



ECOSYN FOUNDATION

SANCTIONS AND RESTRICTED JURISDICTIONS POLICY

Screening, restrictions and enhanced review

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This document is intended as an internal governance and operational document of ECOSYN Foundation. Where this document conflicts with the Articles of Association, applicable law, a board resolution, or a mandatory instruction of a competent authority, the higher-ranking document or law prevails.

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1. Purpose

This policy sets out how ECOSYN Foundation screens persons, entities, countries, territories, projects, payments, donations, partnerships and transactions for sanctions, export-control, anti-circumvention, anti-money-laundering, terrorist-financing, corruption, human-rights, security and reputational risks.

It replaces static country-only approaches. A fixed list of countries is not sufficient because sanctions change frequently and may target individuals, entities, sectors, goods, services, ownership structures, vessels, aircraft, crypto wallets, banks, transactions or circumvention networks rather than entire countries only.

2. Core principle

- 2.1** ECOSYN Foundation must not provide funds, economic resources, services, membership benefits, project benefits, documents, credentials, support, representation or other advantages where doing so would breach applicable EU, UN, Dutch, or other binding sanctions or legal restrictions.
- 2.2** ECOSYN Foundation must not knowingly participate in arrangements designed to circumvent sanctions, export controls, financial restrictions, asset freezes, travel bans, trade restrictions, or other restrictive measures.
- 2.3** Where there is doubt, the relationship, transaction, document issuance or activity must be paused until a documented compliance decision is made.

3. Official sources

The Foundation must rely on current official sources rather than outdated internal lists. Depending on the matter, relevant sources may include:

- 3.1** EU Sanctions Map and EU consolidated financial sanctions list.
- 3.2** Official Journal of the European Union and applicable EU regulations.
- 3.3** United Nations Security Council sanctions lists.
- 3.4** Dutch Government guidance and sanctions orders under Dutch law.
- 3.5** competent supervisory authority guidance, where applicable.
- 3.6** bank, payment provider, insurer, auditor, notary or legal counsel instructions where legally or contractually binding.

4. Screening obligations

- 4.1** Screening must be performed before onboarding members, donors, project partners, beneficiaries, suppliers, contractors, authorised representatives and other relevant persons or entities.
- 4.2** Screening must also be performed before accepting or making payments, awarding grants, issuing documents, approving formal representation, entering into partnerships, or undertaking international activities.
- 4.3** Screening must include the person or entity name, aliases, ownership and control, country of residence or registration, nationality where relevant, bank details where relevant, project country, and any connected third parties where proportionate.
- 4.4** Periodic re-screening is required for continuing relationships, with additional screening when sanctions change, new information appears, ownership changes, a new country is involved, or a risk indicator is identified.

5. Restricted persons and entities

- 5.1** A person or entity is restricted where it appears on an applicable sanctions list, is owned or controlled by a sanctioned person or entity, acts on behalf of a sanctioned party, is subject to asset-freeze measures, or is otherwise legally prohibited from receiving funds, services, resources or benefits.

- 5.2** If a potential match is identified, ECOSYN Foundation must verify whether the match is true, possible, or false. A true or unresolved possible match must be escalated before any activity continues.
- 5.3** No person may ignore, remove, alter or override a sanctions hit without written compliance approval.

6. Restricted and high-risk jurisdictions

- 6.1** A country or territory may be restricted because of comprehensive sanctions, sectoral sanctions, financial restrictions, export controls, armed conflict, occupation, non-recognition, high corruption risk, weak documentation reliability, terrorist-financing risk, serious human-rights risk, or other legal or operational risk.
- 6.2** Residence, nationality, incorporation, project location, payment route, beneficial ownership, shipment route, bank location, or document origin in a high-risk jurisdiction triggers enhanced review.
- 6.3** A high-risk jurisdiction is not automatically prohibited unless applicable law, official guidance, the Foundation's Board, or a documented compliance decision requires prohibition.

