

Yermak-McFaul Working Group on Russian Sanctions

Action Plan on Strengthening Sanctions against the Russian Federation, April 19, 2022

Progress Update, July 27 compared to Apr 19

Prepared by KSE Institute

Sanction Block	Progress	Details
1. Expand Oil and Gas Sanctions #Oil	Yes, but incomplete scope	EU banned purchase, import or transfer seaborne crude oil or petroleum products originated in RF. Norway banned the purchase, import or transfer of oil transported by sea and supporting services. Switzerland banned purchase, import or transfer transit and transport into and through Switzerland of crude oil and petroleum products from RF or originating in RF. G7 made an obligation to ban RF's oil imports. They have now started discussing the use of a price cap on Russian oil to curb revenues. Poland terminated the agreement on the supply of RF gas following the announcement made earlier. Bulgaria, Finland, Netherland and Denmark: RF cut off gas supplies due to refusal to pay in rubles. Lithuania cut import of RF's energy, incl. electricity, ban on transit of RF gas to Kaliningrad region. Slovakia committed to reduce dependence on RF gas by 66% starting from Jun 1. Latvia ban on natural gas supplies from RF from Jan 1, 2023. UK ban on import of RF oil and oil products from 31 Dec, ban on import of RF coal from Aug.
2. Increase Transportation and Insurance-Related Sanctions #Transport	Yes, but incomplete scope	USA banned RF vessels from US ports, denied all export privileges for RF cargo aircraft carrier Aviastar, SDN for RF shipping SOE & 6 private companies & 1 maritime engineering company & 69 vessels. Norway closed borders and ports to RF trucks and ships from May 7. Canada sanctioned 1 manufacturer. The UK denied Aeroflot, Ural Airlines and Rossiya Airlines selling their landing slots, allowed necessary technical assistance for temporarily detained aircraft. EU prohibited insurance and reinsurance of maritime transport of oil and oil products to 3rd countries, extended existing port access ban, allowed technical assistance to RF for aviation. Switzerland banned provision of services, including insurance or reinsurance, connected with transportation of RF oil and certain petroleum products to any destination. EU + Lithuania (EU released guidance for transportation from RF to Kaliningrad – road transit is not allowed, railway – allowed in pre-invasion volumes, transportation of sanctioned military and dual-use goods and related technologies are entirely prohibited, regardless of the mode of transport).
3. Impose New Financial Sanctions #Financial	Yes	USA: adds to SDN list Transkapitalbank, Investtradebank, Bitriver AG & 10 RF subsidiaries, Moscow Industrial Bank (SOE) & 10 its subsidiaries. Didn't renew General License 9C. Before 25 th of May it was allowing use of "frozen" reserves to make payments on debt + 13 associated with Putin's inner circle + 4 connected with Mordashov + ban on purchasing RF securities on the secondary market + extended until 5 Dec 2022 licence allowing for energy financing transactions via RF banks + 71 (SDN List) + 45 RF entities in aerospace, defence and related materiel sector, financial services or technology sectors (inc. major RF SOEs and their subsidiaries) + asset freeze on Heritage Trust + ban on import of gold from RF - 2 Kazakh subsidiaries of Alfa-Bank were excluded from SDN-list (were bought by Kazakhstan bank) + issued General Licence authorising transactions through Dec 16, 2022 involving Gazprom Germania GmbH. UK: 10 defence companies asset freeze (inc. 4 SOEs & 1 SOE stake 25+1) & 32 defence and propaganda, asset freeze for Evraz plc + ban export of banknotes in sterling or any official currency of the EU + 5 RF entities + announced ban on trusts services + asset freeze on RF propagandist analytical centre + extended existing restrictions on Belarus on dealing with financial instruments and providing loans to a broader range of transferable securities, money market instruments, loans and credit + prohibition on transactions related to the management of FX reserves as well as of assets of CB Belarus and Belarus MinFin + financial sanctions reporting obligations were extended to include crypto asset exchange providers and custodian wallet providers + ban on RF gold and ancillary services, exported from RF after Jul 21. gold exported from RF before 21 July 2022 is not in scope + prohibited investment activities in respect of land located in RF, persons connected with RF, relevant entities, joint ventures, opening a representative office or establishing a branch or subsidiary located in RF. Poland: + 37 entities on top of EU lists. Switzerland: ban on trusts registering by Russians + de-SWIFT 3 RF and 1 Belarus banks + sanctioned 18 RF and 8 Belarus entities connected with Armed Forces of Russian and GoV. New Zealand: assets freeze and dealing with securities ban CBR, RDIF + 16 RF banks (8 SOEs), + 4 in defense (1 RF SOE and 1 Belarus SOE) and 2 in shipbuilding (1 RF SOE) + sanctions on 44 entities (38 RF and 6 Belarus, including 32 RF SOEs and 3 Belarus SOEs) + ban on import of RF gold from July 25. Canada: 5 defence and machine building companies + asset freeze and dealing prohibition on 4 RF financial institutions and banks + 46 RF defence entities, + 2 Belarus entities + import ban on RF gold after Aug 6. EU: de-SWIFT 3 RF banks + 1 Belarus; 18 entities that support RF military and security; 8 entities in Belarus + ban on RF gold and jewellery, exported from RF after July 22 + prohibition on accepting deposits was extended to include those from legal persons, entities or bodies established in 3rd countries and majority-owned by Russian nationals or natural persons residing in Russia + 9 entities (inc. 7 SOEs + entering into any transactions with RF public entities necessary to ensure access to judicial, administrative or arbitral proceedings was allowed (further investigation of exemptions needed). Japan: asset freeze 2 RF and 1 Belarus banks + asset freeze for 6 RF entities + embargo on the purchase of RF gold, comes into force on 1 Aug, 2022. Norway: de-SWIFT 3 RF banks; restrictive measures for 18 entities that support RF military and security. Australia: announced ban import of RF gold.
4. Designate the RF as a Sponsor of State Terrorism #Terrorism	Yes	Lithuania officially recognized RF as a state sponsor and perpetrator of terrorism. USA endorsed a resolution calling to recognize RF as a sponsor of terrorism, final decision rests on State Department and the White House. Called RF as "human trafficking" state. A draft Resolution on recognizing Russia's actions in Ukraine as a genocide was registered in the US Senate. NATO recognised RF as "the most significant and direct threat".
5. Strengthen Individual Sanctions against these Categories of Individuals #Individual	Yes	USA: +35 + 18, including A.Mordashov and his family + 58 + visa restrictions for 529 officers of the Russian military and Russian nationals. EU: 2 + G.Schroeder, M.Waring and K.Kneissl left the BoD of Rosneft threatened by sanctions + 65 RF individuals, incl. Kabaeva, P. Kirill was excluded, + 12 individuals in Belarus for internal repression and human rights violations + 47 individuals, inc. Sobyanyin. UK: + 31 individuals (politicians, propagandists and managers of designated banks +8 +7 propagandists) +12 Putin "family", incl. Kabaeva + 12 incl. Patriarch Kirill. NCA created a special unit to "create difficulties" for Russians under the sanctions - 2 top-managers of Rosneft excluded from sanction list + amended the designation criteria under the Russia sanctions regime (positions, official roles and interpretation of being "associated with" a designated person were expanded and clarified + 41. Poland: +15 with entrance ban, 7 of them with assets freeze. New Zealand: +170 + 5 in media and propaganda +23 Belarus senior military leaders incl. Lukashenko. Australia: +76 +34 +15 +16, incl. Kabaeva. Switzerland: +2 oligarchs +65 RF +12 Belarus, incl. Kabaeva. Japan: +141 +62. Liechtenstein: +2. Canada: +14 and adopted bill for the imposition of travel ban on family members of sanctioned people + 22, incl. Kabayeva + 21 + 13 Belarus MinDefence officials. Proposed G7 to allow RF "oligarchs" to pay their way out of the sanctions lists + 30 disinformation and propaganda figures. Norway: +65 RF.
6. Intensify Sanctions on State-Owned Enterprises #SOE	Yes	UK: 4 SOEs defense companies asset freeze + with controlling stake 25+1 shares owned by RF, + 8 SOEs and 2 entities with RF ownership + RF Railways + 2 Airlines. USA: 3 SOEs in media, 1 SOE bank + 10 its subsidiaries + 1 state-supported private weapons manufacturer + 71 (SDN List) + 45 RF entities in aerospace, defence and related materiel sector, financial services or technology sectors (sanction lists mostly consist from major RF SOEs and their subsidiaries. New Zealand: 2 RF SOEs and 1 Belarus SOE in defense and shipbuilding + 3 in media +3 RF SOEs in defense + 32 RF SOEs and 3 Belarus SOEs). Canada: 4 defense and machine building SOEs + 3 RF SOE financial institutions and banks + 28 defence SOEs + 15 entities involved in disinformation activities (inc. 12 SOEs). Australia: RF PMC Wagner + 12 RF propaganda and disinformation SOEs+ 2 Belarus SOEs in defense. EU: 3 SOE media + 6 RF SOEs + 4 owned by SOE on 27% and 3 Belarus SOEs + extended prohibition of broadcasting for 3 RF SOE media + 7 SOEs. Switzerland: 6 SOE + 4 owned by SOE on 27% and 3 Belarus SOEs + prohibition of advertisement of content produced or broadcast by certain RF SOE media. Latvia: ban on distribution of 80 audio and audiovisual programs registered in RF, Japan: 1 RF and 1 Belarus SOE banks. Norway (6 RF SOE + 4 owned by SOE on 27%)

<p>7. Expand Export Controls and Ban Imports #Trade</p>	<p>Yes</p>	<p>UK: import - silver, wood, high-end; export - internet services and online media services; ban on services exports, including management consulting, accounting and PR services + 35% duty for ~£1.4bn of imports (palladium, platinum and chemicals) & export ban to hit > £250 mln (chemicals, plastics, rubber, and machinery) + export ban on: maritime goods&technology and related services, products&technology that could be used to repress people, goods&technology relating to chemical and biological weapons, restricted goods&technology to, or for use in, non-government controlled Ukrainian territory, jet fuel and fuel additives + extended the list of oil refining goods&technology and the list of energy-related goods banned to export + ban on services relating to iron and steel goods + import ban on: revenue generating goods RF origine + allowed for humanitarian assistance activity in uncontrolled territories of Donetsk and Luhansk oblast + ban on export of goods and items of significant importance to the Russian (such as chemicals, materials, machinery goods and electrical appliances with the exception of licensed humanitarian goods) + expanded the scope of existing energy-related goods and services prohibitions + ban on export of accounting, business and management consulting, and public relations services. USA: ban on exports of accounting and consulting services to RF, license requirement for common industrial and commercial items + export control for 70 entities in RF and 1 in Belarus in military + temporary ban on export privileges for AviaStar and Belavia, Nordwind Airlines, Pobeda Airlines (owned by Aeroflot) and Siberian Airlines + 35% import tariff for 570 categories of RF products worth approximately \$2.3 bn. Switzerland: import - lignite and coal, timber, cement, seafood, caviar; export - industrial robots or certain chemical products + extended the list of dual-use goods banned for export by 91 RF entities and 24 Belarus entities + extended the list of prohibited for import from RF goods) + ban on audit, business and pr consultancy services. Japan: ban on export transactions with 71 entity; ban on export of cutting-edge goods (quantum computers, 3D printers) + ban on export goods that strengthen the industrial base of RF (wood products, steel storage tanks and other similar containers, machinery and electrical equipment components + ban on export of goods to 65 RF and 25 Belarus entities in defence + ban on trust, accounting / audit, and management consulting services. Taiwan: strategic high-tech products in 57 categories to RF + ban on export of modern chips to Belarus and RF. Canada: import - luxury goods; export - luxury goods, goods for weapons manufacture and production + export ban on 28 services in the oil, gas and chemical industries, including technical, management, accounting and advertising services + ban on export for Belarus on products that could be used in the production and manufacturing of weapons, export and import ban on Belarus on luxury goods + existing measures on the oil, gas and chemical sectors to include industrial manufacturing. EU: expansion of export restrictions for dual-use goods&technology, goods&technology that can be used in defense and security + ban of accounting, pr and consultancy to RF + exclusions to export ban on luxury goods, allowing for personal use of persons travelling from the EU + reinforced export controls of dual use goods and advanced technology + expanded the list of entities subject to export restrictions regarding dual-use goods and technology by adding 4 Russian entities + extended the exemption from the prohibition to engage in transactions with certain SOEs as regards transactions for agrol products and the transport of oil to 3rd countries. Norway: expansion of goods subject to export controls/bans that help RF military and technological capabilities + ban on auditing and accounting, financial advice.</p>
<p>8. Impose Secondary Sanctions #Secondary</p>	<p>Yes, but slow</p>	<p>No specific document adopted. USA plans to include secondary sanctions in its financial crime strategy, considers sanctions against unscrupulous banks that help circumvent sanctions. USA sanctioned 7 RF entities and 6 non-RF entities for evading newly imposed export controls on Russia, these companies provided support to Russia's military and/or defence industrial base. The US passed a legislative amendment which allows India to buy a missile defence system from Russia. G7 discusses secondary sanctions for oil.</p>
<p>9. Increase Transparency to Discourage Trade with and Investment in RF #Transparency</p>	<p>Yes</p>	<p>USA: registered a bill to oblige public companies to disclose their ties to RF and other aggressor countries + Corp Fin has posted a sample comment letter about potential disclosure obligations arising out of the RF invasion + released warning of increased export control evasion attempts by entities targeted under RF related programs (16 items with a higher risk of evasion attempts + strengthened enforcement of export controls + established an outbound investment review mechanism to protect U.S. technologies (e.g. semiconductors, batteries, AI etc.) against adversaries like China and RF – notification to the federal government 45 days prior to deal closing is required if the investment involves specified sectors). Germany: obliged sanctioned persons to report property in Germany under the threat of imprisonment is to create a national registry of assets that are subject to sanctions. EU: EP gave its consent to the draft Decision which identifies the violation of EU sanctions as an EU crime + strengthened reporting requirements - sanctioned people and entities were obliged to declare assets in EU before 1 Sep 2022 or within 6 weeks from the date of listing + share of information on property of sanctioned persons, entities and bodies between EU Member States and the European Commission. The EU has created a special online mechanism through which whistleblowers can report violations of anti-Russian sanction.</p>
<p>10. Deepen Coordination of Sanctions and Link Sanctions Relief to Peace & Reconstruction #Coordinations #Reconstruction</p>	<p>Yes</p>	<p>USA and Canada are preparing legislative acts to use sanctioned assets for compensation to Ukraine. USA: working on policy proposals and legal changes required to move forward with the strategy. EU: works on the possibility of using the frozen RF assets to help Ukraine + EU is ready to create an international platform for the restoration of Ukraine + EU considers it fair and is preparing a legal basis for the frozen RF assets and assets of RF oligarchs. Baltic countries and Slovakia called on the EU to transfer RF assets to Ukraine + is working on "Sanction Berau" launch. Justice Commissioner of EC suggests keeping Russian assets frozen until RF agrees to pay for the reconstruction of Ukraine after the war ends. Germany: Consider the possibility. UK and EU reached an agreement to enact a co-ordinated ban on insuring ships carrying Russian oil. UK. Introduced an urgent procedure for designations of a person/entity on the basis that they have been sanctioned by the US, the EU, Australia or Canada. Switzerland adopts new EU sanctions and replicates the EU lists of sanctioned individuals and entities. Canada (adopted a law allowing freezing and confiscation of Russian-sanctioned assets). Norway adopted the 6th EU sanction package.</p>

Colour legend

New this week
New and good this week
New and neutral/weak this week
New and bad this week (worth attention)

Previous information
Good/Progress
Neutral/Weak progress
Bad/No progress, worth attention/monitoring

Compared to July 6, the number of both good and bad decisions were taken on the sanction field.

Among good ones, the introduction by Latvia of a ban on natural gas supplies from RF from Jan 1, 2023 and the ban on import of RF oil and oil products from 31 Dec with the ban on import of RF coal from Aug by the UK should be highlighted (#Oil).

Also on July 20, EU ambassadors approved the 7th package of sanctions against RF. Among the most important decisions – the ban on the export of gold and jewellery made from it from Russia and the blocking of Sberbank's European assets (#Financial). 7th package also includes new export control measures and restrictions against more than 50 legal entities and individuals, including the mayor of Moscow (#SOE #Individual).

While in #Transport several negative exemptions and amendments have been adopted. In particular, both the EU and the UK allowed technical assistance for RF aircraft. In addition, the EU released guidance for transportation from RF to Kaliningrad, according to which road transit is not allowed, while railway – allowed, but within pre-invasion volumes. Transportation of sanctioned military and dual-use goods and related technologies are entirely prohibited, regardless of the mode of transport. Also, the UK excluded 2 top-managers of Rosneft from the sanction list (#Individuals).

Unfortunately, in the EU's 7th package, the "sanctions policy" of the last 2 weeks is also visible – on the one hand, the EU has strengthened export control of dual-use goods, but, on the other hand – removed ban on the export of luxury goods, allowing personal use by individuals travelling from the EU, and extended the exception to transactions in agricultural products and the transport of oil to third countries (#Trade).

In addition, four Russian banks authorised to serve the Russian defence-industrial complex remain unauthorised - still stay not de-SWIFTed: JSC Gazprombank, PJSC Bank "St. Petersburg", JSC "All-Russian Bank for the Development of Regions" and JSC "Far Eastern Bank". In addition, seven members of the Military-Industrial Commission of RF did not fall under the sanctions of the EU, of which five are also not under the sanctions of the USA and UK.

Other important updates:

#Financial UK (from Jul 21), EU (from Jul 22) and Canada (from Aug 6) ban on RF gold. While the UK prohibited investment activities in respect of land located in RF, persons connected with RF, relevant entities, joint ventures, opening a representative office or establishing a branch or subsidiary located in RF.

#Trade UK ban on export of goods and items of significant importance to the Russian (such as chemicals, materials, machinery goods) and ban on export of accounting, business and management consulting, public relations services.

#Transparency USA established an outbound investment review mechanism to protect U.S. technologies (e.g. semiconductors, batteries, AI etc.) against adversaries like China and RF – notification to the federal government 45 days prior to deal closing is required if the investment involves specified sectors).

#Terrorism USA called RF a “human trafficking” state, while a draft Resolution on recognizing Russia’s actions in Ukraine as a genocide was registered in the US Senate. Active discussion on designating Russia a terrorist state stays continues.

Small progress:

#SOE Canada sanctioned 12 SOEs + 3 private entities involved in disinformation activities, while EU sanctioned 7 SOEs including Sberbank and Russian terrorist funds.

#Coordination EU is working on the launch of the “Sanction Berau”.

Again no progress in **#Secondary** sanctions in the official sanction fields, despite companies themselves continuing severing ties with RF in the fear of secondary sanctions. As FT reports, China stopped investing in the RF under the One Belt, One Road project in fear of secondary sanctions by the US.

Information on freeze and seizure of Russia assets for the benefit of Ukraine:

	Source: Ministry of Foreign Affairs of Netherlands	Source: Information available in open media-sources
Country	Frozen assets	
Belgium	€2.7 bn frozen	
Cyprus	€86.3 mln frozen	
Germany	€341,595 frozen	Has frozen almost \$149,6 mln in Russian assets (May 30). The German Finance Minister put the value of assets frozen by the country alone at €4.48 bn in mid-June (July 12).
Denmark	€4195.00 frozen	
Finland	€300K frozen	Has at their disposal frozen Russian property of at least \$79,5 mln (May 22).
France	€20 bn from Central Bank, €800 mln in private financial assets frozen	
Ireland	€1.26 bn frozen	Ireland has frozen bank accounts, as well as movable and immovable property of Russian individuals and legal entities under sanctions due to the war of the Russian aggressor country in Ukraine worth \$1.8 bn (June 22).
Italy	€586 mln financial assets frozen	
Latvia	€17.5 mln frozen	
Lithuania	€13.5 mln frozen	

Luxembourg	€2.5 bn frozen	Luxembourg operators have frozen the assets of sanctioned Russian individuals and legal entities worth almost \$4.5 bn (June 8).
Netherlands	€640.8 mln frozen, €425.2 mln in transactions held back	Netherlands frozen russian financial assets worth €640.8 mln (May 13).
Poland	€34.5 mln frozen	
Spain	12 bank accounts and three yachts (value unknown)	
Czech Republic	€10 mln frozen	
United Kingdom	Only total figures of Western efforts are known, not specifically the UK.	
Sweden	€28.7 mln frozen	
Switzerland	€7.5 bn frozen	SECO, the government department responsible for handling sanctions, announced that Swiss authorities have so far frozen CHF6.7 billion (\$6.8 bn) of assets belonging to sanctioned Russians. This represents a CHF400 mln increase since mid-May. The total of blocked assets includes 15 properties (July 8).
Australia		Has frozes \$265,7 mln of Russian big businessmen assets - Austrian Press Agency(May 22).
Kazakhstan		Due to sanctions \$21.6 mln has been blocked on the accounts of Russian banks subsidiaries in Kazakhstan (May 23).
EU		EU froze the assets of Russian oligarchs worth \$13 bn (June 20) + The international depository Euroclear blocked the assets of Russians in the amount of about \$27bn, and the volume of non-residents' assets "stuck" in the National Settlement Depository exceeded \$85bn before revaluation - ITI Capital (June 7). The EU has frozen Russian assets worth €13.8 billion since Russia invaded Ukraine on 24 February, but this large sum remains largely untouched across the bloc. A very large part of it, more than €12 billion, is coming from 5 member states (July 12).
REPO (Russian Elites, Proxies, and Oligarchs Task Force)		At the end of June, an international sanctions task force said its members, including several EU countries, had blocked \$30 bn in assets belonging to Russian oligarchs and officials. Also,(REPO said its members, who also include the US, Canada, Britain, Japan and other allies, had immobilised \$300 bn owned by the Russian central bank (June 29).

SANCTION

ENFORCEMENT

UK. The National Economic Crime Centre (NECC), a multi-agency unit in the National Crime Agency (NCA), and HM Treasury's Office of Financial Sanctions Implementation (OFSI), working in conjunction with law enforcement and financial sector partners as part of the Joint Money Laundering Intelligence Taskforce (JMLIT) issued a 'Red Alert' on financial sanctions evasion typologies by Russian elites and enablers. The purpose of the alert is to provide information from law enforcement and the legal and financial services sectors on some of the common techniques designated persons and their UK enablers are suspected to be using to evade financial sanctions.

USA. Intertech Trading Corporation, an Atkinson-based laboratory equipment distributor, has pleaded guilty in the US District Court for the District of New Hampshire to 14 counts of failure to file export information. Between 2015 and 2019, Intertech used false, innocuous descriptions for the sophisticated scientific equipment it was exporting to destinations including Russia and Ukraine. It also significantly undervalued its shipments. Sentencing is scheduled for 17 October 2022. If the court accepts the terms of the plea agreement, Intertech will pay \$10,000 per count and be subject to a 2-year term of corporate probation and monitoring.

The Treasury Department took action to broadly expand the agricultural and medical authorizations in Russia-related General License (GL) 6B. This GL now covers transactions related to agricultural equipment. Its expansion further reiterates that U.S. sanctions on Russia in response to its war against Ukraine do not stand in the way of agricultural and medical trade. This GL authorizes transactions related to (1) agricultural commodities¹, agricultural equipment, medicine, medical devices, replacement parts and components for medical devices, or software updates for medical devices; (2) the prevention, diagnosis, or treatment of COVID19 (including research or clinical studies relating to COVID-19); or (3) ongoing clinical trials and other medical research

¹ Including food for humans (including raw, processed, and packaged foods; live animals; vitamins and minerals; food additives or supplements; and bottled drinking water) or animals (including animal feeds), seeds for food crops, fertilizers or organic fertilizers; reproductive materials (such as live animals, fertilized eggs, embryos, and semen) for the production of food animals.

activities.

Enabling exports of Russian food and fertilizer is a key part of attempts by the United Nations and Turkish officials to broker a package deal with Russia that would also allow for shipments of Ukrainian grain from the Black Sea port of Odessa, which have been blockaded by the war.

SANCTION

LOOPHOLES

EU. On 21 July, EU extended until 31 Dec 2022 (previously - 5 Sep 2022) the wind-down period for transactions, including sales, of a joint venture or similar legal arrangement concluded before 16 March 2022, involving certain state-owned entities, listed in Annex XIX (OPK Oboronprom, United Aircraft Corporation, Uralvagonzavod, Rosneft, Transneft, Gazprom Neft, Almaz-Antey, Kamaz, Rostec (Russian Technologies State Corporation), JSC PO Sevmash, Sovcomflot, United Shipbuilding Corporation).

