

# EU Sanctions

## Practitioner's Reference Guide

The EU Sanctions Framework — Thematic Guide

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*Not legal advice. Verify against current official publications before use in compliance decisions.*

# 1. How to Use This Guide

## NAVIGATING THIS GUIDE

This guide covers the EU sanctions framework as a system. Use it as follows:

- **Sections 2–3:** Legal architecture, treaty basis, institutional roles — consult first for any new program question.
- **Section 4:** Types of measures (asset freeze, travel ban, arms embargo, sectoral). Read before analysing any transaction.
- **Section 5:** Thematic regimes (terrorism, human rights, cyber-attacks, chemical weapons). Use for non-country-specific designations.
- **Section 6:** Geographic regimes overview. Russia is covered briefly; consult the dedicated Russia sanctions guide for full coverage.
- **Section 7:** Consolidated Sanctions List (FSF), the EU Sanctions Map, and ownership/control rules.
- **Section 8:** Licensing and derogations — when payments or dealings with listed persons may be authorised.
- **Section 9:** Enforcement — Directive 2024/1226, criminal offences, penalties, and member state obligations.
- **Section 10:** Compliance quick-reference checklist — transaction-level, step-by-step.
- **Section 11:** Official document index.

**CROSS-PROGRAM WARNING:** EU sanctions programs use similar terminology but with program-specific definitions. Do NOT reason by analogy from one regime to another. A derogation available under one Council Regulation does not apply under a different one. Always check the specific instrument.

## 2. Legal and Regulatory Framework

EU sanctions — formally called "restrictive measures" — are a tool of the Common Foreign and Security Policy (CFSP). They are not punitive instruments; they are preventive and coercive measures designed to bring about a change in policy or behaviour by targeted parties. As of 2026, the EU operates more than 40 active sanctions regimes spanning country-specific and thematic programs.

### 2.1 Treaty Basis

**Article 29 TEU** ([consolidated TEU](#)): Authorises the Council to adopt CFSP Decisions defining the EU's approach to a particular matter of a geographical or thematic nature. These decisions require Council unanimity. They define the sanctions regime — who is listed, what criteria apply, what measures are imposed — but do not by themselves constitute directly binding EU law on private parties for economic and financial measures.

**Article 215 TFEU** ([consolidated TFEU](#)): Authorises the Council to adopt Regulations implementing CFSP Decisions, on a joint proposal from the High Representative and the European Commission, by qualified majority. Article 215 Regulations are directly applicable in all member states without national implementing legislation. They impose the legally binding obligations on natural and legal persons and carry extraterritorial effect within EU jurisdiction.

The result is a two-instrument structure: every sanctions program consists of (a) a **CFSP Decision** (adopted under Article 29 TEU) and (b) a **Regulation** (adopted under Article 215 TFEU). The Decision names listed persons and sets criteria; the Regulation imposes the binding prohibitions. Both are published in the [Official Journal of the European Union](#).

## 2.2 UN-Mandated vs Autonomous Sanctions

Category	Trigger	Legal Basis	Examples
UN-mandated	UN Security Council Resolution	Art 29 TEU + Art 215 TFEU (implementing UNSCR)	Al-Qaeda, Taliban, DPRK, Iran (nuclear)
Autonomous	EU own initiative (CFSP)	Art 29 TEU + Art 215 TFEU (autonomous)	Russia, Belarus, Myanmar, thematic regimes
Supplementary	Autonomous measures added to UN baseline	Same as autonomous	EU additional Iran measures beyond UN scope

## 2.3 Enforcement Criminalisation — Directive 2024/1226

In November 2022, the Council adopted Decision (EU) 2022/2332, identifying violations of EU restrictive measures as an area of crime meeting the criteria of Article 83(1) TFEU. This unlocked harmonised criminal law across the EU. [Directive \(EU\) 2024/1226](#) of 24 April 2024 establishes minimum rules for criminal offences and penalties for sanctions violations. It requires member states to criminalise intentional violations, aiding and abetting, and — for dual-use and military goods — serious negligence. The transposition deadline was October 2024; as of mid-2025, the Commission had initiated infringement proceedings against 18 member states for non-transposition. Legal persons (companies) face fines of not less than 5% of total worldwide turnover or €40 million, whichever is higher, plus possible exclusion from public procurement and withdrawal of licences.

