# EY Forensic & Integrity Services Crisis response to sanctions



In addition to the US sanctions on Russia, other countries have issued sanctions that have immediate and long-term effects on the Russian economy and financial system as well as companies that have operations in Russia or business relationships with suppliers, vendors or customers in Russia.

	Now	Next	Beyond
Sanctions Compliance	<ul> <li>Utilize Business Intelligence (BI) and third- party risk management data and services for sanctions threat identification and monitoring</li> </ul>	<ul> <li>Sanctions compliance program review and update to address actual or potential exposure to sanctioned parties</li> </ul>	<ul> <li>Maintain updates to the sanctions compliance program and controls, including monitoring signals and reporting</li> </ul>
Anti-Bribery and Corruption (ABAC)/ Foreign Corrupt Practices Act (FCPA)	Conduct analysis to assess risk of ABAC/FCPA violations related to impacted trade routes, intermediaries and current/new vendors	<ul> <li>Assess anti-corruption program and compliance</li> <li>Integrate advanced Business Intelligence (BI) data analytics to detect and investigate potential bribery issues</li> </ul>	<ul> <li>Maintain and enhance program based on identified gaps and recommendations for enhancement</li> </ul>
Crisis Management	<ul> <li>Assess overall crisis management program and potential threats such as cyber attacks and other types of business interruption, including supply chain risks</li> </ul>	<ul> <li>Deploy resources to assist business functions with responding to crisis and interruptions related to supply chain, cyber, sanctions, personnel and financial, and regulatory risks</li> </ul>	<ul> <li>Maintain crisis management monitoring protocols, signals, training and policies to address weaknesses/vulnerabilities</li> </ul>
Fraud	Fraud assessment to identify and prioritize areas of fraud risk, implement correction actions and enhanced monitoring/reporting activities related to fraud	<ul> <li>Address fraud vulnerabilities through enhancement of antifraud controls</li> </ul>	<ul> <li>Implement correction actions and enhanced monitoring/reporting activities related to fraud</li> </ul>
Operations	<ul> <li>Assess supply chain shift requirements as well as people and assets affected by business disruption</li> </ul>	<ul> <li>Address supply chain risks, asset seizures or losses and implement data preservation and lockdown measures where applicable</li> </ul>	<ul> <li>Implement or enhance operations program to stay current with business operations across a crisis life cycle</li> </ul>

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Any organization with investments or other business activities relating to Russia or Russian individuals and entities should assess the impact the levied sanctions may have on its business and risk profile. In order to be prepared in this rapidly evolving environment, organizations should assess the business exposure to sanctioned entities and future threats such as cyber-attacks or supply chain shortages.

Ernst & Young LLP helps companies respond and navigate through a crisis by providing in-depth sanctions, ABAC/FCPA, crisis response and fraud services, including the following:

- Creating a global crisis response center to lead the business through a crisis while executives continue to run the business, drawing on leading domain and sector experience as needed from around the world.
- Establishing or enhancing a more innovative approach to real-time threat monitoring by leveraging technology and business intelligence data to identify and measure risks. Business leaders can then make better decisions by increasing the accuracy, timeliness and amount of data.
- Assisting with evolving crisis management protocols and testing readiness through training and simulation exercises.

## Key takeaways

Recognize disruptive events affecting the following:

- People: safety, mobility, workforce and humanitarian efforts
- Operations: reconsider supply chain risks, managing cyber risks/response, customer and brand management, crisis management and securing assets
- Finance: impact on fixed assets, tax and financial reporting, impact of sanctions and business disruption
- Sanctions/Investigations: understand developing/emerging risks, identify and investigate exposure, and compliance and reporting requirements

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