



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”

Business Operator Training:
**“Trade-Based Sanction Evasion Tactics- Review of Red Flags, tactics
and typologies of illicit actors used to move assets and funds through
trade activity linked to Russia”**

26 June 2025
Venue: Grand Hotel Excelsior Malta
Great Siege Road
Floriana FRN 1810

and online

Online Link to Be Provided Prior to Event to Email provided with Online Registration

Within the framework of the 2023 Council of Europe/EU Technical Support Instrument (TSI) envelope, the Economic Crime and Cooperation Division (ECCD) is supporting the Cyprus, Czech Republic, Hungary, Lithuania, Malta, Slovenia, Spain and indirectly other EU Member States, in the implementation of the EU restrictive measures. The event directly supports the project's objectives by strengthening the ability of National Competent Authorities (NCAs) to identify designated entities and enhance information access and exchange at both national and international levels. Furthermore, analysis and discussions on NCAs' institutional structures and enforcement of EU financial restrictive measures and asset-freezing practices, alongside the use of open-source intelligence (OSINT), aim to contribute to improving the capacity of NCAs to detect, investigate, and prevent sanctions evasion. In addition to these discussions, business operators will undergo targeted training on using OSINT to enhance their ability to detect and prevent sanctions evasion, thereby ensuring improved compliance with EU financial restrictive measures at private sector level.

AGENDA

Time	Details
09:00 – 09:30 (CEST)	Registration of participants
09:30– 09:45	Introductory remarks <i>Economic Crime and Cooperation Division (ECCD), Council of Europe Secretariat-General, Structural Reform and Investment Task Force (SG REFORM), European Commission</i>
09:45 – 11:15	Part 1 – Scope of Trade-Based Activity Linked to Sanction Circumvention <ul style="list-style-type: none"> • Nature of trade activities • Financial institutions and intermediaries involved • General categories of tactics employed to undertake trade-based sanction evasion activity • Movement of funds and value through illicit trade-based activity <i>Council of Europe Expert Discussion and Q&A Moderated by ECCD, Council of Europe</i>
11:15 – 11:40	Coffee break
11:40 – 13:00	Part 2 - Measures to Detect and Prevent Abuse of Trade-Based Activity and Lessons learnt from Past Control Failures <ul style="list-style-type: none"> - Due diligence and knowledge of trade-based activities - Distinctions between “normal” and “unusual” trade arrangements - Examples of control failures and deficiencies - Examples of compliance control failures and lessons learnt <i>Council of Europe Expert Discussion and Q&A Moderated by ECCD, Council of Europe</i>
13:00 – 14:00	Lunch break (in person attendees)