

# Criminalisation of sanctions breaches and strengthened enforcement framework

December 2025



## Key issues

- Transposing Directive (EU) 2024/1226, Romania introduces a strengthened enforcement framework and new criminal offences relating to sanctions breaches and circumvention.
- The Law updates core definitions essential to the operation of the framework, thereby broadening the scope of activities subject to sanctions controls.
- Companies operating in sectors sensitive to EU sanctions now face significantly heightened compliance and enforcement risk.
- Broadly formulated offences, covering the provision of services prohibited or restricted under EU international sanctions, may capture a wide range of activities falling within the EU Sanctions Regulation.

Romania has recently adopted Law No. 224/2025 ("**the Law**"), which significantly amends and supplements GEO No. 202/2008 on the implementation of international sanctions. The Law transposes Directive (EU) 2024/1226 and establishes a comprehensive criminal framework applicable to breaches and circumvention of EU sanctions. By adopting these amendments, Romania aligns itself with the EU's wider efforts to harmonise the enforcement of restrictive measures across Member States and moves towards a substantially more robust and centralised sanctions enforcement regime.

## Broadened scope of conduct that may give rise to criminal liability

The Law revises several fundamental concepts relevant to the application of sanctions:

- "*International sanction*" now expressly covers UN, EU, unilateral measures implemented by Romania, and other international restrictions.
- "*Designated person/entity*" is broadly defined to include all persons, entities or bodies subject to sanctions.
- "*Funds*" now expressly include crypto assets, aligning Romanian law with the EU's MiCA Regulation.
- A new definition of "*third country*" is introduced to support offences related to transactions with third-country actors.

These updated definitions broaden the scope of conduct that may give rise to criminal liability.

## An extensive set of criminal offences

The Law significantly broadens the scope of criminal liability to capture conduct that directly or indirectly contributes to the breach or circumvention of international sanctions.

Under the new framework, the following conduct now constitutes a criminal offence:

- providing funds or economic resources to designated persons, entities or bodies;
- failing to freeze assets belonging to or controlled by designated parties;

### Key issues

- Criminal liability is established for both individuals and legal entities, with imprisonment of up to 12 years and criminal fines up to EUR 69.3million.
- The Law mandates freezing, seizure and confiscation of assets and economic resources involved in committing the offences.
- Extraterritorial application is introduced, Romanian citizens and legal entities can be prosecuted even if the conduct occurred abroad and is not an offence in the jurisdiction where it occurred.

### Takeaways

Overall, these amendments considerably heighten compliance expectations for businesses.

Companies should review their sanctions compliance programs, due diligence procedures, counterparty screening systems and reporting mechanisms.

Particularly, businesses with exposure to high-risk jurisdictions, sensitive goods (including dual-use items) or complex financial flows should carefully assess their risk profiles, implement enhanced internal controls and ensure that relevant staff receive updated sanctions compliance training. Given the breadth of new offences and severity of the penalties, early preparation is essential to mitigate potential criminal, financial and reputational risks.

- facilitating the entry into or transit through Romania of designated individuals;
- carrying out transactions with third countries or entities they control where EU sanctions impose prohibitions;
- trading, importing, exporting or transporting prohibited goods, including items subject to EU restrictive measures;
- providing prohibited services, whether financial, technical or any other category of restricted services;
- breaching or failing to comply with the conditions set out in authorisations issued by competent administrative authorities for activities that would otherwise constitute a violation of an EU international sanctions.

### Substantial penalties

Natural persons may face imprisonment ranging from 1 to 5 years, while aggravated cases involving high-value goods, military products or dual-use items carry sentences ranging from 2 to 7 years.

For legal entities, the penalty will be applied by converting the prison sentence into a criminal fine. A sentence of up to 5 years of imprisonment will be equivalent to a sentence between 120 and 240 days of fine. The amount of a day of fine also vary between EUR 600 and 165,000. Thus, the court will determine, on a case-by-case basis, the criminal fines which may reach up to EUR 39.6 million.

Where the underlying offence carries 2 to 7 years of imprisonment, namely cases involving assets exceeding EUR 100,000 or transactions with military or dual-use items, the maximum potential criminal fine increases to EUR 49.5 million.

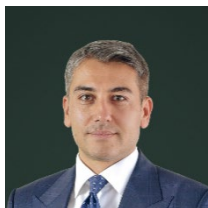
The most serious offences, namely those involving military goods classified under ML1–4, ML6 and ML9–10 according to the Common Military List of the European Union, are punishable by 5 to 12 years of imprisonment. In this case, the maximum criminal fine rises to EUR 69.3 million. These levels far exceed previous thresholds and establish a sanctions regime aligned with EU expectations of deterrence and effective enforcement.

In addition to penalties, the immediate application of precautionary measures such as the freezing and seizure of assets and the confiscation of funds or resources involved is now set out. These measures, potentially taken by DIICOT, may extend not only to the assets of designated persons but also to assets transferred to third parties in attempts to conceal ownership or circumvent sanctions.

### Other significant developments

DIICOT is designated as the authority responsible for investigating sanctions-related offences, centralising enforcement within a specialised body experienced in financial and organised crime, as well as cross-border investigations.

This updated framework further extends the territorial reach of Romanian criminal law by allowing the prosecution of sanctions-related offences committed abroad by Romanian citizens or Romanian legal entities. This applies even where the conduct is not an offence in the jurisdiction where it occurred, significantly increasing the exposure of multinational companies with Romanian entities or personnel involved in international operations.



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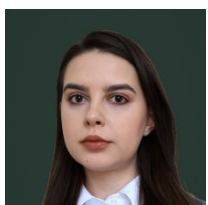
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