

# VinciWorks

## **COMPLIANCE AND THE RUSSIAN INVASION OF UKRAINE**

Challenges and lessons in sanctions  
compliance one year on from the war



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The Russian invasion of Ukraine which began on 24 February 2022 has displaced millions and killed tens of thousands of people. The war has also created several overlapping crises, from refugees to food supplies and massive supply chain disruption.

The conflict has also sparked waves of new laws around the world, from sanctions to tougher economic crime compliance. The main victims of the war are of course those directly caught up in it, but businesses all around the world are experiencing the effects of this unprecedented global event which shows no sign of slowing down in the next year.

In this guide, we will review the key compliance challenges and lessons which have impacted on business one year into this devastating conflict.

## Why did this war happen?

The Russian invasion of Ukraine which began on 24 February 2022 is actually part of a larger conflict between the two countries which has been an armed conflict since 2014, when Russia invaded and illegally annexed the Crimean peninsula of Ukraine.

The modern nation-state of Ukraine emerged from the chaos of the First World War, when the Austro-Hungarian Empire collapsed, and

the Russian Revolution led to a Bolshevik takeover of Kyiv and wider Ukraine which remained a core part of Russia's sphere of influence throughout the 20th century. When the Soviet Union broke apart in 1991, Ukraine achieved independence from Moscow, although the country remained politically aligned to Russia.

In 2004, a disputed election between the pro-Russian Viktor Yanukovich and the pro-Western Viktor Yushenko sparked the Orange Revolution, which brought a pro-Western government to power in Ukraine and angered Russia. In 2010, pro-Russia Yanukovich again became president and in late 2013, abruptly reversed plans to sign a free trade agreement with the EU. This sparked the massive Euromaidan protests in early 2014 which were brutally suppressed by Yanukovich's forces, resulting in the 2014 Ukrainian revolution and the establishment of a new pro-Western government. Russia responded by invading Crimea and supporting pro-Russian separatist forces in Eastern Ukraine, in areas such as the Donbas.

The ongoing regional war in the Donbas area escalated when Russia recognised two breakaway republics in February 2022, and launched a massive invasion of wider Ukraine. The war has included indiscriminate shelling and missile attacks on civilian areas by Russian forces, attacks on critical infrastructure like power stations along with countless documented war crimes perpetrated against Ukrainian civilians by Russian forces including

forced deportations, mass rape, torture, and massacres.

As a result, there has been a concerted effort among Western governments to sanction Russia for its invasion, and do everything possible to put economic pressure on Russia.







## Fast facts one year into the war

- 1200 individuals sanctioned by the UK and EU
- £19 billion of Russian assets frozen in the UK
- 236 Russia sanctions breaches reported to the OSFI
- 10 Russian banks banned from SWIFT
- 335 Foreign companies withdrew completely from Russia

## What are international sanctions?

Sanctions are a diplomatic tool used to promote international peace and security and to combat violations of international law and terrorism. They do this by applying economic pressure on a country or regime by restricting dealings with the regime, as well as certain individuals and entities. The goal of using sanctions is to pressure a regime to change its behaviour regarding certain political, military, or social issues.

Sanctions are legal limitations put in place by individual countries like the United Kingdom or the United States, or by international institutions, such as the United Nations (UN) and the European Union (EU). They may include various forms of trade barriers, from tariffs and restrictions on financial transactions to broad embargoes.



## What are sanctions lists?

Sanctions lists are databases of information published by a national government or international organisation, which designate certain individuals or entities as being subject to sanction. These lists might include information such as date of birth, names or aliases, or last known locations, along with reasoning as to why the individual or entity is on the sanctions list. The quality of data on these lists can vary widely, however. It can also take a long time to update or change sanctions lists.

It might be surprising to know that actually, most countries in the world do not have their own sanctions lists. Only 22% of countries actually publish their own, independent sanctions lists. The vast majority rely on other lists like those published by the EU and the UN.

That's why it's vital to always refer back to these main lists from the EU and UN, as well as lists published by the US and UK, when making an assessment as to whether or not someone is on a sanctions list. Not every country will publish their own list.

A person trying to evade sanctions might explain they are not on their country's sanctions list. But that could be because their country does not have a sanctions list.

