



EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR FINANCIAL STABILITY, FINANCIAL SERVICES AND CAPITAL MARKETS UNION

Financial systems and crisis management
The Director

Brussels
FISMA.E/KW

Mr Simone CUOMO
Secretary General
Council of Bars and Law Societies
of Europe (CCBE)
Rue Joseph II, 40/8
1000 Bruxelles
Belgium

Dear Mr Cuomo,

Since 2014, in response to the illegal annexation of Crimea and the deliberate destabilisation of Ukraine, the EU has progressively imposed restrictive measures (sanctions) against Russia. In 2022, in response to Russia's military aggression against Ukraine, the EU added a significant number of persons and entities to the sanctions list and massively expanded its economic sanctions.

- Currently, 1091 persons and 80 entities are subject to the individual financial measures laid down in Council Regulation (EU) No 269/2014¹, as amended most recently on 8 April 2022. Some persons and entities of interest may be listed in other EU sanctions regimes. The EU Consolidated List of Financial Sanctions² provides the full information in this regard. **All funds and economic resources within EU jurisdiction belonging to, owned, held or controlled by listed persons and entities must be frozen immediately.** In addition, no funds or economic resources can be made available to them, whether directly or indirectly.
- In parallel, Council Regulation (EU) No 833/2014³, as amended most recently on 8 April 2022, contains broader financial and economic measures, such as restrictions on investment in Russia and restrictions on bank deposits from

¹ Council Regulation (EU) No 269/2014 of 17 March 2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 78, 17.3.2014, p. 6–15.

² <https://webgate.ec.europa.eu/fsd/fsf>

³ Council Regulation (EU) No 833/2014 of 31 July 2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 229 31.7.2014, p. 1.

Russian nationals and entities and persons residing in Russia. Similar measures exist in Council Regulation (EU) No 765/2006⁴, concerning Belarus.

- Moreover, Council Regulation (EU) No 692/2014⁵ and Council Regulation (EU) 2022/263⁶ set out restrictions on economic relations with and investment in Crimea and, respectively, the non-government controlled areas of Donetsk and Luhansk oblasts of Ukraine.

It is important to note that **these Regulations are directly applicable** in all Member States and **no further legal basis is required under national law**. They must be complied with by **all national authorities and EU operators**, including financial institutions, private companies and organisations, as well as EU citizens. To prevent sanctions evasion, application must be done without delay, as soon as there are grounds to believe that it is necessary in accordance with either Regulation. In addition, the Regulations expressly prohibit participation in any circumvention of these measures. Non-compliance with the Regulations creates exposure to administrative and/or criminal penalties.

To be able to fulfil its obligations and apply the measures above, each EU operator should perform thorough due diligence on its business counterparts and related transactions. The nature of the checks may depend on the business specificities and the related risk exposure. It is for each operator to develop, implement, and routinely update an EU sanctions compliance programme that reflects their individual business models, geographic and sectoral areas of operations and related risk assessment.

Member States have the responsibility to ensure the proper implementation and enforcement of EU sanctions, through their national competent authorities. In its role as guardian of the Treaties, the Commission ensures uniform implementation throughout the Union and also monitors enforcement. In particular, to improve the efficiency of sanctions against Russian and Belarusian oligarchs, the Commission has set up the ‘Freeze and Seize’ Task Force, which coordinates efforts at national level. The Commission also stands ready to support EU operators in complying with their legal obligations.

The webpage of the Commission’s Directorate-General for Financial Stability, Financial Services and Capital Markets Union (DG FISMA) contains further information about the latest sanctions concerning Russia and Belarus, together with sets of **Frequently Asked Questions**⁷, while the **EU Sanctions Map**⁸ provides a user-friendly display of all EU sanctions regimes. Finally yet importantly, the **Whistleblower Tool**⁹ allows the

⁴ Council Regulation (EC) No 765/2006 of 18 May 2006 concerning restrictive measures against President Lukashenko and certain officials of Belarus, OJ L 134, 20.5.2006, p. 1–11.

⁵ Council Regulation (EU) No 692/2014 of 23 June 2014 concerning restrictive measures in response to the illegal annexation of Crimea and Sevastopol, OJ L 183 24.6.2014, p. 9.

⁶ Council Regulation (EU) 2022/263 of 23 February 2022 concerning restrictive measures in response to the recognition of the non-government controlled areas of the Donetsk and Luhansk oblasts of Ukraine and the ordering of Russian armed forces into those areas, OJ L 42I, 23.2.2022, p. 77–94.

⁷ https://ec.europa.eu/info/sanctions-russia_en

⁸ <https://sanctionsmap.eu>

⁹ <https://eusanctions.integrityline.com>

anonymous sending, directly to the Commission, of information on listed persons' assets and possible violations of EU sanctions.

I would be grateful if you distributed this message to the members of the Council of Bars and Law Societies of Europe. We are at your service for any questions you may have.

Yours sincerely,

(e-signed)
Klaus WIEDNER

c.c.: Mr Peter MACNAMEE, Senior Legal Adviser