

**Questionnaire**

Dear Sir/Madam,

We hope this email finds you well.

I am a research associate at the University of Groningen in the Netherlands, and we are currently conducting academic research on restrictive measures taken by the European Union. The project is led by Dr Pim Geelhoed, Assistant Professor at the Faculty of Law, and Dr Francesco Giumelli, Associate Professor at the Faculty of Arts.

Having researched and listed the competent authorities of the Member States in charge of the implementation of these restrictive measures, we would like to directly ask some questions to each competent authority and collect their answers on the basis of the attached questionnaire.

We will use your answers to establish an overview of how the Member States implement EU restrictive measures. We hope that we find you willing to fill in our questionnaire and provide us with the information necessary for our research. The nature of the research is purely academic, we will treat the identity of the official providing the information confidentially.

We think that the result of the research could be also highly beneficial to the Member States and the European Union, therefore we will make sure to share the results of our study as soon as it is available with you as well.

We look forward to hearing from you. If you have any questions or concerns about the research, please do not hesitate to contact us.

Yours faithfully,

(names)

Questionnaire A: The law in the books

1. On the basis of which **criminal law** provisions can **natural persons** be punished for violating EU sanctions regulations? Which minimum and maximum penalties can be imposed?
2. On the basis of which **criminal law** provisions can **legal persons** be punished for violating EU sanctions regulations? Which minimum and maximum penalties can be imposed?
3. On the basis of which **administrative law** provisions can **natural persons** be punished for violating EU sanctions regulations? Which minimum and maximum penalties can be imposed?
4. On the basis of which **administrative law** provisions can **legal persons** be punished for violating EU sanctions regulations? Which minimum and maximum penalties can be imposed?
5. In case a **mental element** is required, such as intent or negligence, does this element affect the maximum penalties? If yes, please explain how.
6. What are the **time limits** for issuing an export license under the dual-use regime?

Questionnaire B: The institutional overview

1. Which **national authorities** are involved in the enforcement of the criminal and/or administrative liability for violations of the sanctions adopted by the European Union? On the basis of which provisions are these authorities competent?
2. Is an **authorization system** implemented? If yes, which national authorities are competent? And, on the basis of what criteria are exceptions made?
3. If known, how long does it take to process a request for a **license**?
4. In which way is the oversight of **banks and other financial institutions** regarding the sanctions adopted by the European Union regulated, in particular the oversight on whether they comply with their due diligence obligations overseeing other companies' trading activities?

**Table 1: Overview responses member states.**

Member States	Desk research		Responses			Questionnaire		Accessibility to information	
	Covered	Not covered	Responded	Did not respond	Responded but refused to participate	Completed	Not completed	Accessible links or telephone numbers	No accessible links or telephone numbers
Austria	x				x		x	x	
Belgium	x		x			x		x	
Bulgaria		x	x			x		x	
Croatia		x	x			x		x	
Czech Republic		x	x			x		x	
Cyprus	x			x			x	x	
Denmark		x	x			x		x	
Estonia		x	x			x		x	
Finland		x	x			x		x	
France	x				x		x	x	
Germany	x		x			x		x	
Greece		x		x			x		x
Hungary		x	x				x		x
Ireland	x		x			x		x	
Italy	x		x			x			x
Latvia		x		x			x	x	
Lithuania		x	x			x		x	
Luxembourg	x			x			x	x	
Malta	x			x			x	x	

Supplementary material – Submission to Politics and Governance

Article: United in diversity? A study on the implementation of sanctions in the European Union

The Netherlands	x		x			x		x	
Poland		x	x			x		x	
Portugal	x		x				x	x	
Romania		x	x			x		x	
Spain	x		x			x			x
Slovakia		x			x		x	x	
Slovenia		x		x			x	x	
Sweden		x			x		x	x	

**Table 2: Contacted competent authorities of the Member States.**

Member State	Original authority contacted	Second authority contacted
Austria	Federal Ministry for Digital and Economic Affairs, Department III/2	Ministry of the Interior, Office for the Protection of the Constitution and Counterterrorism
Belgium	Federal Public Service Finance	n/a
Bulgaria	Ministry of Economy, Internationally Controlled Trade and Security Directorate	n/a
Croatia	Ministry of Foreign and European Affairs, Directorate General for Political Affairs	n/a
Cyprus	Ministry of Foreign Affairs	Central Bank of Cyprus
Czech Republic	Financial Analytical Office	n/a
Denmark	Danish Business Authority	Ministry of Foreign Affairs, Department of Public and Administrative Law & Archive
Estonia	Tax and Customs Board	Ministry of Foreign Affairs, CFSP/CSDP Division
Finland	Ministry of Foreign Affairs, Unit for Public International Law	n/a
France	Ministry of the Economy and Finance, Directorate-General of Customs and Indirect Taxes	Ministry of the Economy and Finance, Directorate General of the Treasury
Germany	Federal Ministry for Economic Affairs and Energy	German Federal Bank
Greece	Hellenic Financial Intelligence Unit	Ministry of Development and Investment
Hungary	Government Office of the Capital City Budapest, Department of Trade, Defence Industry, Export Control and Precious Metal Assay	n/a
Ireland	Central Bank of Ireland	Department of Foreign Affairs
Italy	Ministry of Foreign Affairs, Directorate General for Political Affairs and Security	n/a
Latvia	Ministry of Foreign Affairs	n/a