## The US sanctions list

US OFAC Specially Designated Nationals and Blocked Persons (SDN) sanctions list is the most important list in the global sanctions landscape due to the importance of the US financial system. The list also has high-quality information and is easy to access, with multiple fields which create a comprehensive picture of the target.

OFAC also provides a built-in search tool to help navigate the more than 10,000 entries on the sanctions lists.

## The EU sanctions list

The European Union maintains a consolidated list of "persons, groups, and entities" who are subject to EU sanctions. All 27 EU member states must decide upon and implement EU sanctions, meaning the sanctions apply to all member states. Some EU countries will only follow the EU list, meaning there is no additional national list to consider.

## UK Sanctions

In the UK, there are a few different types of sanctions. In general these are financial sanctions, such as freezes on assets of companies or individuals. Other types of sanctions include arms embargoes, trade sanctions and travel bans. Financial sanctions compliance is through the Office of Financial Sanctions Implementation (OFSI).

Breaching sanctions is a strict liability offence in the UK meaning that regardless of the intent, the OFSI is able to implement a monetary penalty for a sanctions breach. It's a 'balance of probabilities' test, and the OFSI will take into account factors like severity, amount, whether there was wilful intent or not when deciding on a penalty for a breach. Any breach of sanctions could result in a penalty.

UK sanctions have also targeted specific Russian industries, and have banned certain UK industries from doing business with Russia. These include:

- IT consultancy services
- Architectural services
- Engineering services

- Advertising services
- Transactional legal advisory services
- Auditing services

A further 700 goods crucial to Russian industry have been added to the export ban. These moves come alongside actions by Europe and the US. Additionally, the governor of Russia's Central Bank, Elvira Nabiullina, has also been subjected to a travel ban and an asset freeze. The UK accounts for nearly 60% of Russia's legal service imports. The new legal advisory measures will cover certain commercial and transactional services and hamper Russia's businesses' ability to operate internationally. IT consultancy services, including designing systems and software applications, are also banned. This comes in addition to the bans on quantum computing implemented by the West.

The West aims to cut Russia off from access to professional services such as audit, bookkeeping, advertising and tax consultancy, aiming to disrupt and degrade the capability of Russian business to keep pace with the rest of the world. In total, nearly £19 billion worth of UK-Russia trade has been sanctioned.

An asset freeze prevents any UK citizen, or any business in the UK, from dealing with any funds or economic resources which are owned, held or controlled by the designated person. UK financial sanctions apply to all persons within the territory and territorial sea of the UK and to all UK persons, wherever they are in the world. It also prevents funds or economic resources from being provided to or for the benefit of the designated person.

Recently introduced powers make it a criminal offence for any Russian aircraft to fly or land in the UK and give the government powers to remove aircraft belonging to designated Russian individuals and entities from the UK aircraft register, even if the sanctioned individual is not on board. Russian ships are also banned from UK ports.





# Complying with sanctions on Russia

## Sanctions compliance in the UK

The Sanctions and Anti-Money Laundering Act 2018 provides the main legal basis for the UK to impose, update and lift sanctions. Some sanctions measures apply through other legislation, such as the Immigration Act 1971, the Export Control Order 2008 and the Terrorist Asset-Freezing etc. Act 2010.

You must make a report to the Office of Financial Sanctions Implementation (OFSI) if you suspect a customer or their firm is a designated person under the financial sanctions regime. Everyone has a responsibility under this regime to safeguard the UK. Breaching the financial sanctions requirements can result in criminal prosecution or a fine.

Businesses can be fined up to 50% of the total breach value, or up to £1m, whichever is greater, alongside prison time for individuals.

You can act for someone who's on the sanctions list, but you must apply for a licence from the Office of Financial Sanctions Implementation (OFSI) before you start work.

The financial sanctions regime prevents you from doing business or acting for listed individuals, entities or ships (without a licence). You should check the financial sanctions lists before offering services or undertaking transactions for clients. If an individual is on the sanctions list and subject to an asset freeze, you may not deal with those funds or make resources available to that person.

## New sanctions laws in the UK

In the wake of the Russian invasion of Ukraine, the UK government rushed through the Economic Crime (Transparency and Enforcement) Act which became law on 15 March 2022. These measures include a register of foreign owners of UK property. Entities who do not declare their beneficial owner will face restrictions in selling their property or face prison. Unexplained Wealth Orders (UWOs) are also being strengthened, with those who hold property in the UK in a trust will be considered an asset's holder. Law enforcement will have more time to implement UWOs and be protected from litigation costs if the order is successfully challenged.