The EU refused to impose sanctions on the Ural corporation VSMPO-Avisma, which is the world's largest manufacturer of titanium and titanium alloy products - WSJ. The decision was made due to fears of a ban on imports of products into the EU.

As Bloomberg reports, EU is in discussions about removing sanctions it imposed on some Russian individuals over their involvement in Moscow's war in Ukraine after the bloc's lawyers found that the penalties may have been imposed on weak grounds, according to people familiar with the matter. Some 30 individuals have taken the EU to court, asking to be removed from the sanctions lists, and about another 10 have asked the EU directly to be removed, said the people, who asked not to be identified because the process is private.

USA. The Treasury Department took action to broadly expand the agricultural and medical authorizations in Russia-related General License (GL) 6B. This GL now covers transactions related to agricultural equipment. Its expansion further reiterates that U.S. sanctions on Russia in response to its war against Ukraine do not stand in the way of agricultural and medical trade. This GL authorizes transactions related to (1) agricultural commodities, agricultural equipment, medicine, medical devices, replacement parts and components for medical devices, or software updates for medical devices; (2) the prevention, diagnosis, or treatment of COVID19 (including research or clinical studies relating to COVID-19); or (3) ongoing clinical trials and other medical research activities. Enabling exports of Russian food and fertilizer is a key part of attempts by the United Nations and Turkish officials to broker a package deal with Russia that would also allow for shipments of Ukrainian grain from the Black Sea port of Odessa, which have been blockaded by the war.

China. China sells necessary equipment to Russia to continue the war in Ukraine - WSJ. Chinese exports of microchips, electronic components and military raw materials to Russia increased after the invasion of Ukraine. According to customs data, during the first five months of 2022, shipments of microcircuits from China to Russia increased more than 2 times - to 50 million US dollars. The volume of exports of aluminium oxide, which is used for the manufacture of weapons and the aerospace industry, exceeded the indicators of the previous year by 400 times.

Greece. Greek tanker owners, who control nearly a third of the world's fleet, transported about half of Russian crude oil in May and June - WSJ. During two months, Greek vessels called at Russian ports in the Black and Baltic seas 151 times (compared to 2021 - 89). Greek tankers also go to Russian Siberia: the ship arrived in China after loading crude oil from Kozmino in Russia.

Not-sanctioned individuals. Seven members of the Military-Industrial Commission of RF did not fall under the sanctions of the EU, of which five are also not under the sanctions of the USA and UK - Trap Aggressor.

<i>Members</i>	<i>EU</i>	<i>UK</i>	<i>USA</i>
Anton Siluanov (RF Minister of Finance)	Not covered	Not covered	
Denis Manturov (RF Minister of Industry and Trade)	Not covered	Not covered	Not covered
Alexei Kryvoruchko (RF Deputy Minister of Defence)	Not covered		
Yuriy Borisov (RF Deputy Prime Minister)	Not covered	Not covered	Not covered
Alexey Likhachev (Director General of Rosatom);	Not covered	Not covered	Not covered
Maksym Oreshkin (economic adviser to Putin)	Not covered		Not covered
Ihor Artem'ev (former head of the Federal Antimonopoly Service, assistant to the head of RF Gov)	Not covered	Not covered	Not covered

Also, 8 out of 9 top managers of the main Russian defence corporation Rostec did not fall under the sanctions of the EU, UK, Canada, Switzerland, Australia, Japan and New Zealand - Trap Aggressor.

The following are still not under sanctions:

- Ihor Zavyalov (deputy general director, member of the board) (US 28-06-22)

- Vladimir Artyakov (Deputy General Director) (US 28-06-22)
- Dmitry Lelikov (Deputy General Director) (US 28-06-22)
- Maksim Vybornykh (deputy general director) (US 28-06-22)
- Alexander Nazarov (Deputy General Director) (US 28-06-22)
- Nikolai Volobuev (managing director) (US 28-06-22)
- Oleg Yevtushenko (executive director) (US 28-06-22)
- Natalya Borisova (chief accountant, board member) (US 28-06-22).

DETAILED ANALYSIS

1. Expand Oil and Gas Sanctions

G7 (made an obligation to introduce a ban of import RF's oil and discussing about secondary sanctions, introduction of price cap), **EU** (ban of seaborne crude oil and certain petroleum products from RF, pipeline oil supplied is temporarily excluded), **Switzerland** (ban on RF crude oil and petroleum products), **Poland** (refused from RF gas in response to RF cut off, terminated the agreement on the supply of Russian gas), **Bulgaria** (RF cut off gas supplies due to refusal to pay in rubles), **Lithuania** (completely cut import of Russian energy, incl. electricity, ban on transit of RF gas to Kaliningrad region), **Latvia** (ban on natural gas supplies from RF from Jan 1, 2023), **Slovakia** (from Jun 1, reduced its dependence on Russian gas supplies by 66%). **Finland, Netherlands and Denmark** (RF cut off gas supplies after refusal to pay in rubles), **Norway** (ban on purchase, import or transfer of oil transported by sea and supporting services). **UK** (ban on import of RF oil and oil products from 31 Dec, ban on import of RF coal from Aug).

G7. Leaders of G7 countries made an obligation to introduce a ban of import RF's oil, "First, we commit to phase out our dependency on Russian energy, including by phasing out or banning the import of Russian oil." G7 finance ministers discuss secondary sanctions and other ways to limit Russia's oil revenues in Bonn, minimizing the impact on energy prices. According to Jake Sullivan on June 9th the G7 countries discussed the possibility of setting a cap on Russian oil prices.

EU. The EU leaders agreed in principle on the 6th sanctions package including the ban of seaborne oil from RF. Although the pipeline oil supplied is temporarily excluded from the ban, Germany and Poland supplied via the northern route of Druzhba pipeline committed to phase out Russian oil by the end of 2022. Thus, only landlocked Czech Republic, Hungary and Slovakia will continue buying Russian oil via southern Druzhba route with a capacity 0.25 mb/d after 2022 which accounts for about 8% of Russian oil supply to the EU in 2021.

On 3 June, the EU under the 6th package introduced the ban on the purchase, import or transfer of crude oil and petroleum products from Russia into the EU. The ban envisions the elimination of around 90% of RF oil from the EU market by end of 2022.

Full prohibition on crude oil will enter into force on December 5, 2022; on oil products - on February 5, 2023. Current exemptions include (what is allowed): (1) vacuum gas oil purchases for Croatia; (2) pipeline oil purchases for Hungary, Czech Republic and Slovakia; (3) purchases/import/transfer of seaborne oil and petroleum products until 31 December 2024 within contracts concluded before 4 June 2022 - for Bulgaria; (4) seaborne oil and oil products under the contracts concluded before June 4; (5) seaborne oil and oil products under one-off transactions for near-term delivery; (6) if such purchase is "required in order to meet the essential needs of the purchaser in Russia or of humanitarian projects in Russia".

REPowerEU plan adopted on May 18, stipulates steps to rapidly reduce dependence on Russian fossil fuels and fast forward the green transition.

On 21 July, EU replaced the list of goods and technology suited for use in oil refining and liquefaction of natural gas, which are prohibited to sell, supply, transfer, or export, whether or not originating in the EU, to any natural or legal person, entity or body in Russia or for use in Russia.

EU&USA. On June 7th, the US and European countries discussed limiting Russia's revenue from oil sales, US Treasury Secretary Janet Yellen said.

UK. On 21 July, UK prohibited the import of oil and oil products that originate in or are consigned from Russia or the acquisition or supply and delivery of said oil and oil products with the intention of those goods entering into the UK (as well as related technical assistance, financial services and funds, and brokering services). This measure will take effect on 31 December 2022.

On 21 July, UK prohibited the import of coal and coal products that originate in or are consigned from Russia or the acquisition or supply and delivery of said coal and coal products with the intention of those goods entering into the UK (as well as related technical assistance, financial services and funds, and brokering services). This measure will take effect on 10 August 2022 to align with the equivalent EU measure.

RF. On Apr 27, Gazprom halted gas supplies to Bulgaria (Bulgargaz) and Poland (PGNiG), since both companies refused to pay for gas in rubles. Against this background, gas prices in the EU rose by 21%, to \$1,350 per thousand m³.

On June 14, RF stepped up the use of energy as a weapon by further cutting natural gas shipments via its biggest pipeline to EU, trying to drive up prices. Gazprom PJSC is curbing gas supplies via its Nord Stream pipeline to Germany by 60%, increasing an initial cut to Europe's top buyer. The move adds to a 15% reduction in flows to Italy, the continent's second-largest customer of Russian gas, putting more pressure on already tight EU energy markets and sending gas prices surging more than 25%.

Bulgaria. Bulgaria has threatened to block transit of Russian gas to Serbia and Hungary. Bulgarian GoV intends to review contracts with Gazprom, including those for the transit of gas through the Turkish Stream pipeline to Serbia and Hungary. Bulgarian PM said his country could become completely independent of Russian gas by the end of 2022. According to him, Bulgaria has already found alternative gas suppliers.

Poland. In response to the cutoff Polish PM said that Poland can already refuse Russian gas. Previously, Poland suggested taxing oil and gas from Russia in Europe. PGNiG called the cutoff of supplies a breach of contract. On 23 May, Poland decided to terminate the agreement on the supply of Russian gas, which was signed in 1993 and is valid until the end of 2022.

Slovakia. From Jun 1, it is reducing its dependence on Russian gas supplies by 66%, said the Minister of Economy of the Republic.

Moldova. Moldova hasn't yet received a response from Gazprom regarding the postponement of the obligation to conduct a debt audit – supply of Russian gas from May 1 is questionable. In case Gazprom stops supplying, the country plans to buy gas from international traders – 7 international companies, including Romania, Poland and the Netherlands.

Finland. Country cut RF oil imports by 70% in Mar, replacing it with a product from Norway. **Gasum** (Finnish SOE) refused to pay for gas in rubles and submitted a lawsuit against Gazprom to the International Arbitration due to this demand. It also stated that it would not accept such terms of trade. Gazprom Export informed Gasum that natural gas supplies to Finland under Gasum's supply contract would be cut on May 21.

Netherlands. Russia cut gas supply to the Netherlands (GasTerra, Dutch gas trader) for refusing to comply with a demand to pay for gas in rubles just several days after it cut the supply to **Denmark** for the same reason (Ørsted (Denmark's largest energy company) has officially refused to open an account to pay for RF's gas in rubles).

Lithuania. As of 22 May have completely cut import of Russian energy supplies, i.e. oil, electricity or natural gas – Nord Pool, a pan-European power exchange, has decided to stop trading Russian electricity from its only importer in the Baltic States Inter RAO.

The Seimas of Lithuania officially banned by law the import of Russian natural gas, transit to the Kaliningrad region. The Seimas adopted the relevant amendments to the Law on Natural Gas. According to them, only suppliers from countries that do not pose a threat to national security will be able to use the gas transmission system of the country and the LNG terminal of Klaipėdos Nafta, except for suppliers transporting gas in transit to Kaliningrad.

Latvia. On July 14, Latvian parliament, Saeima, adopted in the final reading the amendments to the Energy Law, stipulating a ban on natural gas supplies from RF to Latvia beginning on Jan 1, 2023. The Saeima also adopted rules for specific cases when negotiating with the regulatory authorities of other EU countries on ways to ensure the ban on natural gas supplies from RF. The rules will apply to cases when Conexus Baltic Grid, the Latvian operator of the natural gas transmission and storage system, is negotiating with the operator of another EU country on creating a unified natural gas transmission system.

Norway. Prohibition on the purchase, import or transfer of oil transported by sea. Prohibition on providing technical assistance, financing, etc. related to the purchase, import or transfer of oil; prohibition on providing technical assistance, financing, etc. concerning the transport to third countries of oil originating in Russia or having been exported from Russia.

Switzerland. Switzerland prohibited the purchase, import or transfer transit and transport into and through Switzerland of crude oil and petroleum products from Russia or originating in Russia. This embargo will be brought into force progressively, as is the case in the EU, taking full effect by the beginning of 2023 following a number of transitional periods. Switzerland imports Russian petroleum products from European member states; in order to take into account the complex transitional periods foreseen by the EU, exceptions are envisaged in Switzerland for Russian oil and petroleum products that were legally imported into an EU member state prior to the new measures.

2. Increase Transportation and Insurance-Related Sanctions

USA (ban RF vessels from US ports + SDN for RF SOE shipping company + 6 private shipping companies + 1 maritime engineering company + 69 vessels), **Norway** (close its borders and ports to Russian trucks and ships), **Canada** (1 manufacturer of gas turbine engines), **UK** (+3 airlines + extension of transport restrictions for Belarus, as well as, closed UK port for Belarus-related ships + **allowed necessary technical assistance for temporarily detained aircraft**), **EU** (discussing ban on insurance of vessels carrying RF oil, **but thinks allow EU vessels to transport Russian oil and fuel to 3rd countries + extended existing port access ban + allowed technical assistance to RF for aviation**), **EU+UK** (co-ordinated ban on insuring ships carrying Russian oil), **Lithuania** (applied transit restrictions on goods subject to EU sanctions between the main part of Russia and the Kaliningrad region), **EU + Lithuania** (EU released guidance for transportation from RF to Kaliningrad – road transit is not allowed, railway – allowed in volumes compared to pre invasion deliveries, transportation of sanctioned military and dual-use goods and related technologies are entirely prohibited, regardless of the mode of transport), **Switzerland** (ban on supporting services, including insurance or reinsurance, for transportation of RF oil and certain petroleum products to any destination).

USA. The White House issued a proclamation banning Russian-affiliated vessels from entering U.S. ports, effective Apr 28, 2022. Banned vessels include Russian-flagged vessels, vessels owned by Russian persons, and vessels that are Russian operated. The order authorizes the U.S. Department of Homeland Security to issue regulations to implement the ban.

On 8 May, the Department of State designated 8 RF maritime-related companies. This includes RF MinDefense's shipping company, Oboronlogistika OOO, as well as private Russian maritime shipping companies that transport weapons and other military equipment for RF GoV - SC South LLC, JSC Northern Shipping Company, Transmorflot LLC, M Leasing LLC, Marine Trans Shipping LLC, Nord Project LLC Transport Company. The Department of State also took action against vessels these maritime shipping companies have an interest in with the addition of 69 vessels to the Department of the Treasury's SDN List.

The Department of State also designated one Russian maritime engineering company (OOO Fertoing) that works with the RG GoV and Russian SOEs (complex marine surveys, navigational, hydrographic and underwater technical support for the construction and operation of facilities for subsea production complexes, offshore, river, and pipeline transport).

Norway. Norway announced that it will Close its borders and ports to Russian trucks and ships from 7 May. Russian fishing vessels, which often land their catch at ports in northern Norway, will receive exemptions from sanctions.

Canada. On 6 May, amended the Special Economic Measures (Russia) Regulations added the UEC Klimov JSC (manufactures gas turbine engines, main gearboxes and accessory drive gearboxes for transport aircraft) company to the list.

UK. On 19 May, UK GoV introduced new sanctions: Aeroflot (SOE - Russia's largest airline), Ural Airlines and Rossiya Airlines (SOE) will be unable to sell their unused, lucrative landing slots at UK airports – preventing Russia from cashing ~£50 mln.

On 5 July, an existing prohibition on providing technical assistance to designated persons in relation to aircraft in Belarus was widened to include technical assistance provided in relation to ships. The current aircraft restrictions were widened so that it will now be an offence for certain Belarus-related aircraft to land in, or overfly, the UK, and for such aircraft to be registered in the UK. UK also gave the Secretary of State power to direct an airport operator to detain a Belarusian aircraft as well as provided the possibility to require refusal of applications for registration, or termination of existing registration, of aircraft owned by designated persons. Conditions relating to the exercise of the power of the Secretary of State to designate persons under the standard procedure and the urgent procedure, which was introduced by the Economic Crime (Transparency and Enforcement) Act 2022, are set out.

UK also added shipping restrictions, prohibiting certain Belarus-related or other ships specified by the Secretary of State from entering UK ports or being registered in the UK, and providing powers to the Secretary of State to direct the movement and detention of such ships.

On 18 July, UK clarified that aircraft or ships owned via a majority interest in a company are in scope under shipping and aircraft sanctions.

On 21 July, UK amended the current aviation technical assistance measures which were introduced on 30 March which apply to "Russian aircraft" to allow necessary technical assistance for temporarily detained aircraft in the ownership of suspected designated persons, at a UK airport, given the rapid rate at which aircraft degrade.

EU. 6th package imposes prohibition to provide, directly or indirectly, technical assistance, brokering services or financing or financial assistance, related to the transport, including through ship-to-ship transfers, to third countries of crude oil or petroleum products (insurance and reinsurance). Prohibition doesn't apply to contracts concluded before June 4th (until December 5, 2022). All exemptions to energy sanctions of the 6th package apply to insurance.

On 31 May, UK and EU reached an agreement to enact a co-ordinated ban on insuring ships carrying Russian oil, shutting Moscow out of the vital Lloyd's of London insurance market and sharply curbing its ability to export crude oil.

In an attempt to defuse rising tensions between Lithuania and RF, the European Commission on 13 July updated its guidelines on the management of the movement of sanctioned goods between the country's mainland and its Kaliningrad exclave. According to the released guidance, while transit by road was not allowed, no such prohibition exists for rail transport from Russia to its outpost of Kaliningrad and that it could not be subject to an outright ban. Russia will be allowed to transit civilian-use goods on the sanctions list, by rail through Lithuania in amounts comparable to pre-invasion deliveries. National authorities will be required to check that transit volumes remain within the historical 3-year average and that there are no unusual flows or trade patterns, especially regarding potential dual-use goods. However, it clarified that goods subject to existent EU sanctions, such as steel and cement, will not be allowed to transit by road. At the same time, sanctioned military and dual-use goods and related technologies are entirely prohibited, regardless of the mode of transport.

On 21 July, EU extended the existing port access ban to locks in the territory of the EU after 29 July 2022 (with the exception of access to locks for the purpose of leaving the territory of the EU) to avoid the circumvention of sanctions.

On 21 July, EU introduced clarifications to existing measures in the field of aviation. Technical assistance to Russia for aviation goods and technology will be allowed insofar as it is needed to safeguard the technical industrial standard setting work of the International Civil Aviation Organization.

Lithuania. On June 18, Lithuania began to apply transit restrictions on goods subject to EU sanctions between the main part of Russia and the Kaliningrad region. Lithuania blocked transshipment through its territory for RF – Kaliningrad region is blocked. Neither to the Kaliningrad region, nor from the Kaliningrad region, a train can be sent through the territory of Lithuania. The only supply and transportation options are ships and ferries now. In response, Russian Baltic Fleet troops began training missile and artillery units in Kaliningrad region after Lithuania stopped passing transit trains with EU-sanctioned goods through its territory.

Lithuania halted the transport of more goods to Kaliningrad as certain trade restrictions introduced by the EU's 5th package of Russia sanctions take effect. Bans on the following were subject to a transition period until 10 July 2022 for contracts concluded before 9 April 2022:

- the purchase, import or transfer (directly or indirectly) into the EU of certain goods, including furniture and parts, cement, wood, caviar and alcohols, as well as the provision of related services; and
- the sale, supply, transfer or export (directly or indirectly) of goods which could contribute in particular to the enhancement of Russia's industrial capacities to any person or entity in Russia or for use in Russia, as well as provision of related services.

Switzerland. In addition, the embargo provides for a ban on the provision of services (technical assistance, brokerage and financial services as well as the granting of finance), including insurance or reinsurance, in connection with the transport of oil and certain Russian petroleum products to any destination. The prohibition does not apply to crude oil and petroleum products if these goods are only transported through Russia and are not owned by Russia

3. Impose New Financial Sanctions

USA (SDN on Transkapitalbank, Investtradebank; virtual currency mining company Bitriver AG + 10 RF subsidiaries + SDN on Moscow Industrial Bank (SOE) + 10 its subsidiaries, did not to renew the General Licence 9C, which previously allowed RF to pay its debt + 7 luxury asset management and service companies associated with Putin's inner circle + 6 yacht linked companies + 4 companies connected with Mordashov, including Severstal + ban on purchasing Russian securities on the secondary market + extended until 5 Dec 2022 license allowing for energy financing transactions via RF banks + 71 (SDN List) + 45 RF entities in aerospace, defence and related materiel sector, financial services or technology sectors (sanction lists mostly consist from major RF SOEs and their subsidiaries) + asset freeze on Heritage Trust + ban on import of gold from RF + 2 Kazakh subsidiaries of Alfa-Bank were bought by Kazakhstan bank and excluded from SDN list + issued General License authorizing transactions through Dec 16, 2022 involving Gazprom Germania GmbH), **UK** (10 defense companies asset freeze + asset freeze for Evraz plc + ban export of banknotes denominated in sterling or any official currency of the EU, +5 RF entities + announced ban on trusts services + asset freeze on RF analytical centre + extended existing restrictions on Belarus on dealing with financial instruments and providing loans to a broader range of transferable securities, money market instruments, loans and credit + prohibited transactions related to the management of reserves as well as of assets of CB Belarus and Belarus MinFin + financial sanctions reporting obligations were extended to include crypto asset exchange providers and custodian wallet providers + ban on RF gold and ancillary services, exported from RF after Jul 21, but gold exported from RF before 21 July 2022 is not in scope + prohibited investment activities in respect of land located in RF, persons connected with RF, relevant entities, joint ventures, opening a representative office or establishing a branch or subsidiary located in RF), **Poland** (+ 37 entities on top of EU lists), **Switzerland** (ban on trusts registering by Russians + de-SWIFT 3 RF and 1 Belarus banks + sanctioned 18 RF and 8 Belarus entities connected with Armed Forces of Russian and GoV + ban on audit, business and pr consultancy services), **New Zealand** (assets freeze and

dealing with securities ban) against the CBR, the Russian Direct Investment Fund (RDIF) plus against 8 largest and 8 other banks linked to oligarchs (8 SOEs), + 4 in defense (1 RF SOE and 1 Belarus SOE) and 2 in shipbuilding (1 RF SOE) + sanctions on 44 entities (38 RF and 6 Belarus) that are funding or fuelling the war, including 32 RF SOEs and 3 Belarus SOEs + banned import of Russian gold from July 25), **Canada** (5 defense and machine building companies + asset freeze and dealing prohibition on 4 RF financial institutions and banks + 46 RF defence entities, + 2 Belarus entities + import ban on RF gold after Aug 6), **EU** (de-SWIFT 3 RF banks + 1 Belarus; restrictive measures for 18 entities that support RF military and security; restrictive measures for 8 entities in Belarus + ban on RF gold and gold jewelries, exported from RF after July 22 + prohibition on accepting deposits was extended to include those from legal persons, entities or bodies established in 3rd countries and majority-owned by Russian nationals or natural persons residing in Russia + 9 entities (inc. 7 SOEs + entering into any transactions with RF public entities necessary to ensure access to judicial, administrative or arbitral proceedings was allowed (further investigation of exemption is needed)), **Japan** (asset freeze 2 RF and 1 Belarus banks + asset freeze for 6 RF entities + Japan MinFin imposed an embargo on the purchase of Russian gold on July 5, comes into force on 1 Aug, 2022), **Norway** (de-SWIFT 3 RF banks; restrictive measures for 18 entities that support RF military and security), **Australia** (announced ban import of Russian gold).

EU. The EU extended the existing prohibition on the provision of specialised financial messaging services (SWIFT) to 3 additional Russian banks - Russia's largest bank Sberbank, Credit Bank of Moscow, and Russian Agricultural Bank - and the Belarusian Bank for Development and Reconstruction.

On 3 June, the European Council imposed restrictive measures (freeze of funds or economic resources and prohibition on the making available of certain funds or economic resources) on 18 entities (including 6 SOE + 4 owned by SOE on 27%) in response to Russia's military aggression against Ukraine and other actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine. This decision is a part of the comprehensive 6th package of sanctions. The 18 sanctioned entities include a variety of companies supporting, directly or indirectly, the Armed Forces of Russia and GoV².

The EU said that any transaction involving payment in favour of the Russian National Settlement Depository is subject to sanctions. The amount of foreign securities of Russian residents blocked by the EU in the National Settlement Depository is approximately 6 trln RUB. NSD came under EU sanctions on 3 June.

