

Guidelines on Financial Sanctions

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1 Preface

To an increasing degree, the EU applies the implementation of restrictive measures against third countries, including financial sanctions. After the terrorist attacks on the USA on 11 September 2001, the international community introduced restrictive measures against terrorism, with growing focus on the consequences of, in particular, the financial sanctions against terrorism.

The objective of this set of guidelines is to provide guidance relating to restrictive financial measures for enterprises, individuals and authorities in Denmark. The Guidelines aim primarily to assist the individuals, enterprises and authorities that implement freezing of funds and economic resources, as well as the individuals and enterprises that become subject to the imposition of freezing.

The Guidelines describe the obligations and rights that proceed from imposition of freezing. The Guidelines endeavours to provide a step-by-step description of the measures that implementing and being subject to imposition of freezing are obligated or permitted to take.

The Danish Enterprise and Construction Authority

1.1 Abbreviations

Designated:	Person or entity designated by the UN or the EU whose funds and economic resources are to be subject to freezing.
EU:	The European Union
Lists of names:	Annexes listing the names of individual persons, entities, groups, organisations, etc. whose funds and economic resources are to be subject to freezing. The annexes are attached to the regulations that do not relate to terrorism.
The Authority:	The Danish Enterprise and Construction Authority
The State Prosecutor:	The State Prosecutor for Serious Economic Crime
Terrorist lists:	Annexes listing the names of individual persons, entities and groups whose funds and economic resources are to be subject to freezing. The annexes are attached to the regulation on combating terrorism and the regulation on the Taliban.

1.2 Definition of sanctions

Sanctions are restrictive measures on trade adopted by the UN and the EU against countries and/or individual persons, groups, legal entities, bodies, etc. The extent of the trade restrictions varies, but restrictions most often encompass a weapons embargo, entry ban and freezing of funds and economic resources. In some cases, sanctions also involve a ban on import and export of other products than weapons.

These Guidelines deal with financial sanctions. For information on the other types of restrictions, please refer to section **15. Contact** on page 17.

1.3 Financial sanctions

Financial sanctions are defined as restrictions on free access by designated individuals or entities to any funds and economic resources owned or possessed by physical or legal persons, groups or entities appearing in the annexes to the EU regulations. All funds and economic resources must be frozen. No financial funds or economic resources may be made available to designated persons or entities. Neither may financial services be supplied to designated persons or entities.

1.4 Sanctions against terrorism

As a response to the terrorist attacks in the USA on 11 September 2001, the EU passed a number of legislative initiatives relating to terrorism. In connection with this, the EU passed legislative acts relating to terrorism in general and also specifically directed against Al-Qaida and the Taliban. The basis of this legislation was provided partly by UN Security Council Resolution 1373 on combating terrorism generally (S/RES/1373/2001), partly by resolution 1267 (S/RES/1267/1999) on Al-Qaida and the Taliban.

The EU legislative acts concerning terrorism generally consist of Council Common Position 2001/930/CFSP, Council Common Position 2001/931/CFSP and Council Regulation (EC) No. 2580/2001, all adopted on 28 December 2001.

These legislative acts operate with two terrorist lists (the EU lists of terrorists).

Council Common Position 2001/931 contains a list that encompasses both terrorists and terrorist organisations connected with third countries and terrorists and terrorist organi-

sations based in the EU. In relation to the latter, the EU Member States have an obligation to establish national legal foundations for implementation of the sanctions indicated. As concerns the terrorists and terrorist organisations connected with third countries, these are also listed in an annex to Council Regulation (EC) No. 2580/2001. As this is a regulation, the obligations pursuant to its provisions apply directly to all Member States. Both lists are updated at six-month intervals.

In addition, the EU has adopted Council Regulation (EC) No. 881/2002 imposing certain specific restrictive measures directed against certain persons and entities associated with Osama bin Laden, the Al-Qaida network and the Taliban. The regulation implements UN Security Council Resolution 1267/1999 on Al-Qaida and the Taliban. The annex to the regulation contains a list updated on a running basis in coordination with the updates of the UN 1267 list.