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### Article: United in diversity? A study on the implementation of sanctions in the European Union

Lithuania	Ministry of Foreign Affairs	n/a
Luxembourg	Ministry of the Economy, Office for Export, Import and Transit Controls	n/a
Malta	Ministry of Foreign Affairs	Sanctions Monitoring Board
The Netherlands	Ministry of Finance, General Treasury	n/a
Poland	Ministry of Finance, Department of Financial Information	Ministry of Foreign Affairs, Security Policy Department
Portugal	Ministry of Foreign Affairs, Department of European Affairs	n/a
Romania	Ministry of Foreign Affairs, Department for Legal Affairs	n/a
Slovakia	Ministry of Finance	n/a
Slovenia	Ministry of Foreign Affairs	n/a
Spain	Ministry of Finance and Public Administration, State Tax Administration Agency	Ministry of Economy, Industry and Competitiveness, Secretary of State for the Economy and Business Support
Sweden	Inspectorate of Strategic Products, Section for International Sanctions	Ministry of Foreign Affairs

**Table 3: Administrative and criminal law on the violation of European sanctions.**

Member State	Natural persons		Legal persons	
	Administrative law	Criminal law	Administrative law	Criminal law
Austria	N/A	3 years' imprisonment; 5 years' imprisonment under aggravating circumstances Fine of 720 daily rates of max. 5,000 EUR each	N/A	85 daily rates of max. 10,000 EUR each; 100 daily rates under aggravating circumstances
Belgium	2.5 million EUR fine	5 years' imprisonment 200,000 EUR fine	2.5 million EUR	400,000 EUR
Bulgaria	N/A	<i>Minor violations:</i> 20,000 BGN fine (≈ 10,200 EUR) <i>Standard violations:</i> 6 years' imprisonment 200,000 BGN fine (≈ 102,000 EUR) <i>Grave violations:</i> 8 years' imprisonment 500,000 BGN fine (≈ 255,000 EUR)	N/A	<i>Minor violations:</i> 20,000 BGN (≈ 10,200 EUR) <i>Standard violations:</i> 200,000 BGN (≈ 102,000 EUR) <i>Grave violations:</i> 500,000 BGN (≈ 255,000 EUR)
Croatia	N/A	<i>Violations of trade sanctions or arms embargo:</i> 5 years' imprisonment Uncapped fine <i>Violations of restrictive measures:</i> 3 years' imprisonment Uncapped fine	N/A	Uncapped fine
Cyprus	N/A	2 years' imprisonment 100,000 EUR	N/A	300,000 EUR
Czech Republic	N/A	3 years' imprisonment; 8 years' imprisonment in case of violation of export restrictions	N/A	730 daily rates of max. 2 million CZK (≈ 79,000 EUR) each

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		Fine of 730 daily rates of max. 50,000 CZK ( $\approx$ 2,000 EUR) each		
Denmark	N/A	4 months' imprisonment; 4 years' imprisonment under particularly aggravating circumstances Fine of 60 uncapped daily rates	N/A	Uncapped fine
Estonia	N/A	5 years' imprisonment Fine of 150 uncapped daily rates	N/A	16 million EUR
Finland	N/A	<i>Minor violations:</i> Fine of 120 uncapped daily rates <i>Standard violations:</i> 2 years' imprisonment Fine of 120 uncapped daily rates <i>Grave violations:</i> 4 years' imprisonment Fine of 120 uncapped daily rates	N/A	850,000 EUR
France	N/A	5 years' imprisonment Fine of twice the amount of the offence	N/A	Ten times the amount of the offence
Germany	500,000 EUR fine	5 years' imprisonment; 15 years' imprisonment under aggravating circumstances Fine of 360 daily rates of max. 30,000 EUR each	10 million EUR	N/A
Ireland	N/A	3 years' imprisonment 500,000 EUR fine	N/A	500,000 EUR
Italy	500,000 EUR fine	6 years' imprisonment 250,000 EUR fine	500,000 EUR	N/A
Lithuania	6,000 EUR fine	5 years' imprisonment 200,000 EUR fine	N/A	5 million EUR
Luxembourg	N/A	5 years' imprisonment 250,000 EUR fine	N/A	500,000 EUR
Malta	N/A	12 years' imprisonment 5 million EUR	N/A	10 million EUR
The Netherlands	N/A	6 years' imprisonment 87,000 EUR fine; 870,000 EUR under aggravating circumstances	N/A	87,000 EUR; 870,000 EUR under aggravating circumstances, or 10% of annual turnover if deemed fitting
Poland	Fine of twice the benefit gained; certain violations 20,868,500 PLN fine ( $\approx$ 4.6 million EUR)	N/A	Twice the benefit gained; certain violations 5 million EUR or 10% of annual turnover	N/A
Portugal	N/A	5 years' imprisonment	N/A	600 daily rates of max. 10,000 EUR each
Romania	30,000 RON ( $\approx$ 6,000 EUR) fine	7 years' imprisonment (only for violations of the dual-use regime)	30,000 RON ( $\approx$ 6,000 EUR)	N/A
Spain	10 million EUR	N/A	10 million EUR	N/A