On 3 June, the EU Council imposed restrictive measures (freeze of funds or economic resources and prohibition on the making available of certain funds or economic resources) on 8 legal entities (including 3 SOE) involved in the continuation of internal repression and human rights violations in Belarus³.

On 21 July, EU introduced a prohibition to purchase, import, or transfer gold (gold unwrought or in semi-manufactured forms, or in powder form; waste and scrap of gold, including metal clad with gold but excluding sweepings containing other precious metals; gold coins), if it originates in Russia and it has been exported from Russia into the EU or to any third country after 22 July 2022. It is also prohibited to purchase, import, or transfer, directly or indirectly the products of gold when processed in a third country incorporating said products originated in Russia.

EU also prohibited the purchase, import, or transfer of jewellery of gold or containing gold, or of metal clad with gold and goldsmiths' or silversmiths' wares of gold, containing gold, or of metal clad with gold, if it originates in Russia and it has been exported from Russia into the EU after 22 July 2022.

On 21 July, EU expanded the scope of the prohibition on accepting deposits to include those from legal persons, entities or bodies established in third countries and majority-owned by Russian nationals or natural persons residing in Russia. Additionally, it subjected the acceptance of deposits for non-prohibited cross-border trade to a prior authorisation by the national competent authorities.

On 21 July, the Council listed additional 9 entities (inc. 7 SOEs), including AVLITA Stevedoring Company, the nationalist motorcycle club Nightwolves MC, the Alexander Gorchakov Public Diplomacy Fund (SOE), the Federal Agency for the Commonwealth of Independent States Affairs (SOE), Compatriots Living Abroad and International Humanitarian Cooperation (Rossotrudnichestvo) (SOE), Russkiy Mir Foundation (SOE), JSC Research and Production Association "Kvant" (SOE), Sberbank (SOE), FORSS Group of Companies, All-Russia "Young Army" Military Patriotic Social Movement (SOE).

² (JSC GARNIZON (SOE), JSC OBORONENERGO (SOE), OJSC Ulyanovsk Automobile Plant (UAZ), JSC VOENTELECOM (VOYENTELEKOM) (SOE), JSC VOENTORG (SOE), VOENTEKSTILPROM LLC, INDEPENDENT INSURANCE GROUP, PJSC KAMAZ alias KAMAZ PTC (SOE), JSC KRONSHADT TEKHNLOGII Group of Companies, Management Company Tatneft-Neftekhim LLC (owned by Tatneft (27% SOE)), Nizhnekamsk All-Steel Tyre Plant (owned by Tatneft (27% SOE)), LLC, PJSC Nizhnekamskshina (owned by Tatneft (27% SOE)), LLC TD KAMA(owned by Tatneft (27% SOE)), OJSC Balashikha Casting and Mechanical Plant (SOE), JSC REMDIZEL (SOE), JSC SUKHOI Company (SOE), JSC "121 AIRCRAFT REPAIR PLANT" (SOE) and Russia's largest securities depository, the National Settlement Depository.

³ OJSC "Belaruskali" (private), JSC "Belarusian Potash Company" (private), "Inter Tobacco" LLC (private), OJSC "Naftan" (private), OJSC "Grodno Tobacco Factory Neman" (SOE), Beltamozhservice (SOE), OJSC "Managing Company of Holding 'Belkommunmash'" (private), Belteleradio Company / National State Television and Radio Company of the Republic of Belarus (SOE).

In order to ensure access to justice, the EU allowed an exemption from the prohibition to enter into any transactions with Russian public entities necessary to ensure access to judicial, administrative or arbitral proceedings.

On 21 July, EU sanctioned Syrian private security company Al-Sayyad Company for Guarding and Protection Services Ltd (also known as "ISIS Hunters") involved in the recruitment of Syrian mercenaries to fight in Ukraine alongside Russian troops.

USA. The US OFAC designated Public JSC Transkapitalbank ("TKB") and its subsidiary, Investtradebank, on its Specially Designated Nationals and Blocked Persons ("SDN") List. U.S. persons are broadly prohibited from conducting business with the banks or with entities that are owned 50% or more by the newly designated SDNs without authorization from OFAC. U.S. persons must also formally "block" (freeze and report) any property or interests in property of the banks.

OFAC for the 1st time designated RF virtual currency mining company Bitriver AG and its 10 Russia-based subsidiaries as SDNs. This prohibits U.S. and U.S. citizens from operating on Bitriver or its property and interests, and requires US individuals to formally freeze any property or interests owned by Bitriver that they own or control.

On 8 May, OFAC designated a Russian state-owned bank JSC Moscow Industrial Bank (MIB) and 10 of its subsidiaries⁴.

The Biden administration is ready to completely block Russia's ability to pay the owners of US bonds, this step could bring it closer to default. On 18 May it was confirmed that they plan to block payments on RF GoV debt after May 25. USA announced not to renew the provisions of General License 9C (transactions in debt or equity of Bank Otkritie, Sovcombank, Sberbank, VTBBank, Alfa-Bank, Alrosa, CBR, NWF and MinFin of RF) pursuant to the Russian Harmful Foreign Activities Sanctions Regulations that expire on 25 May and allowed Russia to make payments to US bondholders, which could bring Moscow closer to default.

On 2 June, OFAC 7 sanctioned a series of luxury asset management and service companies associated with Vladimir Putin's inner circle: SCF Management Services Cyprus Ltd - Russian state-owned, Cyprus-registered company for being owned or controlled by, or for having acted or purported to act for or on behalf of, directly or indirectly, RF GoV; Ironstone Marine Investments, JSC Argument, and O'Neill Assets Corporation for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, Vladimir Putin; Non-Profit Partnership Revival of Maritime Traditions for operating or having operated in the marine sector of the Russian economy; and LLC Gelios (Russian subsidiary of Revival of Maritime Traditions) for being owned or controlled by, or for having acted or purported to act for or on behalf of, directly or indirectly, Revival of Maritime Traditions.

OFAC also designated Imperial Yachts SARL - a yacht brokerage that offers a variety of services relating to superyachts, including their design, order, charter, and management. Imperial Yachts provides yacht-related services to Russia's elites, including those in President Putin's inner circle. Imperial Yachts conducts business with U.S.-designated oligarchs, including through providing management services to at least one yacht linked to an OFAC-designated individual.

OFAC imposed sanctions on OOO Nord Marine, OOO Yakht-Treid, OOO Bilding Management, and OOO Nord Marin Inzhiniring for being owned or controlled by, or for having acted or purported to act for or on behalf of, directly or indirectly, Kochman; San Marino-based SRL Skyline Aviation for operating in the Crimea region of Ukraine.

The U.S. Department of State imposed sanctions on companies linked to Alexey Aleksandrovich MORDASHOV - Public Joint Stock Company Severstal, Severgroup Limited Liability Company, Limited Liability Company Algoritm, Nord Gold Plc.

On June 6th, the US Treasury expanded sanctions against Moscow, banning American investors from purchasing Russian securities (sovereign and corporate bonds) on the secondary market.

On 6 June, OFAC issued a series of FAQs that provide guidance on three recent Executive Orders, which imposed bans on certain "new investment" in Russia: Executive Order 14071, which on April 6 banned new investment in Russia by a US person; Executive Order 14066, which on March 8 banned new investment in the Russian energy sector by a US person; and Executive Order 14068, which on March 11, banned new investment in any sector of the Russian economy determined by the Secretary of the Treasury, in connection with the Secretary of State. Most of the FAQs clarify the concepts specified in these Executive Orders.

The US Treasury has tightened its interpretation of the sanctions regime on Russian debt, effectively banning US investors from buying Russian sovereign and corporate bonds on the secondary market. FAQ 1054 provided that Executive Orders 14071, 14066, and 14068 prohibit the purchase of both new and existing debt and equity securities issued by an entity in Russia. This prohibits US persons from engaging in secondary market trading in pre-existing bonds and debt issued by Russian companies.

Additionally FAQ 1054 clarifies that the three Executive Orders do not prohibit the sale or divestment of - or facilitating the sale or divestment of - debt or equity securities issued by an entity in Russia to a nonUS person. The FAQ also states that a US person

⁴ Agropromyshlenny Kompleks Voronezhskii OOO, Anninskii Elevator OOO, Auditkonsalt OOO, Belinveststroj OOO, Dve Stolitsy OOO, Kontrakt OOO, Ladoga OOO, Nekommercheskaya Organizatsiya Fond Khimicheskoe Razozhuzhenie I Konversiya, Azovskaya Zernovaya Kompaniya OOO, Ekspuluiruyushchaya Kompaniya Tsentri OOO

may continue to hold such previously acquired securities, and to convert depositary receipts to underlying local shares of non-sanctioned Russian issuers.

On June 8th a group of US lawmakers said that they would introduce a bill to the US House of Representatives and Senate that would ban companies doing business with RF GoV receiving government contracts from US agencies - The Washington Examiner.

On June 14, 2022, OFAC reissued General License 8C "Authorizing Transactions Related to Energy", which extends until December 5, 2022 the previous authorization (which was set to expire on June 24, 2022) for transactions "related to energy" involving certain sanctioned Russian financial institutions (VEB Bank, Bank Financial Corporation Otkritie, Sovcombank, Sberbank, VTB Bank, Alfa-Bank and the Central Bank of Russia). The scope of the General License did not change since the previous reissuance.

On 28 June, OFAC issued a Determination pursuant to E.O. 14068 of March 11, 2022 ("Prohibiting Certain Imports, Exports, and New Investment With Respect to Continued Russian Federation Aggression") prohibiting import of gold of Russian origin. Russian-origin gold includes gold produced, manufactured, extracted, or processed in Russia but not gold that has been incorporated or substantially transformed into a foreign-made product. Determination excludes gold of Russian origin that was located outside of Russia prior to the effective date of this determination (June 28, 2022).

On June 28, 2022, OFAC added 71 entities to the SDN List, with a focus on Russia's aerospace, defence and related materiel sector, financial services or technology sectors. The designations target major state-owned defense companies, defense research organizations, and military operations in Ukraine implicated in international human rights violations.

The major target of the new SDN designations are **State Corporation Rostec**, the cornerstone of Russia's defense, aerospace, industrial, technology, and manufacturing sectors, and its numerous subsidiaries (JSC RT-Tekhpriemka (conducts quality control for the production of aeronautical, space equipment, and dual-use technology), JSC Shvabe, JSC Tekhnodinamika (designer and manufacturer of aircraft equipment), OJSC Russian Electronics, RT-Business Development (engages in asset management and direct investments in non-controlling interests of businesses in the natural resources, technology, and infrastructure industries), RT-Capital LLC (engaged in debt and financial restructuring and the management of real estate), RT-Inform LLC (engaged in the implementation of trade and procurement activities of holding companies and organizations of Rostec), RT-Project Technology OJSC (conducts Rostec assets management)). Sanctions are also imposed on subsidiaries of **OJSC Russian Electronics - AO Elektron Optronik**, AO Nauchno issledovatel'skii institut promyshlennogo televideniya Rastr, AO Nauchno issledovatel'skii institut sredstv vychislitel'noi tekhniki, AO Nauchno proizvodstvennoe predpriyatie Svyaz, AO Ryazanskii zavod metallokeramicheskikh priborov, AO Spetsialnoe konstruktorskoe byuro vychislitel'noi tekhniki, AO Spetsialnoe proektno konstruktorskoe byuro sredstv upravleniya, AO NPP Tsiklon Test, JSC Central research institute Cyclone, JSC Meteor Plant, JSC Plasma, JSC Russian research institute Electronstandart, JSC Scientific and research institute of electronic engineering materials, JSC Scientific production enterprise Kontakt, JSC Scientific research institute Giricond, JSC Scientific research institute of electrical carbon products, JSC Scientific research institute Platan With Plant, JSC Special relay system design and engineering bureau, JSC Trading house Rosel, Scientific and research institute Ferrit Domen. This action expands previous U.S. sanctions on certain Rostec-related entities, including Rostec's preexisting designation on OFAC's Sectoral Sanctions Identifications List and on Directive 3 under EO 13662.

In addition, OFAC designated Rostec subsidiary **PJSC United Aircraft Corporation (UAC)** and its subsidiaries and affiliated entities:

- **Irkut Corporation JSC** and its own subsidiaries and affiliated entities - Energotsentr Irkut (chemicals, petroleum, rubber, and plastic company), Irkut-Avtotrans (transport, freight, and storage company), Irkut-Remstroj (construction company), Irkut-Stanko Service (business services company), Rapart Servisez (wholesale business), Sportivno-ozdorovitel'nyi tsentr Irkut-Zenit (leisure company), LLC Networking company Irkut (utilities company), Tipografiya Irkut (printing and publishing company);
- **Tupolev PJSC**, Russia's leading designer and producer of strategic bombers and long-range aircraft, and its subsidiaries - LLC Kapo-Avtotrans, LLC Kapo-Zhilbiltservis;
- **PJSC Taganrog Aviation Scientific-Technical Complex N.A.G.M. Beriev (TANTK)**, produces a variety of aircraft, including the Be-200 amphibious aircraft and the A-50E early radar warning aircraft;
- **JSC Flight Research Institute N.A. M.M. Gromov** (Gromov Flight Research Institute), R&D center that includes ground and flight test complexes;
- **OJSC Ilyushin Aviation Complex**, produces civil and military aircraft;
- **JSC Ilyushin Finance Company**, financial services company;
- **JSC United Engine Corporation (UEC)**, produces engines used for military, civil, and space purposes;

OFAC also designated:

- **Kamaz Publicly Traded Company** (Russia's largest truck manufacturer) and its subsidiaries and affiliated entities - AO Torgovo-finansovaya kompaniya Kamaz (new and used car dealer engaged in the wholesale and retail sale of vehicle parts, supplies, and equipment), Begishevo airport JSC (airport in Republic of Tatarstan), JSC Krasnodarskiy avtocentr Kamaz (official dealer with the authority to sell Kamaz vehicles as well as Nefaz buses), Leasing company Kamaz Incorporated (specializes in selling Kamaz vehicles), MIKAM Holdings Limited (investment holding company registered in Cyprus), NEFAZ

Publicly traded company (manufactures buses, trailers, and other largest vehicles for Kamaz), Non-state pension fund First Industrial Alliance (pension fund provider), PJSC Tutaev motor plant (manufactures internal combustion engines), Chelnyvodokanal OOO (operates the on-site water supply facilities of Kamaz).

- several Russian companies in the information-security sector, including JSC Concern Avtomatika, and JSC Information Security Reform;
- Advanced Research Foundation (FPI), defense research organization;
- **EMC SUD Limited** (legal entity registered in Hong Kong used by KOKOREV, Alexander Aleksandrovich as part of his network and for procurement for or on behalf of the FSB).
- **BM BANK JSC**;
- **Zalog OOO, LLC PFMK and LLC Alfa-Invest** (linked to General Director of Kamaz PJSC KOGOGIN Sergei Anatolyevich).

Companies and organizations participating in the invasion of Ukraine were also sanctioned - **Interregional social organization union of donbas volunteers**, **State flight testing center named after V.P. Chkalov**, **the private military company LLC RSB-Group and LLC Private security organization RSB-Group**.

OFAC also blocked the property and interests in property subject to U.S. jurisdiction of the Donetsk People's Republic and Luhansk People's Republic.

Simultaneously, on 28 June, the Department of State also imposed sanctions on 45 entities, including:

- three Russian Federation military units, the **76th Guards Air Assault Division** and its subordinate **234th Guards Airborne Assault Regiment**, as well as the **64th Separate Motorized Rifle Brigade**, and Russia's **Federal Security Service (FSB)** for violations of international humanitarian law;
- the Uzbekistan-based Promcomplektlogistic Private Company, which has actively supported Radioavtomatika in its effort to evade U.S. sanctions. Promcomplektlogistic Private Company's conduct has included providing electronic components such as microcircuits to Radioavtomatika. Additionally, Promcomplektlogistic Private Company is being concurrently added to the Department of Commerce's Entity List;
- 40 entities that operate in the defence and related materiel sector of the Russian economy - **JSC Ryazan State Instrument Making Enterprise** (develops and produces airborne avionics for Russia's combat aircraft), **JSC Production Association Strela** (involved in developing and producing missiles for Russia's Ministry of Defense), **JSC Corporation Moscow Institute of Heat Technology** (develops missiles for Russia's Ministry of Defense), **JSC Ramensky Instrument Engineering Plant** (produces navigation systems and other equipment for the Russian military's fighter aircraft and armed unmanned aerial vehicles), **Krylov State Scientific Center Federal State Unitary Enterprise** (shipping research center that conducts R&D on naval shipping topics, including naval weapons, submarines, and other military naval products), **JSC Shipbuilding Corporation Ak Bars** (shipbuilding entity that undertakes activities for Russia's State Defense Order, including producing missile corvette vessels for Russia's Navy), **JSC Research and Production Enterprise Radar MMS** (involved in developing targeting complexes for Russia's Ministry of Defense combat aircraft), **JSC Research Institute Polyus of M.F. Stelmakh** (carries out Russia's State Defense Order, including by making laser systems for Russia's military and developing other military devices), **JSC Obninsk Research and Production Enterprise Technologiya named after A. G. Romashin** (carries out Russia's State Defense Order, including by producing items for the Russian Federation military's fighter aircraft), **JSC Permskiy Zavod Mashinostroitel** (develops and produces missiles for Russia's military), **JSC Machine-Building Engineering Office Fakel Named After Akademika P. D. Grushina** (develops and manufactures missiles for the Russian Federation military's air defense systems), **JSC North Western Regional Center of Almaz Antey Concern Obukhovskiy Plant** (designs and manufactures weapons systems and military equipment and is involved in producing Russia's S-400 air defense missile system), **JSC Radiozavod** (manufacturers control systems for Russia's Ministry of Defense, including for weapon systems), **JSC Arzamassky Priborostroitelnny Zavod Imeni Plandina** (manufacturers "special purpose products" and instruments for aircraft), **JSC All Russian Research Institute of Radio Engineering** (carries out tasks for the Russian State Defense Order, including regarding research related to radars, missiles, and other weapons), **Moscow Institute of Electromechanics and Automatics JSC** (conducts avionics R&D for Russia's military airplanes), **LLC Nauchno-Proizvodstvennoye Obyedineniye Radiovolna** (designs and manufactures radomes for Russia's defense applications), **Kizlyar Electromechanical Plant JSC** (manufacturers defense products, including a helicopter for Russia's Aerospace Forces), **JSC Production Association Ural Optical and Mechanical Plant Named After E.S. Yalamov** (develops instruments for Russia's combat aircraft, helicopters, and naval ships), **CJSC Scientific Production Enterprise Topaz** (develops and produces hardware and software used for military aircraft of Russia's Armed Forces), **Kaluga Research Institute of Radio Engineering JSC** (produces electronic warfare systems for Russia's military aircraft), **Aviaavtomatika Named After V. Tarasov JSC** (develops equipment for Russia's military aircraft), **JSC Research and Development Enterprise Almaz** (develops and produces electronic warfare (electronic countermeasures) equipment as well as other electronic products for Russia's military systems), **JSC Center of Research and Technology Services Dinamika** (designs and manufactures flight simulators for Russia's military aircrews), **State Research Institute of Aviation Systems State Research Center of the Russian Federation** (scientific center for military aviation research that focuses on military aviation combat systems and aviation weapons), **Federal Service for Military-Technical Cooperation** (supervises Russian organizations empowered to carry out foreign trade activities regarding military purpose products), **JSC Special Design Bureau Turbina** (produces engines for Russia's armored vehicles, missiles, and artillery systems), **PJSC Research and Production Corporation Istok Named After A.I. Shokin** (produces electronic warfare systems for Russia's Ministry of Defense), **JSC State Scientific Research Institute Kristall** (produces ammunition and bombs), **OJSC Moscow Machinery Building Plant Avangard** (produces missiles for Russia's S-300 and S-400 anti-aircraft systems), **Mariyskiy Machine-**

Building Plant OJSC (manufacturers Russia's air defense systems), **OJSC Start Scientific and Production Enterprise Named After A. Yaskin** (produces and services missiles, including for Russia's Navy), **OJSC Khabarovsk Radio Engineering Plant** (specializes in activities related to Russia's anti-aircraft missile systems), **JSC Vyatskoye Mashinostroitelnoye Predpriyatiye Avitek** (manufactures missiles and components for Russia's air defense systems), **JSC All-Russian Research Institute Signal** (develops equipment for Russia's Armed Forces, including combat robots and unmanned ground vehicles), **JSC Radiopribor** (manufactures and installs electronic warfare systems on Russia's military aircraft), **PJSC Vypel Interstate Corporation** (involved in the development of Russia's missile defense systems),

- two Russian entities that operate in the aerospace sector of the Russian economy: **JSC Scientific and Production Association of Electro Mechanic** (develops items for Russia's missiles, combat aircraft, and other aerospace systems), **Ramenskoye Design Company JSC** (integrator and supplier of avionics for Russia's aircraft, helicopters, and unmanned aerial vehicles, including manufacturing heads-up displays for Russia's fighter aircraft).
- **Rosoboronexport JSC** (sole state-controlled intermediary agency for exporting and importing the entire range of military, defense, and dual-use products, technologies, and services) because it is owned or controlled by, or has acted or purported to act for or on behalf of, directly or indirectly, the Government of Russia and because it is a political subdivision, agency, or instrumentality of the Government of Russia.

On June 30, OFAC issued a Notification of Blocked Property to Heritage Trust, a Delaware-based trust in which OFAC-designated Russian oligarch Suleiman Abusaidovich Kerimov holds a property interest. As of June 30, 2022, Heritage Trust holds assets valued at over \$1bn.

On 14 July, OFAC deleted Kazakhstan-based subsidiaries of Alfa-Bank - SB Alfa-Bank JSC - from its SDN List. It was added to the OFAC's SDN List on 6 April 2022. It was announced on 6 May 2022 that Bank CenterCredit JSC completed the transaction for the acquisition of 100% ordinary shares in SB Alfa-Bank Kazakhstan JSC.

On July 14, OFAC issued General License 30A authorizing transactions through December 16, 2022 involving SEFE Securing Energy for Europe GmbH (formerly known as Gazprom Germania GmbH) or any its subsidiary or affiliated entity, that are otherwise prohibited by Directive 3 under Executive Order 14024, which prohibits dealings by U.S. persons or within the United States in new debt of longer than 14 days maturity or new equity where such new debt or equity is issued after March 26, 2022. Directive 3 applies to certain Gazprom entities. In early April 2022, Gazprom announced that it was relinquishing its business interests and assets in Gazprom Germania GmbH. The German Federal Network Agency (Bundesnetzagentur or BNetzA) subsequently took control of the company to ensure its continued operations until 30 September. Gazprom Germania GmbH has operated under its new name "SEFE Securing Energy for Europe GmbH" since June 20, 2022.

UK. Added 10⁵ defense companies to the sanctions list of asset freeze targets.

On May 4, UK additionally sanctioned 32 entities⁶ (subject to an asset freeze) in media, defense, technology and electronics, shipbuilding, among sanctioned – VGTRK, Zvezda, KAMAZ, Mikron. 8 SOEs + 2 with shares in RF ownership.

On 5 May, Evraz plc (steel manufacturing and mining company) was designated under its Russia sanctions regime. The company is now subject to an asset freeze. **But UK issued a license, which allows commercial activities of the North American subsidiaries of Evraz. Evraz North America includes 6 plants: in Portland (Oregon), Regina (Saskatchewan, Canada), Pueblo (Colorado), Calgary, CSamrose and Red Deer (Alberta). EVRAZ North America also owns 18 processing plants in Canada and the US.**

On 9 May, UK amended the listings of 6 entities under its Russia sanctions regime. All relate to entities designated under the urgent procedure on 15, 24 or 31 March 2022. Statements of reasons for 6 entities were amended to remove them as urgent procedure listings.

On 23 June, UK prohibited the export to, or for use in, Russia, of sterling denominated banknotes and banknotes denominated in any official currency of the EU; as well as prohibited the making available, supply, or delivery of such banknotes to a person connected with Russia; and on the making available of such banknotes for use in Russia.

