



TECHNICAL SHEET REGARDING THE IDENTIFICATION OF A PERSON ON AN EU/UN FINANCIAL SANCTIONS LIST

The purpose of this document is to help professionals in the non-financial sector to **properly identify a customer** by **searching** for them on a **financial sanctions list of the European Union or the United Nations**, as well as **to determine the customer's level of risk**.

Questions to ask yourself as a professional:

***1. Am I bound by international financial sanctions ?**

☞ **Answer : Yes¹** ✓



To all natural and legal persons
operating on the territory of the
Grand Duchy of Luxembourg

***2. Where can I search for a person on an EU/UN sanctions list?**

☞ **Answer : Via various PAID** ✓

- ☐ Refinitiv World-Check
- ☐ Dow Jones
- ☐ ComplyAdvantage
- ☐ AMLspotter CDDS
- ☐ 1stKYC
- ☐ MyKyc

¹ Article 3 of the law of 19 December 2020 on the implementation of restrictive measures in financial matters as amended (Below "TFI Law").

☞ **Answer :** *On the AED² website via various PUBLIC and NON-PAYING search tools* ✓

Outils de recherche

Liste sanctions financières internationales onusiennes (ONU et CSNU)

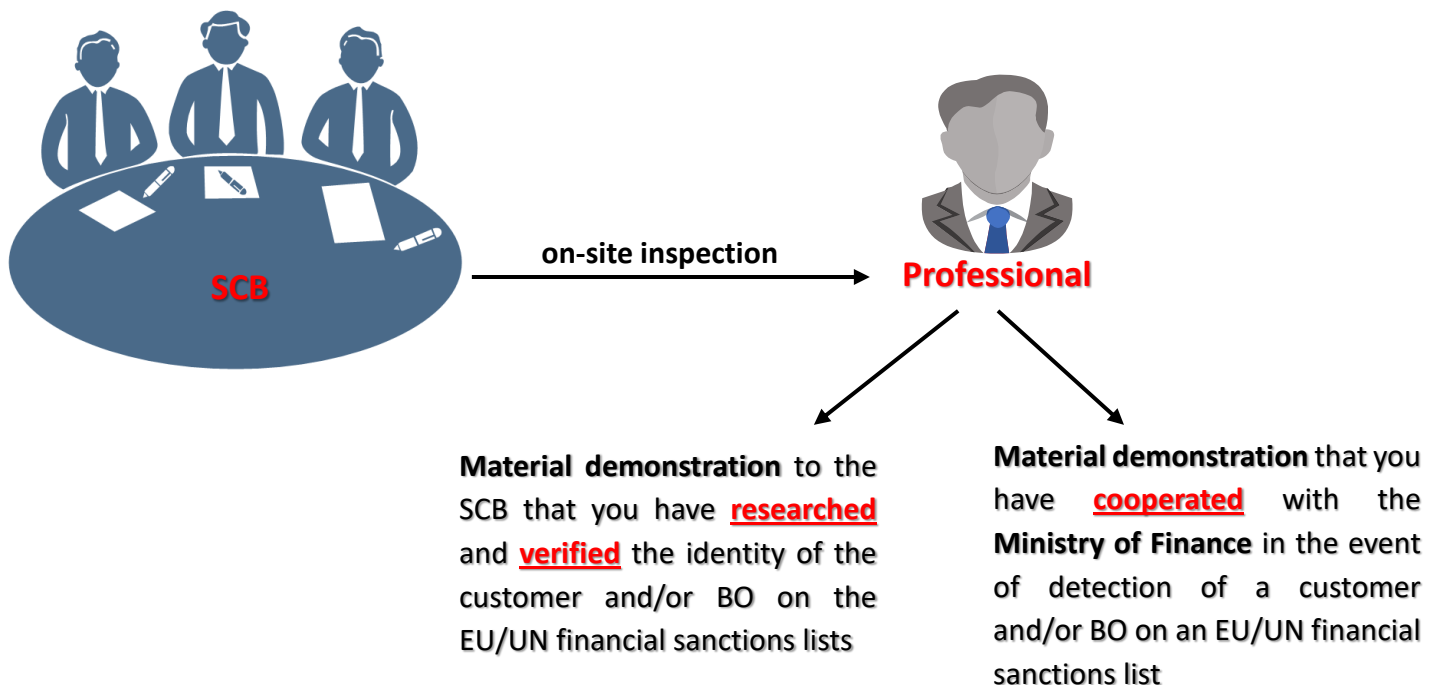
- ▶ [Liste récapitulative CSNU](#)
- ▶ [Moteur de recherche ONU](#)