**KEY COMPLIANCE TAKEAWAY:** EU sanctions operate through a mandatory two-instrument structure: the CFSP Decision defines the regime; the Article 215 Regulation imposes binding legal obligations. The Regulation — not the Decision — is the operative compliance document.

## 3. Institutional Roles and Responsibilities

### 3.1 The Council of the European Union

The Council adopts all EU sanctions regimes. CFSP Decisions require unanimity among member states; Regulations under Article 215 TFEU require qualified majority. In practice, both instruments are adopted simultaneously. The General Secretariat of the Council maintains sanctions-related working groups, including RELEX/Sanctions.

Any single member state can block a CFSP Decision — and thus a sanctions package — through its veto. This structural feature has been the subject of significant political debate, most notably regarding Hungary's use of its veto to delay Russia-related measures. The Council has implemented a "thin decision" approach (a minimal CFSP Decision confined to core principles) to reduce veto leverage in some contexts.

### 3.2 European External Action Service (EEAS)

The High Representative of the Union for Foreign Affairs and Security Policy, supported by the [EEAS](#), co-proposes sanctions regulations with the Commission and leads political-level negotiations. The EEAS maintains the EU Sanctions Map and coordinates with like-minded third states on sanctions alignment.

### 3.3 European Commission — DG FISMA

The Directorate-General for Financial Stability, Financial Services and Capital Markets Union (DG FISMA) under the [European Commission](#) prepares draft Regulation texts, co-proposes with the High Representative, monitors implementation and enforcement by member states, answers interpretation questions from national competent authorities, and publishes guidance notes. DG FISMA manages the Consolidated Financial Sanctions List (FSF) and the EU Sanctions Helpdesk.

### 3.4 National Competent Authorities (NCAs)

Implementation and enforcement of EU sanctions are the primary responsibility of member states and their NCAs. NCAs grant authorisations (derogations from asset freezes), conduct investigations, and impose penalties. The EU publishes a contact list of NCAs.

There is no single EU-wide enforcement body equivalent to OFAC. Enforcement capacity and penalty levels vary significantly across member states, though Directive 2024/1226 is intended to reduce this disparity.

**WARNING — No Central EU Enforcement Body:** Unlike OFAC in the US, there is no single EU agency that enforces sanctions across all member states. Enforcement, investigation, and penalty decisions rest with each member state's NCA. Compliance obligations are EU-wide; enforcement consequences depend on which member state's jurisdiction applies.

**KEY COMPLIANCE TAKEAWAY:** The Commission sets the rules and monitors implementation; NCAs enforce them. For derogations, authorisations, or investigation enquiries, contact the NCA of the relevant member state, not the Commission.

## 4. Types of Restrictive Measures

EU sanctions impose one or more of the following categories of measure. The specific measures applicable under any given program are set out in the relevant Council Regulation. Not every program uses every measure type.

### 4.1 Asset Freeze

An asset freeze (also called "freezing of funds and economic resources") prohibits all dealings with the funds and economic resources owned, held, or controlled by a listed person or entity. Specifically:

- **Prohibition to transfer, use, or access:** No funds or economic resources may be transferred, altered, converted, moved, or otherwise used. The assets must be held frozen in place.

- **Prohibition to make available:** No funds or economic resources may be made available, directly or indirectly, to or for the benefit of a listed person or entity.
- **Scope of "funds":** Cash, cheques, money orders, bank deposits, electronic money, bonds, shares, securities, and similar financial instruments.
- **Scope of "economic resources":** Assets of any kind, tangible or intangible, movable or immovable, that are not funds but may be used to obtain funds, goods, or services — including real estate, goods, intellectual property.

