

EU SANCTIONS HELPDESK SUPPORTING EU SMES WITH SANCTIONS COMPLIANCE

# Launch of Pilot Phase

Dear Member State Partners,

Following our introduction at the RELEX meeting on 6 September, we are pleased to announce that the EU Sanctions Helpdesk, is now available to provide sanctions compliance support for EU SMEs, for enquiries submitted through National Competent Authorities.

The EU Sanctions Helpdesk is an initiative funded by the European Union to assist EU operators in understanding sanctions due diligence processes. It offers free support for the conducting of due diligence when users lack the necessary tools or resources.

#### Pilot due diligence support

In this pilot phase we will be working exclusively with the member states' National Competent Authorities responsible for implementing EU restrictive measures. The Helpdesk is available to support you with questions and enquiries you receive from SMEs:

- Guidance on whether or not certain activity is permitted
- Compliance of the transaction with applicable asset freeze measures
- Assistance with due diligence on a specific project, transaction or counterparty

Owing to data processing constraints, in this pilot phase, we are only able to correspond with National Competent Authorities and not directly with SMEs themselves.

Additional details are set out in the attached Q&A document, which also contains information about our future plans.

#### Using our services

Anonymized requests from SMEs can be submitted through <u>getsupport@eu-sanctions-helpdesk.eu</u>.

During this trial phase, you will be able to submit a maximum of two requests per batch. Once each batch of cases have been processed and the Helpdesk assessment has been sent, you will be able to submit a new batch of cases.

If you so wish, we would be delighted to first discuss our services and your particular needs, and agree the exact details of how we will work with you. You can either book a convenient



time for a video call on our <u>booking site</u>, or you can email us at <u>outreach@eu-sanctions-helpdesk.eu</u> to arrange a time for a call.

### Feedback and future partnership

We look forward to working with you on this – and future – initiatives.

Sincerely,

The EU Sanctions Helpdesk team





## Questions and answers for National Competent Authorities

### About the Helpdesk

- Q: What is the EU Sanctions Helpdesk?
- A: The EU Sanctions Helpdesk funded by the EU assists European operators, particularly Small and Medium-sized Enterprises (SMEs), in complying with European Union restrictive measures (also known as sanctions) imposed worldwide.
- Q: Who are the target users?
- A: Primarily European SMEs, defined by EU recommendation 2003/361. This includes companies with:
  - Fewer than 250 employees
  - Up to €50 million turnover
  - Total balance sheet assets of up to €43 million
- Q: What are the Helpdesk's response times?
- A: All requests will be acknowledged within **2 working days**. For straightforward requests, we aim to respond within **5 working days**. For more complex requests, including those involving extensive sanctions programs such as Russia, Belarus, and Iran, we aim to respond within **10 working days**.
- Q: What restrictive measures are covered by the Helpdesk?
- A: The Helpdesk covers all UN and autonomous EU restrictive measures applicable across the EU. We screen against, UN, EU and national sanctions lists of EU Member States, where applicable. The Helpdesk will not address sanctions risk arising under third countries' sanctions programmes.
- *Q:* Does the information the Helpdesk provides constitute official guidance of the EU?
- A: No. While the Helpdesk is an EU-funded initiative and makes every effort to ensure accuracy, the European Commission does not take responsibility or accept liability for any activity undertaken by the Helpdesk. EU operators must make the final decision about pursuing business opportunities and accepting associated risks. The Helpdesk's role is to help locate certain information and to advise SMEs of potential risks.



### Work in the pilot phase

- Q: What support will the Helpdesk be offering to EU SMEs in the pilot phase?
- A: The Helpdesk will provide the following compliance support services:
  - Guidance on whether certain activity is permitted in accordance with applicable sectoral measures.
  - Compliance of the transaction with applicable asset freeze measures
  - Assistance with due diligence on a specific project, transaction or counterparty

### Q: How will NCAs pass enquiries to the Helpdesk?

A: When you want the Helpdesk to deal with an enquiry from an EU SME, you should forward an anonymised version of the enquiry (see question below) to our dedicated email address, getsupport@eu-sanctions-helpdesk.eu

We will review the enquiry and contact you if we need further information. Once we have dealt with the enquiry and it has been checked by our sanctions compliance experts, we will send you a response by email.

- Q: What is an anonymised enquiry?
- A: European Commission data rules currently limit the Helpdesk's processing of personal data, for example the names of staff at SMEs who write to you. You will need to remove the details of the person or business making the enquiry to you and replace it with a unique reference number.
- *Q:* What information will be included in your final report?
- A: Depending on the exact scope of the request, it can include assessments of:
  - SME's counterparty or any party in the transaction to identify if they are sanctioned directly or owned or controlled by a Designated Person (*Who*)
  - The goods or services being transacted and whether they are subject to EU restrictive measures (*What*)
  - The Locations and jurisdictions where goods, services or related payments will be transiting to determine whether any restrictive measures are being breached (Where)
  - End-use and end-user to ensure compliance with restrictive measures (*Why*)
- *Q*: Can we share your report with the SME making the enquiry?
- A: Yes, if you choose. You may share our report or, alternatively, you may choose to use the information provided in our report to formulate your own response to the SME.

### Q: Can we provide your contact details direct to the SMEs?

A: No. In this pilot phase we are working exclusively with the member states' National Competent Authorities and will not be communicating directly with or offering services to any other parties.



### *Q:* Who is responsible for the information and guidance provided to the SME?

A: While the Helpdesk's team of experts will use its resources to collate, analyse and report its findings on enquiries sent to us, the final report is designed to inform your response to the SME that has send an enquiry to you. As such, you should satisfy yourself that the information provided is in keeping with your own understanding and local practice. Feedback is welcome at any time.

### **Future plans**

- *Q:* What are your future plans?
- A: Over the coming months we will be announcing more initiatives such as:
  - A website providing helpful resources supplementary to those already published by the European Commission.
  - A portal for EU SMEs to directly access our sanctions compliance support.
  - Information sessions, seminars, and workshops.
  - Participation in third party events, conferences and trade fairs.
- *Q:* How do I stay up to date with the activities of the Helpdesk?
- A: You can sign up for our newsletter by emailing <u>outreach@eu-sanctions-helpdesk.eu</u> with the subject line "Newsletter subscription". Your email address will automatically be added to our distribution list. You may unsubscribe at any time.
- Q: How do I contact you to discuss partnership opportunities?
- A: We would be delighted to explore partnership opportunities to promote sanctions compliance to SMEs. Please contact us at <u>outreach@eu-sanctions-helpdesk.eu</u> and let us know your thoughts!

#### **Remember:**

If you have a **due diligence enquiry** for us to work on, send it to:

getsupport@eu-sanctions-helpdesk.eu

If you would like to **discuss the project** with the Helpdesk team, it's:

outreach@eu-sanctions-helpdesk.eu