Thus, the EU regulation of this area consists of the following legislative acts:

a) EU implementation of UNSC Resolution 1373(2001):

Council Common Position 2001/930/CFSP of 27 December 2001 on combating terrorism, which determines the overall approach of the EU to Resolution 1373.

Council Common Position 2001/931/CFSP of 27 December 2001 on the application of specific measures to combat terrorism, which specifies some of the obligations that rest upon the EU Member States pursuant to Council Common Position 2001/930/CFSP.

Council Regulation (EC) No 2580/2001 of 27 December 2001 on specific restrictive measures directed against certain persons and entities with a view to combating terrorism. (This regulation is ordinarily referred to as the regulation on the fight against terrorism in general).

b) EU implementation of UNSCR Resolution 1267(1999):

Council Regulation (EC) No 881/2002 of 27 May 2002 imposing certain specific restrictive measures directed against certain persons and entities associated with Osama bin Laden, the Al-Qaida network and the Taliban, and repealing Council Regulation (EC) No 467/2001 prohibiting the export of certain goods and services to Afghanistan, strengthening the flight ban and extending the freeze of funds and other financial resources in respect of the Taliban of Afghanistan. (This is ordinarily referred to as the '1267 list'.)

As the contents of the two Council Regulations with subsequent amendments relate to individuals and entities that are also relevant in relation to Danish anti-terrorism legislation, including the provisions on measures to prevent money laundering and financing of terrorism, reporting must be made direct to the State Prosecutor for Serious Economic Crime (State Prosecutor), pursuant to an agreement between the Danish Enterprise and Construction Authority and the State Prosecutor.

1.5 Sanctions against third countries

Sanctions against third countries include all other sanctions directed against countries outside the EU and which do not relate to terrorism. This group includes, for instance, the sanctions against Sudan, Zimbabwe, Burma/Myanmar, Iran, etc. A complete list of sanctions or restrictive measures in force (measures adopted in the framework of the CFSP) may be found in the EU database on

current sanctions at http://ec.europa.eu/external_relations/cfsp/sanctions/measures.htm
cf. also section 14. *Useful links*, on page 16.

2 Concepts

2.1 Third countries

The term ‘third country’ is used with reference to countries that are not EU Member States. All EU regulations on financial sanctions are directed against third countries and individuals and entities connected with the third countries in question.

However, this does not apply to the EU regulations against the Taliban and against terrorism in general. These regulations are directed against not only terrorists outside the EU but also against terrorists inside the EU. The latter are also called ‘internal terrorists’. More information on the two regulations is provided for in section 1.4 *Sanctions against terrorism*, on page 5.

2.2 Funds

‘Funds’ are defined as financial assets and economic benefits of every kind, including but not limited to cash, cheques, claims on money, drafts, money orders and other payment instruments; deposits with financial institutions or other entities, balances on accounts, debts and debt obligations; publicly and privately traded securities and debt instruments, including stocks and shares, certificates presenting securities, bonds, notes, warrants, debentures, derivatives contracts; interest, dividends or other income on or value accruing from or generated by assets; credit, right of set-off, guarantees, performance bonds or other financial commitments; letters of credit, bills of lading, bills of sale; documents evidencing an interest in funds or financial resources, and any other instrument of export-financing.

2.3 Economic resources

‘Economic resources’ are defined as: assets of every kind, whether tangible or intangible, movable or immovable, which are not funds but can be used to obtain funds, goods or services.

2.4 Freezing of funds

‘Freezing of funds’ is defined as preventing any move, transfer, alteration, use of or dealing with funds in any way that would result in any change in their volume, amount, location, ownership, possession, character, destination or other change that would enable the use of the funds, including portfolio management.