An asset freeze does not extinguish the underlying legal relationship; it suspends the ability to use or benefit from the asset. Interest and other payments may accrue to a frozen account but cannot be released without authorisation.

## 4.2 Travel Ban (Restrictions on Admission)

Travel bans prohibit listed individuals from entering or transiting through EU territory. They are imposed directly by CFSP Decisions (not Regulations) and enforced by member states at borders. Travel bans apply to natural persons only, not entities. They do not affect EU nationals already present in the territory.

## 4.3 Arms Embargo

Arms embargoes prohibit the supply, sale, transfer, or export of arms and related materiel to a designated country or to listed persons. Depending on the program, embargoes may also cover internal repression equipment, dual-use goods, or technical assistance and financing for military activities. Most EU country-specific sanctions programs include an arms embargo.

## 4.4 Sectoral Measures

Sectoral restrictions impose targeted economic measures beyond individual listings. They may include:

- Import and export restrictions on specified goods or categories (e.g., luxury goods, oil, steel, technology, military goods)
- Restrictions on financial services (e.g., access to capital markets, correspondent banking, financial messaging services)
- Prohibition on providing specified services (e.g., auditing, consulting, IT services, legal advisory)
- Restrictions on transport (e.g., overflight bans, access to ports, vessel bans)

Sectoral measures apply to sectors or categories of goods/services, not just listed persons. They may apply to any counterparty in the sanctioned country or to transactions involving specified goods — regardless of whether any specific individual is listed.

**WARNING — Sectoral Measures Are Not SDN-Equivalent:** Sectoral measures restrict categories of activity, not just dealings with listed persons. A transaction with an unlisted company in a sanctioned country may still be prohibited if it falls within a sectoral restriction. Always check both the list and the sectoral provisions of the relevant Regulation.

**KEY COMPLIANCE TAKEAWAY:** Compliance requires checking both the designated persons list and the sectoral provisions of every applicable Regulation. A clean list screen does not clear a transaction from sectoral exposure.

## 5. Thematic (Horizontal) Sanctions Regimes

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Unlike country-specific regimes, thematic regimes are not tied to a particular state. They target individuals and entities anywhere in the world who are responsible for, involved in, or associated with specific categories of harmful conduct. The EU currently operates four thematic regimes.

### 5.1 EU Terrorist List (Counter-Terrorism)

The EU terrorist list was the first thematic regime, established following the September 2001 attacks. It comprises two distinct lists with different legal bases and populations:

#### 5.1.1 UN-Derived List (Al-Qaeda / ISIL)

Council Regulation (EC) No 881/2002 implements UN Security Council Resolution 1267 and successor resolutions targeting Al-Qaeda, ISIL/Da'esh, and associated persons and entities. The EU adds and removes entries to mirror UN Security Council Committee decisions. Asset freeze applies; no EU travel ban (UN travel ban applies instead).

#### 5.1.2 Autonomous EU Terrorist List (CP 931)

Council Common Position 2001/931/CFSP and Council Regulation (EC) No 2580/2001 establish an autonomous EU list targeting persons, groups, and entities involved in terrorist acts as defined by EU law. The list covers Hamas, Hezbollah's military wing, FARC, Real IRA, and numerous other designated organisations and individuals. Asset freeze and prohibition to make funds available apply. Listings must be based on a decision by a competent authority in an EU member state or third country that meets EU standards.

Important: In February 2026, the Council of the EU designated the Islamic Revolutionary Guard Corps (IRGC) as a terrorist organisation under this regime.

**CRITICAL DISTINCTION — Two Separate Lists:** The UN-derived Al-Qaeda/ISIL list and the autonomous CP 931 list are legally distinct instruments with different legal bases, different listing criteria, and different populations. An entity on one is not automatically on the other. Screen against both.

