



Appendix Statement due to European sanctions against Russia and Belarus

The European Union has introduced various sanctions against Russia and Belarus as a result of Russia's invasion of Ukraine. More information about the sanctions and which people, companies and organisations in Russia and Belarus are on a sanctions list can be found on: www.sanctionsmap.eu. These sanctions may have consequences for the granting of residence permits for the purposes of companies that have ties with Russian and/or Belarusian companies or persons included on a sanctions list. Under the Sanctions Act, it is in fact prohibited to make funds and/or economic resources available to listed companies or persons. The effect of the prohibition also extends to companies that are not on a sanctions list themselves, but are indeed owned by or under the control of a listed company or person. By making this statement, you indicate whether you or your company is affiliated with a Russian or Belarusian parent company on the sanctions list.

1 Details of the applicant

Fill in in block capital letters

- 1.1 Company name
(name given in the articles of association according to Chamber of Commerce (KvK) _____
- 1.2 Chamber of Commerce registration number _____
- 1.3 IND client number
(if known) **1-** _____
- 1.4 Business address
- Street _____
- House number and addition _____
- Postcode _____
- City/town _____
- _____
- 1.5 Telephone number _____

2 Statement

Fill in in block capital letters

- 2.1 Is your company a subsidiary of a parent company?
If the company is a sole trader, then tick 'No'
- Yes Skip to question 2.2
- No Skip to question 2.5
- 2.2 Is the parent company Russian/Belarussian?
- Yes Skip to question 2.3
- No Skip to question 2.5
- 2.3 Is the parent company in Russia or Belarus on the European sanctions list?
(see www.sanctionsmap.eu)
- Yes Skip to question 2.4
- No Skip to question 2.5
- 2.4 Is your company under control or owned by the parent company in Russia or Belarus?
See the text box on page 3 for a more detailed explanation of control or ownership
- Yes
- No
- 2.5 Statement
- I declare that I am authorised to sign this statement on behalf of the company, and I declare that I have filled in the foregoing truthfully.

3 Signature

Fill in in block capital letters

- 3.1 Name
-
- 3.2 City/town and date
- City/town*
-
- | <i>Day</i> | <i>Month</i> | <i>Year</i> | | | | | |
|------------|--------------|-------------|--|--|--|--|--|
| | | | | | | | |
- 3.3 Signature
-

When does ownership or control exist?

This follows from the European Sanctions Guidelines ([pdf \(europa.eu\)](#)) under 55a and 55b:

Ownership: The criterion to be taken into account when assessing whether a legal person or entity is owned by another person or entity is possession of more than 50% of the proprietary rights of an entity or having a majority interest in it.

Control: The 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, could include, inter alia):

- a. having the right or exercising the power to appoint or remove a majority of the members of the administrative, management or supervisory body of such legal person or entity;
- b. having appointed solely as a result of the exercise of one's voting rights a majority of the members of the administrative, management or supervisory bodies of a legal person or entity who have held office during the present and previous financial year;
- c. controlling alone, pursuant to an agreement with other shareholders in or members of a legal person or entity, a majority of shareholders' or members' voting rights in that legal person or entity;
- d. having the right to exercise a dominant influence over a legal person or entity, pursuant to an agreement entered into with that legal person or entity, or to a provision in its Memorandum or Articles of Association, where the law governing that legal person or entity permits its being subject to such agreement or provision;
- e. having the power to exercise the right to exercise a dominant influence referred to in point (d), without being the holder of that right;
- f. having the right to use all or part of the assets of a legal person or entity;
- g. managing the business of a legal person or entity on a unified basis, while publishing consolidated annual accounts;
- h. sharing jointly and severally the financial liabilities of a legal person or entity or guaranteeing them.

If any of these criteria are satisfied, it is considered that the legal person or entity is controlled by another person or entity.

Processing of personal data

The Immigration and Naturalisation Service (IND) processes personal data when it processes your application, notification, or request. This means that if needed the IND will request data from you yourself and other organisations or persons. The IND also uses and stores data and shares them with other organisations. When doing so, the IND strictly adheres to the stipulations of privacy legislation. For instance, the IND must treat data safely and with due care. The law also gives rights. At your request, you are allowed to see which data on you the IND processes. You can also get information on why the IND does so and to whom your data have been passed on. On www.ind.nl you can read how the IND processes your data and which rights you have. You can also read how to use your rights.

