

Joint EU SG REFORM / Council of Europe TSI Project on:
**“Effective implementation of the sanctions regime and enhanced cross-border
cooperation in EU Member States”**

Training course for Business Operators

**Undertaking Due Diligence to determine possible links between legal entities
and designated individuals: Beneficial Ownership and Control
Considerations**

AGENDA

22 May 2025 09:15 – 13:00 (CEST)

This event directly aligns with the project's objectives by enhancing the capacity of National Competent Authorities (NCAs) and business operators to identify designated entities, improve access to information, and facilitate information exchange at both national and international levels. It also promotes the use of open-source intelligence (OSINT), aiming to strengthen the detection, investigation, and prevention of sanctions evasion, thereby ensuring better compliance with EU financial restrictive measures.

Venue: TBD and online

Online Link to be provided to Registrants Prior to Training

Time	Details
08:45– 09:15 (CEST)	Registration of Participants
09:15– 09:30	Introductory remarks: <i>Programme Manager, Economic Crime and Cooperation Division (ECCD), Council of Europe Secretariat-General, Structural Reform and Investment Task Force (SG REFORM), European Commission</i>
9:30 – 9:45	Introduction to EU Sanctions Helpdesk Platform <ul style="list-style-type: none">- Role of Platform in supporting small and medium-sized enterprises (SMEs) in performing sanctions due diligence checks- Resources and assistance made available through the Platform

Time	Details
	<i>Team Leader Senior Key Expert on EU Restrictive Measures, EU Sanctions Help Desk</i> <i>Moderated by Programme Manager, ECCD, Council of Europe</i> <i>Questions and Discussion from Business Operators</i>
09:45 – 11:00	Part 1 – Meaning of “Ownership” and “Control” – What Does this Mean: Challenges and Obstacles <ul style="list-style-type: none">- Ownership formats- Control mechanisms- The “grey zone” of ownership and control of legal entities <i>Council of Europe expert</i> <i>Moderated by Programme Manager, ECCD, Council of Europe</i> <i>Discussion – Q&A</i>
11:00- 11:20	Coffee break
11:20 – 12:50	Part 2 – Strategic due diligence to determine links between designated individuals and the control or ownership of legal entities <ul style="list-style-type: none">- Beyond the use of registry data: Sources of ‘evidence’ and use of OSINT- Authenticity, anonymity, legitimate cause- Tactics employed to conceal ownership and control – red flags and warning signs- Case studies and practical example <i>Council of Europe expert</i> <i>Moderated by Programme Manager, ECCD, Council of Europe</i> <i>Discussion – Q&A</i>
12:50 – 13:00	Conclusions and closing remarks <i>Programme Manager, ECCD, Council of Europe</i> <i>Secretariat-General, Structural Reform and Investment Task Force (SG REFORM), European Commission</i>