### 5.2 Chemical Weapons Sanctions Regime

Council Regulation (EU) 2018/1542 and Decision (CFSP) 2018/1544 established the EU's chemical weapons sanctions regime in October 2018. This was the EU's first autonomous thematic regime not derived from a UN mandate and the first EU coercive instrument specifically targeting chemical weapons.

The regime targets persons responsible for developing, producing, stockpiling, transferring, or using chemical weapons, or providing financial, technical, or material support for such activities. Asset freezes and travel bans apply. The regime supports the Chemical Weapons Convention and has been used to designate Russian entities following confirmed OPCW findings of chemical weapons use in Ukraine (including riot control agents deployed as a method of warfare, confirmed in May 2025).

### 5.3 Cyber Sanctions Regime

Council Regulation (EU) 2019/796 and Decision (CFSP) 2019/797 established the EU cyber sanctions regime in May 2019. It targets persons responsible for cyber-attacks or attempted cyber-attacks threatening the EU or its member states, and those providing financial, technical, or material support for such attacks.

Designations have included Russian GRU and FSB officers (for the NotPetya attack, Bundestag breach, WADA breach), Chinese state-affiliated actors, and North Korean entities. Asset freeze and travel ban apply.

In December 2025, the Council sanctioned twelve individuals and two entities under this regime for information manipulation and cyber-attacks targeting EU member states and partners.

## 5.4 Global Human Rights Sanctions Regime (GHRSR)

Council Regulation (EU) 2020/1998 and Decision (CFSP) 2020/1999 established the EU Global Human Rights Sanctions Regime (GHRSR) in December 2020. The regime targets persons responsible for, involved in, or associated with serious human rights violations and abuses anywhere in the world, including genocide, crimes against humanity, torture, arbitrary detention, and enforced disappearances.

The GHRSR does not require any connection to an EU member state — it can designate any person anywhere. Listings have covered officials from Russia, China (Xinjiang), Myanmar, Belarus, Libya, North Korea, South Sudan, Syria, Eritrea, and others. Asset freeze and travel ban apply. The Commission adopted implementation guidance on 17 December 2020. In July 2025, the Council used the GHRSR to sanction eight Iranian individuals and one entity for transnational repression.

The four thematic regimes are summarised in the table below:

Regime	Established	Legal Basis (Reg)	Measure Types	Geographic Scope
EU Terrorist List (UN-derived)	2002	Reg 881/2002	Asset freeze	Global (UN mandate)
EU Terrorist List (Autonomous CP 931)	2001	Reg 2580/2001	Asset freeze	Global (EU autonomous)
Chemical Weapons	2018	Reg 2018/1542	Asset freeze, travel ban	Global
Cyber-attacks	2019	Reg 2019/796	Asset freeze, travel ban	Global
Global Human Rights (GHRSR)	2020	Reg 2020/1998	Asset freeze, travel ban	Global

**KEY COMPLIANCE TAKEAWAY:** Thematic regimes designate individuals and entities globally without geographic restriction. A counterparty domiciled in a non-sanctioned country may still appear on a thematic list. Screening cannot be limited to counterparties from sanctioned jurisdictions.

## 6. Geographic Sanctions Regimes — Overview

The EU maintains over 40 active country-specific sanctions regimes. This section provides an overview of the major programs. **Russia is addressed below with a cross-reference to the dedicated Russia sanctions guide.** For any country-specific program, always consult the full text of the relevant Council Regulation and Decision.

### 6.1 Russia — Refer to Dedicated Guide

**A separate, dedicated Russia sanctions guide is available from mrsanctions.com. That guide provides full practitioner-level coverage of:**

- — The complete Russia sanctions architecture (18+ packages as of 2026)
- — Regulation (EU) No 833/2014 (sectoral measures) and all amendments
- — Regulation (EU) No 269/2014 (asset freeze, listed persons)

- — Specific derogations, authorisations, and general licenses
- — Annex IV entities and the shadow fleet

This guide provides context only. Key reference points: The EU has imposed 20+ rounds of sanctions on Russia as of May 2026 in response to the February 2022 invasion of Ukraine and the illegal annexation of Ukrainian regions, supplementing earlier measures from 2014. Russia sanctions are among the most complex and rapidly evolving EU sanctions programs. Consult the dedicated guide and official sources before any Russia-related compliance decision.