2.5 Freezing of economic resources

‘Freezing of economic resources’ is defined as preventing their use to obtain funds, goods or services in any way, including, but not limited to, by selling, hiring or mortgaging them.

2.6 Sanctions committees

In connection with the adoption by the UN Security Council of sanctions against a country in the shape of resolutions, the Security Council often sets up a Sanctions Committee, which is to monitor the progress of the implementation of the resolution in question and submit progress reports to the Security Council.

2.7 Matching names

Matching names means that, for instance, a financial institution or an enterprise has observed that one of its customers has a name that entirely or partially matches a name on the terrorist lists or a list of names in the annex of one of the other regulations on financial sanctions. Same or similar names may also relate to business connections, tenants, etc.

2.8 Matching identities

Matching identities means that, for instance, a financial institution or an enterprise has observed that one of the individuals, enterprises, organisations or similar, in its lists of customers has a name and personal information that are a 100 per cent match with a name on the terrorist lists or a list of names in the annex of one of the other regulations on financial sanctions.

3 Matching names

3.1 Matching names in relation to sanctions against terrorism

Pursuant to the regulations against terrorism, a person, enterprise, authority or body that is in possession of funds or economic resources associated with the person or entity that bears the matching name shall have the right, on own initiative, to freeze the funds or the economic resources without prior permission from the authorities. This, however, shall not apply to the names listed in Council Common Position 2001/931/CFSP with subsequent amendments and which are marked with an asterisk (*). In such cases, the State Prosecutor must assess whether a freezing must be imposed. However, in order to avoid unnecessary or erroneous freezing, the Danish Enterprise and Construction Authority recommends that the following procedure should be followed:

If, in connection with a customer relationship, transfer of money to or from a foreign country or where a name matches a name appearing in one of the three lists attached as annex to, respectively, Council Common Position 2001/931/CFSP, Council Regulation (EC) No 2580/2001 on specific restrictive measures directed against certain persons and entities with a view to combating terrorism and Council Regulation (EC) No 881/2002 relating to the Taliban, with subsequent amendments, direct contact must be made to the SPSEC immediately where there is any doubt about the matching names under the two regulations. The State Prosecutor will then try to establish whether there is actual identity between the name appearing in the list in question and the customer or entity in question or it is a case of “false positive”. Transactions may then only be carried out with the permission of the State Prosecutor. If the assessment indicates that the customer or enterprise relates to a person on the list, the financial institution or enterprise must freeze immediately in compliance with the Regulation. In other cases, the State Prosecutor decides whether a seizure must be imposed.

3.2 Matching names in relation to sanctions against third countries

Pursuant to the regulations against third countries, the person, enterprise, authority or organisation that is in possession of funds or economic resources related to the person or entity that bears an identical or similar name has the possibility for taking own initiative to freeze the funds or economic resources without obtaining prior permission to take this step. However, the Danish Enterprise and Construction Authority recommends that a person, enterprise, authority or organisation observing the occurrence of a matching name should make immediate and direct contact to the State Prosecutor in order to avoid unnecessary freezing,

The State Prosecutor will then try to clarify whether there is in fact identity between the name in the list and the reported occurrence of the name. Transactions may then only be carried out with the permission of the State Prosecutor. If the investigation shows that the customer relationship or transaction does indeed relate to a person on the list, the financial institution or the enterprise must immediately freeze in compliance with the regulation and immediately hereafter inform the Authority of the freezing.

4 Matching identity

4.1 Matching identity

When funds, typically a bank account, have been frozen pursuant to a regulation on the basis of matching identities on the customer list and the terrorist lists, the account holder/owner should receive immediate notification from the financial institution or enterprise. The notification should make it explicit that the account holder/owner will not be able to withdraw funds from the account or otherwise exercise disposal of the deposit or object without prior permission from the Danish Enterprise and Construction Authority, which administers the regulation. The notification should also make it explicit that any question concerning the freezing, including any request for exemptions from the freezing, must be made directly to the Danish Enterprise and Construction Authority.