Other key changes include:

- Requirements on foreign legal entities seeking to sell their property to identify their true owners to Companies House
- Overseas entities must declare if any of their beneficial owners are under UK sanctions
- New powers to enhance data sharing between HMRC and Companies House
- Amending the 'false filing' offence into a two-tier offence. The first being an offence of providing false or misleading information 'without reasonable excuse' which can result in an unlimited fine. The second is an 'aggravated' offence of knowingly doing so which can result in a prison sentence
- New measures increase fines for certain offences within the Act and reduce the transition period during which overseas entities must register with Companies House from 18 to 6 months

## US sanctions on Russia

US sanctions on Russia

Since the invasion, the US has implemented a variety of sanctions and export controls which aim to have significant and long-lasting consequences on Russia's defence industrial base. Since February 2022, the United States have coordinated

with allies to use export controls and sanctions to restrict Russia's access to advanced technology, which has degraded the Russian weapons industry's ability to produce and stockpile weapons to replace those that have been destroyed in the war.

Sanctions designations and related actions the Biden Administration and Congress have taken since February 2022 include actions targeting Russian government assets, international trade, broad economic sectors, and specific individuals and entities.

These measures include:

- Restrictions on transactions with Russia's central bank, limiting its ability to draw on dollar-denominated foreign reserves, as well as on transactions with Russia's Ministry of Finance and National Wealth Fund
- Export controls targeting Russia's defence, aerospace, and maritime sectors; energy production; and "a wide range of commercial and industrial operations"
- A ban on the import to the United States of Russian oil and other energy products and suspension of normal trade relations with Russia and its ally Belarus

- Ban on new US investment in Russia
- Ban on US import of gold, diamonds, seafood, and alcoholic beverages from Russia
- Ban on export of US luxury goods and dollar-denominated banknotes
- Ban on the provision of accounting, trust and corporate formation, management consulting, and quantum computing services
- Ban on secondary-market transactions by US financial institutions in Russian sovereign debt
- Ban on entrance into and use of US airspace
- Ban on entrance into US ports
- Ban on US trade or investment in Russia-occupied regions of eastern Ukraine
- A ban on entry to the US for thousands of Russian officials and military personnel, including Duma members and members of the Putin regime

## EU sanctions on Russia

EU sanctions regulations have direct effect in all Member States of the EU, and, as such, are legally binding on all natural and legal persons across the European Union. A natural or legal person who contravenes a

provision of an EU sanctions regulation shall be guilty of an offence and liable to prosecution.

The EU has imposed unprecedented sanctions against Russia in response to the invasion, and these sanctions add to existing measures imposed on Russia since 2014 following the annexation of Crimea. Sanctions include targeted restrictive measures (individual sanctions), economic sanctions and visa measures.

The aim of the economic sanctions is to impose severe consequences on Russia for its actions and to effectively thwart Russian abilities to continue the aggression.

There are also individual sanctions target people responsible for supporting, financing or implementing actions which undermine the territorial integrity, sovereignty and independence of Ukraine or who benefit from these actions.

Sanctions on individuals consist of travel bans and asset freezes. Travel bans prevent listed individuals from entering or transiting through EU territory, by either land, air or sea.

Asset freezes mean that all accounts belonging to the listed persons and entities in EU banks are frozen. It is also prohibited to make any funds or assets directly or indirectly available to them. This ensures that their money can no longer be used to support the Russian regime nor can they try to find a safe haven in the EU.

The EU has also adopted sanctions against:

- Belarus, in response to its involvement in the invasion of Ukraine
- Iran, in relation to the use of Iranian drones in the Russian aggression against Ukraine

EU sanctions are very wide ranging and also target:

- Banks that are financing Russian military and other operations in those territories
- The ability of the Russian state and government to access the EU's capital and financial markets and services, to limit the financing of escalatory and aggressive policies
- Target trade from the two breakaway regions to and from the EU, to ensure that those responsible clearly feel the economic consequences of their illegal and aggressive actions

- A ban on the importation of crude oil and petroleum products originating in Russia
- An expansion of the list of goods and technology which may contribute to the technological enhancement of Russia's defence and security sector and whose export is prohibited
- An expansion of the list of items that generate significant revenues for Russia whose import into the EU is prohibited
- An expansion of the list of military-affiliated end-user entities in Russia and Belarus subject to tighter export restrictions
- A ban on providing accounting; auditing; tax consulting; management consulting; and public relations services to entities established in Russia
- The exclusion of additional Russian and Belarusian financial institutions from the SWIFT payments system
- Further additions to the lists of Russian and Belarusian individuals and entities subject to financial sanctions





## What happens when sanctions are breached?

### **Standard Chartered Bank, fined over £20m for Ukraine breaches**

In July 2014, the European Union (including the UK) imposed restrictive measures against those responsible for the Russian invasion of Crimea.