Liste sanctions financières européennes (PESC/UE)

- ▶ [EU Sanctions Map](#)
- ▶ [EU Sanctions whistleblower tool](#)
- ▶ [UE - Liste consolidée des sanctions financières internationales](#)

***3. Who bears the burden of proof in the event of an on-site inspection by the SCB³ ?**

☞ **Answer :** YOU !



² <https://pfi.public.lu/fr/blanchiment/sanctions-financieres-internationale.html>

³ Service contrôle blanchiment.

CASE STUDY 1

Mr. Y, from **Luxembourg** comes to your establishment. He provides you with his **identity card** so that you can identify him and **answers all your questions openly**.

***Question to ask yourself :** *What country is Mr. Y from ?*

☞ **Answer :** *Luxembourg = Low risk*

Luxembourg European Union			Non-EU countries				FATF blacklisted countries Countries on EU/UN financial sanctions list		
1	2	3	4	5	6	7	8	9	10

***Question to ask yourself :** *Is Mr. Y acting suspiciously ? Is he reluctant to hand over his identification document ?*

☞ **Answer :** *No = Low risk*

No			A little				Yes		
1	2	3	4	5	6	7	8	9	10

***Question to ask yourself :** *By which method did you identify Mr. Y ?*

☞ **Answer :** *Face-to-face* (copy of identity card, dated and signed) = *Low risk*

Face-to-face identification			Third-party identification				Remote identification		
1	2	3	4	5	6	7	8	9	10

***Question to ask yourself : Did Mr. Y provide you a valid ID card?**

☞ **Answer : Yes** (expiration date : 2028) = **Low risk**

Yes							No		
1	2	3	4	5	6	7	8	9	10

***Question to ask yourself : Is Mr. Y a politically exposed person (PEP) ?**

☞ **Answer : No** = **Low risk**

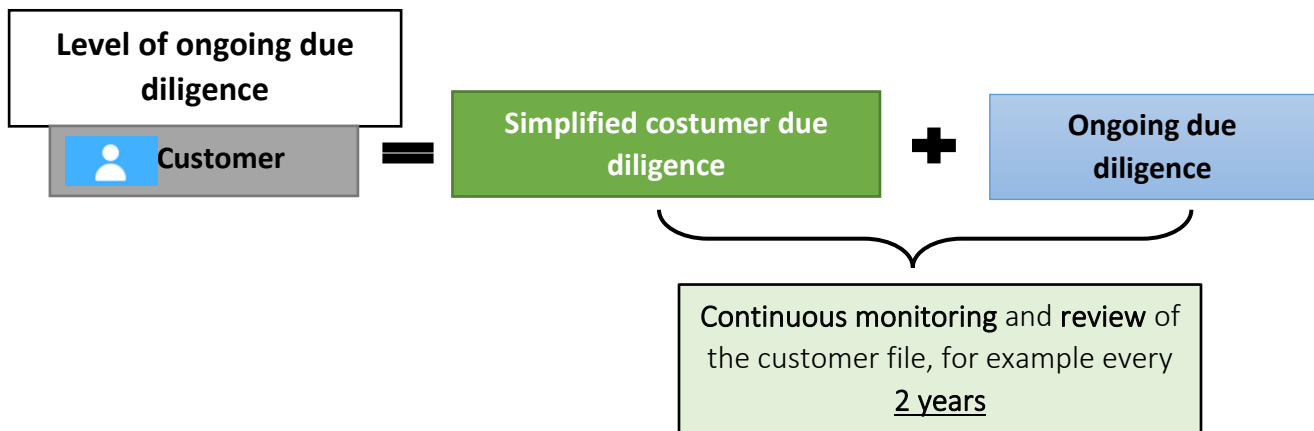
No							Yes		
1	2	3	4	5	6	7	8	9	10

***Question to ask yourself : Is Mr. Y on an EU/UN sanctions list?**

☞ **Answer : No** = **Low risk**

No							Yes		
1	2	3	4	5	6	7	8	9	10

SUM OF POINTS			
0-10	11-20	21-30	29-30
Low risk	Medium risk	High risk	Very high risk



CASE STUDY 2

Mr. **POUTINE**, originally from **Russia** comes to your establishment. He provides you with his **passport** so that you can identify him.