5 Freezing

5.1 Who is to impose freezing

Freezing is typically implemented by financial institutions and enterprises. However, freezing may also be implemented by authorities, organisations and private individuals.

5.2 Reporting information on freezing

When a freezing has been imposed pursuant to a regulation, the Danish Enterprise and Construction Authority must be notified of the matter immediately. The notification should, to the extent possible, include the following information:

- The name and address of the account holder/owner.
- Civil Registration Number (CPR), passport number, identification number or other similar form of identification number.
- Account number/description of items, or similar.
- Specification of the amount of the value of deposits/the value of items as per the date of the freezing.
- Statement of postings in accounts, or similar
- Other relevant information

The Danish Enterprise and Construction Authority must convey the information, which is subject to confidentiality, to the EU Commission, which is also under obligation to treat the information as confidential.

5.3 Requirements in relation to freezing

The financial institution or the enterprise that implements the freezing is obligated to ensure that the frozen assets are not managed in a way which causes them to lose value unnecessarily or otherwise forfeit the rights of the frozen assets to the extent that the administration of the assets is not in breach of the regulation pursuant to which the freezing was imposed.

5.4 Crediting of interest accruals, and similar, relating to frozen accounts

Interest or any other earnings accruing to a frozen account or amounts due under contracts, agreements or obligations entered into prior to the date of the imposition of freezing may be credited to the account, subject to the provision that such funds are to be frozen immediately. The Danish Enterprise and Construction Authority must be informed immediately of such transactions.

5.5 Consequences of freezing

Freezing means that the designated person or entity as a point of departure no longer has the right to exercise decisions relating to the frozen funds or economic resources. The financial institution or enterprise that has implemented the freezing must deny the designated person or entity access to the frozen assets. The designated person or entity must obtain permission from the Danish Enterprise and Construction Authority to gain access to the frozen assets.

If the freezing is imposed on items of personal property, the frozen assets may in certain situations be used by the designated person or entity, as long as the frozen assets are not used for obtaining funds, goods, services, and similar, which are prohibited under the regulation.

It is important to emphasise that the designated person or entity does not forfeit the property rights to the frozen assets.

6 Exemptions from freezing

There are three types of possibilities for obtaining exemption from freezing. All the exceptions are subject to permission from the authorities.

1. Exemptions granted for humanitarian reasons, for instance for payment of basic living costs, including foods, rent or mortgage payments for housing, medicine and medical treatment, tax, insurance premium and public rate payments.
2. Fees and reimbursement of costs incurred in connection with legal assistance concern payment of a reasonable fee and compensation of expenditures in connection with legal assistance.
3. Extraordinary expenditures concerning payment of necessary extraordinary expenditures. These costs are not defined in detail and may be based on an assessment of the concrete situation.

7 Request for exemptions from freezing

7.1 Eligibility criteria for exemption from freezing

- The designated person or entity or a representative of either may submit a request for permission to lift the freezing.
- A person, enterprise or authority that has a legal claim against the designated person or entity may also submit a request for permission to lift the imposed freezing, for instance in connection with the payment of invoices, settlement of contracts, and similar, which do not relate to matters that are in contravention of the sanctions.

7.2 Required information to be submitted with an application for exemption

Application for permission to lift the freezing must be submitted to the Danish Enterprise and Construction Authority.

The application for permission to lift the imposed freezing must include the following information:

- The name, address, telephone number and e-mail address of the applicant.
- If the applicant is a person: the name and address of the designated person on behalf of whom the request for permission to lift the imposed freezing is made.
- Reference to the regulation that provides the basis for the application. Desirable information includes indication of the article in the relevant regulation that provides the basis for the request.
- The reason for the request for permission to lift the imposed freezing.
- Documentation substantiating the reason for the request for permission to lift the imposed freezing, for instance a copy of a contract, invoice or statement from an authority, medical practitioner, or similar, as relevant to the reason for the request.
- Detailed information on the desired destination of the amount, for instance the name and address of the bank, account number, and similar.