## 6.2 Belarus

EU sanctions on Belarus have intensified significantly since the fraudulent 2020 presidential election and the forced landing of Ryanair flight FR4978 in May 2021. Measures include targeted asset freezes and travel bans on officials and individuals responsible for serious human rights violations, plus sectoral measures covering petroleum products, potash, tobacco, financial services, and aviation.

## 6.3 Iran

The EU maintains multiple overlapping Iran sanctions programs: nuclear-related measures (supporting the JCPOA and UN Security Council resolutions), measures against human rights violations, and — since 2023 — measures targeting Iran's supply of drones (Shaheds) to Russia. The 2022 and 2023 rounds broadened designations significantly. In January 2026, the Council adopted new sanctions against Iran. The IRGC was designated as a terrorist organisation under the EU terrorist list in February 2026.

## 6.4 Syria

EU Syria sanctions have been in place since 2011. Following the fall of the Assad regime in late 2024 and early 2025, the EU suspended major economic sanctions on key sectors (February 2025) to support Syria's transition and reconstruction, while maintaining targeted measures against individuals responsible for past atrocities. As of May 2026, EU Syria sanctions are undergoing continued adjustment.

## 6.5 Myanmar

EU sanctions on Myanmar were extended until April 2027 following the 2021 military coup. They target military and civilian officials responsible for human rights violations and the undermining of democracy. An arms embargo is in place. Sectoral measures include restrictions on businesses linked to the military.

## 6.6 North Korea (DPRK)

EU DPRK sanctions implement UN Security Council resolutions and add autonomous measures. They include comprehensive trade restrictions, a ban on new joint ventures, restrictions on financial services, an arms embargo, and targeted asset freezes. The DPRK regime is among the most comprehensive geographic sanctions programs the EU operates.

## 6.7 Other Active Regimes

Additional active EU geographic sanctions programs include (non-exhaustive): Afghanistan, Burundi, Central African Republic, Democratic Republic of Congo, Guinea, Guinea-Bissau, Haiti, Lebanon, Libya, Mali, Moldova (Transnistria-related), Nicaragua, Somalia, South Sudan, Sudan, Tunisia, Venezuela, Yemen, and Zimbabwe. The [EU Sanctions Map](#) provides a comprehensive, up-to-date listing of all active regimes and their legal acts.

**KEY COMPLIANCE TAKEAWAY:** The EU operates over 40 active sanctions regimes. Use the EU Sanctions Map to identify all applicable programs for a given counterparty or transaction. Russia-specific analysis requires the dedicated Russia sanctions guide.

## 7. The Consolidated Sanctions List, Screening, and Ownership

### 7.1 EU Consolidated Financial Sanctions List (FSF)

The European Commission (DG FISMA) maintains the [Consolidated Financial Sanctions List \(FSF\)](#) — a single database of all individuals, groups, and entities subject to EU financial sanctions across all regimes (asset freezes and prohibitions to make funds/economic resources available). The list is updated whenever the Official Journal publishes new or amended designations.

The FSF is the operative compliance screening list for financial institutions and other obliged entities. It is available for download in XML, CSV, and PDF formats. Users must register for an account to access download links.

Important limitation: The FSF covers only asset freeze obligations. Entities subject only to sectoral restrictions — for example, certain Annex IV entities under Regulation 833/2014 — do not appear in the FSF if they are not also subject to an asset freeze. The [EU Sanctions Map](#) provides broader coverage including sectoral restrictions.

**WARNING — FSF Scope Limitation:** The FSF Consolidated List covers asset freezes only. Entities subject exclusively to sectoral restrictions (e.g., certain Russian entities subject to Annex IV of Regulation 833/2014 but not to a personal asset freeze) may not appear in the FSF. A clean FSF screen does not confirm that all applicable restrictions have been checked.

