

Financial Sanctions – Information for Producers

What are Financial Sanctions?

Sanctions are imposed by governments on entities which could be individuals, companies and organisations (including banks and financial institutions) or other counterparties.

They prohibit transactions with the sanctioned counterparty, including non-financial transactions such as the provision of goods, content, publicity, or services that may result in economic gain for the recipient, even if no payment is made or received.

Under UK law, the BBC and producers must not make funds or other financial benefits available—directly or indirectly—to sanctioned individuals, companies, or banks.

To ensure its own compliance, the BBC may request producers share information about their own screening policies, procedures, and the outcome of any screening.

The main concerns will be UK, US, EU, and UN imposed sanctions, but other regimes may also apply. Any US dollar transactions are likely trigger US sanctions.

The BBC has adopted its own approach to managing sanctions risks which your relevant business affairs contact can discuss with you by way of illustration to help assist producers in identifying their own approach.

What is the legal position?

Producers must make their own decisions to ensure they comply with all relevant sanctions laws, based on independent legal advice, and their own sanctions exposures and risk appetite.

How do producers screen counterparties?

Before making any payments, producers must conduct thorough due diligence to ensure recipients and banks are not subject to any applicable sanction regimes. Counterparties subject to UK sanctions are listed on the Office of Financial Sanctions Implementation (OFSI) [Consolidated List of financial sanctions targets](#).

If the producer is unsure whether they need to professionally screen, they should obtain their own independent legal advice. Various companies provide this screening service.

What does the producer need to do?

The producer should answer the questions in the Financial Due Diligence section in the Commissioning Specification, providing a reason for its assessment.

If sanctions screening is required, the producer should confirm to the BBC they will undertake professional sanctions screening on all payments prior to being made throughout the duration of the production.

The producer should keep all payments under review and flag to the BBC any further counterparties it later elects to screen and follow the same process.

Additional Special Terms will be included in the Programme Production Agreement where the requirement for sanctions screening is identified by the producer in the Commissioning Specification.

What information does the producer need to send to the BBC?

The professional sanctions screening reports must be shared with the BBC.

The producer must not engage or make payments until screening results are confirmed by whichever professional service is used, and only after the BBC has also confirmed in writing.

What information does the producer need to send to the BBC when the BBC indicates to the producer it will undertake its own screening?

In some circumstances the BBC may elect to undertake its own professional sanctions screening in addition to that of the producer.

Then, the producer should:

- Complete the BBC Sanctions Template for any counterparties falling within the BBC's screening criteria and send it to the BBC. The Business Affairs contact can provide this template.
- The producer should keep all payments under review and flag to the BBC any further counterparties falling within the BBC's screening criteria.
- The BBC will require some lead time for its own confirmation so producers must allow adequate time for this before any payments are due or made.

What happens if the check reveals a match or a suspected match?

Any identified risks must be discussed with the BBC before contracting with the proposed counterparty.

If a match is suspected, producers must assess whether it is a false or a true designation match and seek legal advice if uncertain.

If BBC undertakes screening itself and a match or suspected match is found by the BBC, it shall request further information from the producer regarding the counterparty.

If the BBC screening confirms a match the Business Affairs Manager will confirm and discuss this with the producer prior to any payment being made.

What happens if the producer makes a payment to a sanctioned counterparty?

Breaches, even if inadvertent, may result in enforcement action against the producer and the BBC which may lead to civil and/or criminal penalties.

Where to get help?

If you intend to film or otherwise engage people in countries which are subject to sanctions regimes, or have concerns that individuals, companies and organisations, or banks may be subject to sanctions, please speak to your BBC Business Affairs contact in the first instance.