The Authority may require further information from the applicant or the applicant's representative where the Authority deems it necessary for the further processing of the request.

If an enterprise that has a legitimate claim against a designated person or entity requests permission to lift the freezing, it will be a prerequisite that the designated person or entity acknowledges the claim. If the designated person or entity does not acknowledge the claim, the parties must settle the dispute between them before the Authority will be able to consider whether to grant or deny the application for permission to lift the freezing.

No application form has been prepared for the purpose of requesting permission to lift the freezing.

7.3 Processing of applications

The Danish Enterprise and Construction Authority confirms the receipt of the application to the applicant, who will, at the same time, be informed of the measures that the Authority will initiate, including the frequent necessity for the Authority to obtain further information from the parties involved. The Authority will also often discuss the application with other Danish authorities. In certain cases, it will be necessary to contact the authorities of other countries. When the case has been fully investigated, the Authority will decide whether the application meets the requirements for lifting of the imposed freezing provided in the relevant regulation.

If the Authority upon assessment decides that the request may be granted, the applicant will be notified hereof. In certain cases, the Authority will be able to grant immediate permission for the imposed freeze to be lifted. However, in many cases the regulations require that lifting of imposed freezing must be submitted for hearing in the other EU Member States and the EU Commission, or must be approved by the UN sanctions committee in question, if such a committee has been set up in relation to the relevant UN resolution.

If the Authority on the basis mentioned above reaches the assessment that the application does not meet the requirements provided in the regulation, the Authority will in-

form the applicant that the request cannot be granted, and the reasons for the decision. The Authority will then consider the case closed. For information on access to appeal of the decision, please refer to section **8. Court trial**, below.

All permissions to lift an imposed freeze shall be reported to the EU Commission.

8 Court trial

In the cases where the Danish Enterprise and Construction Authority has turned down a request for lifting of freezing pursuant to an EU regulation, or where a designated person or entity finds that the freezing is unwarranted, the decision may in most cases be brought before a court. Depending on the legal basis, however, the possibilities for appeal differ.

8.1 Refusal of lifting of freezing

Cases relating to a request for lifting of imposed freezing pursuant to the EU regulations on sanctions, in which the Danish Enterprise and Construction Authority has the authority to make the final decision and has rejected an application, appeal against the decision may be brought before the Ministry of Economic and Business Affairs.

Cases relating to a request for lifting of freezing pursuant to the EU regulations on sanctions, in which the Danish Enterprise and Construction Authority has rejected the application upon hearing of the EU Member States, the EU Council and the EU Commission, the decision may be brought before the national courts. The decision may, furthermore, be brought before the Court of First Instance of the European Communities, the decision of which may be appealed to the Court of Justice of the European Communities.

In cases relating to a request for lifting of freezing in which a UN sanctions committee has rejected the application, there is no possibility for appeal.

Cases relating to a request for lifting of freezing pursuant to EU Council Common Position 2001/931/CFSP and Council Regulation (EC) No. 2580/2001 of 27 December 2001 on specific restrictive measures directed against certain persons and entities with a view to combating terrorism, where the Danish Enterprise and Construction Authority has rejected the application, the decision may be brought before the national courts.

8.2 Concerning the imposed freezing in itself

In cases relating to the freezing itself pursuant to the EU regulations on sanctions, the decision on the freezing may be brought before the national courts. The decision may furthermore be brought before the Court of First Instance of the European Communities, the decision of which may be appealed to the Court of Justice of the European Communities, which is able to assess the legality pursuant to Community law.

