



## The Swedish Club Sanctions Due Diligence Questionnaire

Please note that EU sanctions regulations apply to all parts of The Swedish Club's operations as the Club is a Sweden-domiciled and regulated entity for which it is unlawful to breach EU sanctions legislation. This thus applies to all entries in the Club, regardless of insurance class or which office Members are entered through. So, in some instances, it may be lawful for Members to engage in a trade which at the same time is unlawful for the Club as an EU-regulated entity to insure.

It is thus for the Club's Members, regardless of insurance class, to ascertain the legality of their trade. Still, the Club wish to highlight that it is important that Members also ensure that their trade does not expose their insurers and/or reinsurers to any sanctions risks. Even if a trade is lawful for the Member to engage in, if the trade is unlawful for the Club and/or its reinsurers to insure and/or to pay claims for that is a breach of the insurance contract, and there will be shortfalls of the applicable cover falling back on Members.

Cover may further even cease or must be terminated, depending on the particular circumstances. Cover is always subject to the applicable insurance conditions, and the provision of this information does not prejudice the Club's right to rely on any sanctions clauses.

Particulars	Information Required
Vessel details	
Vessel name	
IMO number	
Flag	
Member and ETA	
Member/Assured name and nationality	
Date of Expected Time of Arrival – Load Port	
Date of Expected Time of Arrival – Discharge Port	
Details of parties	
Confirm the identities; registered addresses; and nationalities of the following (as applicable): (Please provide as much detail as possible)	



Particulars	Information Required
a. Vessel owner	
b. Port operator and/or authority	
c. Shipper	
d. Supplier	
e. Charterer	
f. Buyer	
g. Seller	
h. Consignee	
i. End User	
<b>Cargo details</b>	
Country of origin of the Cargo	
Nature/name of the Cargo (be as specific as possible)	
CN/HS code of the Cargo	
End use of the Cargo	
Where is the end destination of the goods/cargo?	
<b>Load and Discharge Port details (or STS)</b>	
Load Port (if loading via STS, please provide IMO number, name and flag of providing STS vessel)	
Discharge Port (if discharging via STS, please provide IMO number, name and flag of receiving STS vessel)	



Particulars	Information Required
Voyage details	
Details of intermediary port call(s), if any	
Will the vessel/goods transit through any sanctioned country?	
Insurance policy sanctions clause	
Is there a sanctions clause in the policy? Confirm that this is JH2010/009 or equivalent.	
Sanctions Due Diligence details	
Please confirm that the above-named parties have been screened against the UK, UN, EU and US sanctions lists.  Describe any findings and detail why the voyage may take place in light of the findings.	
Describe why the shipment is permissible under the relevant UK, UN, EU and US sanctions regimes.  If obtained, please attach legal advice on the sanctions position instead.	
If the shipment is covered by a General or Specific Licence issued by the UK, UN, EU or US, please provide details/evidence of this.	

This checklist is designed to provide a non-exhaustive outline of key questions that are likely to arise during the conduct of due diligence in respect of shipments to sanctioned territories. Please ensure all questions are answered in sufficient detail. Should any concerns arise from the answers to the above questions, further information may be required.