



Affirmation concerning sanctions

Discretionary government grants for development cooperation projects by Finnish NGOs in 2025–2028 (project grants)

Government grant applicant's affirmation concerning sanctions and counter-terrorism measures

- 1) Consistent with the UN Security Council resolutions relating to terrorism, including UN Security Council Resolutions 1373 (2001) and 1267 (1999) and the related resolutions, the government grant authority and the government grant applicant commit themselves to the international fight against terrorism and, in particular, the fight against the financing of terrorism. The government grant authority and the government grant applicant are also committed to full compliance with other sanctions regimes, including targeted financial sanctions and other measures, adopted by the Security Council under Article 41, Chapter VII of the Charter of the United Nations, and economic and financial restrictive measures adopted under Article 215 of the Treaty on the Functioning of the European Union.

It is the policy of the government grant authority to seek to ensure that none of its funds are made available, directly or indirectly, to or for the benefit of such natural or legal persons, entities or bodies, or natural or legal persons, entities or bodies associated with them, which the UN or the EU have designated as being subject to sanctions.

- 2) The government grant applicant affirms that it will fully comply with the sanctions imposed by the UN and the EU and that
 - a) the UN or the EU have not imposed any sanctions on¹

¹ In accordance with the [EU \(2022\) Best Practices for the effective implementation of restrictive measures](#), the criterion to be taken into account when assessing whether a legal person or entity is owned by another person or entity is the possession of more than 50% of the proprietary rights of an entity or having majority interest in it. If this criterion is satisfied, it is considered that the legal person or entity is owned by another person or entity (paragraph 62). The EU Best Practices list criteria to be taken into account when assessing whether a legal person or entity is controlled by another person or entity, alone or pursuant to an agreement with another shareholder or other third party (paragraph 63).



Affirmation concerning sanctions

- the government grant applicant,
 - the government grant applicant's direct or indirect owners,
 - members of the administrative, management or supervisory body of the government grant applicant or persons exercising control, representation, decision-making or supervision power of the applicant,
 - contracting partners or subcontractors participating in producing the goods or providing the services that have been procured using the discretionary government grant awarded by the government grant authority,
 - the direct or indirect owners of such contracting partners or subcontractors,
 - members of the administrative, management or supervisory body of such contracting partners or subcontractors or persons exercising control, representation, decision-making or supervision power of such contracting partners or subcontractors,
 - the groups of beneficiaries of such contracting partners or subcontractors,
 - the recipients of redistributed funds or other partners,
 - the direct or indirect owners of the recipients of redistributed funds or partners,
 - members of the administrative, management or supervisory body of the recipients of redistributed funds or partners or persons exercising control, representation, decision-making or supervision power of such recipients of redistributed funds or partners,
 - the groups of beneficiaries of the government grant applicant, recipients of redistributed funds and partners; and
 - beneficiaries of grant-financed activities or projects
- b) if the government grant applicant undertakes procurements for the project and the public or concession contract in question falls within the scope of the EU public procurement directives exceeding the EU thresholds, the supplier of the goods or services is not, within the meaning of Article 5k of Regulation (EU) 833/2014,
- i. a Russian national, a natural person residing in Russia or a legal person, entity or body established in Russia,



Affirmation concerning sanctions

- ii. a legal person, entity or body whose proprietary rights are directly or indirectly owned for more than 50 % by an entity referred to in point 2. b) i. nor
 - iii. a natural or legal person, entity or body acting on behalf or at the direction of an entity referred to in point 2. b) i. or b) ii.
- c) if the government grant applicant undertakes procurements for the project and the public or concession contract in question falls within the scope of the EU public procurement directives exceeding the EU thresholds, the supplier's subcontractor, supplier or entity whose capacities are being relied on, where such party accounts for more than 10 per cent of the contract value, is not an entity referred to in points 2. b) i.–iii.
- d) the government grant applicant will immediately inform the government grant authority if sanctions are imposed on any of the parties referred to in section 2. a) or if a situation referred to in sections b)–c) is at hand
- e) the activities financed by a discretionary government grant from the government grant authority and/or the use of the goods or services to be procured from the supplier and its subcontractors do not violate the aforementioned sanctions.

Upon request, the government grant applicant will without delay provide the government grant authority information on its direct or indirect owners, contracting partners, subcontractors, recipients of redistributed funds, partners and other beneficiaries.

The government grant applicant also undertakes to notify the government grant authority without delay if the payments relating to the government grant or to procurement may indirectly or directly be made available to a party subject to sanctions.

The government grant applicant also undertakes to notify the government grant authority without delay if the discretionary government grant may indirectly or directly be made available to a party subject to sanctions.



Affirmation concerning sanctions

- 3) The government grant authority may issue a decision to discontinue the payment of a government grant immediately if
 - a) the European Union and/or the UN impose sanctions on the government grant applicant or on one of the parties referred to in section 2. a) above or
 - b) a situation referred to in sections 2. b)–c) is at hand or
 - c) payments relating to a discretionary government grant may indirectly or directly be made available to a party subject to the sanctions referred to herein.