9 Lifting of freezing

9.1 When is freezing lifted?

Freezing is lifted when the sanctions are lifted either as a whole or in relation to specific designated persons and/or entities, that is, when the UN Security Council and/or the EU decide to abolish the sanctions. In practice, this means that the EU decides to abolish or amend the relevant regulation, whereupon the decision is published in the form of a new regulation in the Official Journal of European Union.

10 Duty to report

10.1 The duty of authorities to report

The rule that applies to all EU regulations on financial sanctions is that the national competent authority must notify the EU Commission and the other EU Member States immediately of all matters and information relating to the regulations. This applies, for instance, to information on freezing implemented, granting of exemptions from the regulations, court decisions on violations of the regulations and penal provisions on violation of the regulations.

All information submitted shall be treated with confidentiality by the EU Commission and the EU Member States.

11 De-listing

If persons, groups or entities find themselves unjustly included in a UN or an EU list of terrorists or names and by virtue thereof find themselves subject to restrictive measures (sanctions), it is possible to submit a request for removal from the list or lists (so-called de-listing).

11.1 EU procedure relating to terrorism

As concerns the two EU terrorist lists provided as annexes to EU Council Common Position 2001/931/CFSP and Council Regulation (EC) No. 2580/2001 of 27 December 2001 on specific restrictive measures directed against certain persons and entities with a view to combating terrorism, the EU Member States have adopted special guidelines for the work relating to the EU terrorist lists, including de-listing. The guidelines were amended at the middle of 2007 and provide, among other things, that requests for de-listing may be submitted to the Council of the European Union. The guidelines are publicly available, and may be downloaded from here, cf. *Factsheet The EU List of persons,.... to combat terrorism, 6 February 2008*:

http://www.consilium.europa.eu/cms3_fo/showPage.asp?id=631&lang=en&mode=g

As concerns the running update by the EU of the annex to Council Regulation (EC) No. 881/2002 imposing certain specific restrictive measures directed against certain persons and entities associated with Osama bin Laden, the Al-Qaida network and the Taliban, implementing UN Security Council Resolution 1267/1999 on Al-Qaida and the Taliban (the so-called 1267 List), requests for de-listing may also be submitted to the Council of the European Union. Request for de-listing may also be submitted to the Ministry of Foreign Affairs, which will provide assistance in connection with the further process.

11.2 EU procedure relating to sanctions against third countries

As concerns request for de-listing in connection with the name lists relating to EU sanctions against third countries, the request for de-listing may similarly be submitted to the Council of the European Union or to the Ministry of Foreign Affairs.

11.3 UN procedure, Focal Point

If a request for de-listing relates to the UN terrorist list or other name lists, it is furthermore possible to take direct contact to the UN Focal Point for treatment of requests for de-listing. Focal Point was established in 2007 on the basis on UN Resolution 1730(2006), with a view to conveyance of requests for de-listing to the relevant UN sanctions committees, including also to the Al Qaida/Taliban Sanctions Committee. The

procedures for listing and delisting are described by the Sanctions Committee's Guidelines, pursuant to which the Committee makes decisions on requests for de-listing in consultation with the governments involved. Here is a link to the UN Sanctions Committee's guidelines, cf. Resolution 1735(2006):

<http://www.un.org/sc/committees/1267/resolutions.shtml>

Link to the UN website on Focal Point and Security Council resolution 1730/006 on the establishment of Focal Point:

<http://www.un.org/sc/committees/1521/dfp.shtml>

Questions concerning de-listing may be directed to the Ministry of Foreign Affairs, the Department of International Law (jtf@um.dk).

11.4 General remarks on the EU procedure relating to access to filing complaints

The access to filing complaints pursuant to Article 263 of the Lisbon Treaty applies generally to any natural or legal person affected by, among other things, EU sanctions against third countries. As a point of departure, there is a deadline for filing a complaint of two months from the day when the legislative act, according to its kind, has been published in the Official Journal of the European Union or communicated to the plaintiff.

