

# Due Diligence Helpdesk on EU Sanctions

for EU SMEs  
dealing with Iran



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**IRAN**

Funded by the  
European Union



# Background

The Joint Comprehensive Plan of Action (JCPOA) was agreed in 2015 between Iran and the E3/EU+3 (China, France, Germany, Russia, UK and US, as well as the EU). As a result, in 2016 the EU lifted all its economic and financial restrictive measures (sanctions) imposed in connection with the Iranian nuclear programme.

However, a number of other EU sanctions concerning Iran remain in place. These include financial restrictions on certain Iranian individuals and entities, as well as export bans.

European companies interested in doing business with Iran must first consider whether their activities would fall under existing EU sanctions.

Many companies, in particular SMEs, are not always able to allocate resources to carry out due diligence checks. If uncertain about the legality of their planned activities, they may abstain from pursuing legitimate opportunities in Iran.

# Project Overview

Contracting authority: European Commission, Service for Foreign Policy Instruments (FPI)

Title: Due Diligence Helpdesk on EU Sanctions for EU SMEs dealing with Iran

Website: [www.sanctions-helpdesk.eu](http://www.sanctions-helpdesk.eu)

Objective: To support EU companies interested in legitimate business with Iran, in particular Small and Medium-sized Enterprises (SMEs), in compliance with EU sanctions legislation, and as part of the EU's continued commitment to the JCPOA.

# Goals

- Provide concrete support to EU SMEs by carrying out due diligence regarding **EU sanctions compliance** for specific business projects;
- Help reduce transaction costs for EU SMEs dealing with Iran;
- Encourage EU SMEs to engage in Iran by applying a due diligence concept based, *inter alia*, on principles elaborated within the framework of the Commission's preceding action financed under the Partnership Instrument ("*Due diligence for EU operators related to Iran*");
- Reassure European banks, which may be currently reluctant to handle transactions involving Iran, by providing EU SMEs with well-researched due diligence documentation on their Iranian business partners;
- Demonstrate the EU's continued commitment to the JCPOA by allocating significant funds to improving EU-Iran trade.

# Helpdesk Services

A

Identification and enrolment of Helpdesk users

B

Due diligence Orientation & Automated Initial Assessment (Level 1)

C

- Document Verification (Level 2)
- On the Ground Research (Level 3)

D

- Ancillary services
- Guidance
  - Trainings
  - Networking

# Levels of Due Diligence

Due Diligence request received by the Helpdesk

## Level 1: Due Diligence Orientation & Automated Initial Assessment

- Provide the initial Due Diligence questionnaire and list of necessary documents from the potential Iranian partners
- Review & assess documentation and carry out due diligence based on the submission
- Assist in identifying any missing information or red flags as part of the due diligence

## Level 2: Document Verification

Additional independent verification, including research of local Farsi databases, to cover any discrepancy or missing information

## Level 3: On-the-Ground Research

Site visits in Iran, interviews with relevant individuals etc.

# Due Diligence Analysis Tool

- Helpdesk Team receives and processes requests from EU SMEs for conducting due diligence using comprehensive forms available on the website
- Based on the disclosure quality and any red flags in the submitted documentation, the team will conduct Level 1-3 due diligence
- GDPR (General Data Protection Regulations) & compliance with privacy law are of utmost importance during the process



# Other Helpdesk Services



Publication of  
business guides,  
factsheets and  
other information  
materials



Organizing  
trainings and  
webinars



Supporting  
business  
matchmaking  
events



# EU Sanctions Tool

- Managed by the European Commission, independent from the Helpdesk
- Initial general assessment of compliance with EU sanctions
- Simple design using a 'decision tree' model
- Provides general guidance to EU SMEs on the potential business activity and Iranian partner
- To be launched in summer 2020 at <https://sanctions-tool.ec.europa.eu>



# Other resources

- EU Sanctions Map  
<https://sanctionsmap.eu>
- Consolidated List of EU financial sanctions  
<https://webgate.ec.europa.eu/europeaid/fsd/fsf>
- Information on EU sanctions  
<https://ec.europa.eu/info/sanctions>
- Information on the EU Blocking Statute  
<https://ec.europa.eu/info/blocking-statute>
- INSTEX  
<https://instex-europe.com>
- Ministry of Foreign Affairs of Italy (MAECI)  
[https://www.esteri.it/mae/it/politica\\_estera/politica\\_europea/misure\\_deroghe](https://www.esteri.it/mae/it/politica_estera/politica_europea/misure_deroghe)



# Thank you!

[info@sanctions-helpdesk.eu](mailto:info@sanctions-helpdesk.eu)

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