On 29 June, OFSI added 5 entities to its Russia sanctions list - JSC MARSHAL.GLOBAL (Russian investment banking, financial and asset management firm), JSC MOSCOW INDUSTRIAL BANK, JSC KOLMAR GROUP (Russian coal mining and processing company), JSC NEW OPPORTUNITIES (carrying on business in the Russian information, communications and digital technologies sector), R-STYLE SOFTLAB (carrying on business in the Russian information, communications and digital technology sector, able to undermine sanctions and Russian banks' exclusion from the SWIFT payment messaging network

⁵ Aleksandrov Scientific research technological institute Niti, Central research institute of machine building JSC, Federal state unitary enterprise Dukhov automatics research institute, JSC Arzamas machine-building plant, JSC GTLK, JSC Kalashnikov concern, Llc Military industrial company, Promtech-Dubna JSC, Radiotechnical and information systems concern, Rocket and space centre progress JSC.

⁶ VGTRK (SOE), ALL-RUSSIAN PUBLIC ORGANIZATION SOCIETY FOR THE PROMOTION OF RUSSIAN HISTORICAL DEVELOPMENT TSARGRAD, ANALITICHESKII TSENTR KATEKHON OOO, AO NII VEKTOR (SOE), AVANGARD JSC (SOE), BAIKAL ELECTRONICS JSC, CHEBOKSARY ELECTRICAL EQUIPMENT PLANT, CROCUS NANO ELECTRONICS (14.32% SOE), FORSS TECHNOLOGY LTD, GARANTEX EUROPE OU, INFOROS, INTEGRAL SPB, IZMASH UNMANNED SYSTEMS, JOINT STOCK COMPANY MIKRON (6.5% SOE), KAMAZ (SOE), KRANARK LLC, MCST JSC, MOLECULAR ELECTRONICS RESEARCH INSTITUTE, JOINT STOCK COMPANY, MOSCOW INSTITUTE OF PHYSICS AND TECHNOLOGY (SOE), MPI VOLNA LLC, N.A. DOLLEZHAL ORDER OF LENIN RESEARCH AND DESIGN INSTITUTE OF POWER ENGINEERING JSC (SOE), OOO VOLGA GROUP, PELLA-MASH LLC, RADIOAVIONICA JSC, RSB GROUP, SOUTHFRONT, STRATEGIC CULTURE FOUNDATION, DALZAVOD SHIP REPAIR CENTRE JSC (SOE), SPECIAL TECHNOLOGY CENTRE LLC, T-PLATFORMS, TSARGRAD OOO, ZVEZDA PJSC (SOE)

through its work on implementing a program to modernise the payment infrastructure and exchange of financial data via the Russian Central Bank's System for Transfer of Financial Messages).

On 29 June, the UK announced a ban on Russia accessing UK trusts services.

On 4 July, OFSI imposed asset freeze sanctions on United World International (Russian propagandist analytical centre).

On 5 July, UK GoV extended existing restrictions on Belarus on dealing with financial instruments and providing loans to a broader range of transferable securities, money market instruments, loans and credit (in particular applied the prohibitions to securities or money-market instruments issued by a wide range of persons connected with Belarus and related entities thus effectively capturing all Belarusian entities beyond just state-owned entities, but with a carve out for Belarusian entities majority owned by non-Belarusian entities; applied the prohibitions on providing loans and credit arrangements to a wide range of persons connected with Belarus and related entities and a wider range of loans to certain persons connected to the Government of Belarus.).

UK GoV introduced a new prohibition on the provision of financial services for the purpose of foreign exchange reserve and asset management to the Central Bank of Belarus and the Ministry of Finance of Belarus and related entities.

On 5 July, UK added new purposes to the 2019 Regulations, targeting actions by the Government of Belarus in destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine, including by supporting or facilitating Russia's actions in respect of Ukraine and any other action which undermines or threatens peace, security or stability in eastern Europe.

On 19 July, the UK introduced new financial sanctions reporting obligations. The definition of 'relevant firms' that have financial sanctions reporting obligations was extended to include crypto asset exchange providers and custodian wallet providers. The expanded definition will come into effect on 30 August 2022. There is a requirement for 'relevant firms', as defined in sanctions regulations, to notify OFSI of certain information as soon as practicable when encountering a designated person in the course of their business. This requirement applies to relevant firms in the UK or under UK jurisdiction including people working for them.

On 19 July, the UK prohibited people and entities from undertaking certain investment activities (and services directly related to those investments) in respect of land located in Russia, persons connected with Russia, relevant entities, joint ventures, opening a representative office or establishing a branch or subsidiary located in Russia.

On 21 July, UK prohibited the import (whether directly from Russia or via a third country), acquisition or supply and delivery of gold that originates in Russia on or after 21 July 2022. Ancillary services (related technical assistance, financial services and funds, and brokering services) on gold exported from Russia on or after 21 July 2022 will also be prohibited. Russian-origin gold exported from Russia before 21 July 2022 is not in scope.

On 26 July, UK imposed sanctions on Al-Sayyad Company for Guarding and Protection Services Ltd (Syrian private security company involved in recruiting fighters and mercenaries in Syria to fight alongside Russian forces in Ukraine).

New Zealand. Sanctions (assets freeze and dealing with securities ban) against the CBR, the Russian Direct Investment Fund plus sanctions against 8 largest and 8 other banks linked to oligarchs (8 SOEs), Russia's defence sector and annexation of Crimea. These major institutions make up approximately 80% of Russia's total banking assets. The sanctioned entities are: Alfa-Bank, Bank Rossiya, Bank Otkritie (SOE), Black Sea Bank for Development and Reconstruction, Credit Bank of Moscow, Gazprombank (SOE, 50+1), GenBank, Industrial Savings Bank, Novikombank (SOE), Russia Agricultural Bank (SOE), Russian National Commercial Bank (SOE), Sberbank (SOE, 50+1), Sovcombank, SMP Bank, Vnesheconombank SOE, VTB (SOE, 60+1). Regulations designating companies and organizations in the **defense** sector (Kronshtadt Group, Makeyev Rocket Design Bureau (SOE), Minsk Wheel Tractor Plant (MZKT) (Belarus SOE), Wagner Group) and **shipbuilding** (United Shipbuilding Corporation (SOE), Zelenodolsk Shipyard Plant) which have contributed to the assault on Ukraine's sovereignty and territorial integrity.

On 8 June, New Zealand imposed sanctions on 44 entities that are funding or fuelling the Russian war in Ukraine:

38 Russian entities, including 32 SOEs, involved in the undermining of Ukraine's sovereignty and territorial integrity - Admiralty Shipyards JSC (SOE), Aleksandrov Scientific Research Technological Institute (NITI) (SOE), Federal Research Center Boreskov Institute of Catalysis, Federal State Unitary Enterprise Dukhov Automatics Research Institute (VNIIA) (SOE), Gazprom PJSC (SOE, 50+1), Gazpromneft (SOE, 50+1), Irkut Corporation (SOE, 50+1), JSC Scientific Research Institute of Computing Machinery (SOE), JSC Central Research Institute of Machine Building (JSC TsNIMash) (SOE), JSC Kazan Helicopter Plant (SOE), JSC Rocket and Space Centre - Progress (SOE), Kamaz, Moscow Institute of Physics and Technology (SOE), NPO High Precision Systems JSC (SOE), NPO Splav JSC (SOE), Oboronprom (SOE), PJSC Beriev Aircraft Company (SOE), POLYUS Research Institute of M.F. Stelmakh JSC, Promtech-Dubna JSC, Radiotechnical and Information Systems (RTI) Concern, Rapart Services LLC (SOE), Rosneft (SOE), Rosoboronexport OJSC (SOE), Rostec (SOE), Rostekh-Azimuth (SOE), RusHydro (SOE), Russian Aircraft Corporation MiG (SOE), Russian Helicopters JSC (SOE), Sovcomflot (SOE), Sukhoi Aviation JSC (SOE), Sukhoi

Civil Aircraft (SOE), Transneft (SOE), Tupolev JSC (SOE), UEC-Saturn (SOE), United Aircraft Corporation (SOE), United Engine Corporation (SOE), United Instrument Manufacturing Corporation (SOE).

6 Belarusian entities, including 3 SOEs, linked to the Belarusian government or military - 140 Repair Plant JSC (SOE), Agat-Electromechanical Plant OJSC (SOE), Belspetsvneshtekhnika SFTUE (SOE), BelTechExport, Minotor-Service, Peleng JSC.

On 4 July, New Zealand prohibited the import, directly or indirectly, of gold of Russian origin into New Zealand from July 25.

Poland. Introduced Poland-specific list of designated parties subject to measures not covered by EU Regulations 765/2014 and 269/2014, covering 37 entities⁷. In addition to the measures under EU legislation related to freezing assets and suspension of transactions, the Act also foresees the possibility of exclusion from public procurement proceedings.

Switzerland. With the decision of 27 Apr, Switzerland implemented new measures adopted by the EU on 8 Apr. In particular, support within the framework of a Swiss national programme of Russian organizations which are publicly owned or controlled will be prohibited. With immediate effect, trusts may no longer be registered in Switzerland for Russian nationals or natural or legal persons resident in Russia. Various services for such trusts will also be prohibited.

On 10 June, the Federal Council decided to adopt new EU sanctions against Russia and Belarus and instructed the The Federal Department of Economic Affairs, Education and Research (EAER) to adapt the Ordinance on measures in connection with the situation in Ukraine. The EAER approved the sanctioning of 18 Russian (including 6 SOE + 4 owned by SOE on 27%) and 8 Belarusian entities supporting (3 SOEs), directly or indirectly, the Armed Forces of Russian and GoV. The Swiss list of sanctioned individuals and entities is thus identical to that of the EU.

Switzerland approved the exclusion of three Russian (Sberbank, Credit Bank of Moscow, Russian Agricultural Bank) and one Belarusian (Belinvestbank) banks from SWIFT.

Norway. New listings of 18 entities. These include several companies in the defence industry and a financial institution + Exclusion of three more RF banks from the SWIFT payment system, including Sberbank, the Credit Bank of Moscow and the Russian Agricultural Bank.

Canada. On 6 May, amended the Special Economic Measures (Russia) Regulations to list 5 additional companies: Zelenodolsk Shipyard JSC (partly), Military Industrial Company LLC (private), Rosgvardia (SO), UEC Klimov JSC (private but connected with Rostekh), KAMAZ PTC (SOE).

On 27 May, Canada imposed an asset freeze and dealings prohibition on 4 Russian financial institutions and banks: Management Company of the Russian Direct Investment Fund JSC (SOE), RVC Management Company LLC (SOE), Russian Agricultural Bank JSC (SOE) and Investtradebank JSC.

On June 27, the Canada GoV sanctioned 46 defence entities (incl. 38 SOEs) for their role in enabling or supporting Russia's invasion of Ukraine⁸.

On June 27, Canada sanctioned 2 entities - Belramoshservice and Belteleradio Company - which are close associates of the Alexander Lukashenko regime.

On 7 July, Canada prohibited the import, purchase or acquisition of unwrought gold, semi-manufactured gold, gold powder, monetary gold and jewellery made of gold, from Russia or from any person in Russia. Prohibition takes effect 30 days after it comes into force.

Japan. On 7 June, Japan designated two banks of RF (Credit Bank of Moscow and Rosselkhozbank SOE) and one bank of RB (Belinvestbank SOE) as targets for asset freezing.

⁷ ACRON PAO, AXIOMA DR IT, BARTER COAL, BELOIL Polska, EUROCHEM POLSKA, „FABERLIC BALTIJA SIA” Sp. z o.o., ODDZIAŁ W POLSCE, FABERLIC EUROPE, GO SPORT POLSKA, IRL Polska, KAMAZ, KASPERSKY (KASPERSKY LAB), KASPERSKY Lab Polska, Kaspersky Store, K Dystrybucja, KTK Polska, MAGA DYSTRYBUCJA 2, MAGA FOODS, MEDMIX POLAND (do 3.03.2022 r. – SULZER MIXPAC POLAND), NEGRINIO LIMITED, NORICA HOLDING Sàrl, Novatek Green Energy, OAO NOVATEK, OAO PhosAgro, Opansa Enterprises Limited, PAO Gazprom, PhosAgro POLSKA, PHOSINT LIMITED, Rainbee Holdings Limited, SEVERSTAL DISTRIBUTION, SIA SEVERSTAL DISTRIBUTION, Oddział w Polsce, SUEK Polska, SULZER PUMPS WASTEWATER POLAND, SULZER TURBO SERVICES POLAND, WILDBERRIES, „1C-POLAND”.

⁸ SOE: Pskov Distance Communication Plant, Radiozavod JSC, Razryad JSC, Research Production Association Mars, Ryazan Radio-Plant, Scientific Production Center Vigstar JSC, Scientific Production Enterprise “Radiosviaz”, Scientific Research Institute Ferrite-Domen, Scientific Research Institute of Communication Management Systems, Novosibirsk Semiconductor Devices Plant Vostok JSC, State Machine Building Design Bureau “Vympel” By Name I.I. Toropov JSC, Plant Kulakov JSC, Raduga Design Bureau, TAO GNPP “Region”, Concern “MPO – Gidropribor”, Concern Granit-Electron JSC, Ural Design Bureau “Detal”, Tambov Plant (TZ) “October”, Engineering Centre Moselectronproekt, Ship Maintenance Centre “Zvezdochka” and 22 entities of JSC Tactical Missiles Corporation - “Uralelement” JSC, “Plant Dagdiesel” JSC, PA Strela JSC, Ravenstvo JSC, Ravenstvoservice JSC, Saratov Radio Instrument Plant JSC, Severny Press JSC, “Research Centre for Automated Design” JSC, NPO Lightning, “MBDB ‘ISKRA’” PJSC, “Central Design Bureau of Automation”, 711 Aircraft Repair Plant, Azov Optomechanical Plant, “Krasny Gidropress” JSC, Elektrotyaga JSC, GosNIIIMash JSC, RKB Globus, Smolensk Aviation Plant, Private: Scientific-Production Enterprise Volna, Electronic Computing Technology Scientific Research Centre JSC, Elektrosignal JSC, “Salute” JSC, KB Mashinostroeniya, NPO Electromechanics, AO TMKB “Soyuz”, Zvezda-Strela LLC

On 5 July, Japan imposed asset freeze sanctions on 6 Russian entities - JSC Almaz-Antey Air and Space Defence Corporation, The Strategic Culture Foundation, Southfront, Newsfront, Inforos, OOO, United World International.

Japan MinFin imposed an embargo on the import of Russian gold on July . The ban comes into force on 1 August, 2022.

UK, US, Canada & Japan. On 26 June, UK, US, Canada and Japan announced a ban on the import of Russian gold. The UK announced that this import ban will apply to newly mined or refined gold and will not impact Russian-origin gold previously exported from Russia.

Australia. On 4 July, the Prime Minister of Australia announced that Australia will prohibit the imports of Russian gold.

4. Designate the Russian Federation as a Sponsor of State Terrorism

Lithuania (Lithuanian Seimas officially recognize RF as a state sponsor and perpetrator of terrorism), **USA** (endorsed a resolution calling to recognizing RF as a sponsor of terrorism, final decision rests on State Department and the White House, called RF a "human trafficking" state, a draft Resolution on recognizing Russia's actions in Ukraine as a genocide was registered in the US Senate), **NATO** (recognised RF as "the most significant and direct threat").

USA. Biden administration is considering naming Russia a state sponsor of terrorism but officials haven't determined the Kremlin's actions meet the legal standard for the designation — Blinken told lawmakers on Apr 27 (Source: [WSJ](#)) On May 10, the US Senate has registered a resolution recognizing Russia as a sponsor of terrorism (Source: [Resolution](#)).

On 15 June, OFAC designated Stanislav Shevchuk, a Europe-based representative of the Russian Imperial Movement (RIM), and Alexander Zhuchkovsky, a Russia-based supporter of RIM. RIM is a Russia-based ultranationalist, white supremacist group which provides paramilitary-style training to supporters. It was designated by the US as a Specially Designated Global Terrorist (SDGT) organisation in April 2020.

On June 24, the US Senate Foreign Relations Committee endorsed a resolution calling on the State Department to recognize Russia as a state that sponsors terrorism. The Senate notes that this is only a resolution with an appeal. The final decision rests with the State Department and the administration of US President Joseph Biden, and the resolution itself is a call to the administration, but not the actual recognition of Russia as a sponsor of terrorism.

On July 20, the US State Department called the Russian Federation as one of the states that demonstrate "encouraging policies or elements thereof" regarding human trafficking. In addition, on July 20, a draft Resolution on recognizing Russia's actions in Ukraine as a genocide was registered in the US Senate. The resolution supports international criminal investigations and tribunals to hold the Russian military and political leadership accountable for war crimes, crimes against humanity and genocide.

On June 21, The speaker of the US House of Representatives called on Blinken to recognize the Russian Federation as a state sponsor of terrorism, and then Congress will do it.

Lithuania. The Seimas states in the Resolution that RF, whose military forces deliberately and systematically select civilian targets for bombing, is a state sponsor and perpetrator of terrorism (Source: [Seimas of the Republic of Lithuania](#)).

NATO. At the summit on June 29, the leaders of the NATO countries recognized RF as "the most significant and direct threat" to the security of the Alliance - this is stated in the strategic concept adopted in Madrid.

5. Strengthen Individual Sanctions against these Categories of Individuals

USA (+35 + 18 officials, SOEs management and oligarchs, including A.Mordashov and his family + 58 + visa restrictions for 529 officers of the Russian military and Russian nationals), **Canada** (+40, +14 +22 senior officials of financial institutions and their family members, including Kabayeva + 21 + 13 Belarus MinDefence officials +30 disinformation and propaganda figures), **EU** (2 + Gerhard Schroeder, Karin Kneisl and Matthias Waring left board on directors of Rosneft due to threat of sanctioning by EU + 65 RF individuals responsible for atrocities in Bucha and Mariupol, Alina Kabayeva, **Patriarch Kirill was excluded**, + 12 individuals in Belarus for internal repression and human rights violations + 47 individuals, inc. Sobyenin (the mayor of Moscow), **UK** (+31, +12 (Putin's family and friends, incl. Kabayeva) + 12 incl. Patriarch Kirill +8 +7 propagandists - 2 top-managers of Rosneft excluded from sanction list + amended the designation criteria under the Russia sanctions regime (positions, official roles and interpretation of being "associated with" a designated person were expanded and clarified + 41), **Poland** (incl. Putin's, Lavrov's daughters, Nabiullina), **New Zealand** (+170 + 5 in media and propaganda +23 (Belarus military officials and Lukashenko), **Australia** (+76, +34, +15 +16, incl. Kabaeva), **Switzerland** (+2 +65 RF +12 Belarus), **Japan** (+141+62), **Liechtenstein** (2), **Norway** (65 RF).

Since Feb 24, more than 1,500 Russian government officials, businessmen and propagandists are currently under Western sanctions: UK sanctioned 1,315 persons, Canada - 1,266, the EU - 1,266, Switzerland - 1,172, Australia - 1,008, USA - 926, Japan - 836, New Zealand - 686; Ukraine - 3,642 (NAZK).

Data from NAZK and KSE Institute.

New personal sanctions – Apr 19, 2022 – July 27, 2022

Country	Number of individuals sanctioned
USA	+142
UK	+112-2+41
EU	+79+47
Canada	+314+30
Switzerland	+67
Australia	+288
Japan	+203
Poland	+15
Liechtenstein	+2
New Zealand	+193
Norway	+65

USA. On 20 April, OFAC designated 29 individuals involved in attempts to evade sanctions imposed by the United States and its international partners on Russia. Among the designated individuals are Deputy Governors of the CBR Mikhail Alekseev and Ksenia Yudaeva, Board members of Bank Otkritie, Konstantin Malofeyev, and military personnel, individuals linked to Bank Otkritie, a network of individuals that support Malofeyev's activities, including those related to sanctions evasion and misinformation campaigns. Alina Kabaeva, the woman believed to be Putin's girlfriend and the mother of at least three of his children, avoided sanctions due to a last-minute decision of the National Security Council.

On 8 May, OFAC designated 8 current and recent members of the Executive Board of Sberbank and 27 members of Gazprombank Board of Directors.

On 2 June, the U.S. Department of State imposed sanctions on Maria Zakharova, the spokesperson of the Russian Ministry of Foreign Affairs as well as Alexey Mordashov, the leader of Severgroup and one of Russia's wealthiest billionaires; and his family members (MORDASHOV, Kirill Alekseyevich, MORDASHOV, Nikita Alekseyevich, MORDASHOVA, Marina Aleksandrovna).

OFAC imposed sanctions on Sergei Pavlovich Roldugin, a close friend and part of a system that manages Putin's offshore wealth and Elena Yuryevna Mirtova, Roldugin's wife; JSC Argument's sole shareholder and former director, Andrei Valeryevich Gasilov, and Russian CEO of Imperial Yachts, Evgeniy Borisovich Kochman. On 2 June, OFAC imposed sanctions on 9 RF officials, SOEs management and oligarchs⁹.

On 28 June, OFAC designated 29 Russian individuals¹⁰ and State Department 29 Russian individuals as SDNs¹¹.

On 28 June, the U.S. Department of State imposed visa restrictions on 511 officers of the Russian military and 18 Russian nationals pursuant to alternative policies under the Immigration and Nationality Act in relation to suppression of dissent, including politically motivated detentions.

Canada. On 19 April, Canada listed an additional **14** oligarchs, close associates of the Russian regime, and members of their families. This includes President Putin's two adult daughters and CBR Chief Elvira Nabiullina¹². On April 26, Canada amended its sanctions measures by designating an additional **203** individuals determined by the Government of Canada to be current senior officials or current or former members of the People's Councils of the so-called DPR and LPR. On 2 May, Canada further amended the Special Economic Measures (Russia) Regulations to list an additional 21 oligarchs, close associates of the Russian regime, and members of their families¹³. On 6 May, Canada added to list an additional 19 individuals who are senior defense officials¹⁴. On 18 May, Canada imposes sanctions on 14 individuals - oligarchs, their family members and close associates who were sanctioned for having directly enabled Putin's senseless war in Ukraine¹⁵. On 19 May, GoV has introduced a [Bill](#) that would expand the scope of the Immigration and Refugee Protection Act (IRPA) to allow for the imposition of travel bans on people listed pursuant to all sanctions regulations and orders made under the Special Economic Measures Act (SEMA), including the Russia sanctions regulations. Family members of listed people may also be subject to travel bans¹⁶. The Bill is currently at 2nd reading in the Senate.

The Deputy PM of Canada proposed G7 to allow Russian "oligarchs" to pay for leaving the sanctions lists. In response, the G7 countries are considering whether to allow Russia's sanctions oligarchs to pay for the release of sanctions: it is expected that the funds will go to rebuild Ukraine. Neither the Russian oligarchs themselves nor the Ukrainian authorities seem to oppose such an idea, which was proposed after a conversation with the oligarchs.

On 27 May, Canada imposed sanctions on 22 Russian individuals who are senior officials of financial institutions and their family members¹⁷.

⁹ Yury Slyusar, the President of United Aircraft Corporation (UAC), a Russian state-owned company and major supplier of aircraft to Russia's military, and one of the leading actors in Russia's industry and defense sector with close ties to RF GoV; Vitaly Savelyev, the Minister of Transport of Russia, a member of the Board of Directors of Russian Railways; the Chairman of the Board of Directors of Aeroflot; Maxim Reshetnikov, the Minister of Economic Development of Russia, member of the boards of sanctioned Russian entities, including VTB Bank, VEB.RF, and Russian Railways; Irek Envarovich Faizullin, the Minister of Construction, Housing and Utilities of Russia and a member of the board of directors of Russian Railways; Dmitriy Yuryevich Grigorenko, the Deputy Prime Minister and Chief of the Government Staff of Russia; Sergey Nikolaevich GORKOV (General Director - Chairman of the Board of JSC "Rosgeologiya"), Dmitriy Yuryevich GRIGORENKO (Deputy Prime Minister of Russia - Chief of the Government Staff), God Semenovich NISANOV (Russian billionaire and real estate tycoon), Evgeny Grigorievich NOVITSKY (Russian entrepreneur, former president of the AFK Sistema holding (1995-2005); Board member of RTI Systems defense concern).

