

Sanctions Policy

1. Introduction

This policy outlines the guidelines and procedures which ESE will follow when dealing with individuals or institutes who work or reside in countries that are subject to financial sanctions from the UK Government (see Appendix 1).

2. Scope

The scope covers any relationship and/or financial transaction with an individual or institute for the following activities:

- ESE Membership – individual and organisational membership.
- ESE Events – online and physical events, as delegates, speakers, chairs (and including the EBEDM Exam).
- Abstracts – oral communications and posters, and publication.
- Committees and working groups (including journal) – as a member or chairmanship.
- Grants – all (including journal).
- Awards – all (including journal).
- Journals – submission and sales.

3. Principles

ESE will follow the conditions set out below. Individuals, institutes and organisations from a sanctioned country will be checked through a 3rd party compliance checker. If there is an alert raised on the individual, institute or organisation then ESE will not be able to continue the relationship or transact with them.

Membership – current, new and renewing	Individual membership permitted from sanctioned countries but all individuals from sanctioned countries and their institution to go through a compliance check. No sanctioned individuals or individuals from sanctioned institutions permitted.
Membership - National Partner Societies	Russia and Belarus suspended. No suspensions for other sanctioned countries. Main contacts to go through compliance check (for countries on sanction list).
Membership - Specialist Partner Societies	Not permitted for Russia and Belarus. No restrictions for other sanctioned countries but main contacts and organisation to go through a compliance check (for countries on sanction list). No sanctioned individuals or sanctioned institutions permitted.
ESE Events – attending online events	Event attendance permitted from sanctioned countries but all individuals from sanctioned countries and their institution to go through a compliance check. No sanctioned individuals or individuals from sanctioned institutions permitted.
ESE Events – attending in-person events	Event attendance permitted from sanctioned countries but all individuals from sanctioned countries and their institution to go through a compliance check. No sanctioned individuals or individuals from sanctioned institutions permitted.

ESE Events – participating in the EBEDM Exam	Exam participation permitted from sanctioned countries but all individuals from sanctioned countries and their institution to go through a compliance check. No sanctioned individuals or individuals from sanctioned institutions permitted.
ESE Events – speakers, chairs, faculty	Not permitted for Russia and Belarus (they are not allowed to speak or chair). No restrictions for other sanctioned countries but all individuals from sanctioned countries and their institution to go through a compliance check. No sanctioned individuals or individuals from sanctioned institutions permitted.
Event abstracts – e-posters	Abstracts permitted from sanctioned countries but all first and corresponding authors (aka first author and corresponding author) from sanctioned countries and their institution to go through a compliance check. No sanctioned individuals or individuals from sanctioned institutions permitted to have abstracts accepted or published.
Event abstracts – Oral Communications	Not permitted for Russia and Belarus. No restrictions for other sanctioned countries but all first and corresponding authors from sanctioned countries and their institution to go through a compliance check. No sanctioned individuals or individuals from sanctioned institutions permitted.
Committees and working groups, editorial boards etc	Not permitted for Russia and Belarus. No restrictions for other sanctioned countries but all individuals from sanctioned countries and their institution to go through a compliance check. No sanctioned individuals or individuals from sanctioned institutions permitted.
Grants	Not permitted for Russia and Belarus. Grants not permitted (or possible) for countries under banking sanctions. ESE is not permitted to make payments through third parties (see section 4 below for further information).
Awards	Not permitted for Russia and Belarus. No restrictions for other sanctioned countries but all individuals and their institution to go through a compliance check. No sanctioned individuals or individuals from sanctioned institutions permitted. ESE is not permitted to make payments through third parties (see section 4 below for further information).
Journals - EJE	<p>New sales transactions in Russia and Belarus have been stopped, except for where institutions or individuals are not subject to international sanctions. Access to content under current contracts has not been withdrawn.</p> <p>Authors from Russia and Belarus can continue to submit their work. Editors will follow usual practice on “Fair Play”: “The editor should evaluate manuscripts for their intellectual content without regard to race, gender, sexual orientation, religious belief, ethnic origin, citizenship, or political philosophy of the authors.”.</p>
Journals – Endocrine Connections	Articles permitted from sanctioned countries however, any articles that include a sanctioned individual or sanctioned institute will not be published.

4. Financial Payments

Payments are **not permitted** where prohibited by UK Government financial sanctions, including in countries subject to banking or financial restrictions (e.g. Russia and Belarus).

ESE will not make payments:

- to any individual who is subject to UK Government financial sanctions;
- to any institution or organisation that is subject to UK Government financial sanctions; or
- to any institution or organisation that is **owned or controlled, directly or indirectly, by a sanctioned individual or entity.**

These restrictions apply regardless of whether the payment is made directly or indirectly, and regardless of whether the individual receiving the payment is themselves subject to sanctions.

ESE will not transfer funds (e.g. for grants, awards, honoraria or expenses) to third parties in order to circumvent sanctions. Payments may be made to an individual's institution or organisation **only where that institution or organisation is not subject to sanctions and is not owned or controlled by a sanctioned party.**

Where payments are made:

- to an individual, the bank account must be in the name of that individual;
- to an institution or organisation, appropriate supporting documentation (e.g. official letterhead with banking details) must be provided.

All payments are subject to sanctions screening and due diligence checks in line with ESE procedures.

5. Review and Amendments

This Sanctions Policy will be reviewed periodically to ensure its continued compliance.

6. Acknowledgment

By participating in ESE activities, individuals, institute or organisation are deemed to have read and agreed with the conditions of this Sanctions Policy.

7. Communication

This Sanctions Policy will be made available to all through the ESE website and other appropriate channels.

Appendix 1 – List of countries subject to UK Government sanctions regimes (note: sanctions apply to designated individuals/entities and specific activities, not all persons within a country).

This list is indicative and must be read alongside the UK Sanctions List and current guidance.

Afghanistan
Belarus
Bosnia and Herzegovina
Central African Republic
Democratic People's Republic of Korea
Democratic Republic of the Congo
Guinea
Guinea-Bissau
Haiti
Iran
Iraq
Lebanon
Libya
Mali
Myanmar
Nicaragua
Russia
Somalia
South Sudan
Sudan
Syria
Venezuela
Yemen
Zimbabwe