***Question to ask yourself : What country is Mr. *POUTINE* from ?**

☞ **Answer : Russia = Very high risk**

Luxembourg European Union			Non-EU countries				FATF blacklisted countries Countries on EU/UN financial sanctions list		
1	2	3	4	5	6	7	8	9	10



***Question to ask yourself : Is Mr. *POUTINE* acting suspiciously ? Is he reluctant to hand over his identification document ?**

☞ **Answer : A little = Medium risk**

No			A little				Yes		
1	2	3	4	5	6	7	8	9	10



***Question to ask yourself : Is Mr. *POUTINE* a politically exposed person (PEP) ?**

☞ **Answer : Yes = Very high risk**

No							Yes		
1	2	3	4	5	6	7	8	9	10



***Question to ask yourself : Is Mr. *POUTINE* on an EU/UN sanctions list ?**

☞ **Answer : Yes = Very high risk**

No							Yes		
1	2	3	4	5	6	7	8	9	10

European Union Consolidated Financial Sanctions List

EU reference number: EU.7510.16

Legal basis: 2022/332 (OJ L53)

Programme: UKR - Ukraine

Identity information:

- **Name/Alias:** Vladimir Vladimirovich PUTIN **Function:** President of the Russian Federation
- **Name/Alias:** Влади́мир Влади́мирович ПУ́ТИН
- **Name/Alias:** Vladimir Vladimirovitj PUTIN
- **Name/Alias:** Vladimir Vladimirovich POUTINE ←

***Question to ask yourself : Which *actions* should the professional take when he *identifies* a customer and/or BO on an EU/UN international financial sanctions list?**

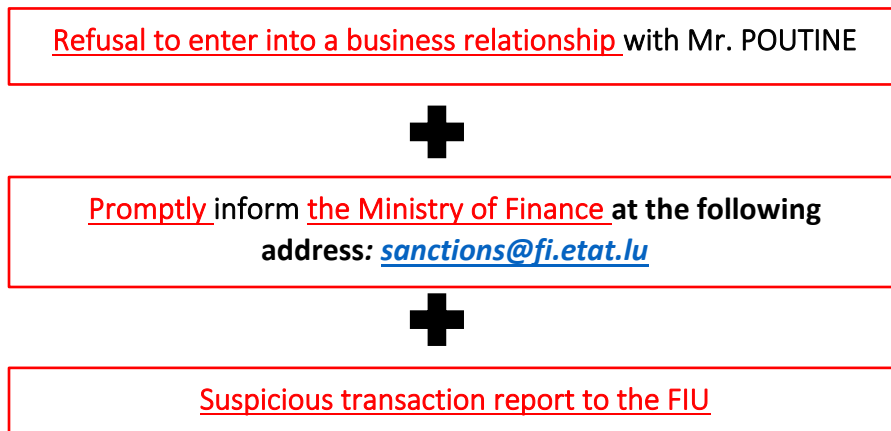


- ☞ **Answer : Inform promptly the Ministry of Finance⁴ at the following address : sanctions@fi.etat.lu, in order to freeze funds, assets or other economic resources held or controlled by the listed person.**
- ☞ **Answer : Application of enhanced due diligence under article 3-2 of the AML/CFT Law + abstention from executing any transaction**
- ☞ **Answer : Filing a suspicious transaction report to the FIU for non-compliance with financial restrictive measures**