¹⁰ **7 government officials of the so-called DPR** - ANANCHENKO, Aleksandr Evgenyevich, ANTONOV, Vladimir Nikolaevich, EZHIKOV, Vladimir Vladimirovich, GOVTVIN, Yuriy Nikolaevich, KHOTSENKO, Vitaliy Pavlovich, PEREVERZEVA, Tatiana Viktorovna, TODOROVA, Anna Yurievna; **16 members of Interregional Social Organisation Union of Donbas Volunteers** - ANOSOV, Viktor Yuryevich, CHUMAKOV, Aleksey Nikolaevich, DANILTSEV, Yuriy Viktorovich, DZINIKASHVILI, Dmitriy Vladimirovich, ENALDIEV, Tamerlan Borisovich, KHAVCHENKO, Dmitriy Vasilyevich, KOLEDA, Mariya Vasilyevna, KULYGINA, Olga Ivanovna, KUZNETSOVA, Anastasiya Viktorovna, LASHKARYOVA, Nadezhda Vitaleyevna, LENSIN, Roman Yuryevich, PINCHUK, Andrei Yuryevich, PUGACHYOV, Oleg Ivanovich, SHEVCHENKO, Yuriy Valeryevich, SOSONYY, Aleksey Petrovich; **3 individuals that are part of a covert procurement network linked to Russia's FSB** - KOKOREV, Alexander Aleksandrovich, KOKOREVA, Natalia Vasilyevna and AFANASYEV, Dmitriy Valeryevich; **3 business persons**: GRIGORYEV, Andrey Ivanovich (Director of Advanced Research Foundation (FPI); KOGOGIN, Sergei Anatolyevich (General Director of KAMAZ PJSC), KRINITSYN, Oleg Anatolyevich (Director of LLC RSB-GROUP).

¹¹ **The illegitimate Russia-installed "mayor" of Melitopol** - DANYLCHENKO, Halyna Viktorivna; **19 members of the Rostec board of directors** - ANDRIANOV, Nikolay Valentinovich, ARTYAKOV, Vladimir Vladimirovich, BORISOVA, Natalya Vladimirovna, BROVKO, Vasily Yuryevich, EVTUSHENKO, Oleg Nikolaevich, KIRYANOV, Victor Nikolayevich, KOPTEV, Yury Nikolayevich, LELIKOV, Dmitriy Yuryevich, LITVIN, Vladimir Zalmanovich, NAZAROV, Aleksandr Yuryevich, OSIN, Pavel Mikhaylovich, POPOV, Aleksandr Nikolaevich, SERDYUKOV, Anatoly Eduardovich, SIERRA, Elena Oduliovna, SMIRNOVA, Natalya Ivanovna, TSYB, Sergey Anatolyevich, VOLOBUEV, Nikolai Anatolevich, VYBORNYKH, Maksim Vladimirovich, ZAVYALOV, Igor Nikolaevich; and **9 of their family members** - ARTYAKOV, Dmitriy Vladimirovich, ARTYAKOVA, Tatiana Vladimirovna, KIRYANOVA, KIRYANOVA, Tatiana Borisovna, KANDELAKI, Tina, KONDRAKHINA, Melaniya Andreyevna, KONDRAKHIN, Leontiy Andreyevich, SERDYUKOV, Sergey Anatolevich, SERDYUKOVA, Natalya Anatolevna, VASILEVA, Evgeniya Nikolaevna;

¹² Petr Olegovich Aven, Oleg Viktorovich Boyko, Mikhail Maratovich Fridman, Mikhail Safarbekovich Gutseriev, Igor Viktorovich Makarov, Elvira Sakhripzadovna Nabiullina, Sergey Roldugin, Alexander Torshin, German Borisovich Khan, Alexander Ponomarenko, Katerina Vladimirovna Tikhonova, Maria Vladimirovna Vorontsova, Maria Aleksandrovna Lavrova, Yekaterina Sergeyevna Vinokurova.

¹³ Vagit Yusufovich ALEKPEROV, Alexander Dmitrievich PUMPYANSKY, Sergey Alexandrovich KULIKOV, Andrey Andreevich GURYEV, Dmitri Alekseevich LEBEDEV, Viktor Filippovich RASHNIKOV, Alexey Viktorovich KUZMICHEV, Aleksandr Aleksandrovich MIKHEEV, Alexander Nikolayevich SHOKHIN, Marina Vladimirovna SECHINA, Daria Aleksandrovna DUGINA, Artur Aleksandrovich DUGIN, Pavel Alekseevich EZUBOV, Sergei Vladimirovich MATVIYENKO, Olga Konstantinovna DERGUNOVA, Valery Vacilyevich IVANENKO, Anatoly Yurievich PECHATNIKOV, Olga GOLODETS, Bella Ilyinichna ZLATKIS, Stanislav Konstantinovich KUZNETSOV, Boris Viktorovich OBNOSOV

¹⁴ Andrey Sergeevich IVANAYEV, Igor Yurievich KOROTCHENKO, Andrey Ivanovich SYCHEVOY, Tatiana Viktorovna SHEVTSOVA, Maria Vladimirovna KITAYEVA, Rossiyana Vladimirovna MARKOVSKAYA, Andrey Nikolaevich SERDYUKOV, Valery Ivanovich FLYUSTIKOV, Aleksandr Pavlovich LAPIN, Ruslan Khadzhiismelovich TSALIKOV, Gennady Valeryevich ZHIDKO, Sergey Analolievich KOGOGIN, Dmitry Evgenievich SHUGAEV, Azatbek Asanbekovich OMURBEKOV, Yunus-Bek Bamatgireyevich YEVKUROV, Sharip Sultanovich DELIMKHANOV, Alimbek Sultanovich DELIMKHANOV, Amkhad Sultanovich DELIMKHANOV

¹⁵ Oleg Valentinovich BELOZYOROV, Grigory Viktorovich BEREZKIN, Elena Petrovna TIMCHENKO, Farkhad AKHMEDOV, Igor Albertovich KESAEV, David Lvovich DAVIDOVICH, Andrey Valerievich RYUMIN, Dmitry Arkadievich MAZEPIN, Nikita Dmitriyevich MAZEPIN, Ksenia Gennadevna FRANK, Gleb Sergeevich FRANK, Natalya BROWNING, Alexander Yevgenievich LEBEDEV, Julia Alexandrovna MATVIYENKO

¹⁶ Under the current IRPA, the government may deem a foreign national inadmissible for entry into Canada if, amongst other things, they are listed by an international organisation of which Canada is a member, listed pursuant to the Justice for Victims of Corrupt Foreign Officials Act (Sergei Magnitsky Law), or listed pursuant to the human rights or corruption criteria under SEMA. The amendments would also reorganise the proposed and existing sanctions-related travel ban criteria into a distinct sanctions ground for inadmissibility.

¹⁷ Alina Maratovna KABAEVA (Chairman of the Board of Directors of CJSC National Media Group, politician, Russian athlete), Olga AYZIMAN (wife of Mikhail FRIDMAN), Elena Aleksandrovna GEORGIEVA (Chairman of the Board of Novikombank), Larisa Mikhailovna FRIDMAN and Ekaterina FRIDMAN (daughters of Mikhail FRIDMAN), Andrei KOZITSYN (General Director of the Ural Mining and Metallurgical Company), Mikhail Lvovich KUCHMENT (Vice President of Home interior (Hoff); Chairman of the Supervisory Board of Sovcombank), Milana KOROLEVA (Russian blogger, model, TV presenter and journalist; wife of Mikhail KUCHMENT), Anatoly Alexandrovich BRAVERMAN (First Deputy General Director of the Russian Direct Investment Fund; General Director of the Russian Venture Company), Inna Yakovlevna BRAVERMAN (wife of Alexander BRAVERMAN), Alexander Arnoldovich BRAVERMAN (First Deputy Chairman of VEB.RF), Mikhail Nikolaevich ROSSEEV (Deputy Chairman of the Board - Chief Accountant of Gazprom), Vadim KULIK (Deputy Chairman of the Board of the VTB Bank), Natalia Germanovna DIRKS (Member of the Board of VTB Bank), Maxim Dmitriyevich KONDRATENKO (Member of the Board of VTB Bank), Erkin Rakhmatovich NOROV (Member of the Board of VTB Bank), Svyatoslav OSTROVSKY (Member of the Board of VTB Bank), Dmitry PIANOV (Member of the Board of VTB Bank), Sergey Alexandrovich MALTSEV (Member of the

On June 27, Canada sanctioned 6 individuals¹⁸ who are Russian senior defence officials, 13 senior officials of the Ministry of Defence of Belarus¹⁹ and 15 former senior officials and their family members, as well as so-called leaders in areas of Ukraine illegally occupied by Russian forces or controlled by Russian-backed proxies²⁰.

On 7 July, Canada sanctioned 30 individuals who are Russian disinformation and propaganda figures²¹.

EU. On 21 April, EU added Serhiy Vitaliyovich Kurchenko and Yevgeniy Viktorovich Prigozhin to its Russia sanctions list. The EU considers adding Alina Kabayeva and Patriarch Kirill. After the European Parliament threatened former German Chancellor Gerhard Schroeder and former Austrian Foreign Minister Karin Kneisl with sanctions due to connections with RF, both have left their positions in the board of directors of Rosneft. CEO of Nord Stream AG Matthias Waring did the same.

On 3 June, the European Council imposed sanctions on 65 individuals responsible for the atrocities committed by Russian troops in Bucha and Mariupol, personalities supporting the war, leading business persons and family members of listed oligarchs and Kremlin officials. This decision is a part of the comprehensive 6th package of sanctions. The 65 listed individuals include the military staff that led the actions of those units of the Russian army that killed, raped, and tortured civilians in Ukraine in Bucha, including Colonel Azatbek Omurbekov (the 'Butcher of Bucha'), Colonel-General Mikhail Mizintsev (the 'Butcher of Mariupol'); those who participated in the creation of the so-called Committee of Salvation for Peace and Order in March 2022 – an organ for collaboration with the Russian occupation in Kherson Oblast; politicians, propagandists, leading business persons and family members of already sanctioned individuals. The former gymnast and State Duma member Alina Kabaeva is also included in the list as a close associate of President Vladimir Putin. Sanctions also were imposed on the wife of Putin's spokesman Dmitry Peskov, Tatiana Navka, and his two children.

On 3 June, the EU Council imposed restrictive measures on 12 individuals involved in the continuation of internal repression and human rights violations in Belarus.

On 21 July, the Council imposed sanctions on 48 individuals, including:

- **17 representatives of Russian national and regional political elite** - Adam Sultanovich DELIMKHANOV (Member of the State Duma of RF, First Deputy Chairman of the Committee on Security and Anti-Corruption), Andrey Removich BELOUSOV (First Deputy Prime Minister of RF), Yury Yakovlevich CHAIKA (non-permanent member of the Security Council of RF, the Plenipotentiary Representative of the President of RF in the North Caucasus Federal District), Sergey Semyonovich SOBYANIN (the mayor of Moscow), Aleksey Vladimirovich DENISENKO (member of the Chelyabinsk regional Legislative Assembly, member of the Presidium of the Regional Political Council, member of the Kremlin-aligned ruling party "United Russia"), Alexander Nikolaevich BELSKIY (Chairman of the Legislative Assembly of St. Petersburg, member of the Kremlin-aligned political party "United Russia"), Alexander Valentinovich ISHCHEENKO (Chairman of the Legislative Assembly of the Rostov Region, Secretary of the Rostov Regional Branch of the Kremlin-aligned ruling party "United Russia"), Mikhail Vladimirovich STRUK (member of the Legislative Assembly of the Volgograd Oblast, member of the Kremlin-aligned ruling party "United Russia"), Nikolay Nikolaevich ZABOLOTNEV (head of the Regional Executive Committee of the Khanty-Mansiysk Regional Branch of the Kremlin-aligned ruling party "United Russia"), Nikolay Timofeevich VELIKDAN (Chairman of the Stavropol Regional Duma, first Deputy Chairman of the Government of the Stavropol Territory, member of the Kremlin-aligned ruling party "United Russia", member of the Presidium of the Regional Political Council of the Party), Dmitriy Vladimirovich KHOLIN (member of the Samara Provincial Duma, member of the Samara Regional Branch of the all-Russian public organization "Combat Brotherhood" (organization for veterans)), Sergey Evgenievich TSVILEV (governor of the Kemerovo region), Roman Alexandrovich GOVOR (member of the Legislative Assembly of the Kemerovo Region – Kuzbass, member of the Kremlin-aligned ruling party "United Russia"), Roman Sergeevich CHUYKO (head of the Regional Executive Committee of the All-Russian People's Front, member of the regional Legislative Assembly in Tuymen Oblast, member of the Kremlin-aligned ruling party "United Russia"), Viktor Vladimirovich BABENKO (Chairman of the Sverdlovsk Regional Council of Supporters of the "United Russia" Party, member of the Legislative Assembly of the Sverdlovsk Region and Deputy Secretary of the Sverdlovsk Regional Branch of "United Russia"), Yury Alexandrovich BURLACHKO (chairman of the Legislative Assembly of the Krasnodar Krai, member of the Kremlin-aligned ruling party "United Russia"), Yury Zimelevich KAMALTYNOV (Deputy Chairman of the State Council of the Republic of Tatarstan, previously - Deputy Prime Minister of the Republic of Tatarstan and

Board of PJSC "Sberbank", Kirill Alexandrovich TSAREV (Member of the Board of PJSC Sberbank), Natalya Andreevna ALYMOVA (Member of the Board of PJSC Sberbank), Alexandra Yurievna BURIKO (Member of the Board of PJSC Sberbank).

¹⁸ Adam Sultanovich DELIMKHANOV, Mikhail Eduardovich OSEEVSKY, Mikhail Igorevich POLUBOYARINOV, Sergei Alexandrovich MARKOV, Sergey Alexandrovich PAHOMOV, Denis Gennadievich POPOV.

¹⁹ Dzmityr Valeryevich PAULICHENKA, Yury Leandavich SIVAKOV, Viktor Uladzimiravich SHEIMAN, Andrii SICH, Igor Viktorovich PETRISHENKO, Yury Victorovich NAZAROV, Roman Aleksandrovich GOLOVCHENKO, Vladimir Vladimirovich MAKEY, Yury Mikhailovich SELIVERSTOV, Aleksander Viktorovich CHERVYAKOV, Viktor Mikhailovich KARANKEVICH, Uladzimir Borisovich PIARTSOU, Kanstantsin Konstantinovich SHULHAN.

²⁰ Galina Viktorovna DANILCHENKO, Illia Volodymyrovich KIVA, Kateryna Illiaovna KIVA, Aleksandr Yurievich KOBETS, Volodymyr Vasylovych SALDO, Kirill Sergeevich STREMOUSOV, Konstantin Vladimirovich IVASHCHENKO, Tetiana Oleksandrivna KUZMICH, Yevheniy Vitaliyevich BALITSKY, Serhiy Mykolayovych CHEREVKO, Ihor Ihorovych SEMENCHEV, Georgiy Dmytrovych KALENOV, Dmytro Mikhailovich SAVLUCHENKO, Pavel Igorevich FILIPCHUK, Vladimir Valeryevich ROGOV.

²¹ Alexander Yevgenievich LEBEDEV, Aleksei Viktorovich PIMANOV, Andrei Vitaliyevich ILYASHENKO, Armen Sumbatovich GASPARYAN, Artyom Grigoryevich SHEYNIN, Dmitry Yevgenievich KULIKOV, Maksut Igorevich SHADAYEV, Vladimir Nikolayevich SUNGORKIN, Oleg Borisovich DOBRODEEV, Sergey Vladimirovich MIKHAILOV, Tigran Edmondovich KEOSAYAN, Olga Vladimirovna SKABEYeva, Modest Alexeyevich KOLEROV, Roman Georgievich BABAYAN, Yevgeniy Nikolaevich PRILEPIN, Anton Vyacheslavovich KRASOVSKY, Arkady Viktorovich MAMONTOV, Alexey Lvovich NIKOLOV, Anton Sergeevich ANISIMOV, Maria Vladimirovna ZAKHAROVA, Irina Vladimirovna VOLK, Vladimir Mikhailovich GUNDYAYEV, Tigran Oganosovich KHUDAVERDYAN, Andrei Yurievich LIPOV, Vladimir Viktorovich LOGUNOV, Oleg Aleksandrovich TERLYAKOV, Vadim Alekseevich SUBBOTIN, Milosh Eduardovich VAGNER, Petr AKOPOV, Ekaterina Sergeevna ANDREEVA.

plenipotentiary representative of the President of the Republic of Tatarstan in the State Council of the Republic of Tatarstan, member of the Kremlin-aligned ruling party “United Russia”);

- Maria Alexeyevna LVOVA-BELOVA (Presidential Commissioner for children's rights, initiated the simplification of the procedure for granting citizenship to orphaned children in Ukraine),
- **12 Russian military officials** - Sharip Sultanovich DELIMKHANOV (Commander of the Chechen branch of the National Guard of RF), Alibek Sultanovich DELIMKHANOV (Deputy Commander of the Chechen branch of the National Guard of RF), Viktor Nikolayevich STRIGUNOV (First Deputy Director of the Federal Service of the National Guard of RF (Rosgvardia) – Commander-in-Chief of Rosgvardia), Oleg Anatolyevich PLOKHOI (Secretary of State, Deputy Director of the Federal Service of the National Guard of RF (Rosgvardia) – Commander-in-Chief of Rosgvardia), Yuriy Viktorovich YASHIN (Chief of the General Staff of the National Guard Troops of RF – Deputy Director of the Federal Service of the National Guard Troops of RF – Commander-in-Chief of the National Guard Troops of RF), Igor Anatolyevich ILYASH (Deputy Director of the Federal Service of the National Guard of RF (Rosgvardia) – Commander-in-Chief of Rosgvardia), Sergei Anatolyevich LEBEDEV (Deputy Director of the Federal Service of the National Guard of RF (Rosgvardia) – Commander-in-Chief of Rosgvardia), Alexey Mikhailovich KUZMENKOV (Deputy Director of the Federal Service of the National Guard of RF (Rosgvardia) – Commander-in-Chief of Rosgvardia), Alexey Stepanovich BEZZUBIKOV (Deputy Director of the Federal Service of the National Guard of RF (Rosgvardia) – Commander-in-Chief of Rosgvardia), Alexander Anatolievich MAKSIMTSEV (Deputy Commander-in-Chief of the Aerospace Forces for military-political work), Yuri Nikolaevich GREKHOV (Colonel-General, a Deputy Commander-in-Chief of the Russian Aerospace Forces), Zabit Sabirovich KHEIRBEKOV (Lieutenant General of the Russian Aerospace Forces, Deputy Commander-in-Chief of the Russian Aerospace Forces for Logistics);
- **1 security service official** - Sergei Borissovich KOROLEV (the First Deputy Director of the Russian FSB),
- **7 so-called leaders in areas of Ukraine illegally occupied by Russian forces or controlled by Russian-backed proxies** - Yevgeniy Vitalievich BALYTSKIY (the so-called Governor of the Zaporizhzhia region of Ukraine), Konstantin Vladimirovich IVASHCHENKO (the so-called mayor of Mariupol), Aleksandr Yurievych KOBETS (the so-called mayor of the city of Kherson), Vladimir Valeryevich ROGOV (the so-called representative of the main council of Zaporozhzhia region’s military-civil administration), Alexandr Fedorovich SAULENKO (the so-called head of the provisional administration of Berdyansk and the Berdyansk region), Andrei Vladimirovich SHEVCHIK (the so-called mayor of Enerhodar), Oleg KRYUCHKOV (the spokesperson for the Russian occupation authority in Crimea and advisor to the Head of Crimea);
- **3 relatives of businessmen against whom sanctions were imposed earlier** - Stanislav Sergeyevich CHEMEZOV (son of Sergei Chemezov, a member of the Supreme Council of “United Russia” and chairman of the Rostec conglomerate), Maya Nikolaevna BOLOTOVA (born TOKAREVA) (daughter of Nikolay Tokarev, the CEO of Transneft), Pavel EZOUBOV (cousin of Oleg Deripaska, who owns the Russian Machines industrial conglomerate which includes the Military Industrial Company);
- **4 members of the nationalist motorcycle club Nightwolves MC** - Alexander Sergeyevich ZALDOSTANOV (the leader and founder), Andrey BOBROVSKIY, Jozef HAMBÁLEK (President of the Europe chapter of the club based in Slovakia), Alexei WEITZ;
- **1 businessperson** - Andrey Anatolyevich KOZITSYN (co-founder and CEO of Ural Mining Metallurgical Company);
- **2 actors** - Sergey Vitalevich BEZRUKOV (Russian actor and politician, chairman of “United Russia”’s “Culture of the little homeland project”), Vladimir Lvovich MASHKOV (Russian actor, director and screenwriter who actively supported Russia’s war of aggression against Ukraine).

On 21 July, EU sanctioned 6 individuals²² involved in the recruitment of Syrian mercenaries to fight in Ukraine alongside Russian troops.

UK. On 21 April, added 16 individuals²³ to the sanctions list of asset freeze targets.

Important. In its analytics NAZK notes that UK fast-tracked on 19 individuals and entities in alignment with G7 and the EU to target Russia’s military and defense capabilities. Notable individuals and entities that have been sanctioned: Sergei Korolyov (Federal Security Service of Russia); The CEO of Russian Railways Oleg Belozorov was also sanctioned, Kalashnikov Concern; Arzamas Machine-Building Plant; Military Industrial Company; GTLK (transport). Family members – asset freeze was imposed on Anzhelika Khan, wife of UK-sanctioned oligarch German Khan. The latest UK sanctions also targeted Russian military officials (Generals)

²² Muhammad AL-SALTI (Commander-in-Chief of the “Palestine Liberation Army”), Abu Hani SHAMMOUT (former Syrian military officer and leader of the “al-Ahdat al-Omariya” faction), Nabeul AL-ABDULLAH (commander of the National Defence Forces in the city of Suqaylabiyah), Simon AL WAKIL (commander of the National Defence Forces in the city of Maharda (Hama)), Fawaz Mikhail GERGES (director of Al-Sayyad Company for Guarding and Protection Services Ltd, a Syrian private security company), Yasar Hussein IBRAHIM (co-owner of Al-Sayyad Company for Guarding and Protection Services Ltd, a Syrian private security company).

²³ Belozorov, Oleg Valentinovich (Chief Executive Officer Of Russian Railways), Bogdanovsky, Nikolay Vasilevich (First Deputy Chief Of The General Staff Of The Armed Forces Of Russia), Chupriyan, Aleksandr Petrovich, Flyustikov, Valery (Commander Of The Special Operations Forces), Khan, Anzhelika (Wife Of German Borisovich Khan, A Prominent Russian Businessman), Kiva, Ilya (A Former Member Of The Ukrainian Parliament), Konashenkov, Igor Yevgenyevich, Korolyov, Sergei Borisovich, Korotchenko, Igor Yurievich ((1) Chairman Of The Public Council Under The Ministry Of Defence Of The Russian Federation (2) Editor-In-chief Of The National Defence Magazine (3) Director Of The Centre For Analysis Of The World Arms Trade (4) Military Rank - Reserve Colonel), Kuprin, Anton Valerevich (Captain Of The Frigate “Admiral Essen” Of The Russian Black Sea Fleet), Obnosov, Boris Viktorovich (Linked To: Tactical Missiles Corporation Jsc), Omurbekov, Azatbek (Commanding Officer Of The Russian 64th Separate Motorised Rifle Brigade), Pimanov, Aleksei Viktorovich ((1) Director General Of Managing Organisation Creative Association Red Star (2) Head Of The Krasnaya Zvezda Media Holding), Romanov, Arkadiy Yurevich, Serdyukov, Andrey Nikolayevich (Commander Airborne Forces Of The Russian Federation), Volozhinsky, Andrei Olgerovich”

committing atrocities on the front-line in Ukraine, and individuals outside of Putin's military who are actively supporting his illegal invasion of Ukraine.

On 26 April, the Office of Financial Sanctions Implementation announced the amendment of 195 entries on UK asset freeze list. Those amendments were made to update the "statement of reasons" for the relevant listings which had originally been made under the new "urgent procedure". The urgent procedure allows UK to designate individuals and entities who have already been designated under sanctions imposed by certain other jurisdictions. However, listings made under the urgent procedure must be "recertified" after a set period, requiring UK government to confirm that it has reasonable grounds to suspect that the person meets the criteria for designation under the relevant UK sanctions legislation.

On May 4, UK additionally sanctioned +31 individuals²⁴ with asset freezes and travel bans. Many of sanctioned individuals are actors from mainstream media organisations²⁵.