### 7.2 EU Sanctions Map

The [EU Sanctions Map](#) is a tool maintained by the European Commission providing a comprehensive visualization of all EU sanctions regimes and their associated legal acts. It covers both financial sanctions (asset freezes) and other restrictive measures (arms embargoes, sectoral restrictions, travel bans) across all programs. Unlike the FSF, it includes programs and measures not captured in the Consolidated List.

### 7.3 Ownership and Control — The EU Equivalent of the 50% Rule

EU sanctions regulations do not use the term "50% Rule" as OFAC does, but an equivalent principle applies. Under most EU Regulations, the prohibition to make funds and economic resources "available" to or for the benefit of a listed person extends to entities **owned or controlled** by a listed person, even if those entities are not themselves listed.

The Commission's 2020 Opinion on Article 2 of Regulation 269/2014 (Ukraine/Russia) clarified that "control" covers both legal control (majority shareholding, voting rights) and factual control (ability to determine key commercial or operational decisions). This is broader than a simple ownership percentage and requires substantive analysis. Unlike OFAC's mechanical 50% rule, EU control analysis is more contextual.

For most EU programs, the prohibition to deal with a listed person's controlled entities applies even without a separate listing — but the threshold and definition of control varies by Regulation. Always review the specific Regulation's definitions section.

**WARNING — Control Analysis Is Fact-Specific:** EU "control" is not defined by a mechanical ownership percentage in most Regulations. A 49%-owned entity may be controlled if the listed person has factual decision-making authority. Conversely, a majority-owned entity may not be controlled if structural safeguards are in place. This requires legal analysis, not just an ownership percentage check.

**KEY COMPLIANCE TAKEAWAY:** Screen against the FSF for financial sanctions and the EU

Sanctions Map for the full picture. Then conduct a control analysis for any counterparty with apparent links to listed persons — the analysis is contextual, not a mechanical percentage rule.

## 8. Licensing and Derogations

EU sanctions Regulations do not use the term "general license" as OFAC does. Instead, they provide specific derogations from the asset freeze obligation, which must be authorised by the NCA of the relevant member state (and, in some cases, notified to or approved by the Commission). There is no EU-wide licensing authority.

### 8.1 Standard Derogations in Most Regulations

Most EU asset freeze Regulations include the following categories of derogation (precise conditions vary by Regulation; always check the specific text):

- **Basic needs:** Release of frozen funds to meet basic needs of a listed natural person (food, rent, medicine, utilities, legal fees, routine banking fees). Notification to other member states required.
- **Extraordinary expenses:** Release for extraordinary expenses on a case-by-case basis, requiring prior NCA authorisation and notification to the Commission and other member states.
- **Prior contractual obligations:** Release to meet obligations under contracts predating the listing, subject to NCA authorisation.
- **Existing court orders:** Release to satisfy judgments or arbitral awards entered before the listing.
- **Diplomatic missions:** Funds and economic resources of diplomatic missions, consular posts, and international organisations may be exempt.

### 8.2 Humanitarian Aid Carve-Outs

Since 2020–21, the Commission has issued guidance notes clarifying that EU sanctions do not prohibit genuine humanitarian aid activities. The Commission's 30 June 2022 [guidance note on humanitarian aid compliance](#) provides detailed analysis. Key points: humanitarian actors must use due diligence to avoid diversion; the guidance is not a blanket license; and individual Regulations may have specific humanitarian carve-outs (e.g., Syria).

### 8.3 The EU Blocking Statute

The [EU Blocking Statute \(Regulation \(EC\) No 2271/96\)](#) protects EU operators from compliance with specified extraterritorial sanctions adopted by third countries (currently: certain US sanctions on Cuba and Iran). It prohibits EU persons from complying with those specified third-country sanctions without EU authorisation and provides for recovery of damages in EU courts. The Blocking Statute does not apply to EU sanctions themselves; it is a defense against extraterritorial application of non-EU sanctions.