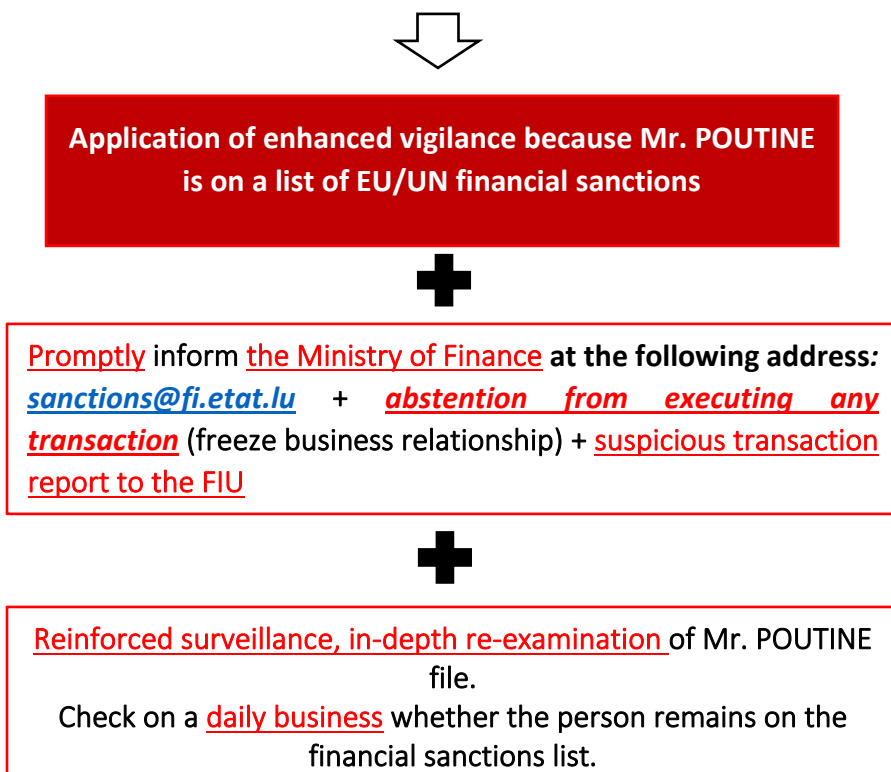
⁴ Article 6 of the law of 19 December 2020 on the implementation of restrictive measures in financial matters as amended (Below “TFI Law”).

SUM OF POINTS			
0-10	11-20	21-30	29-30
Low risk	Medium risk	High risk	Very high risk

IN PRINCIPLE :



EXCEPTION : If you already have a business relationship with Mr. POUTINE



**MATERIAL DEMONSTRATION OF THE RESEARCH AND VERIFICATION
OF THE CUSTOMER'S IDENTITY AND/OR BO⁵ ON AN EU/UN FINANCIAL
SANCTIONS LIST**

REFINITIV™

Confidential

WORLD-CHECK ONE

MATCH PROFILE - ZERO FOOTPRINT

WORLD-CHECK RECORD UID: e_tr_wco_588073

Name	[REDACTED]		
Group	[REDACTED]		
Created & Screened	21 Feb 2023 10:35	Date Printed	21-02-2023, 10:38
Total Pages	28		

Research and verification date: 08/09/2023

Signature of Compliance officer:



OR

**European Union
Consolidated Financial Sanctions List**

EU reference number: EU.7510.16

Legal basis: 2022/332 (OJ L53)

Programme: UKR - Ukraine

Identity information:

- **Name/Alias:** Vladimir Vladimirovich PUTIN **Function:** President of the Russian Federation
- **Name/Alias:** Влади́мир Влади́мирович ПУ́ТИН
- **Name/Alias:** Vladimir Vladimirovitj PUTIN
- **Name/Alias:** Vladimir Vladimirovich **POUTINE**

Research and verification date: 08/09/2023

Signature of Compliance officer:



⁵ Beneficial owner.

The demonstration can be done either:

-by the **extract** generated by the search tool, **dated** and **signed** by the **Compliance officer**

OR

-by a **screenshot of the search** on a list of international financial sanctions, **dated** and **signed** by the **Compliance officer**

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Material and effective demonstration of the research and verification of the identity of the customer and/or BO on an EU/UN financial sanctions list
ACCEPTED by the SCB.



Attention : It should be noted that the **risk assessment** is purely indicative (by way of example) and **does not exempt** you from carrying out **your own risk assessment** and **determining the level of ongoing due diligence.**

During an on-site inspection, the SCB checks **your knowledge** and **understanding** of the AML/CFT risks your business may face.