The sanctions are intended to prevent certain Russian banks, companies, and their subsidiaries from accessing EU primary and secondary capital markets (including access to loans). Specifically, any EU person is prohibited from making loans or credit or being part of an arrangement to make loans or credit available to sanctioned entities.

Standard Chartered Bank made a series of 102 loans to Denizbank A.Ş. between 2015 and 2018. At the time the loans were made, Denizbank A.Ş. was almost wholly owned by Sberbank of Russia. Sberbank was subject to EU sanctions designed to target those undermining Ukraine's sovereignty and territorial integrity. As Sberbank's majority-held subsidiary, the restrictions also applied to Denizbank A.Ş.

The value of loans which breached

sanctions amounted to nearly £100m. OFSI assessed that Standard Chartered Bank was aware of the sanctions regime and the need to take compliance steps and had initially ceased all trade finance business with Denizbank A.Ş. when Denizbank A.Ş. became a sanctioned entity. However, Standard Chartered Bank had then sought to introduce dispensations enabling such loans to be made where they considered an exemption was applicable. OFSI assessed that these dispensations were not appropriately put in place, and the subsequent operation of the dispensations enabled loans to be made which were not within any exemption and therefore were in breach of the EU Regulation.

However Standard Chartered did undertake their own investigative report, and after a review by the minister, decided that they did not wilfully breach the sanctions regime, had acted in good faith, had intended to comply with the relevant restrictions, had fully cooperated with OFSI and had taken remedial steps following the breach.

## Payoneer

Payoneer is a firm specialising in business-to-business cross-border payments. It is used by global leaders like Airbnb, Amazon, Google and Upwork to facilitate cross-border wire transfers, online payments, and debit card services. The company also offers facilities for small and medium-sized businesses to send payments anywhere in the world, quickly and cheaply.

But this business model recently hit the wall of sanctions compliance. Sending money anywhere in the world might be a good marketing slogan, but it's also a violation of international sanctions. In July 2021, Payoneer was fined \$1.4 million by the US sanctions authority, the Office of Foreign Assets Control (OFAC) for over 2,200 violations of multiple sanctions regimes.

In the settlement agreed to by Payoneer, they admitted to processing payments for parties located in Crimea, Iran, Sudan and Syria, all countries subject to US sanctions. They also processed 19 payments on behalf of individuals sanctioned by the US.

This meant sanctioned individuals were able to engage in over

\$800,000 worth of transactions. The fine comes at a tricky time for Payoneer, who began trading on the Nasdaq exchange the month before, with a valuation of \$3.3 billion.

The sanctions failings relate to Payoneer failing to focus on sanctioned locations, and having no system in place for monitoring IP addresses or flagging addresses from sanctioned locations. OFAC noted that Payoneer had reason to know the location of sanctioned users.

OFAC found multiple sanctions control breakdowns from weak algorithms that allowed close matches on the sanctions list to go unflagged, failing to screen for Business Identifier Codes, even when these were included on sanctions lists, and allowing flagged and pending payments to be automatically released without review during backlog periods.

If Payoneer hadn't settled, it would have been looking at over \$4 million in sanctions. Other actions the company took included firing its chief compliance officer, retraining compliance staff and putting in place more checks within its system.

## Have sanctions on Russia worked?

Since Russia launched its invasion of Ukraine at the end of February 2022, the West has imposed significant sanctions on Russia, Belarus, and Vladimir Putin's oligarchs who fund his war. The conflict has also marked unprecedented international cooperation between Western allies unseen since the days of the Cold War.

Sanctions on Russia are designed to hurt the country's economy and make it more difficult to wage war. One out of every nine Russian companies have been impacted by sanctions.