On 9 May, UK amended the listings of 82 people under its Russia sanctions regime. All relate to people designated under the urgent procedure on 15, 24 or 31 March 2022. Statements of reasons for 79 people were amended to remove them as urgent procedure listings. Only the personal details of entries for Maiya Nikolaevna Bolotova, Marat Shakirzyanovich Khusnullin and Viktor Feliksovich Vekselberg were amended, so they remain urgent listings.

On 13 May, UK imposed sanctions on 12 people from Putin's family and friends incl. Alina Kabaeva²⁶.

The British National Crime Agency (NCA) has created a special unit whose goal is to "create difficulties" for the Russians under the sanctions. The NCA has already carried out three searches in the homes of people who are relatives or close associates of Russian businessmen who have been sanctioned.

On June 16, UK imposed sanctions on 12 individuals. The list includes representatives of Russian business, RF military commanders, representatives of the occupation authorities of the Kherson region and the head of the Russian Orthodox Church - Patriarch Kirill²⁷.

On 29 June, OFSI added 8 individuals to its RF sanctions list²⁸.

On 4 July, OFSI added 5 individuals to the UK Sanctions List - Aleyona Anatolyevna Chuguleva (SouthFront 'volunteer' and Secretary of the "Organizing Committee of Patriotism in Journalism"), Yuriy Sergeyeich Fedin (CEO of NewsFront), Darya Aleksandrovna Dugina (contributor of disinformation in relation to Ukraine and the Russian invasion of Ukraine on various online platforms), Yevgeniy Eduardovich Glotov (Deputy Director of Newsfront), Aelita Leonidovna Mamakova (key individual associated with the disinformation website SouthFront), Mikhail Anatolyevich Sinelin (Cofounder of Newsfront and Deputy Chairman of the State Corporation "Bank for Development and Foreign Economic activity").

On 5 July, UK added 2 individuals involved in spreading disinformation and promoting Russian actions in Ukraine to the consolidated list under the Russia financial sanctions regime (Denis Yakovlevich GAFNER, Valeriya KALABAYEVA) and removed 2 individuals from the consolidated list under the Russia financial sanctions regime (Yakov Vladimirovich REZANTSEV, Galina ULYUTINA).

UK also removed 8 individuals from the list under Cyber financial sanctions regime which were redesignated under Russia financial sanctions regime (Yuriy Sergeyeich FEDIN, Yevgeniy Eduardovich GLOTOV, Valeriya KALABAYEVA, Mikhail Anatolyevich SINELIN, Denis Yakovlevich GAFNER, Darya Aleksandrovna DUGINA, Aleyona Anatolyevna CHUGULEVA, Aelita Leonidovna MAMAKOVA).

²⁴ (Oleg Dobrodeev (Director General of VGTRK), Alexander Malkevich (General Director of the Saint Petersburg TV channel), Sergey Mikhailov (Director General of the Russian News Agency TASS), Vladimir Sungorkin (Director General and Editor-in-Chief of Komsomolskaya Pravda), Eugeny Poddubny (war correspondent at All-Russian State Television and Radio Broadcasting Company), Alexander Kots (war correspondent for Russian newspaper Komsomolskaya Pravda), Dmitry Steshin (journalist and special correspondent for Komsomolskaya Pravda), propagandist Nailya Asker-zade, mistress of banker Kostin, host Mikhail Leontiev), senior executive officers or member of the board of directors of designated banks - Dmitry Gusev (Chairman of Sovcombank), Irina Kashina, Mikhail Kuchment, Oleg Mashtal'yar, Alexey Panferov (all Sovcombank), Mikhail Zadornov (Head of Otkritie Bank), Dmitry Levin, Tatyana Nesterenko, Viktor Nikolaev (all Otkritie Bank) and political elite (members of the Federation Council of the Russian Federation - Yelena Avdeeva, Viktor Kress, Aleksandr Nekrasov, Valery Ponomaryov, Eduard Rossel, Ilyas Umakhanov, Putin's aide Maxim Oreshkin).

²⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1073104/Notice_Russia_040522.pdf

²⁶ Alina KABAEVA (a retired Olympic gymnast, Chair of the Board of the National Media Group, have a close personal relationship with Putin), Viktor KHMARIN (a lawyer and businessman, who is a friend and relative-by-marriage of Putin), Mikhail KLISHIN (an Executive in Bank Rossiya, and a member of the Board of Directors at SOGAZ), Vladimir KOLBIN, Lyudmila OCHERETNAYA (ex-wife of Putin), Aleksandr Grigorevich PLEKHOV (a close friend of Putin), PUTIN, Igor Alexandrovich (first cousin of President Vladimir Putin, and a Russian businessman), PUTIN, Mikhail Evgenievich (a Russian businessman and relative of President Vladimir Putin), PUTIN, Roman Igorevich (first cousin once removed of President Vladimir Putin), SHAMALOV, Yuri Nikolayevich (son of Nikolai Shamalov, and brother of Putin's former son-in-law, Kirill), SHELOMOV, Mikhail Lvovich (a Russian business owner and Putin's first cousin, once removed), ZATSEPILINA, Anna Yakovlena (grandmother of Alina Kabaeva and associate of Gennady Timchenko).

²⁷ Vladimir Mikhailovich Gundyayev (aka Patriarch Kirill), head of the Russian Orthodox Church; Maria Alekseevna Lvova-Belova, Russian Children's Rights Commissioner; Alexey Ivanovich Isaykin, President and Board Member of Volga-Dnepr Group; Sergey Vladimirovich Savostyanov, deputy of the Moscow city Dum;a Serhiy Mikolayovich Cherevko, Tetiana Kuzmich, Volodymyr Vasilyovich Saldo and Kyrlyo Sergiyovich Stremousov, Members of the 'Salvation Committee for Peace and Order' in Kherson; and Viacheslav Sergeevich Klobukov, Aleksandr Leonidovich Shershnev, Aleksandr Viktorovich Vins and Andrei Boevich Kurbanov, Military Colonels of the 64th Separate Motorised Rifle Brigade.

²⁸ BAYSAROV Ruslan Sulimovich (Chairman of the Board of Directors, BTSMOST JSC), GUTSERIEV Said Mikhailovich (member of the Board of Directors of SFI Investment Holding, an entity carrying on business in the Russian financial services sector), GUTSERIEV Sait-Salam Safarbekovich (Chairman of the Board of Directors of JSC NK Neftisa, an entity carrying on business in the energy sector), PERENČEVIĆ Mihajlo (Croatian businessman and President of the Russian pipeline construction company Velesstroy), POTANIN Vladimir Olegovich (owner of Interros, Rosbank), TSIVILEVA Anna (Putin's first cousin once removed, Chair of the Board of Directors of JSC Kolmar Group, an entity carrying on business in Russian energy and extractives sector), TSIVILEV Sergei Evgenievich (Governor of Kemerovo), TYRYSHKIN Ivan Aleksandrovich (director at SPB Exchange and JSC NRK-R.O.S.T., both companies are carrying on business in the Russian financial services sector)

On 5 July, the UK added new criteria for designating individuals to incorporate conduct destabilising Ukraine. This includes persons supporting or facilitating Russia's actions in respect of Ukraine or obtaining a benefit from or supporting the Government of Belarus through carrying on a relevant business activity including in sectors of economic and strategic significance to the Government of Belarus.

On 15 July, OFSI removed 2 individuals from the consolidated list and are no longer subject to an asset freeze: **Didier Casimiro (First Vice President of Rosneft) and Zeljko Runje (Deputy Chairman of the Management Board of Rosneft).**

On 18 July, UK amended the designation criteria under the Russia sanctions regime by:

- expanding the definition of person "involved in obtaining a benefit from or supporting the Government of Russia" to include working as a "manager" of, or otherwise "holding the right, directly or indirectly, to nominate at least one director (whether executive or non-executive), trustee or equivalent" of a Russian government-affiliated entity, an entity carrying on business as a Government of Russia-affiliated entity or an entity carrying on business of economic significance to the Government of Russia;
- identifying people occupying certain official roles under the Russian government or affiliates as being involved in "destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine" or "obtaining a benefit from or supporting the Government of Russia" ((a) an aide or adviser to the President of RF; (b) a head or deputy-head of any public body, federal agency or service subordinate to the President of RF, including the Administration of the President of RF; (c) a member of the Security Council of RF, its Secretary or any of its Deputy Secretaries; (d) the Chairman of the Government of RF or any deputy of the Chairman; (e) a Minister or Deputy Minister of any Ministry of RF; (f) a Governor or member of the Board of Directors of the Central Bank of RF; (g) a Presidential Plenipotentiary Envoy to a Federal District, or a regional Governor or Deputy Governor or equivalent; (h) a head or deputy head of any other public body or agency of the Government of RF; (i) a member of the armed forces or law-enforcement organs of RF of the rank of colonel, or equivalent, or higher; (j) a member of the Russian security and intelligence services of the rank of colonel, or equivalent, or higher; (k) a vice president, or equivalent position or higher, of a Government of Russia-affiliated entity; (l) a director or manager, or equivalent position or higher, of a Government of Russia-affiliated entity.
- broadening the interpretation of being "associated with" a designated person to include being an immediate family member of that person - a wife or husband; a civil partner; a parent or step-parent; a child or step-child; a sibling or step-sibling; a niece or nephew; an aunt or uncle; a grandparent; a grandchild.

On 26 July, UK imposed sanctions on 41 individuals, including:

- **3 Syrian and 1 Palestinian military officials** - AL WAKIL, Simon (Commander of the National Defence Forces in the city of Maharda (Hama)); AL-ABDULLAH, Nabeul (Commander of the National Defence Forces in the city of Suqaylabiyah); SHAMMOUT, Abu Hani (oversees the recruitment of Syrian mercenaries to fight alongside Russia in Ukraine); AL-SALTI, Muhammad (Commander-in-Chief and Chief of Staff of the Palestine Liberation Army);
- **1 Syrian private security company official** - GERGES, Fawaz Mikhail (CEO of Al-Sayyad Company for Guarding and Protection Services responsible for the recruitment of fighters and mercenaries in Syria to fight alongside Russian forces in Ukraine)
- **28 representatives of Russian political elite (24 governors and 4 heads of regions)** - ARTAMONOV, Igor Georgievich (Governor of Lipetsk Region), ARTYUKHOV, Dmitry Andreevich (Governor of the Yamalo-Nenets Autonomous Area), AVDEEV, Alexander Alexandrovich (Acting Governor of Vladimir Region), AZAROV, Dmitry Igorevich (Governor of Samara Region), BOCHAROV, Andrei Ivanovich (Governor of Volgograd Region), BOGOMAZ, Alexander Vasilievich (Governor of Bryansk Region), BUSARGIN, Roman Viktorovich (Acting Governor of Saratov Region), DROZDENKO, Alexander Yurievich (Governor of Leningrad Region), EGOROV, Maxim Borisovich (Acting Governor of Tambov Region), GUSEV, Aleksandr Viktorovich (Governor of Voronezh Region), KUVSHINNIKOV, Oleg Aleksandrovich (Governor of Vologda Region), KUYVASHEV, Yevgeny Vladimirovich (Governor of Sverdlovsk Region), MOOR, Alexander Viktorovich (Governor of Tyumen Region), NIKITIN, Gleb Sergeevich (Governor of Nizhny Novgorod Region), ORLOV, Vasily Aleksandrovich (Governor of the Amur Region), PASLER, Denis Vladimirovich (Governor of Orenburg Region), SHAPSHA, Vladislav Valeryevich (Governor of Kaluga Region), STAROVOIT, Roman Vladimirovich (Governor of Kursk Region), TEKSLER, Alexei Leonidovich (Governor of the Chelyabinsk Region), TOMENKO, Viktor Petrovich (Governor of the Altai Territory), TRAVNIKOV, Andrei Alexandrovich (Governor of Novosibirsk Region), USS, Alexander Viktorovich (Governor of Krasnoyarsk Territory), UYBA, Vladimir Viktorovich (Head of the Komi Republic), VLADIMIROV, Vladimir Vladimirovich (Governor of Stavropol Territory), VOROBYOV, Andrei Yuryevich (Governor of Moscow Region), KHABIROV, Radiy Faritovich (Head of the Republic of Bashkortostan/Bashkiria), NIKOLAYEV, Oleg Alekseyevich (Head of Chuvashia), NIKOLAYEV, Aisen Sergeevich (Head of the Republic of Sakha (Yakutia));
- **2 representatives of RF government** - CHUICHENKO, Konstantin Anatolyevich (Minister for Justice), SVIRIDENKO, Oleg Mikhailovich (Deputy Minister of Justice);
- **3 so-called leaders in areas of Ukraine illegally occupied by Russian forces or controlled by Russian-backed proxies** - KHOTSENKO, Vitaly Pavlovich (Prime Minister of the Donetsk People's Republic), KUZNETSOV, Vladislav Garievich (First Deputy Chairman of the 'Luhansk People's Republic'), RAZVOZHAYEV, Mikhail Vladimirovich (Governor of Sevastopol);
- **2 relatives of businessmen against whom sanctions were imposed earlier** - ISMAILOV, Sanjar Zunnurovich (nephew of Alisher Usmanov), ISMAILOV, Sarvar (nephew of Alisher Usmanov);

- **1 UK propaganda figure** - PHILLIPS, Graham William (video blogger who has published media content that supports and promotes actions and policies which destabilise Ukraine).

Poland. Poland-specific list of designated parties subject to measures not covered by EU Regulations 765/2014 and 269/2014 covered **15 individuals**²⁹. These individuals are added to the list of foreigners whose stay in Poland is undesirable. For 7 of them³⁰ funds and economic resources are completely frozen, ban to provide, directly or indirectly, and funds or economic resources is imposed. In addition to the EU measures legislation related to freezing assets and suspension of transactions, the Act also foresees the entry on the list of foreigners whose residence in the territory of Poland is undesirable.

Switzerland. On 3 May, the Federal Department of Economic Affairs EAER added Serhiy Vitaliyovich KURCHENKO and Yevgeniy Viktorovich PRIGOZHIN to its sanctions list (financial sanctions + ban on entry and transit). The measures come into force at 6 p.m. on 4 May 2022.

On 10 June, the Federal Council decided to adopt new EU sanctions against Russia and Belarus and instructed the The Federal Department of Economic Affairs, Education and Research (EAER) to adapt the Ordinance on measures in connection with the situation in Ukraine. The EAER approved the sanctioning of over 65 Russian and 12 Belarusian individuals, including military personnel held responsible for the atrocities committed in Bucha, people operating in the fields of politics and disinformation/propaganda, certain oligarchs and their family members (including Alina Kabayeva). The Swiss list of sanctioned individuals and entities is thus identical to that of the EU.

Australia. The Australian GoV imposed sanctions on 147 more people, which include Russian senators, and daughters of Vladimir Putin and Russian Foreign Minister Sergei Lavrov.

On 3 May, the Australian government imposed sanctions on 76 members of the State Duma of the Federal Assembly of the Russian Federation, who voted in favor of the resolution recognizing the independence of "LPR" and "DPR".

The Australian GoV has also imposed targeted financial sanctions and travel bans on 34 senior members of the Russian-led movements in Ukrainian regions Donetsk and Luhansk, the so-called "People's Council of the People's Republic of Donetsk" and "People's Council of the People's Republic of Luhansk".

On 17 May, Australia sanctioned 4 individuals for supporting the invasion - Aleksandr Chupriyan (acting Minister of Emergencies for Russia), Sergei Korolyov (First Deputy Director of Russia's Federal Security Service (FSB)), Nikolay Bogdanovsky (First Deputy Chief of the General Staff of the Armed Forces of Russia), and Illia Kyva (a pro-Russian former member of the Ukrainian Parliament) and 11 individuals in the Russian media industry who promote the Russian Government's false narratives: Taras Romanovych Kozak, Dmitriy Konstantinovich Kiselyov, Alexey Lvovich Nikolov, Sergey Borisovich Brilev, Aleksandr Aleksandrovich Zharov, Mikhail Ilich Yakushev, Mikhail Vladimirovich Leontyev, Alexander Igorevich Kots, Evgeny Poddubny, Aleksandr Yakovlevich Shkolnik, Dmitry Anatolyevich Steshin.

On 28 June, Australia sanctioned 16 individuals, including Kabaeva³¹.

New Zealand. Regulations designating 170 members of the upper house of RF Federation Council, and extending further prohibitions on those already sanctioned.

On 11 May, New Zealand imposed new sanctions against Russia: for disinformation and cyber attacks on Ukraine. In particular, sanctions were imposed against 5 persons: Igor Konashenkov (Chief spokesperson of RF MinDefence), Igor Kostyukov (Head of Russia's military intelligence agency GRU), Aleksei Pimanov (Head of Krasnaya Zvezda), Mikhail Sinelin (Co-founder of NewsFront) and Oleg Dobrodeev (Chief Executive of VGTRK).

On 17 May, New Zealand imposed sanctions on President of Belarus **Alexander Lukashenko** and 22 military officials of Belarus³².

²⁹ Bakalczuk Tatiana, Deripaska Oleg, Fridman Michail, Gucerjew Michail, Gucerjew Sait-Salam, Kantor Wiaczeslaw Mosze, Kaspierski Jewgienij, Melniczenko Aleksandra, Melniczenko Andrije, Mordaszow Aleksiej, Nieczajew Aleksiej (Nechayev Alexy Gennadyevich), Nuraliev Boris, Raszidow Timur, Sieczin Igor Iwanowicz (Sechin Igor Ivanovich), Vekselberg Victor.

³⁰ Bakalczuk Tatiana, Gucerjew Sait-Salam, Kaspierski Jewgienij, Melniczenko Aleksandra, Nuraliev Boris, Raszidow Timur, Vekselberg Victor.

³¹ Alina Maratovna Kabaeva (Chair of the Board of the National Media Group), Igor Alexandrovich Putin (Director of Pechenga International Sea Port, and relative of President Putin), Mikhail Evgenievich Putin (Deputy Chairman of the Management Board of Sogaz Insurance and Gazprom, and relative of President Putin), Roman Igorevich Putin (Chair of the board of directors of the MRT Group of Companies LLC, and relative of President Putin), Yuri Nikolayevich Shamalov (President of Gazfond (the pension fund of Gazprom) and a member of the board of directors of Gazprombank), Aleksandr Grigorevich Plekhov (Executive Director of Vital Development Corporation JSC), Mikhail Alekseevich Klislin (Executive of Bank Rossiya, and a member of the Board of Directors at SOGAZ), Sergey Nikolayevich Gorkov (Banker, lawyer and Director-General of Rosegeologia), God Semenovich Nisanov (Property developer and chairman of Kievskaya Ploschad Group of Companies), Evgeny Grigorievich Novitsky (Former head of Sistema and Chairman of Radiotechnical and Information Systems Concern (RTI)), Grigory Viktorovich Berezkin (Chairman of the Board of Directors of ESN Group), Igor Albertovich Kesaev (Owner and President of Mercury Group), Irek Envarovich Faizullin (Minister for Construction, Housing and Utilities of Russia), Vitaly Gennadyevich Savelyev (Minister for Transport of Russia), Dmitry Nikolayevich Patrushev (Minister for Agriculture of Russian), And Maria Alekseevna Lvova-Belova (Commissioner for Children's Rights in Russia).

³² Leonid Viktorovich Kasinsky (Assistant to the Minister of Defense for Ideological Work in the Armed Forces), Igor Vladimirovich Mozhilovsky (Assistant to the Minister of Defense for Military Economy and Finance; Head of the Main Financial and Economic Department in the Ministry of Defense), Oleg Leonidovich Voinov (Head of the International Military Cooperation Department of the Ministry of Defense; Assistant to the Minister of Defense for International Military Cooperation), Ivan Josephovich Boguslavsky (Head of the Chief Military Inspectorate of the Armed Forces in the Ministry of Defense), Dmitry Anatolievich Miholap (Deputy Commander of the Air Force and Air Defense Forces), Anatolij Anatolievich Bulavko (Deputy Commander for Ideological Work and Head of Ideological Work of the Air Force and Air Defense Forces), Victor Vladimirovich Soyko (Deputy Commander for Armaments and Head of the Air Force and Air Defense Forces Armament Department), Alexander Ivanovich Bas (Deputy Commander of the Western Operational

Japan. On 10 May, 8 RF officials (Mikhail Mishustin, Rashid Nurgaliev, Aleksandr Dvornikov, Vladimir Bogdanov, Elena Timchenko, Nataliya Browning, Kseniya Frank, Gleb Frank) and 133 individuals from self-proclaimed "Donetsk People's Republic" and "Luhansk People's Republic" designated as targets for measures for asset freeze by the Ministry of Foreign Affairs Notification.

Japan. On 5 July, Japan imposed asset freeze sanctions on 57 Russian individuals³³ and 5 Russian-backed proxies in occupied Ukrainian territories³⁴.

Liechtenstein. On 22 April, funds and economic resources owned or under the direct or indirect control of Serhiy Vitaliyovich KURCHENKO and Yevgeniy Viktorovich PRIGOZHIN were blocked. It is forbidden to transfer funds or to otherwise directly or indirectly make funds and economic resources available to the natural persons, companies and organizations affected by the blocking.

Norway. New listings of 65 people. These include people responsible for the actions of Russian troops in Butcha and Mariupol, leading businessmen and family members of listed oligarchs and civil servants.

6. Intensify Sanctions on State-Owned Enterprises

USA (3 SOEs in media, 1 SOE bank + 10 its subsidiaries + 1 state-supported private weapons manufacturer), **UK** (sanctions against 5 defence SOEs +1 RF Railways + 2 Airlines), **New Zealand** (2 RF SOEs, 1 Belarus SOE in defence and shipbuilding + 3 in media +3 Belarus SOEs in defence), **Canada** (4 defence and machine building + 3 RF SOE financial institutions and banks + 28 defence SOEs + 15 entities involved in disinformation activities (including 12 SOEs), **Australia** (1 RF PMC Wagner + 2 Belarus SOEs in defence +12 RF propaganda and desinformations company), **EU** (3 SOE media +6 SOEs + 4 entities owned by SOE on 27% + National Settlement Depository + 3 Belarus SOE + extended prohibition of broadcasting for 3 RF SOE medias + 7 SOEs), **Latvia** (ban on distribution of 80 audio and audiovisual programs registered in RF), **Japan** (1 RF and 1 Belarus SOE banks), **Switzerland** (6 SOE + 4 owned by SOE on 27% and 3 Belarus SOEs + prohibition of advertisement of content produced or broadcast by certain RF SOE media).

EU. The EU suspended the broadcasting activities in the EU of 3 Russian state-owned broadcasting outlets used by RF GoV as instruments to manipulate information and promote disinformation about the invasion of Ukraine, including propaganda: Rossiya RTR/RTR Planeta, Rossiya 24 / Russia 24 and TV Centre International.

On 3 June, the European Council imposed restrictive measures (freeze of funds or economic resources and prohibition on the making available of certain funds or economic resources) on 6 SOEs + 4 entities owned by SOE on 27% in response to Russia's military aggression against Ukraine and other actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine: JSC GARNIZON (SOE), JSC OBORONENERGO (SOE), JSC VOENTELECOM (VOYENTELEKOM) (SOE), JSC VOENTORG (SOE), PJSC KAMAZ alias KAMAZ PTC (SOE), Management Company Tatneft-Neftekhim LLC (owned by Tatneft (27% SOE)), Nizhnekamsk All-Steel Tyre Plant (owned by Tatneft (27% SOE)), LLC, PJSC Nizhnekamskshina (owned by Tatneft (27% SOE)), LLC TD KAMA(owned by Tatneft (27% SOE)), OJSC Balashikha Casting and Mechanical Plant (SOE), JSC REMDIZEL (SOE), JSC SUKHOI Company (SOE), JSC "121 AIRCRAFT REPAIR PLANT" (SOE) and Russia's largest securities depository, the National Settlement Depository.