12 Penalty for violation of sanctions

Violation of the EU regulations on sanctions adopted with reference to Articles 60, 301 and 308 of the EC Treaty may be subject to punishment pursuant to Section 110 c of the Penal Code. Due to the Lisbon Treaty, which entered into force on 1 December 2009, the articles in the EC Treaty have been replaced by Article 215 of the Lisbon Treaty. Violation of that Article may also be subject to punishment pursuant to Section 110 c of the Penal Code.

12.1 Section 110 c of the Criminal Code

§110 c (1) Any person who, intentionally or through negligence, contravenes any provisions or prohibitions that may have been provided by law for the protection of state defence or neutrality shall be liable to a fine or to imprisonment for any term not exceeding four months or, in aggravating circumstances, to imprisonment for any term not exceeding three years.

(2) Any person who, intentionally or through negligence, contravenes any provisions or prohibitions that may have been provided by law for the fulfilment of the state's obligations as a member of the United Nations shall be liable to a fine or to imprisonment for any term not exceeding four months or, in aggravating circumstances, to imprisonment for any term not exceeding four years.

(3) Any person who contravenes provisions provided by or issued pursuant to regulations passed on the authority of Articles 60, 301 or 308 of the Treaty Establishing the European Community, and which aims to interrupt or curtail the financial or economic links with one or more countries outside the European Union or similar sanctions against individuals, groups or legal persons shall be liable to the same punishment as provided in Subsection 2.

(4) Where a crime as specified in Subsections 1, 2 or 3 has been committed through negligence, the offender shall be liable to a fine or to imprisonment for a term not exceeding two years.

In cases involving intentional assistance relating to funding of terrorism, this will furthermore be encompassed by the special provisions thereon in Section 114 b of the Criminal Code.

13 General remarks

In every case, the wording of the specific legislative act with subsequent amendments, where relevant, shall apply and shall provide the determining element of the Authority's guidance and case processing.

For the interpretation of the legislative acts, the Authority applies, among other things, the *EU Best Practices for the effective implementation of restrictive measures* and *Guidelines on implementation and evaluation of restrictive measures (sanctions) in the framework of EU Common Foreign and Security Policy*.

The Best Practice and Guidelines may be found in the Authority's website:
www.deaca.dk/Financial_Sanctions

14 Useful links

14.1 The Official Journal of the European Union

Amendments and changes to sanctions will be published in the Official Journal of the European Union, which is published every day. The Official Journal of the European Union may be compared to the Danish Legal Gazette. Every time new amendments or changes to the regulations are published in the Official Journal of the European Union, the Danish Enterprise and Construction Authority will issue information about the amendments and changes by e-mail to a number of interested parties, with a view to immediate investigation of the possibility of having customers or clients whose funds and economic resources are subject to the requirement for freezing. The Authority recommends that interested parties should keep informed about amendments and changes to sanctions by reading the Official Journal of the European Union. The Official Journal of the European Union may be found here:

<http://eur-lex.europa.eu/JOIndex.do?ihmlang=en>

14.2 EU database of sanctions currently in force

In cooperation with four European banking organisations, the EU Commission has established an electronic database of persons, groups and legal entities that are encompassed by all EU financial sanctions. The database has been established with a view to making it simpler for the financial sector and other parties involved to handle the name lists and terrorist lists annexed to the EU regulations and common positions on financial sanctions. The database enables electronic handling and comparison of the name lists and terrorist lists with, for instance, customer databases. The Danish Enterprise and Construction Authority recommends using the database. The database may be found here:

[European Union \(EU\) and Sanctions or restrictive measures](#)

14.3 EUR-Lex

EUR-Lex is a search function in the EU website, which makes it possible to perform searches for specific documents, including regulations and common positions. If the document number is known and the year of, for instance, the regulation, EUR-Lex provides a fast way of retrieving the regulation by searching under “Document reference”. EUR-Lex may be found here:

http://eur-lex.europa.eu/RECH_menu.do?ihmlang=en

15 Contact

15.1 Financial sanctions in general (freezing of assets), matching names that are not related to terrorism, dual-use products (products and technology that can be applied in civil and military ways)