The IMF predicts the Russian economy will contract around 10-15% as a result of these sanctions. Russia is a G20 economy. Russia was part of the G8 until 2014 when it was removed following the first invasion of Ukraine and ongoing occupation of Ukraine's Crimea region. Hundreds of billions of dollars of Russia's central bank assets have been frozen, and the West has either banned Russian energy imports or is rapidly moving away from them.

Russian GDP contracted by 3% in April 2022, and retail sales fell by an annual rate of nearly 10%, double the

5% fall forecast. Russian GDP is forecast to shrink by as much as 4.5% a year as a result of sanctions. Mining and energy sectors have been severely constricted by being shut off from foreign markets. Because Russia can't get parts though from the West, domestic car output shrank 61% because assembly lines can't be serviced.

Banking and payments have been severely impacted, and this is probably one of the most important areas for businesses to look at when it comes to sanctions compliance. Because Russia has been cut off from the SWIFT banking system and so many assets of oligarchs have been frozen, those individuals and businesses are scrambling around to find other places and other ways to use their money.

Sanctions implemented by the West have immobilised about \$300 billion worth of Russian Central Bank assets, limiting the central bank's ability to aid the war effort and mitigate sanctions impacts. Sanctioned Russian oligarchs and financial institutions have been forced to divest from long-held assets outside Russia. Moreover, sanctions have prompted banks in several countries to curtail ties with the Russian financial sector.

## What's coming next for sanctions in 2023?

The last year was defined and shaped by sanctions on an unprecedented scale. Following Russia's invasion of Ukraine, the most comprehensive sanctions were imposed against a major power since the end of the Second World War, with the US, UK and EU and others coordinating their actions in new ways. Sanctions against Russia will likely continue, and even increase, as long as the conflict is ongoing.

Russia is unlikely to either conquer Ukraine or fully surrender, and it is likely the conflict will continue throughout 2023. As the conflict progresses, Ukraine may make incremental territorial gains, such as they did in Kharkiv and Kherson in late 2022. At some point, serious talks about ending the war will come, but it is unlikely that either side will be willing to make significant concessions at this stage.

Without a significant escalation in Russian violence, it is unlikely there will be further moves from the EU on natural gas supplies, or the ultimate financial sanction, to remove all Russian financial institutions from the international financial

architecture or grey list or black list Russia as has been done to North Korea.

But there is likely to be new categories of sanctions coming against particular industries, and we might also see things like:

- Extending lists of designations for pre-existing types of targets
- Shortened timetables for the implementation of some existing bans
- A strong focus on tackling sanctions evasion efforts through new designations, law enforcement, judicial action, and the practical implementation of 'freeze to seize' measures

We can also expect increased enforcement of sanctions violations in 2023, while the pace of new legislation will likely slow. OFSI action was limited in 2022, with only one fine being issued under the Russian sanctions regime last year. Given the fact there were at least 230 breaches of sanctions reported to OFSI since February 2022, there is likely to be increased enforcement action coming this year.



Over the coming year, OFSI will take on more, and more complex, enforcement cases to match its increased resourcing and capabilities. To do this, OFSI will take a risk-based approach and utilise new powers provided by the Economic Crime (Transparency and Enforcement) Act 2022. Those new powers:

- Allow OFSI to impose monetary penalties for financial sanctions breaches on a strict liability basis (i.e., without the need to show that a person in breach of sanctions knew or had reasonable cause to suspect that they were acting in contravention of the relevant prohibitions)
- Allow the publication of details of financial sanctions breaches even if no monetary penalty has been imposed
- Broaden OFSI's existing power to share information with other government organisations

These powers are likely to make it easier for OFSI to investigate suspected breaches and to impose fines where contraventions are identified.

More enforcement action will likely come from the EU as well. The position on enforcement in the EU, however, is more complex than in the UK as it is not the responsibility

of the European Commission and instead is left to the competent authorities of each Member State. This leads to something of an "enforcement gap" where EU sanctions are developed at the EU level, but each Member State has a different competent authority, different judicial practices and, ultimately, different punishments. However the EU has recently adopted a new decision to include sanctions violations as an EU crime which a central EU body can have authority to investigate and fine.

There's also expected to be an increased focus on preventing the circumvention of sanctions from taking place in third countries. The EU intends to appoint a new sanctions envoy to try to ensure global compliance with EU sanctions.