**KEY COMPLIANCE TAKEAWAY:** EU derogations require authorisation from the NCA of the relevant member state. There is no pan-EU licensing authority. Humanitarian aid activities are generally not prohibited but require due diligence and may require specific NCA engagement depending on the program.

## 9. Enforcement

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### 9.1 Member State Responsibility

Enforcement of EU sanctions is a member state function. Each member state designates one or more NCAs responsible for implementing EU sanctions, authorising derogations, conducting investigations, and imposing penalties. The Commission monitors implementation but does not itself enforce.

### 9.2 Criminal Offences Under Directive 2024/1226

[Directive \(EU\) 2024/1226](#) requires member states to criminalise the following as intentional criminal offences:

- Failing to freeze funds or economic resources of a designated person
- Making funds or economic resources available to a designated person
- Importing, exporting, selling, purchasing, or transferring goods in violation of sanctions
- Providing prohibited services (financial, legal, advisory, auditing, etc.)
- Supplying false or misleading information to conceal funds that should be frozen
- Circumventing or attempting to circumvent restrictive measures
- Providing assistance or brokering services for prohibited transactions

For dual-use and military goods: serious negligence (not only intentional acts) is included as a criminal offence.

### 9.3 Penalties

Directive 2024/1226 requires minimum penalty levels. Natural persons face imprisonment of at least five years for aggravated offences. Legal persons face fines of not less than 5% of total worldwide annual turnover or €40 million (whichever is higher). Additional sanctions for legal persons include: exclusion from public procurement and grants, withdrawal of permits and authorisations, and judicial winding-up.

As of mid-2025, EU-wide enforcement had resulted in 7 criminal convictions with a combined 19.5 years of imprisonment, fines and confiscations exceeding €9 million, and coordinated raids across 10 EU member states. The Commission opened infringement proceedings against 18 member states in July 2025 for failing to transpose Directive 2024/1226 by the May 2025 deadline.

### 9.4 EU Sanctions Whistleblower Tool

The Commission operates the [EU Sanctions Whistleblower Tool](#) to receive reports of potential sanctions violations. Reports can be submitted anonymously and are forwarded to competent authorities in relevant member states.

**KEY COMPLIANCE TAKEAWAY:** Enforcement is a member state function, but the criminal standards set by Directive 2024/1226 are now uniform across the EU. Legal persons face fines of up to 5% of global turnover for intentional violations. The lack of transposition by most member states as of mid-2025 does not relieve compliance obligations — it only affects the specific criminal prosecution mechanism.

## 10. Compliance Quick-Reference Checklist

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Use this checklist for any transaction, relationship, or activity with potential EU sanctions exposure.

Step	Action
1. Identify applicable regimes	Determine all EU sanctions programs that could apply to the transaction (counterparty country, sector, activity type, thematic exposure). Use the EU Sanctions Map.
2. Screen the FSF	Screen all parties (counterparty, beneficial owners, subsidiaries, intermediaries) against the EU Consolidated Financial Sanctions List (FSF) at <a href="http://webgate.ec.europa.eu/fsd/fsf">webgate.ec.europa.eu/fsd/fsf</a> .
3. Check sectoral restrictions	Review the sectoral provisions of each applicable Regulation — not just the listed persons annex. Confirm goods, services, and financial flows are permitted.
4. Conduct ownership/control analysis	If any party has apparent links to a listed person, conduct a substantive control analysis. Do not rely on a mechanical ownership percentage.
5. Review thematic exposure	Check all four thematic regime lists separately: UN-derived terrorism list (Reg 881/2002), autonomous terrorism list (Reg 2580/2001), chemical weapons (Reg 2018/1542), cyber (Reg 2019/796), human rights (Reg 2020/1998).
6. Russia-specific check	If Russia is involved, consult the dedicated Russia sanctions guide. Russia requires separate analysis of Regulation 833/2014 (sectoral) and Regulation 269/2014 (listed persons) as a minimum.
7. Assess licensing need	If any prohibition appears to apply, determine whether a derogation is available under the specific Regulation and contact the relevant member state NCA for authorisation.
8. Document the analysis	Record all steps taken, databases screened, dates, conclusions, and any NCA communications. Documented due diligence is material to enforcement outcomes.
9. Monitor for updates	EU sanctions lists are updated without advance notice. Establish a monitoring process for Official Journal publications and FSF updates.

