Russia & Belarus SME guide

What's banned, what needs a licence, and what to put in every contract.

Russia and Belarus are the **most heavily sanctioned major economies in history**. The EU has issued **20+ sanctions packages** since February 2022. Rules change every few months and **circumvention via third countries is now a criminal offence** across the EU. Treat any crossborder activity touching RU or BY as high-risk by default.

The 50 % rule, in one picture

Outright ban
no transaction, no license

- Crude oil & refined products
- Most dual-use items
- Luxury goods > €300
- Services to RU government & firms (accounting, audit, consulting, IT, legal advisory)
- Anything for/by listed persons

License required
apply via CDIU / your authority

- Specific medical / humanitarian goods
- Some wind-down transactions
- Limited agricultural exceptions
- Spare parts for previously supplied items
- Contractual obligations predating sanctions

Case-by-case
but always with full DD

- Goods not on any restriction list
- Counterparty fully unrelated to RU/BY
- Documented end-use & end-destination
- Bank-cleared payment route
- No transit-country diversion risk

Transit countries: treat with extra care (includes more restrictions on place/transit hubs)

United Arab Emirated

Türkiye

Kazakhstan

Kyrgyzstan

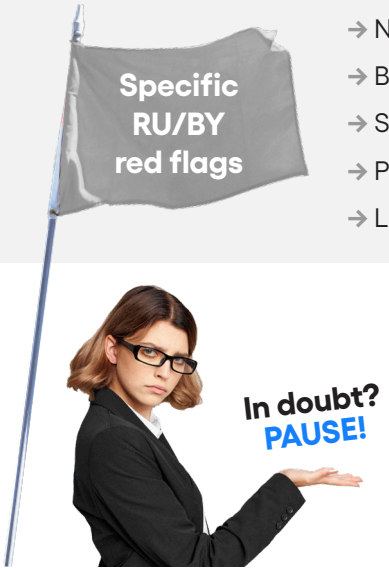
Armenia

Georgia

The mandatory no-re-export clause

Since 20 March 2024, EU exporters of certain restricted goods must contractually prohibit re-export to Russia or for use in Russia. The clause must be enforceable, allow audit/penalties, and be cascaded.

> *"The Buyer shall not, directly or indirectly, sell, export or re-export any goods supplied under this contract to the Russian Federation or to the Republic of Belarus, or for use in those countries. The Buyer shall pass on this obligation to its own customers and shall, on request, provide evidence of compliance. Breach of this clause gives the Seller the right to terminate and to claim damages."*



- → New customer in a transit hub **with no clear local market** for your goods.
- → Buyer **refuses to sign** the no-re-export clause, or wants it watered down.
- → Sudden order spike **just after a new sanctions package**.
- → Payment routed through **a third country** not connected to the buyer.
- → Listed Russian / Belarusian person appears in the **ownership chain**.

1. Check the latest at **sanctionsmap.eu** and **douane.nl/cdiu**
2. **For payment / banking questions:** your bank's compliance helpdesk.
3. **For interpretation:** your lawyer, sector association.

Don't ship **just because** the contract is old, sanctions can apply to **existing obligations**.