

Russia Sanctions – Compliance Guide

FAQ FOR NGOS



GREECE

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Law firms participating in this research are not liable towards third parties for the accuracy of the information contained in the Russia sanctions compliance guide. The research cannot be considered as legal advice. It was carried out in 2022 and responds to the regulatory framework on sanctions in this time period. If you have further queries please reach out to our clearinghouse for legal help.

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Since the Russian invasion of Ukraine, countries and regional organisations around the world have imposed sanctions on Russia and Belarus, as a means of putting pressure on Russia's government to end the invasion. These sanctions take different forms and have different targets (sectors/individuals/companies etc.).

While the objective of these sanctions is not to affect organisations such as NGOs who operate in or have links with Russia, inevitably these sanctions might have a direct or indirect impact on them.

The following questionnaire has been created to collect legal research, that will in turn help NGOs understand how sanctions regimes might impact them and to understand how some of these risks could be managed.

Jurisdiction	Greece
Date Last Updated	12 April 2022

Public regulatory/executive body responsible for Sanctions

As an EU Member State, the sanctions regime that is applicable in Greece is that of the EU in the context of its common foreign and security policy (CFSP). The bodies/actors that are responsible at EU level for the adoption of sanctions are the Council of the EU, the High Representative of the European Union for Foreign Affairs and Security Policy and the European Commission. For more details, please consult the EU-specific Tracker.

As regards the authorities in Greece in charge of authorizations, please refer to question 12 below.

Consolidated List

The Consolidated List of persons, groups and entities subject to EU financial sanctions is the one that applies within Greece. For more details, please consult the EU-specific Tracker.

Relevant Guidance

Please consult the EU-specific Tracker for guidance concerning EU substantive legal issues. The competent authority in Greece responsible for implementing import and export restrictions has also published some relevant guidance (in Greek) which can be downloaded [here](#) (document titled "Restrictive measures due to Russian actions that destabilize the situation in Ukraine"). This mostly describes the substantive rules that are applicable under the EU Regulations but also provides some guidance for how to apply for an export license in Greece.

Key Points to note

Do the Russia Sanctions apply to you?

Is there any reason to think that you have any connection to Russia or Russians?

The answer to this question concerns substantive EU law. Please consult the EU-specific Tracker.

With which sanctions regimes may you and/or your employees need to comply as a matter of law?

As an entity operating in Greece, the sanctions regime that the NGO/charity would have to comply with is the EU sanctions regime. For more details about Guidance documents and the applicability of these sanctions to NGOs/charities, please consult the EU-specific Tracker.

Have you agreed to comply with sanctions with which you would not be required to comply as a matter of law by contractual agreements (e.g. with lenders, in donor agreements)?

The answer to this question concerns substantive EU law. Please consult the EU-specific Tracker.

Connections with Russian Individuals and Businesses

Are you engaging with any person specifically targeted by any of these sanctions?

The answer to this question concerns substantive EU law. Please consult the EU-specific Tracker.

Are you engaging with any entity owned or controlled by any of these sanctions?

The answer to this question concerns substantive EU law. Please consult the EU-specific Tracker.

Are you importing or exporting any goods that may be subject to import/export restrictions?

The answer to this question concerns substantive EU law. Please consult the EU-specific Tracker.

Do you have any involvement with activities in the Donetsk, Luhansk and Crimea regions, which are subject to specific regimes?

The answer to this question concerns substantive EU law. Please consult the EU-specific Tracker.

Payments and Investments

Do you have a charitable trust or foundation that might involve dealing with equity/debt instruments issued by, or making loans available to Russian state owned companies, persons connected with Russia, or the Government of Russia?

The answer to this question concerns substantive EU law. Please consult the EU-specific Tracker.

Are you affected by restrictions on processing funds (e.g. making payments where Russian banks have been removed from SWIFT)?

The answer to this question concerns substantive EU law. Please consult the EU-specific Tracker.

Are you affected by restrictions on access by Russian individuals to local bank accounts?

The answer to this question concerns substantive EU law. Please consult the EU-specific Tracker.

Are there any sanctions that apply to using or trading cryptoassets?

The answer to this question concerns substantive EU law. Please consult the EU-specific Tracker.

Exemptions and Other Points to Note

To the extent there are restrictions which apply, can you apply to relevant authorities for licences, e.g. “in connection with the performance of any humanitarian assistance activity”

Regarding the existence of such licenses, and substantive conditions for acquiring them, please consult the EU-specific Tracker. The national competent authorities of each EU Member State are responsible for the implementation of EU sanctions, including the issuance of relevant licenses. The competent authorities in Greece are the following (their contact details can be accessed [here](#)):

- Freezing of assets and prohibition of providing financial services: Unit B - Financial Sanctions Unit of the “Anti-Money Laundering Authority” of L. 4557/18 (Government Gazette ’ 139, art. 47 and thereof).
- Import and Export Restrictions: B6 Directorate for Multilateral Economic Relations and Commercial Policy
 1. Department III of the Directorate is responsible for issuing export licenses for dual-use items (see [here](#)). The relevant form that has to be completed and sent to this Department can be downloaded [here](#) (document titled “FORM 2022-335”)
 2. In addition to completing the relevant form, the Greek competent authority also requires for the issuance of a dual use license:

An end-user certificate, which clearly shows that the export is not for military use or military end-use.

A declaration L. 1599/86 signed by the company that the recipient of the export is not a natural or legal person subject to Annex IV of Regulation 328/2022, that the export has no military use and is not intended for the aviation or spacecraft.

Other points to consider

Please consult the EU-specific Tracker.