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 E-mail: eksportkontrol@ebst.dk concerning dual-use products
 Website: www.deaca.dk/Financial_Sanctions
 Website: <http://www.deaca.dk/exportcontrols/0/30>

15.2 Matching names in relation to sanctions against terrorism and third countries and suspicious transactions (STRs) relating to weapons of mass destruction and financing of terrorism

The State Prosecutor for Serious Economic Crime
 Bryggervangen 55, 3.
 P.O. Box 809
 DK-2100 Copenhagen O
 Phone: (+45) 35 25 95 00
 Fax: (+45) 45 15 00 16
 E-mail: saoek@ankl.dk

15.3 Prohibition against investment and granting of any financial loan or credit

The Danish Financial Supervisory Authority (FSA)
 Århusgade 110
 DK-2100 Copenhagen O
 Phone: (+45) 33 55 82 82
 Fax: (+45) 33 55 82 00
 E-mail: finanstilsynet@ftnet.dk
 Website: www.finanstilsynet.dk/?sc_lang=en

The Danish Commerce and Companies Agency (DCCA)
 Kampmannsgade 1
 DK-1780 Copenhagen V
 Phone: (+45) 33 30 77 00
 Fax: (+45) 33 90 77 99
 E-mail: eogs@eogs.dk
 Website: www.eogs.dk/sw21252.asp

The Danish Bar and Law Society
 Kronprinssegade 28
 DK-1306 Copenhagen K
 Phone: (+45) 33 93 97 98
 E-mail: samfund@advokatsamfund.dk
 Website: <http://www.advokatsamfundet.dk/Default.aspx?ID=11692>

15.4 Arms embargo

The Ministry of Justice
 Slotholmsgade 10
 DK-1216 Copenhagen K
 Phone: (+45) 33 92 33 40
 Fax: (+45) 33 93 35 10
 E-mail: jm@jm.dk
 Website: <http://www.justitsministeriet.dk/english.html>

15.5 Entry ban

Ministry of Foreign Affairs (MFA)
 Department of International Law
 Asiatisk Plads 2
 DK-1448 Copenhagen K
 Phone: (+45) 33 92 00 00
 Fax: (+45) 32 54 05 33
 E-mail: jft@um.dk / um@um.dk
 Website: www.um.dk/en

Danish National Police
 Polititorvet 14
 DK-1780 Copenhagen V
 Phone: (+45) 33 14 88 88
 Fax: (+45) 33 93 73 71
 E-mail: politi@politi.dk
 Website: www.politi.dk/en/servicemenu/home/

15.6 Import and export of goods

The Central Customs and Tax Administration (TAX)
 Toldlovgivningen
 Østbanegade 123
 DK-2100 Copenhagen O
 Phone: (+45) 72 22 18 18
 Fax: (+45) 72 22 19 19
 E-mail: via www.skat.dk
 Website: www.skat.dk

- general questions relating to import/export

Ministry of Foreign Affairs (MFA)
 Department of International Law
 Asiatisk Plads 2
 DK-1448 Copenhagen K
 Phone: (+45) 33 92 00 00
 Fax: (+45) 32 54 05 33
 E-mail: jft@um.dk or um@um.dk
 Website: www.um.dk/en

15.7 De-listing

Ministry of Foreign Affairs (MFA)
Department of International Law
Asiatisk Plads 2
DK-1448 Copenhagen K
Phone: (+45) 33 92 00 00
Fax: (+45) 32 54 05 33
E-mail: jft@um.dk or um@um.dk
Website: www.um.dk/en

15.8 The Court

The Court of First Instance of the European Communities
L – 2925 Luxembourg
Phone: (352) 4301-1
Fax: (352) 4303-2600
E-mail: ECJ.registry@curia.europa.eu