On 3 June, the EU Council imposed restrictive measures (freeze of funds or economic resources and prohibition on the making available of certain funds or economic resources) on 3 Belarus SOEs (OJSC "Grodno Tobacco Factory Neman" (SOE),

Command), Dmitry Leontievich Bekren (Deputy Commander of the Army for Ideology, and the Head of the Ideology Department of the Western Operational Command), Vitaly Fridrikhovich Kilchevsky (Deputy Commander for Armaments and the Head of Armaments), Sergey Nikolayevich Grinyuk (Deputy Commander of Troops for Logistics, and Head of Logistics Department, Western Operational Command), Aleksandr Viktorovich Naumenko (Commander of the Troops of the North-Western Operational Command), Vyacheslav Aleksandrovich Lenkevich (Deputy Commander in Charge of Logistics and Head of Logistics of the North-Western Operational Command), Dmitry Alexandrovich Zabrotsky (First Deputy Head of the Financial and Economic Department of the Ministry of Defense), Sergei Anatolievich Sauta (Head of the Department of Legal Support of the Ministry of Defense), Yuri Mikhailovich Preyganovich (Deputy Commander of the Air Force and Air Defence Forces for Logistics and a Head of Department), Vadim Evgenievich Shadura (Chief of Staff – First Deputy Commander of the Troops of the North-Western Operational Command), Vladimir Vladimirovich Kulazhin (Deputy Commander of the Troops of the North-Western Operational Command), Valery Ivanovich Yanushkevich (Deputy Troops Commander for Ideological Work – Head of the Ideological Work Department of the North-Western Operational Command), Dmitri Ivanovich Surovich (Deputy Commander for Armaments, and the Head of Armaments Directorate of North-Western Operational Command), Oleg Nikolayevich Kopyl (Deputy Head of the Main Department – Head of the Department of Moral and Psychological Support of the Main Department of Ideological Work of the Ministry of Defense), Vadim Anatolyevich Lukashevich (Head of the information department of the main department of ideological work of the Ministry of Defense).

³³ Dmitry Grigorenko (Deputy Prime Minister of Russia and Chief of the Government Staff of Russia), Sergei Roldugin (Cellist), Elena Mirtova (Wife of Sergei Roldugin), Marina Mordashova (Wife of Alexey Mordashov), Kirill Mordashov (Relative of Alexey Mordashov), Nikita Mordashov (Relative of Alexey Mordashov), Sergey Gorkov (Director General - Chairman of the Board of RosGeo), Yury Slyusar (President of United Aircraft Corporation), Andrei Gasilov (Solo shareholder of JSC Argument), God Nisanov (Board Chairman of Kievskaya Ploschad Group), Evgeniy (Evgenii) Kochman (CEO of Imperial Yachts SARL), Evgeny (Evgeni) Novitsky (Novitski) (Chairman of RTI Systems), 45 military officials of the 64th Separate Motorised Rifle Brigade of the 35th Combined Arms Army of Russia - Azatbek Omurbekov (Colonel, commander of the Brigade), Andrei Kurbanov (Colonel), Viacheslav Klobukov (Colonel), Aleksandr Vins (Colonel), Aleksandr Shershnev (Colonel), Sergei Vetrov (Lieutenant colonel), Ruslan Mitiyev (Lieutenant colonel), Andrei Ermishko (Lieutenant colonel), Maksim Platonenkov (Lieutenant colonel), Vladimir Matafonov (Lieutenant colonel), Dmitrii Lvov (Lviv) (Lieutenant colonel), Evgenii Ladyzhenskii (Lieutenant colonel), Dmitrii Pakhandrin (Lieutenant colonel), Anatolii Shipitsyn (Lieutenant colonel), Denis Deev (Lieutenant colonel), Oleg Bukhvalov (Lieutenant colonel), Dmitrii Smoliago (Lieutenant colonel), Aleksei Bolshakov (Lieutenant colonel), Roman Nadezhdin (Lieutenant colonel), Viktor Filippov (Lieutenant colonel), Faik Mamedov (Mammadov) (Major), Igor Fedotov (Major), German Kulemin (Major), Roman Burdo (Major), Dmitry Kozlov (Major), Ivan Kurkin (Major), Evgeny Vazhenov (Major), Dmitry Ionov (Major), Alexander Kochergin (Major), Alexander Kopylov (Major), Maxim Chernyshev (Major), Stanislav Makarov (Major), Andrey Ivanov (Major), Sergei Pereshivkin (Major), Aleksey Prysev (Major), Sergey Rudenko (Major), Olga Khamenok (Major), Dmitriy Levin (Major), Dmitriy Gonchar (Major), Sergey Zorin (Major), Aleksandr Potapov (Major), Stepan Grigorov (Major), Sergey Mosalev (Major), Valentin Lutsak (Major), Sergey Borisenko (Major).

³⁴ 4 members of the 'Salvation Committee for Peace and Order' in Kherson Kyrylo STREMOUSOV, Volodymyr SALDO, Serhiy CHEREVKO, Tetiana KUZMICH and appointed acting mayor of Melitopol Galina DANILCHENKO

Beltamozhservice (SOE), Belteleradio Company / National State Television and Radio Company of the Republic of Belarus (SOE)).

On 21 July, the Council listed additional 9 entities inc. 7 SOEs: the Alexander Gorchakov Public Diplomacy Fund (SOE), the Federal Agency for the Commonwealth of Independent States Affairs (SOE), Compatriots Living Abroad and International Humanitarian Cooperation (Rossotrudnichestvo) (SOE), Russkiy Mir Foundation (SOE), JSC Research and Production Association "Kvant" (SOE), Sberbank (SOE), All-Russia "Young Army" Military Patriotic Social Movement (SOE).

Switzerland. On 10 June, the Federal Council decided to adopt new EU sanctions against Russia and Belarus and instructed the The Federal Department of Economic Affairs, Education and Research (EAER) to adapt the Ordinance on measures in connection with the situation in Ukraine. The EAER approved the sanctioning on 6 SOE + 4 owned by SOE on 27% and 3 Belarus SOEs, directly or indirectly, the Armed Forces of Russian and GoV.

USA. On 8 May, OFAC designated: 3 major Russian state-owned media outlets as SDNs: JSC Channel One Russia, Television Station Russia-1, and JSC NTV Broadcasting Company; Russian state-owned bank Joint Stock Company Moscow Industrial Bank (MIB) and 10 of its subsidiaries; Russian state-supported private weapons manufacturer LLC Promtekhlogiya.

UK. Added 4 state owned defense companies plus one with controlling stake 25+1 shares owned by RF³⁵ to the sanctions list of asset freeze targets. On 19 May, UK GoV introduced new sanctions: Aeroflot (SOE - Russia's largest airline) and Rossiya Airlines (SOE) will be unable to sell their unused, lucrative landing slots at UK airports.

On May 4, UK additionally sanctioned 32 entities, including 8 SOEs + 2 with shares in RF ownership³⁶ (subject to an asset freeze) among sanctioned – VGTRK, Avangard JSC, Moscow institute of physics and technology, N.A. Dollezhal order of lenin research and design institute of power engineering JSC, The Dalzavod ship repair centre JSC, Zvezda, KAMAZ.

On 13 May, UK imposed sanctions on Russian Railways.

New Zealand. Regulations designating companies and organizations in the **defense** sector (Makeyev Rocket Design Bureau (SOE), Minsk Wheel Tractor Plant (MZKT) (Belarus SOE) and **shipbuilding** (United Shipbuilding Corporation (SOE)).

On 11 May, New Zealand imposed new sanctions against Russia: for disinformation and cyber attacks on Ukraine. In particular, sanctions were imposed against 3 entities: 85th Main Special Service Centre (GTsSS) (SOE), Internet Research Agency, Main Centre for Special Technologies (GTsST).

On 17 May, New Zealand imposed sanctions on 3 Belarus defense entities: State authority for military industry of the Republic Of Belarus (SAMI), OKB TSP Scientific Production LLC (OKB TSP), Oboronnye Initsiativy, LLC Synesis.

On 8 June, New Zealand imposed sanctions on 44 entities that are funding or fuelling the Russian war in Ukraine, among which 32 RF SOEs and 3 Belarus SOEs:

Admiralty Shipyards JSC (SOE), Aleksandrov Scientific Research Technological Institute (NITI) (SOE), Federal State Unitary Enterprise Dukhov Automatics Research Institute (VNIIA) (SOE), Gazprom PJSC (SOE, 50+1), Gazpromneft (SOE, 50+1), Irkut Corporation (SOE, 50+1), JSC Scientific Research Institute of Computing Machinery (SOE), JSC Central Research Institute of Machine Building (JSC TsNIIMash) (SOE), JSC Kazan Helicopter Plant (SOE), JSC Rocket and Space Centre - Progress (SOE), Kamaz, Moscow Institute of Physics and Technology (SOE), NPO High Precision Systems JSC (SOE), NPO Splav JSC (SOE), Oboronprom (SOE), PJSC Beriev Aircraft Company (SOE), Rapart Services LLC (SOE), Rosneft (SOE), Rosoboronexport OJSC (SOE), Rostec (SOE), Rostekh-Azimuth (SOE), RusHydro (SOE), Russian Aircraft Corporation MiG (SOE), Russian Helicopters JSC (SOE), Sovcomflot (SOE), Sukhoi Aviation JSC (SOE), Sukhoi Civil Aircraft (SOE), Transneft (SOE), Tupolev JSC (SOE), UEC-Saturn (SOE), United Aircraft Corporation (SOE), United Engine Corporation (SOE), United Instrument Manufacturing Corporation (SOE).

3 SOEs, linked to the Belarusian government or military - 140 Repair Plant JSC (SOE), Agat-Electromechanical Plant OJSC (SOE), Belpetsvneshtekhnika SFTUE (SOE).

³⁵ Aleksandrov Scientific research technological institute Niti, Federal state unitary enterprise Dukhov automatics research institute, JSC GTLK, JSC Kalashnikov concern (25+1), Rocket and space center progress JSC.

³⁶ VGTRK (SOE), ALL-RUSSIAN PUBLIC ORGANIZATION SOCIETY FOR THE PROMOTION OF RUSSIAN HISTORICAL DEVELOPMENT TSARGRAD, ANALITICHESKII TSENTR KATEKHON OOO, AO NII VEKTOR (SOE), AVANGARD JSC (SOE), BAIKAL ELECTRONICS JSC, CHEBOKSARY ELECTRICAL EQUIPMENT PLANT, CROCUS NANO ELECTRONICS (14,32% SOE), FORSS TECHNOLOGY LTD, GARANTEX EUROPE OU, INFOROS, INTEGRAL SPB,IZMASH UNMANNED SYSTEMS, JOINT STOCK COMPANY MIKRON (6,5% SOE), KAMAZ (SOE), KRANARK LLC, MCST JSC, MOLECULAR ELECTRONICS RESEARCH INSTITUTE, JOINT STOCK COMPANY, MOSCOW INSTITUTE OF PHYSICS AND TECHNOLOGY (SOE), MPI VOLNA LLC, N.A. DOLLEZHAL ORDER OF LENIN RESEARCH AND DESIGN INSTITUTE OF POWER ENGINEERING JSC (SOE), OOO VOLGA GROUP, PELLA-MASH LLC, RADIOAVIONICA JSC,RSB GROUP, SOUTHFRONT, STRATEGIC CULTURE FOUNDATION, DALZAVOD SHIP REPAIR CENTRE JSC (SOE), SPECIAL TECHNOLOGY CENTRE LLC, T-PLATFORMS,TSARGRAD OOO, ZVEZDA PJSC (SOE).

Canada. On 6 May, amended the Special Economic Measures (Russia) Regulations to list 5 additional companies: Zelenodolsk Shipyard JSC (partly), Rosgvardia (SO), UEC Klimov JSC (private but connected with Rostekh), KAMAZ PTC (SOE).

On 27 May, Canada imposed an asset freeze and dealings prohibition on 3 Russian SOE financial institutions and banks: Management Company of the Russian Direct Investment Fund JSC (SOE), RVC Management Company LLC (SOE), Russian Agricultural Bank JSC (SOE).

On June 27, the Canada GoV sanctioned 28 defence SOEs for their role in enabling or supporting Russia's invasion of Ukraine³⁷.

Japan. On 7 June, Japan designated 1 SOE bank of RF (Rosselkhozbank SOE) and one bank of Belarus (Belinvestbank SOE) as targets for asset freezing.

Australia. On 17 May, sanctioned 3 SOE - the Private Military Company "Wagner" (PMC Wagner) and two Belarus defense enterprises (Industrial-Commercial Private Unitary Enterprise Minotor-Service and OJSC KB Radar-Managing Company of Radar Systems Holding). Both companies produce sophisticated equipment used by the Armed Forces of Belarus, who have in turn provided significant strategic support to Russian forces. And imposed sanctions on 12 entities for promoting Russian propaganda and disinformation³⁸.

Latvia. On 6 June, the Latvian regulator the National Electronic Mass Media Council of Latvia (NEPLP) prohibited the distribution (including retransmission) of 80 audio and audiovisual programs registered in RF in the territory of Latvia, until RF terminates its aggression in Ukraine.

Norway. 6 RF SOE + 4 owned by SOE on 27% in line with 6th EU package.

PROPAGANDA

EU. EU extended the existing prohibition on the broadcasting of content to three further Russian State outlets (Rossiya RTR/RTR Planeta; Rossiya 24/Russia 24 and TV Centre International) which was introduced in the EU's 3rd package (3 March). This ban is to come into force on 25 June 2022.

Switzerland. On 29 June, Switzerland prohibited the advertisement of content produced or broadcast by certain Russian media such as Russia Today or Sputnik (RT- Russia Today English, RT- Russia Today UK, RT - Russia Today Germany, RT - Russia Today France, RT - Russia Today Spanish, Sputnik, Rossiya RTR / RTR Planeta, Rossiya 24 / Russia 24, TV Centre International).

Canada. On 7 July, Canada sanctioned 15 entities involved in disinformation activities (including 12 SOEs) - Channel One Russia JSC (SOE), Television Station Russia-1 (SOE), NTV Broadcasting Company JSC (SOE), Russtrodnichestvo (SOE), TASS (SOE), The All-Russia State Television and Radio Broadcasting Company (VGTRK) (SOE), Gazprom Media (SOE), National Media Group (private), Rossiya-24 TV Channel (SOE), Smotrim (private), Vesti.Ru (SOE), RT (SOE), Sputnik (SOE), REGNUM News Agency (private), Roskomnadzor (governmental institution).

³⁷ SOE: Pskov Distance Communication Plant, Radiozavod JSC, Razryad JSC, Research Production Association Mars, Ryazan Radio-Plant, Scientific Production Center Vigstar JSC, Scientific Production Enterprise "Radiosviaz", Scientific Research Institute Ferrite-Domen, Scientific Research Institute of Communication Management Systems, Novosibirsk Semiconductor Devices Plant Vostok JSC, State Machine Building Design Bureau "Vypel" By Name I.I. Toropov JSC, Plant Kulakov JSC, Raduga Design Bureau, TAO GNPP "Region", Concern "MPO – Gidropribor", Concern Granit-Electron JSC, Ural Design Bureau "Detal", Tambov Plant (TZ) "October", Engineering Centre Moselectronproekt, Ship Maintenance Centre "Zvezdochka" and 22 entities of JSC Tactical Missiles Corporation - "Uralelement" JSC, "Plant Dagdiesel" JSC, PA Strela JSC, Ravenstvo JSC, Ravenstvoservice JSC, Saratov Radio Instrument Plant JSC, Severny Press JSC, "Research Centre for Automated Design" JSC, NPO Lightning, "MBDB 'ISKRA'" PJSC, "Central Design Bureau of Automation", 711 Aircraft Repair Plant, Azov Optomechanical Plant, "Krasny Gidropress" JSC, Elektrotyaga JSC, GosNIIMash JSC, RKB Globus, Smolensk Aviation Plant,

³⁸ Internet Research Agency LLC, New Eastern Outlook, Oriental Review, Strategic Culture Foundation, SouthFront, NewsFront, OOO Inforos, United World International, Geopolitica, Odná Rodyna, Journal Kamerton, Analiticheski Tsentr Katekhon OOO (Part 2 of Schedule 2)

7. Expand Export Controls and Ban Imports

UK (import - silver, wood, high-end + 35% duty for ~£1.4bn of imports, revenue generating goods RF origine, export - restrictions relating to internet services and online media services + export bans to hit > £250 mln + maritime goods&technology + goods&technology that could be used to repress people + goods&technology relating to chemical/biological weapons + restricted goods&technology + jet fuel and fuel additives + extended lists of oil refining goods&technology and energy-related goods banned to export + ban on services relating to iron and steel goods + export restrictions for Belarus on goods and technology relating to critical industry, quantum computing, oil refining, luxury goods including dual-use good and technology (will block trade of ~£60 mln of goods with Belarus + **allowed for humanitarian assistance activity in uncontrolled territories of Donetsk and Luhansk oblast** + ban on export of goods and items of significant importance to the Russian (such as chemicals, materials, machinery goods and electrical appliances with the exception of licensed humanitarian goods) + expanded the scope of existing energy-related goods and services prohibitions + ban on export of accounting, business and management consulting, and public relations services), **USA** (ban on exports of accounting and consulting services to RF, license requirement for common industrial and commercial items + export control for 70 entities in RF and 1 in Belarus + temporary ban on export privileges for Belavia, Nordwind Airlines, Pobeda Airlines (owned by Aeroflot) and Siberian Airlines + 35% import tariff for 570 categories of RF products worth approximately \$2.3 bn), **Japan** (bans on exports to 71 organizations and a ban on the export of cutting-edge goods (quantum computers, 3D printers, etc) + ban on export goods that strengthen the industrial base of RF (wood products, steel storage tanks and other similar containers, machinery and electrical equipment components) + ban on export of goods to 65 RF and 25 Belarus entities in defence + ban on trust, accounting / audit, and management consulting services), **Taiwan** (strategic high-tech products in 57 categories to Belarus + ban on export of modern chips to Belarus and RF), **Canada** (ban on import – luxury goods; ban on export – luxury goods, goods for weapons manufacture and production + export ban on 28 services vital for the operation of the oil, gas and chemical industries, including technical, management, accounting and advertising services + ban on export for Belarus on products that could be used in the production and manufacturing of weapons, export and import ban on Belarus on luxury goods + expanded existing measures on the oil, gas and chemical sectors to include industrial manufacturing). **EU** (expansion of entities list with export restrictions for dual-use goods and technology + expansion of list of goods and technologies that can be used in defense and security sectors banned for export + ban of accounting, pr and consultancy services to RF + **exclusions to export ban on luxury goods, allowing for personal use of persons travelling from the EU** + reinforced export controls of dual use goods and advanced technology + expanded the list of entities subject to export restrictions regarding dual-use goods and technology by adding 4 Russian entities + **extended the exemption from the prohibition to engage in transactions with certain SOEs as regards transactions for agrol products and the transport of oil to 3rd countries**), **Switzerland** (import - lignite and coal, timber, cement, seafood, caviar; export - industrial robots or certain chemical products + extended the list of dual-use goods banned for export by 91 RF entities and 24 Belarus entities + extended the list of prohibited for import from RF goods + ban on trust, accounting / audit, and management consulting services), **Norway** (expansion of list of goods subject to export controls / bans that could help increase Russia's military and technological capabilities + ban auditing and accounting, financial advice).

UK. Expanded the list of products facing import bans - silver, wood products and high-end products from RF including caviar. A further package of goods are subject to additional 35% duties, when imported from RF and RF (~ £130 mln worth). **The Institute of Chartered Accountants of England and Wales (ICAEW, which includes the "big four" auditors: KPMG, EY, Deloitte and PwC) is asking UK GoV for exceptions to the ban on providing services to Russian companies - FT.**

On 29 Apr, UK introduced new trade sanctions relating to internet services and online media services. This instrument introduces requirements that: *Social media services*, including video sharing platforms, must take reasonable steps to prevent content that is generated, uploaded to or shared by a designated person being encountered by a UK-based user; *Internet access services*, including fixed and wireless broadband providers, must take reasonable steps to prevent UK-based users from accessing websites provided by a designated person. This will likely take the form of URL blocking; *Application stores*, including those on smartphones, must take reasonable steps to prevent UK-based users from downloading or otherwise accessing an application provided by a designated person.

The instrument confers powers on the Secretary of State to designate persons to whom these online restrictions will apply. The instrument also confers on the Office of Communications (OFCOM) the power to impose civil monetary penalties, of up to £1 mln on a person who fails to comply with the new trade sanctions. Failing to comply with the new sanctions is also a criminal offense.

On 4 May, UK announced a ban on services exports to Russia, including management consulting, accounting and PR services.

On May 9, UK announced new sanctions against RF and Belarus – 35% duty for ~£1.4bn of imports will be imposed, including on palladium, platinum and chemicals. In addition, planned export bans intend to hit more than £250 mln (representing almost 10% of UK exports to Russia in 2021), including chemical products, polymers, and equipment (manufacturing and heavy machinery sectors).

On 23 June, UK prohibited: the export of maritime goods and technology for the placing on board of a Russian-flagged vessel; supply or delivery of maritime goods or technology from a third country for the placing on board of a Russian-flagged vessel; the making maritime goods or technology available for the placing on board of a Russian-flagged vessel; the transfer of maritime

technology to a Russian-flagged vessel. Related technical assistance, financial services, funds and brokering services are also prohibited.

UK prohibited the export, supply and delivery, making available and transfer of goods and technology that could be used to repress people (interception and monitoring equipment) as well as related technical assistance, financial services, funds and brokering services. The prohibitions relate to Russia, and the non-government controlled Ukraine territories. Simultaneously, UK prohibited the provision of interception and monitoring services to, or for the benefit of, the Government of Russia, as well as the supply or delivery of interception and monitoring services to, or for the benefit of, the Government of Russia from a third country.

UK prohibited the export, supply and delivery, making available and transfer (as well as related technical assistance, financial services, funds and brokering services) of goods and technology relating to chemical and biological weapons.

UK prohibited the export of restricted goods and technology to, or for use in, non-government controlled Ukrainian territory, supply or delivery of these goods and technology from a third country to a place in non-government controlled Ukrainian territory, making these goods or technology available to a person connected with, or for use in, non-government controlled Ukrainian territory, transfer of relevant restricted technology to a place in, or to a person connected with, non-government controlled Ukrainian territory.

UK prohibited the export to, or for use in Russia of jet fuel and fuel additives, as well as supply or delivery of such products from a third country to a place in Russia and the making available of such products to a person connected with, or for use in Russia. Technical assistance, financial services, funds, brokering services relating to jet fuel and fuel additives are also prohibited.

UK prohibited the import, acquisition or supply and delivery of revenue generating goods³⁹ that originate in or are consigned from Russia (as well as related technical assistance, financial services, funds, and brokering services).

On 23 June, UK extended the list of oil refining goods and technology (relating to LNG-process⁴⁰) and the list of energy-related goods (oil and gas exploration data, hydraulic fracturing items) which are prohibited from exporting to Russia.

UK prohibited the provision of technical assistance, financial services and funds, brokering services relating to iron and steel goods.

From 5 July, the UK GoV introduced new export restrictions to Belarus:

- widened the prohibitions on the export, supply and delivery, making available and transfer of dual-use items so that they apply irrespective of whether there is a military end-user;
- prohibited the export, supply and delivery, making available and transfer of critical industry goods and technology (as well as related technical assistance, financial services, funds and brokering services);
- prohibited the export, supply and delivery, making available and transfer of quantum computing and advanced materials-related goods and technology (as well as related technical assistance, financial services, funds and brokering services);
- prohibited the export, supply and delivery, making available and transfer of oil refining goods and technology (as well as related technical assistance, financial services, funds and brokering services);
- prohibited the export, supply, delivery, making available and transfer of certain luxury goods;

New import restrictions also were imposed:

- widened the existing prohibitions on petroleum products to capture a wider range of oils and other products;
- prohibited the import of iron and steel products which are consigned from or originate in Belarus;
- prohibited the provision of technical assistance, financial services, funds and brokering services relating to the import of potash, iron and steel products.

A range of technical assistance and financial services were also prohibited:

- extended the prohibition of the provision of technical assistance relating to aircraft to, or for the benefit of a designated person in Belarus, to ships;
- prohibited the provision of technical assistance, armed personnel, financial services or funds, or brokering services where such provisions enables or facilitates the conduct of military activities by the Belarusian military or other military end-users connected with Belarus.

These trade restrictions will block the trade of around £60 million of goods with Belarus.

