# Don't be a back door

When "not sanctioned" isn't enough: spotting sanctions evasion in your supply chain.

**Sanctions evasion** is when goods, money or services find their way to a sanctioned country or party via a **third country, intermediary or shell company**. Since the **EU Directive of April 2024**, helping or even **turning a blind eye** to evasion is a criminal offence: "I didn't know" is no longer a defence if you should have known.

**Your EU company**
Ships goods

**Third country**
UAE · TR · KZ · KG

**Sanctioned destination**
RU · BY · etc.

**YOUR problem**
Criminal liability

## Common evasion patterns

**Diversion**
Goods routed via transit hubs

**Shell companies**
No staff, no website, no real activity

**End-user swap**
Real buyer is hidden behind agent

**Mismatch**
Goods don't fit buyer's business!

- → Buyer in a known **transit hub** (UAE, Türkiye, Kazakhstan, Kyrgyzstan, Armenia, Georgia, Hong Kong, Serbia…) ordering goods with no clear local market.
- → Sudden **spike or change in order pattern**: new product, larger volume, new payment route, especially after sanctions tightened.
- → Counterparty **refuses to sign a no-re-export clause** for Russia / Belarus, or pushes back on basic enduse questions.
- → Goods or technology **do not match** the buyer's normal business or the destination country's economy.
- → Pressure to **skip paperwork, ship fast or not ask questions**, or unusual payment routing through third countries.

## 4 things every SME should do

**Map your supply chain & routes**

**Screen all parties involved in the transaction**

**Insert a no-re-export clause in contracts**

**Document and escalate any red flag**

Document & ESCALATE FIRST.

**No in-house compliance team?** Don't guess - hold the transaction and contact:

1. Your **bank**
2. The **Dutch licensing authority**
   → **Douane / CDIU** for export controls
   → **MinBuZa / DNB** for financial sanctions
3. Your **lawyer**
4. Your **sector association**

Documenting why you proceeded matters **as much as the decision itself.**