

# Circumvention of commercial/sectoral sanctions

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

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 Legal Partner,  
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## DETECTING COMMERCIAL SANCTIONS CIRCUMVENTION SCHEMES

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

Marc Kilcher et Diane de Sénépart

### 9.40 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

10.30 Coffee break

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

10.50 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

11.50 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

12.40 End of the seminar

**GENEVA, WEDNESDAY 3 JUNE 2026, HOTEL PRESIDENT, 9.00-12.40 / ONLINE**

### INFORMATION & REGISTRATION

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### FEE

620 CHF (+VAT 8,1%)  
 Additional participants from the same company: -50%

### PAYMENT

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 "Circumvention of commercial sanctions" on 3 June 2026

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

Full name .....

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

Address .....

Zip code/City .....

Tel ..... Mobile.....

E-mail.....

Date ..... Signature.....