



COMPLIANCE CIRCULAR

29/2022 [CC 29_2022]

To:

**ALL FIRMS OF THE INSTITUTE
ALL COMPLIANCE OFFICERS**

Date:

21 October 2022

Subject:

**Clarifications on sanctions
circumvention**

The Institute of Certified Public Accountants of Cyprus with the current Circular notifies its members regarding clarification given by the EU Commission about sanctions circumvention.

In an answer given, the EU Commission confirmed that the fact that a person may have transferred ownership of an asset to a third person **before** being listed as subject to EU sanctions, **does not constitute in itself** a violation of the sanctions.

However, if the designated person maintains control over the assets **after** the listing, then persons under EU jurisdiction are required to treat the assets as frozen.

In addition, if a certain scheme was created in order to assist a person to evade the effects of its possible future listing, then participation in that scheme after the listing is in force can amount to circumvention.

Parliamentary question can be accessed [here](#), answer can be accessed [here](#).

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