

# Violations of commercial/sectoral sanctions

- > Circumvention schemes and enforcement cases (OFAC, SECO, EU)
- > Document review (transport, customs, sales contract, banking documents...)

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## DETECTING COMMERCIAL SANCTIONS CIRCUMVENTION SCHEMES

### 13.40 Violations of commercial sanctions rules: lessons learned from enforcement cases (i.e. OFAC, SECO and the EU)

- Key cases and patterns
- From root causes of violations to how violations surfaced and were handled
- What authorities are really punishing? From Russia and circumvention via third-countries, dealings in sanctioned sectors, to data and screening.
- What is a significant payment under E.O. 14114 – how to define it?
- Understanding the complexity through real cases from the banking and financial industry highlighted by the OFAC, the EU and some overall lessons learned by SECO.

**Olivier Maes**

### 14.40 Circumvention Schemes : How do they function? How to detect them?

- Sanctions schemes typology
- Explanation of the different sanctions circumvention schemes operate currently
- What unites such schemes and what is different about them?
- What does a compliance officer need to know to detect risks of sanctions circumvention?
- Detecting specific sanctions circumvention schemes:
- What information is typically available within a bank of one of the involved entities?
- What are the red flags and how can you obtain information about the other pieces and links of the whole scheme, to understand that there is a circumvention which is attempted / operated?

- What information may not be readily available to compliance officers?
- How to deal with the issue of limited information availability to determine the existence of a sanctions circumvention scheme?
- Practical examples illustrating sanctions circumvention schemes, associated red flags and detection techniques

**Michael Lastovskiy**

15.20 Coffee break

## DOCUMENT REVIEW: transport related document, CIS documents (official, banking...)

### 15.40 Explanation of transport related documents: Certificates of Origin, Bills of Ladings and Customs documentations

- What to look for
- How to detect forged documents, possible frauds and indicia of circumvention of sanctions

**Raphael Brunner**

### 16.40 Document Review: issues and challenges, redflags, methodology, examples

- Forged documents, falsified documents
- Reviewing contracts: sales contracts, transport contracts
- Reviewing official documents/ / CIS official documents: customs documents, passports
- Reviewing business document / CIS business documents: financial statements, reports
- Reviewing banking documents / CIS banking documents

**Michael Lastovskiy**

17.30 End of the seminar

**ZURICH, THURSDAY 21 MAY 2026, ZURICH SHERATON HOTEL, 13.40-17.30 /ONLINE**

#### INFORMATION & REGISTRATION

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Additional participants from the same company: -50%

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An invoice will be sent to you by email following registration. Payment is made by bank transfer or credit card.

I register to the seminar "Violations of commercial sanctions" on 21 May 2026

- I will attend in the conference room       I will attend online on Zoom.

Full name .....

Position ..... Company.....

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