

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!

Red flags: you've seen these before

- 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

Saw a red flag?
Stop and think!

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.