

SANCTIONS AND MEMBER RESOURCES

Since the 2022 Russian invasion of Ukraine, the EU has passed a number of sanctions Regulations against many Russian entities and individuals. These and other previously passed sanctions Regulations have required us to invest more time and effort in screening potentially sanctioned members or End Users than in previous years. This included reviewing whether non-sanctioned members or End Users were owned or controlled by sanctioned parties.

To ensure compliance, we have invested in a sanctions third-party screening tool to automate this process; however, our manual follow-up due diligence checks still required substantial effort from us. In cases where a member or End User is found to be subject to sanctions, we are required to freeze their registered resources in the RIPE Database. However, we do not have to deregister these resources or terminate memberships.

In the sixth sanctions package against Russian entities and individuals, the EU Regulations introduced an exemption, and we confirmed with the Dutch government that this exemption also applied to Internet number resources. As a result, we were able to remove sanctions-related restrictions from 150 RIPE NCC members and End Users in

2023. We will also continue to investigate the possibility of a blanket exemption from all EU sanctions regulation for Internet number resources.

Since 2021, we have also been dealing with ongoing banking issues as many banks are hesitant to accept payments from individuals or entities in Iran and Syria. This has prevented many of our Iranian and Syrian members from being able to fulfil their financial payment obligations to us. We have therefore offered payment extensions to these members until we resolve the issues with our banks and are seeking a long-term solution to this situation.

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QUARTERLY SANCTIONS TRANSPARENCY REPORTS

To keep members informed, we publish quarterly sanctions transparency reports on how RIPE NCC members, End Users and legacy resource holders are affected by sanctions. In 2023, we published four reports:

