



**НАЦІОНАЛЬНЕ АГЕНТСТВО
ЗПИТАНЬ ЗАПОБІГАННЯ
КОРУПЦІЇ**

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**NATIONAL AGENCY
ON CORRUPTION
PREVENTION**

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**National Agency of Ukraine on Corruption Prevention
Announces Launch of the Art Sanct Task Force**

Today the National Agency of Ukraine on Corruption Prevention (“NACP”) is presenting the work of the Art Sanct Task Force, an initiative to track and curb violations of sanction regimes in global art market transactions and thwart the illicit traffic of art and antiquities during the ongoing war in Ukraine. The Art Sanct Task Force will identify and implement a database of art objects stolen from Ukrainian collections and art property belonging to sanctioned persons, in order to ensure due diligence and proper compliance within the art world.

Since 24 February 2022, Ukraine has been facing an unprecedented attack on its territorial integrity and independence. The war that the Russian Federation instigated in 2014 and escalated in 2022 has caused tens of thousands, if not hundreds of thousands, of casualties and prompted millions of Ukrainians to seek refuge elsewhere. The economic losses of Ukraine are estimated to be worth hundreds of billions of US dollars. According to UNESCO, over 230 cultural sites in Ukraine have already been damaged, and many objects have been looted. Increasingly, looted objects, such as important archeological treasures, books, folk and fine art from Ukraine, are offered for sale at various auctions and galleries across the world.

Ukraine’s allies have imposed numerous sanctions and additional restrictions on Russian authorities, companies, individuals and their shell companies. In addition, companies and individuals of third countries who directly or indirectly engage in business with sanctioned persons may also be subject to sanctions, and other restrictions.

NACP is an analytical unit mandated by the State of Ukraine to identify leads on sanction targets in order to deter actions that undermine or threaten Ukraine’s territorial integrity and independence. Sanctions targets are published in NACP’s Database, accessible through the [War & Sanctions Portal](#).

NACP also aims to ensure that sanctions are acted upon in connection with art and other collectable and luxury goods transactions. In cooperation with Ukrainian cultural institutions and international experts, including members of the Art Sanct Task Force and the Stanford-based International Working Group on Russian Sanctions, we identified two key issues facing international art market participants:

1. Know Your Client (KYC)-related challenges connected to transactions, such as consignment and loan agreements, where targeted persons may wish to be a party, directly or not;
2. The lack of a unified database of looted art objects from Ukraine facilitates dealings in such objects.

The Agency aims to respond to those challenges by making available a database of art objects stolen from Ukrainian private and public collections as well as the War & Sanctions Database.

We appreciate the uneasy balancing act that members of the international art trade have to perform in order to protect the integrity of the field. We welcome all efforts of international business and financial institutions aimed to put on hold dealings with persons directly or indirectly involved in the Russian aggression or benefit from it and to prevent transacting in cultural property illegally exported from Ukraine as a result of the armed conflict.

Actionable tips about art assets of the sanctioned persons or looted art objects will be recorded in the Database to prevent their circulation on the art market pending title disputes and, where relevant, forfeiture action. We invite you to join the initiative to prevent violation of sanction regimes and thwart the illicit traffic of art and antiquities.

Undoubtedly, our shared objectives are to avoid a protracted state of limbo involving art owned by the sanctioned persons and to prevent sales of looted and illicitly exported objects from Ukraine on the scale of the embarrassment and costs associated with finding and recovering or, rather, clearing title to Nazi-era looted art that continues to haunt the art market and museums alike to this day.

Art market players may possess valuable information related to the sanctioned individuals and be in need of up-to-date information about the art assets of the said individuals to ensure proper and prompt compliance with the sanction regimes. To this end, we have partnered with such industry leaders as Artory and members of the Responsible Art Market initiative to collect data and make available lists of property belonging to sanctioned persons as well as lists of looted and displaced artifacts belonging to the State of Ukraine. The lists will help you to conduct due diligence on art objects offered for consignment and sale.

We invite your input concerning the functionality of the Database to tailor the needs of the art market, including which tools, such as training or registries, you may need to ensure that the art market remains compliant. If you would like to assist with this initiative, please submit your suggestions or questions to us by completing our [Survey](#).

Please contact us via email at artsanct@moca.org.ua, if you have any further questions or input. We recognize your art market leadership and acumen and invite you to play a leading role in shaping the art market's future in the post-Russia-Ukraine war space.

A handwritten signature in blue ink, consisting of stylized, overlapping loops and a long, sweeping horizontal stroke extending to the left.

Yours sincerely

Oleksandr NOVIKOV
Head of the National Agency of Ukraine
on Corruption Prevention