## What are the key things to remember for sanctions compliance on Russia?

You as a business need to be sure for yourself that you aren't dealing with sanctioned entities. You should have good measures in place to screen clients and customers against sanctions lists, and periodically do so with existing clients as well depending on risk.

If you do have a match against a sanctions list, there are specific steps you must take. First, you need to understand what kind of match you have. If the name of an individual or entity you are dealing with matches an entry on the sanctions list, this is known as a name match. If there is a name match, but you are satisfied that the individual does not match the description, you do not need to take further action. This happens more often than you think. If that's the case, record it and write up your reasoning.

If the individual or entity you are dealing with matches all the information on the sanctions list, this is likely a target match.

If you have a target match, or if you are unsure, it must be reported immediately. You should have a

clearly-defined senior management responsibility for sanctions compliance. That function will be required to evaluate the match and determine the next steps. You must stop all work on that client or that transaction.

You generally cannot deal with Russian entities. For example, a Russian business that is sanctioned which is a client, you cannot deal with or make funds or economic resources available to them unless there is an exemption in legislation or you have a licence. And you cannot do anything that would circumvent the asset freeze either. Even providing free services to sanctioned entities may be construed as trying to circumvent sanctions, so you should be very cautious when dealing with sanctioned entities.

If you do find yourself dealing with a sanctioned entity, freeze all their assets and undertake no transactions or assistance unless you have a licence from the authorities.

Ultimately, the West does not want businesses working with Russian entities or doing business with people in Russia. At a minimum, you should be undertaking ongoing monitoring. Think about what kind of transactions the client is asking you to do. What is their source of funds or source of wealth? Do they have Russian bank accounts, Russian properties? Are they travelling to Russia?

Theoretically, someone withdrawing money to then go and spend in Russia which could potentially be spent in a sanctioned entity is a risk in itself. You have to look at what the authorities want, which is to offer no safe quarter for oligarchs and to hurt the Russian economy in order to make it harder for them to wage their war of aggression in Ukraine. You need to ask yourself is your relationship to Russian clients living outside of Russia hindering that policy end, or more precisely, how are you reconciling those two things?



## How to stay compliant with sanctions in 2023

Sanctions compliance is something every business must consider and have policies and procedures to deal with. However, maintaining compliance does not necessarily have to be complicated or expensive. Undertaking a check of a customer who could be a risk, either because they're unknown or from a high-risk jurisdiction, helps to ensure compliance with sanctions rules.

Remember to always maintain a written record when undertaking a sanctions check. Record who was checked, how, when, and against how many sanctions lists. Showing a 'paper trail' of sanctions checking may be required as a defence if you are targeted by those trying to evade sanctions.

- Renew risk assessments, particularly for sanctioned countries and for Russia
- Review client lists for those who require ongoing monitoring
- Review customer onboarding and client due diligence procedures
- Strengthen sanctions screening processes and ensure sanctions checks are regularly undertaken
- Update [sanctions training](#) for all staff
- Review [sanctions policy template](#) with our free updated version





## VinciWorks' sanctions compliance solutions

The field of economic sanctions has been growing increasingly complicated in recent years. As events in Russia, Iran, China and other countries grab global headlines, businesses are struggling to stay on top of changes. Our resources include a library of free guides, policy templates, on-demand webinars and blogs to help your organisation get to grips with the latest sanctions.

**Sanctions Resource Page**

## Online training

All businesses are required to screen for sanctions compliance when conducting due diligence, but in particular, regulated entities should make sure everyone is up to speed on the new sanctions rules. Our courses will teach users to understand global sanctions regimes for different jurisdictions and how they affect your business. Users will learn how to apply processes for customer screening, to identify red flags and report them, and how to make sense of recent sanctions changes. For businesses also operating under EU sanctions, VinciWorks will shortly be releasing a specific EU version of the sanctions course. Please contact us for more information.

**Learn More**



## About VinciWorks

We are a creative and driven team working hard each day to reinvent the impact that compliance tools and training can make. Too many businesses are using boring, tedious and cumbersome processes to train their staff and maintain compliance. We know you can do better, and to prove it, we have been developing compliance training, tools and resources to help any organisation of any size to change the status quo. VinciWorks offers compliance training, software and resources relating to ESG, anti-money laundering, GDPR and data protection, anti-bribery, sanctions and more. We exist to cover every organisation's compliance needs.



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