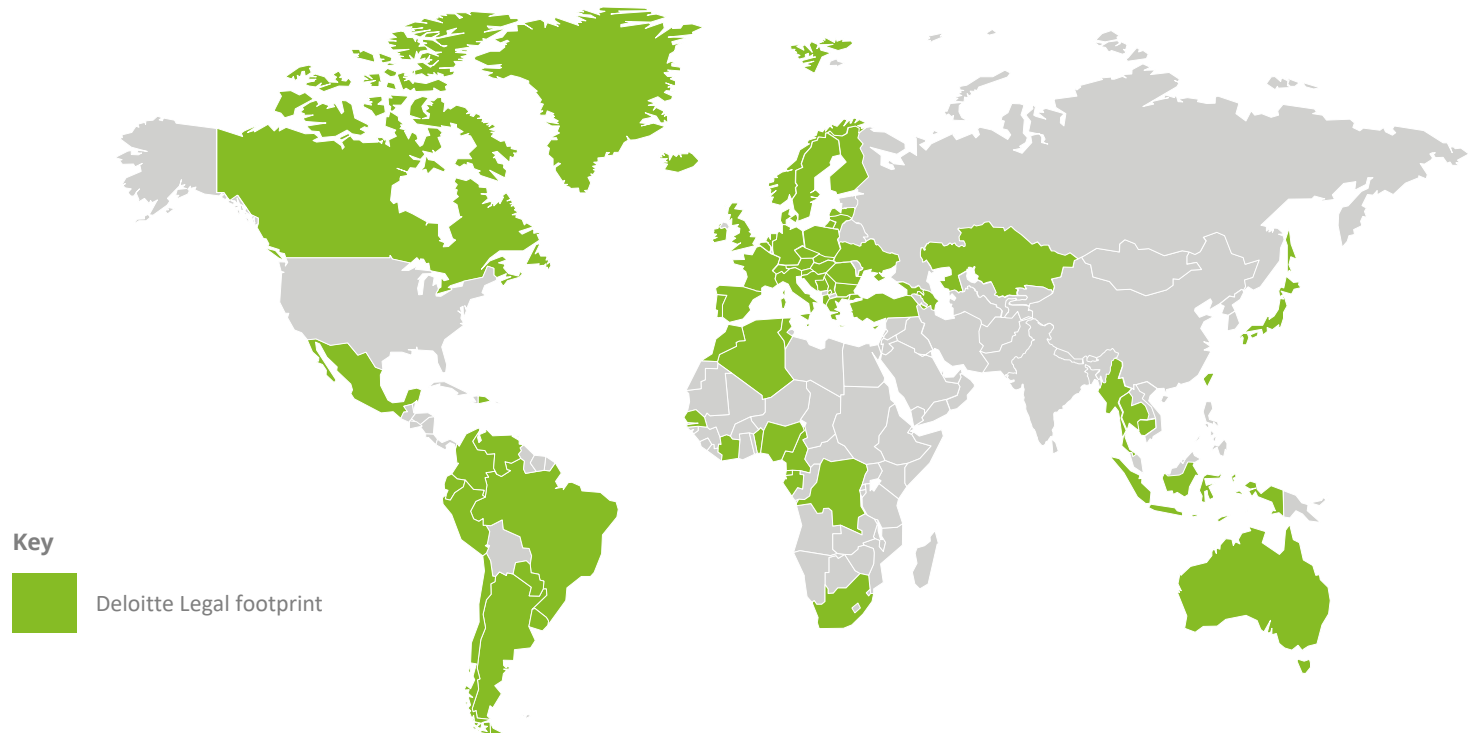
**Thank you very
much**
for your attention.



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