

Comprehensive Sanctions Intelligence & Strategic Risk Advisory

SUBJECT: [REDACTED] — Russian chemicals group

CONFIDENTIAL / SAMPLE

RESEARCH MANDATE

Cross-jurisdictional sanctions & reputational risk assessment

SOURCES

OFAC · EU consolidated list · national (Poland) · global news OSINT

INFORMATION CUT-OFF

Point-in-time at report generation

PREPARED BY

Deep Research · ScreenVeritAI

CLASSIFICATION

Sample · subject details redacted

Overall sanctions posture — one entity, three authorities:

UNITED STATES (OFAC)

No listing

EUROPEAN UNION

No listing

POLAND

Listed since 26 April 2022

Asset freeze · full economic embargo

Clean in OFAC. Clean in the EU. Sanctioned in Poland since 2022. A check that stopped at the first two lists would have cleared it.

Critical risk exposures

Direct prohibitions (Poland). All assets and transactions with Polish entities or through Polish territory are prohibited — hitting any Polish banking relationship, logistics hub, or joint venture.

Secondary-sanctions vulnerability. Although OFAC and the EU have not designated the entity, exposure to a sanctioned Russian-linked party can trigger enhanced due diligence or de-risking by EU and US banks and partners.

Reputational damage. Continued association with an entity linked to the Russian government's destabilizing activities in Ukraine attracts negative media and investor scrutiny, particularly in ESG-sensitive markets.

Key strategic implications

- Market access: restricted reach into Polish and EU financial infrastructure, and possible reluctance of EU buyers to engage a partially sanctioned supply-chain partner.
- Supply-chain stability: disruption risk for fertilizer and chemical purchasers in Central and Eastern Europe that rely on the group's commodities.
- Financial transactions: blocking of funds and potential freeze of escrow or letter-of-credit facilities routed through Polish banks.
- Partnerships & M&A: heightened diligence and possible withdrawal of European strategic investors or project financiers.

The same entity screened against three authorities — and the reason single-jurisdiction screening fails.

A · United States (OFAC)

NOT LISTED

RESTRICTIONS

N/A

IDENTIFIERS & ALIASES

None on file

DESIGNATION

N/A

B · European Union

NOT LISTED

REGIME

No listing under any EU restrictive measure (e.g. Russia territorial integrity)

RESTRICTIONS

N/A

DESIGNATION

N/A

C · Poland (national)

LISTED · 26 APR 2022

LEGAL BASIS

Polish Council of Ministers Regulation (26 April 2022)

RESTRICTIONS

Freezing of all financial assets and economic resources; prohibition on providing funds or resources, direct or indirect; ban on circumvention.

CONTROL

Parent controlled by an individual sanctioned by the EU and UK.

RATIONALE

Strategic importance to the Russian government; contribution to the destabilization of Ukraine.

HARMONIZATION GAP

The entity is exempt from OFAC and EU lists yet fully sanctioned by Poland — a patchwork obligation for any EU-wide operation. Subsidiaries must maintain Poland-specific screening beyond standard EU/OFAC checks, or risk an inadvertent breach when a payment clears through a Polish correspondent. This is precisely the case a two-list check never sees.

- Confirmation of sanctions: no additional designations surfaced in news sources; the Polish listing stands as the sole formal action.
- Evasion or investigations: no credible reports of sanctions evasion or ongoing investigations tied directly to the entity.
- Indirect link: controlled by an individual sanctioned by the EU and UK, amplifying reputational scrutiny.

- Sector sensitivity: the fertilizer industry is under heightened global scrutiny for its leverage in food security and geopolitics.
- Geopolitical context: continued escalation of EU and US measures on Russian strategic industries may presage broader designations.

RISK CATEGORY	LIKELIHOOD	IMPACT	COMMENTS
A · Primary sanctions risk	High (Poland)	Medium–High	Direct blocking of assets; any subsidiary or transaction char prohibited.
B · Secondary sanctions risk	Medium	Medium	Non-US/EU counterparties m de-risking by global banks ov Russian ties.
C · Transactional risk	High (PL corridors)	High	Payments, letters of credit an guarantees via Polish banks a of refusal or freeze.
D · Operational risk	Medium	Medium	Supply-chain delays if Polish hubs disallow transit or storag group's products.
E · Reputational & stakeholder risk	Medium	Medium–High	ESG investors and major buy pre-emptively terminate or re engagements.
F · Compliance-program gaps	Likely	Variable	No Poland-specific screening systems; limited beneficial-ov tracing; insufficient secondar escalation.

A Immediate imperatives (next 30–90 days)

- Enhanced screening & blocking: integrate the Polish sanctions list — all aliases, addresses and identifiers — into global screening engines, and block any transaction linked to the entity or its affiliates via Polish financial institutions.
- Targeted due diligence: run enhanced due diligence on top European counterparties in the fertilizer and chemical trade to uncover indirect exposures.
- Internal alert & training: circulate a compliance advisory to Treasury, Procurement, Logistics, Legal and Sales outlining the Polish measures and escalation procedures.

B Medium-term adjustments (3–12 months)

- Supply-chain de-risking: identify alternative non-Russian-linked fertilizer suppliers in Western Europe and North America; pilot new contracts.
- Contractual review: review contracts for sanctions-compliance clauses, termination rights and force-majeure triggers, prioritising high-value agreements.
- Program enhancement: upgrade to a screening solution with robust alias matching, ownership-linkage graph analytics, and national-list integration.

C Long-term vigilance & resilience

- Scenario planning & stress testing: model sanctions-escalation scenarios (full EU listing, expanded UK listings, US secondary sanctions) and stress-test existing controls.
- Geopolitical monitoring: establish a cross-functional watch team tracking policy signals on Russian industrial sectors and diplomatic developments.

Appendix A — Key sanctioned entities & identifiers

ENTITY	JURISDICTION	PROGRAM / REGIME	LISTING DATE	KEY IDENTIFIERS
██████████	Poland	Polish Council Reg. (2022)	26 Apr 2022	HQ withheld · Russia; controlled by a UK/EU-sanctioned individual
██████████	EU · UK	EU Russia regime; UK Russia sanctions	Apr 2022 (EU)	Multiple aliases; controlling individual, POB withheld

Appendix B — Material adverse news

No direct adverse reporting identified. Absence of evidence; ongoing watch recommended.

Appendix C — Glossary of key terms

Asset freeze

Prohibition on dealing with or transferring ownership of designated assets.

Secondary sanctions

Penalties on non-US persons for activity that would violate US primary sanctions if conducted by a US person.

Economic resource

Any asset, tangible or intangible, capable of economic value.

Enhanced due diligence (EDD)

In-depth investigation process for high-risk customers or transactions.

END OF SAMPLE

SAMPLE REPORT · DEEP RESEARCH · SUBJECT DETAILS REDACTED