7. Enhanced due diligence

Enhanced due diligence may include:

- 7.1** certified identification documents and proof of address.
- 7.2** beneficial ownership information and proof of control.
- 7.3** source-of-funds and source-of-wealth information.
- 7.4** purpose and nature of the relationship or transaction.
- 7.5** screening of directors, officers, owners, donors, intermediaries and beneficiaries.
- 7.6** adverse-media, corruption, human-rights and security checks.
- 7.7** bank/payment-route review.
- 7.8** legal review or advice from a competent professional.
- 7.9** written approval by an authorised ECOSYN Foundation officer or board member.

8. Prohibited conduct

- 8.1** making funds or economic resources available to a sanctioned person or entity.
- 8.2** accepting funds from a sanctioned person or entity where prohibited.
- 8.3** facilitating transactions through a third party to avoid sanctions.
- 8.4** splitting transactions to avoid review thresholds.
- 8.5** misrepresenting country, ownership, beneficial owner, end-use, project purpose or payment route.
- 8.6** issuing documents, confirmations or credentials that may assist sanctions evasion.
- 8.7** providing services, support or representation where legally restricted.
- 8.8** destroying or altering compliance records.

9. Escalation and decision-making

- 9.1** Potential sanctions matches, high-risk countries, unusual payment routes, unclear ownership, inconsistent identification, adverse media, or suspected circumvention must be escalated to the authorised compliance function or the Board.
- 9.2** A decision to decline, suspend, terminate, report, or continue with conditions must be documented with reasons and supporting evidence.

9.3 Where required by law or by a competent authority, ECOSYN Foundation will make the necessary report and preserve relevant records.

10. Monitoring and review

10.1 This policy must be reviewed at least annually and whenever major sanctions, legal, operational or risk developments occur.

10.2 The Annex A review list must be treated as a risk indicator only and must not be used as a substitute for current sanctions screening.

11. Records and confidentiality

11.1 Screening results, compliance decisions, due diligence documents, approvals and escalation records must be retained securely.

11.2 Access to compliance records is limited to authorised persons with a need to know.

11.3 Where a sanctions match or suspicious circumstance is investigated, ECOSYN Foundation must avoid unauthorised disclosure that could prejudice an investigation, reporting obligation, or legal requirement.

12. Annex A: internal high-risk review list

The following legacy jurisdiction list is retained only as an internal high-risk review list. It is not a current official sanctions list, not exhaustive, and not an automatic refusal list. Each case must be checked against current official EU, UN and Dutch sources before any decision is made.

Abkhazia	Afghanistan	Algeria
Angola	Armenia	Azerbaijan
Belarus	Bolivia	Bosnia and Herzegovina
Bulgaria	Cambodia	Cameroon
Central African Republic	Côte d'Ivoire	Cuba
Democratic Republic of the Congo	Egypt	Eritrea
Ethiopia	Fiji	Georgia
Haiti	Iran	Iraq
Kazakhstan	Kenya	Kuwait
Kyrgyzstan	Lao People's Democratic Republic	Lebanon
Liberia	Libya	Mali
Moldova	Monaco	Mongolia
Nagorno-Karabakh	Nepal	North Korea
Pakistan	Palestine	Papua New Guinea
Russia	Rwanda	Sahrawi Arab Democratic Republic
Sierra Leone	Somalia	Somaliland
South Ossetia	South Sudan	Sri Lanka
Sudan	Syria	Tajikistan
Turkmenistan	Uzbekistan	Venezuela
Vietnam	Virgin Islands (UK)	Yemen
Zimbabwe		

Before using this list in any decision, ECOSYN Foundation must verify the person, entity, beneficial owner, country, sector, service, payment route and transaction against current official sources.

13. Final provisions

13.1 This policy enters into force after approval by the authorised body of ECOSYN Foundation.

13.2 ECOSYN Foundation may amend this policy, suspend activities, refuse a relationship, or impose additional checks where required by law, risk, competent authority guidance, bank instructions, or Board decision.

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