## 11. Official Document Index

### Treaty Provisions

Instrument	Official URL
Article 29 TEU (CFSP decisions)	<a href="http://eur-lex.europa.eu">eur-lex.europa.eu</a> — <a href="https://eur-lex.europa.eu/lexuri/cs/cs/CELEX/12016M029/">CELEX:12016M029</a>
Article 215 TFEU (Restrictive measures)	<a href="http://eur-lex.europa.eu">eur-lex.europa.eu</a> — <a href="https://eur-lex.europa.eu/lexuri/cs/cs/CELEX/12016E215/">CELEX:12016E215</a>

### Key Legislative Instruments

Instrument	Type	URL
Directive (EU) 2024/1226 — Criminal offences	Directive	<a href="http://eur-lex.europa.eu">EUR-Lex</a>

Instrument	Type	URL
Council Decision 2022/2332 — Art 83(1) TFEU	Council Decision	OJ L 308, 29.11.2022
Reg (EU) 2020/1998 — Global Human Rights	Regulation	<a href="#">EUR-Lex General Framework</a>
Reg (EU) 2019/796 — Cyber-attacks	Regulation	<a href="#">EUR-Lex General Framework</a>
Reg (EU) 2018/1542 — Chemical weapons	Regulation	<a href="#">EUR-Lex General Framework</a>
Reg (EC) No 2580/2001 — Autonomous terrorism	Regulation	<a href="#">EUR-Lex General Framework</a>
Reg (EC) No 881/2002 — Al-Qaeda/ISIL (UN)	Regulation	<a href="#">EUR-Lex General Framework</a>

## Official Resources and Tools

Resource	URL
EEAS EU Sanctions page	<a href="https://eeas.europa.eu/eu-sanctions">eeas.europa.eu — EU Sanctions</a>
EC Finance — Sanctions overview	<a href="https://finance.ec.europa.eu/sanctions-overview">finance.ec.europa.eu — Sanctions overview</a>
EUR-Lex — General Framework for EU Sanctions	<a href="https://eur-lex.europa.eu/general-framework">eur-lex.europa.eu — General Framework</a>
EU Sanctions Map	<a href="https://sanctionsmap.eu">sanctionsmap.eu</a>
Consolidated Financial Sanctions List (FSF)	<a href="https://webgate.ec.europa.eu/fsd/fsf">webgate.ec.europa.eu/fsd/fsf</a>
EU Sanctions Helpdesk	<a href="https://eu-sanctions-compliance-helpdesk.europa.eu">eu-sanctions-compliance-helpdesk.europa.eu</a>
EU Sanctions Whistleblower Tool	<a href="https://finance.ec.europa.eu/whistleblower">finance.ec.europa.eu — Whistleblower</a>
EU Blocking Statute	<a href="https://finance.ec.europa.eu/blocking-statute">finance.ec.europa.eu — Blocking Statute</a>
EU Best Practices (2024)	<a href="#">Council doc ST-11623-2024-INIT (PDF)</a>
2018 CFSP Guidelines	<a href="#">Council doc ST-5664-2018-INIT (PDF)</a>
EU Russia Sanctions (EEAS)	<a href="https://eeas.europa.eu/russia-sanctions">eeas.europa.eu — Russia sanctions</a>
EU Russia Sanctions (EC Finance)	<a href="https://finance.ec.europa.eu/russia-sanctions">finance.ec.europa.eu — Russia sanctions</a>

*Not legal advice. All information should be verified against current official EU publications before use in compliance decisions.  
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