

Review procedure for applications that have been rejected by the Unit for the Implementation of Sanctions in the Financial Sector (MEK) and the Advisory Committee on Economic Sanctions (SEOK)

The Permanent Secretary of the Ministry of Finance, on the 11th November 2022 appointed three members as the Sanctions Review Committee, whose responsibility is to prepare a Factual Report to the Permanent Secretary regarding complain from complainants in cases where their applications have been rejected by the Minister of Finance as Chair of both committees, after recommendation by members of MEK and SEOK.

2. Specifically, under the current procedure, any applicant who disagrees with the decision of the Minister of Finance, has the right, within 30 calendar days from the date of notification of this decision, to submit a specific form (EMEK 2), for a review of the decision specifying the legal and factual grounds on which the complain is based and attaching any supporting documents.

3. The complain shall be submitted (via form EMEK 2) to the Permanent Secretary of the Ministry of Finance. The Permanent Secretary, after reviewing the complain and the Factual Report prepared by the Sanctions Review Committee may:

- (i) reject the complain and uphold the Decision and inform the complainant within 30 days; or
- (ii) accept the complain, repeal the Decision and inform the Minister of Finance to issue a new decision and inform the complainant within 30 days.

Note 1: The review of the application should be completed as soon as possible and the Minister's decision should be issued within 30 calendar days of receipt of the complain, unless there are special reasons.

Note 2: The complainant has the right to submit an administrative recourse of the decision of the Minister at the Administrative Court in accordance with article 146 of the Constitution.

The above procedure is also uploaded at the website of the Ministry of Finance (Sanctions).