On 18 July, UK introduced a new exception from trade sanctions measures (the prohibition on outward trade in goods and infrastructure-related services) for humanitarian assistance activity (the work of international and non-governmental organisations

³⁹ The list of revenue generating goods include: crustaceans; caviar and caviar substitutes; cement; some organic chemicals (phosphinates, phosphonates, phosphates and polyphosphates; acyclic hydrocarbons and alcohols and their derivatives; phenols and phenol-alcohols; ethers, ether-alcohols, ether-phenols, ether-alcohol-phenols, alcohol peroxides, ether peroxides, acetal and hemiacetal peroxides, ketone peroxides and their derivatives); potassium chloride; mineral or chemical fertilisers; polymers of propylene or of other olefins; new pneumatic rubber tyres; wood and articles of wood, wood charcoal; wood pulp; uncoated kraft paper and paperboard; articles of cement, of concrete or of artificial stone; glass and glassware items (float glass and surface ground or polished glass; safety glass; carboys, bottles, flasks, jars, pots, phials, ampoules and other containers of glass; glass fibres); silver; aluminium plates, sheets and strip; unwrought lead; turbojets, turbopropellers, gas turbines and parts of gas turbines; cruise ships, excursion boats, ferry-boats, cargo ships, barges and similar vessels; tugs and pusher craft; light-vessels, fire-floats, dredgers, floating cranes; floating docks; floating or submersible drilling or production platforms; other furniture and parts thereof.

⁴⁰ Cold boxes, cryogenic exchangers, cryogenic pumps, process units for gas cooling, process units for the liquefaction of the natural gas; process units for the separation and fractionation of the hydrocarbons.

carrying out relief activities for the benefit of the civilian population) in the non-government controlled areas of the Donetsk and Luhansk oblasts.

On 21 July, UK prohibited the export, supply and delivery, and making available of goods (as well as related technical assistance, financial services and funds, and brokering services), to, or for use in Russia, of a list of goods known as the G7 dependencies and further goods list. These goods have been identified as items of significant importance to the Russian economy and goods for which Russia particularly depends on the UK and G7 partners. The list of goods is wide-ranging and includes chemicals, materials, machinery goods and electrical appliances. Appropriate licences can be sought for any sanctioned goods to be used for humanitarian purposes.

On 21 July, UK expanded the scope of existing energy-related goods and services prohibitions from the 2019 Regulations. These provisions will now capture the export of energy-related goods to Russia, regardless of their eventual point of use (which could be outside Russia), the making available of energy-related goods to a person connected with Russia, and the provision of technical assistance, financial services and funds, and brokering services related to these activities. Prohibitions on energy-related services, such as drilling or well testing, are expanded so that it is prohibited to provide these services to all oil and gas exploration and production projects in Russia.

On 21 July, the UK prohibited the provision of accounting, business and management consulting, and public relations services to persons connected to Russia. The prohibitions cover the provision of services via any or all of Modes of service supply 1, 2, 3, or 4 as defined under the WTO's General Agreement on Trade in Services (GATS), to any person connected with Russia. This would include the provision of services to Russian residents who are temporarily located in another country, including the UK.

USA. The Director of OFAC, in consultation with the Department of State, has determined that E.O. 14071 now applies to the following categories of services: accounting, trust and corporate formation, and management consulting services. As a result, the prohibitions of E.O. 14071 include the exportation, reexportation, sale, or supply, directly or indirectly, from USA or by a U.S. person, wherever located, of accounting, trust and corporate formation, or management consulting services to any person located in Russia. This Determination takes effect on June 7, 2022.

The Department of Commerce Bureau of Industry and Security (BIS) issued a final rule to expand export controls on equipment and other items that are widely used by Russian industry. The final rule imposes a U.S. license requirement on exports, reexports, and transfers of hundreds of common industrial and commercial items, including “wood products, industrial engines, boilers, motors, fans, and ventilation equipment, bulldozers, and many other items with industrial and commercial applications.” In total, 205 HTS codes at the 6-digit level and 478 corresponding 10-digit Schedule B numbers were added to the list of items subject to Russian industry sector export controls.

The U.S. Nuclear Regulatory Commission from May 12, 2022 suspended the general licenses that previously permitted export of radioactive material, and deuterium for nuclear end use from USA to Russia. Exporters now must apply for a specific license pursuant to NRC regulations.

On 2 June, the U.S. Department of Commerce's Bureau of Industry and Security (BIS) added 70 Russian entities and one Belarussian entity (JSC Eleron) to the Entity List under the Export Administration Regulations (EAR) for acquiring and attempting to acquire US-origin items in support of the Russian military. This activity is determined to be contrary to the national security and foreign policy interests of USA and these entities qualify as military end users under the EAR. 65 Russian entities⁴¹ were determined as 'military end users' and designated under “footnote 3” which imposes a license requirement for the export, reexport, export from abroad or transfer (in-country) of all items subject to the EAR, as described by the Russia/Belarus foreign “direct product” (FDP) rule. 5 Russian entities⁴² were added to the Entity List for acquiring and attempting to acquire U.S.-origin items in support of activities contrary to U.S. national security and foreign policy interests. These entities are added to the Entity List with a license requirement for all items subject to the EAR. BIS will review license applications under a policy of denial, and no license exceptions are available for these entities being added. Such measures will effectively cut them off from obtaining U.S.-origin items or foreign-made products derived from certain U.S. technology or software thus further restricting the Russian military's capacity.

⁴¹ AO Rubin; Branch of AO Company Sukhoi Yuri Gagarin Komsomolsk on Amur Aircraft Plant; Branch of PAO II – Aviastar; Branch of RSK MiG Nizhny Novgorod Aircraft Construction Plant Sokol; Chkalov Novosibirsk Aviation Plant; entities of Concern Radio-Electronic Technologies (JSC Aeropribor Voskhod; JSC All Russian Scientific Research Institute Gradient; JSC Almatyevsk Radiopribor Plant; JSC Experimental Design Bureau Elektroavtomatika in the name of P.A. Efimov; JSC Industrial Controls Design Bureau; JSC Kazan Instrument Engineering and Design Bureau; JSC Microtechnology; JSC Phasotron Scientific Research Institute of Radio Engineering; JSC Radiopribor; JSC Ramensk Instrument Engineering Bureau; JSC Research and Production Center SAPSAN; JSC Rychag; JSC Scientific Production Enterprise Izmeritel; JSC Scientific Production Union for Radioelectronics named after V.I. Shimko; JSC Taganrog Communications Scientific Research Institute; JSC Urals Instrument Engineering Plant; JSC Vzlet Engineering Testing Support; JSC Zhiguli Radio Plant; PJSC Bryansk Special Design Bureau; PJSC Moscow Institute of Electro Mechanics and Automation; PJSC Stavropol Radio Plant Signal; PJSC Techpribor; Ramensky Instrument Engineering Plant; V.V. Tarasov Avia Avtomatika; Design Bureau of Chemical Machine Building KBKhM; Far Eastern Shipbuilding and Ship Repair Center; Ilyushin Aviation Complex Branch; Myasishcheva Experimental Mechanical Engineering Plant; Institute of Marine Technology Problems Far East Branch Russian Academy of Sciences; Irkutsk Aviation Plant; JSC Aerocomposit; JSC Avtomatika; JSC Bryansk Electromechanical Plant; JSC Eleron; JSC Experimental Design Bureau named after A.S. Yakovlev; JSC Federal Research and Production Center Altai; JSC Head Special Design Bureau Prozhektor; JSC Ilyushin Aviation Complex; JSC Lazurit Central Design Bureau; JSC Ramensky Instrument Engineering Plant; JSC Research and Development Enterprise Protek; JSC SPMDB Malachite; JSC Votkinsky Zavod; Kalyazinsky Machine Building Factory – Branch of RSK MiG; Main Directorate of Deep-Sea Research; NPP Start; OAO Radiofizika; P.A. Voronin Lkhovitsk Aviation Plant, branch of RSK MiG; PJSC Voronezh Joint Stock Aircraft Company; Radio Technical Institute named after A. L. Mints; Russian Federal Nuclear Center – All Russian Research Institute of Experimental Physics; Shvabe JSC; Special Technological Center LLC; St. Petersburg Marine Bureau of Machine Building Malakhit; St. Petersburg Naval Design Bureau Almaz; St. Petersburg Shipbuilding Institution Krylov 45; Strategic Control Posts Corporation; TsKB MT Rubin; Vladimir Design Bureau for Radio Communications OJSC; V.A. Trapeznikov Institute of Control Sciences of Russian Academy of Sciences; Voentelecom JSC.”

⁴² A.A. Kharkevich Institute for Information Transmission Problems (IITP), Russian Academy of Sciences (RAS); Ak Bars Holding; Gazprom Neft Shelf; Special Research Bureau for Automation of Marine Researches Far East Branch Russian Academy of Sciences; Systems of Biological Synthesis LLC

The US Department of Commerce's Bureau of Industry and Security (BIS) issued an order temporarily denying all export privileges for the Russian cargo aircraft carrier Aviastar due to "ongoing violations" of the United States' export controls on Russia. Aviastar is headquartered in Moscow and provides various cargo services to Russia. The temporary denial order (TDO) states that Aviastar used US-origin aircraft subject to the Export Administration Regulations (EAR) on recent flights into Russia without authorization from BIS, in violation of US controls on the export of aviation-related items to Russia. The TDO prohibits Aviastar from participating in any transactions subject to the EAR, including exports from the United States and re-exports of items subject to the EAR from abroad, for 180 days. In particular, this means that the airlines cannot operate U.S.-manufactured aircraft nor obtain U.S.-manufactured parts for purposes of even routine repair or maintenance on their aircraft, whether manufactured in the United States or elsewhere.

On 17 June, the US Department of Commerce's Bureau of Industry and Security (BIS) issued an order temporarily denying the export privileges of Belavia Belarusian Airlines for a period of 180 days due to ongoing violations of the comprehensive export controls imposed on Belarus by the Commerce Department. The Temporary Denial Order (TDO) bans Belavia from participating in any transactions subject to the Export Administration Regulations (EAR), including exports from the US and reexports of items subject to the EAR from abroad. TDO may be renewed after 180 days.

On 24 June, Bureau of Industry and Security (BIS) requested the issuance of an Orders temporarily denying, for a period of 180 days, the export privileges under the Export Administration Regulations (EAR) of three Russian airlines - Nordwind Airlines, Pobeda Airlines (owned by Aeroflot Russian Airlines JSC) and Siberian Airlines.

On 27 June, pursuant to the Suspending Normal Trade Relations with Russia and Belarus Act, U.S. President announced a significant increase in ad valorem tariff rates (35 %), effective on July 29, 2022, on more than 570 categories of Russian-origin goods, covering a wide range of steel, aluminum, minerals, ores, metals, chemicals, arms and ammunition, wood and paper products, aircraft and parts, and automotive-related products. Higher tariff rate will be implemented on Russian products worth approximately \$2.3 bn.

EU. Under the 6th EU package, the EU expanded the list of Russian and Belarusian entities concerned by export restrictions regarding dual-use goods and technology by adding 91 Russian entities⁴³ and 24 Belarusian entities⁴⁴. Moreover, the EU expanded the list of goods and technology which may contribute to the technological enhancement of Russia's defense and security sector. This will include 80 chemicals which can be used to produce chemical weapons. In addition, the EU prohibited the provision of accounting, public relations and consultancy services to Russia.

On 21 July, EU added exclusions to the export ban on luxury goods by allowing articles of jewellery, articles of goldsmiths' or silversmiths' wares and parts thereof, of precious metal or of metal clad with precious metal, for personal use of natural persons travelling from the EU or members of their immediate families travelling with them, owned by those individuals and not intended for sale.

On 21 July, the EU reinforced export controls of dual use goods and advanced technology by extending the list of controlled items, which may contribute to Russia's military and technological enhancement or the development of its defence and security sector. EU also expanded the list of entities subject to export restrictions regarding dual-use goods and technology by adding 4 Russian entities - Federal Center for Dual-Use Technology (FTsDT) Soyuz, Turayev Machine Building Design Bureau Soyuz, Zhukovskiy Central Aerohydrodynamics Institute (TsAGI), Rosatomflot.

⁴³ Krayushin Evgeny, 46th TSNII Central Scientific Research Institute, Alagir Resistor Factory, All-Russian Research Institute of Optical and Physical Measurements, All-Russian Scientific-Research Institute Etalon JSC, Almaz JSC, Arzam Scientific Production Enterprise Temp Avia, Automated Procurement System for State Defense Orders, LLC, Dolgoprudniy Design Bureau of Automatics (DDBA JSC), Electronic Computing Technology Scientific-Research Center JSC, Electrosignal JSC, Energiya JSC, Engineering Center Moselectronproekt, Etalon Scientific and Production Association, Foreign Trade Association Mashpriborintorg, Ineko LLC, Informakustika JSC, Institute of High Energy Physics, Institute of Theoretical and Experimental Physics, Inteltech PJSC, ISE SO RAN Institute of High-Current Electronics, Kaluga Scientific-Research Institute of Telemechanical Devices JSC, Kulon Scientific-Research Institute JSC, Lutch Design Office JSC, Meteor Plant JSC, Moscow Communications Research Institute JSC, Moscow Order of the Red Banner of Labor Research Radio Engineering Institute JSC, NPO Elektromekhaniki JSC, Omsk Production Union Irtysh JSC, Omsk Scientific-Research Institute of Instrument Engineering JSC, Optron, JSC, Pella Shipyard OJSC, Polyot Chelyabinsk Radio Plant JSC, Pskov Distance Communications Equipment Plant, Radiozavod JSC, Razryad JSC, Research Production Association Mars, Ryazan Radio-Plant, Scientific Production Center Vigstar JSC, Scientific Production Enterprise 'Radiosviaz', Scientific Research Institute Ferrite-Domen, Scientific Research Institute of Communication Management Systems, Scientific-Production Association and Scientific-Research Institute of Radio-Components, Scientific-Production Enterprise 'Kant', Scientific-Production Enterprise 'Svyaz', Scientific-Production Enterprise Almaz JSC, Scientific-Production Enterprise Salyut JSC, Scientific-Production Enterprise Volna, Scientific-Production Enterprise Vostok JSC, Scientific-Research Institute 'Argon', Scientific-Research Institute and Factory Platan, Scientific-Research Institute of Automated Systems and Communications Complexes Neptune JSC, Special Design and Technical Bureau for Relay Technology, Special Design Bureau Salute JSC, Tactical Missile Company, JSC 'Salute', Tactical Missile Company, JSC 'State Machine Building Design Bureau 'Vypmel' By Name I.I.Toropov', Tactical Missile Company, JSC 'URALELEMENT', Tactical Missile Company, JSC 'Plant Daggiesel', Tactical Missile Company, JSC 'Scientific Research Institute of Marine Heat Engineering', Tactical Missile Company, JSC PA Strela, Tactical Missile Company, JSC Plant Kulakov, Tactical Missile Company, JSC Ravenstvo SSID: 175-55780 Name: Tactical Missile Company, JSC Ravenstvovservice, Tactical Missile Company, JSC Saratov Radio Instrument Plant, Tactical Missile Company, JSC Severny Press, Tactical Missile Company, Joint-Stock Company 'Research Center for Automated Design', Tactical Missile Company, KB Mashinostroeniya, Tactical Missile Company, NPO Electromechanics, Tactical Missile Company, NPO Lightning, Tactical Missile Company, Petrovsky Electromechanical Plant 'Molot', Tactical Missile Company, PJSC 'MBDB 'ISKRA'', Tactical Missile Company, PJSC ANPP Temp Avia, Tactical Missile Company, Raduga Design Bureau, Tactical Missile Corporation, 'Central Design Bureau of Automation', Tactical Missile Corporation, 711 Aircraft Repair Plant, Tactical Missile Corporation, AO GNPP 'Region', Tactical Missile Corporation, AO TMKB 'Soyuz', Tactical Missile Corporation, Azov Optical and Mechanical Plant, Tactical Missile Corporation, Concern 'MPO – Gidropribor', Tactical Missile Corporation, JSC 'KRASNY GIDROPRESS', Tactical Missile Corporation, JSC Avangard, Tactical Missile Corporation, JSC Concern GranitElectron, Tactical Missile Corporation, JSC Elektrotyaga, Tactical Missile Corporation, JSC GosNIIMash, Tactical Missile Corporation, RKB Globus, Tactical Missile Corporation, Smolensk Aviation Plant, Tactical Missile Corporation, TRV Engineering, Tactical Missile Corporation, Ural Design Bureau 'Detal', Tactical Missile Corporation, Zvezda-Strela Limited Liability Company, Tambov Plant (TZ) 'October', United Shipbuilding Corporation 'Production Association Northern Machine Building Enterprise', United Shipbuilding Corporation '5th Shipyard'

⁴⁴ 140 Repair Plant JSC, 558 Aircraft Repair Plant JSC, 2566 Radioelectronic Armament Repair Plant JSC, AGAT - Control Systems - Managing Company of Geoinformation Control Systems Holding, JSC, AGAT - Electromechanical Plant OJSC, AGAT – SYSTEM, ATE - Engineering LLC, BelOMO Holding, Belpetsvneshtekhnika SFTUE, Beltechexport CJSC, BSVT-New Technologies, Department of Internal Affairs of the Gomel Region Executive Committee, Internal Troops of the Ministry of Internal Affairs of the Republic of Belarus, KGB Alpha, Kidma Tech OJSC, Minotor-Service, Minsk Wheeled Tractor Plant, Oboronnye Initsiativy LLC, OJS KB Radar Managing Company, Peleng JSC, State Authority for Military Industry of the Republic of Belarus, State Security Committee of the Republic of Belarus, Transaviaexport Airlines JSC, Volatavto OJSC

On 21 July, with a view to avoid any potential negative consequences for food and energy security around the world, EU extended the exemption from the prohibition to engage in transactions with certain state-owned entities as regards transactions for agricultural products and the transport of oil to third countries.

The EU committed to avoid all measures which might lead to food insecurity around the globe and stressed that none of the adopted measures target in any way the trade in agricultural and food products, including wheat and fertilisers, between third countries and Russia. As well, EU measures do not prevent third countries and their nationals operating outside of the EU from purchasing pharmaceutical or medical products from Russia.

Canada. On 18 May, Canada banned export, sell, supply or shipment of luxury goods, including alcoholic beverages, tobacco, some textile products and sportswear, footwear, luxury clothing and accessories, jewelry, kitchenware, and art, and banned wherever situated in RF, to RF or to any person. Banned export, sell, supply or shipment of goods that could be used in the production and manufacture of weapons in RF, to RF or to any person. Prohibited import, purchase or acquisition of luxury goods, including alcoholic beverages, seafood, fish and non-industrial diamonds, wherever situated, from RF or from any person in RF.

On June 8, Canada imposed a ban on the export of 28 services vital for the operation of the oil, gas and chemical industries, including technical, management, accounting and advertising services. The banning of the exportation of oil, gas and chemical services targets an industry that accounts for about 50% of Russia's federal budget revenues.

On June 27, the Canada GoV prohibited the export of advanced goods and technologies. The list of items includes components, materials, software and technology related to quantum computers and advanced manufacturing equipment. Canada GoV also banned the import of luxury goods from Belarus, as well as the export of luxury goods.

Under the Special Economic Measures (Belarus) Regulations, which came into force on September 28, 2020, Canada prohibited from exporting, selling, supplying or shipping any good, wherever situated, or to provide any technology, to Belarus or to any person in Belarus, if it is described in the Restricted Goods and Technologies List. On July 27, Canada also introduced a list of certain goods which could be used in the manufacturing of weapons and are banned from exporting to Belarus.

On 14 July, the Government of Canada expanded existing measures on the oil, gas and chemical sectors to include industrial manufacturing. These new measures prohibit the provision of 2 manufacturing services (services incidental to manufacturing, except to the manufacture of metal products, machinery and equipment; services incidental to the manufacture of metal products, machinery and equipment) to the production of goods made by these sectors. These new sanctions apply to land and pipeline transport and the manufacturing of basic metals and fabricated metal products, computer, electronic and optical products, electrical equipment, transport, as well as machinery.

Switzerland. With the decision of 27 Apr, Switzerland implemented the new measures adopted by the EU on 8 Apr. The new measures include far-reaching sanctions on goods, including a ban on imports of lignite and coal as well as on goods that are important sources of revenue for Russia (e.g. timber, cement, seafood, caviar). In addition, there are export bans on goods that can help strengthen Russia's industrial capacities (e.g. industrial robots or certain chemical products). Switzerland prohibited purchase of coal and other solid fossil fuels from or originating in Russia and the import, transit and transport of these goods into and through Switzerland under adoption of 5th EU package.

On 10 June, the Federal Council decided to adopt new EU sanctions against Russia and Belarus and instructed the The Federal Department of Economic Affairs, Education and Research (EAER) to adapt the Ordinance on measures in connection with the situation in Ukraine. Switzerland extended the list of goods banned for export that could help to strengthen Russia in military and technological terms or to develop its defence and security sector, namely certain chemicals. Switzerland expanded the list of

Russian persons and entities concerned by export restrictions regarding dual-use goods and technology by adding 91 Russian entities⁴⁵ and 24 Belarusian entities⁴⁶.

On 10 June, Switzerland extended the list of economically important goods for Russia that are prohibited from purchase, import, transit and transport from Russia or originating in Russia.

Prohibited the direct and indirect provision of auditing services, including auditing, accounting and tax advice, as well as business and public relations consultancy, to the RF GoV or to any legal person, company or organisation established in Russia.

Norway. Extension of goods subject to export controls / bans, such as goods that could help increase Russia's military and technological capabilities. This includes 80 chemicals that can be used to develop chemical weapons; ban on provision of a number of services to Russian legal entities or the Russian government, such as auditing and accounting, financial advice and more.

Japan. On 10 May, bans on exports to 71 organizations⁴⁷ designated as specific organizations in RF by the Ministry of Foreign Affairs Notification. Also bans on the export of cutting-edge goods to RF were announced.

On 13 May, the Japan Cabinet introduced a ban on the export of cutting-edge goods (quantum computers, 3D printers, etc⁴⁸) destined for Russia. Based on this, the Cabinet Order to partially revise the Export Trade Control Ordinance was approved by the Cabinet, and it will implement the measures from May 20th. In addition, due to the amendment of the Ministry of Economy, Trade and Industry notification, service transactions related to the above export bans will also be subject to regulation.

On 10 June, Japan introduced an export ban on certain goods that contribute to strengthening Russia's industrial base, including wood and wood products, steel storage tanks and other similar containers, machinery and electrical equipment components, trains, bulldozers and trucks, measuring equipment. The ban will enter into force on 17 June 2022. Target items include: wood and some of its products, steel storage tanks and other similar containers, compatible for hand tools or processing machines, machinery and some of these parts and accessories (liquid motors, bulldozer, valve (for hydraulic transmission, etc.), electrical equipment and some of its parts, railway locomotives, railway maintenance vehicles, transportation machinery and some of its parts, measuring equipment, inspection equipment, and their parts.

⁴⁵ Krayushin Evgeny, 46th TSNII Central Scientific Research Institute, Alagir Resistor Factory, All-Russian Research Institute of Optical and Physical Measurements, All-Russian Scientific-Research Institute Etalon JSC, Almaz JSC, Arzam Scientific Production Enterprise Temp Avia, Automated Procurement System for State Defense Orders, LLC, Dolgoprudny Design Bureau of Automatics (DDBA JSC), Electronic Computing Technology Scientific-Research Center JSC, ElectroSignal JSC, Energiya JSC, Engineering Center Moselectronproekt, Etalon Scientific and Production Association, Foreign Trade Association Mashpriborintorg, Ineko LLC, Informakustika JSC, Institute of High Energy Physics, Institute of Theoretical and Experimental Physics, Inteltech PJSC, ISE SO RAN Institute of High-Current Electronics, Kaluga Scientific-Research Institute of Telemechanical Devices JSC, Kulon Scientific-Research Institute JSC, Lutch Design Office JSC, Meteor Plant JSC, Moscow Communications Research Institute JSC, Moscow Order of the Red Banner of Labor Research Radio Engineering Institute JSC, NPO Elektromekhaniki JSC, Omsk Production Union Irtysh JSC, Omsk Scientific-Research Institute of Instrument Engineering JSC, Optron, JSC, Pella Shipyard OJSC, Polyot Chelyabinsk Radio Plant JSC, Pskov Distance Communications Equipment Plant, Radiozavod JSC, Razryad JSC, Research Production Association Mars, Ryazan Radio-Plant, Scientific Production Center Vigstar JSC, Scientific Production Enterprise 'Radiosviaz', Scientific Research Institute Ferrite-Domen, Scientific Research Institute of Communication Management Systems, Scientific-Production Association and Scientific-Research Institute of Radio-Components, Scientific-Production Enterprise 'Kant', Scientific-Production Enterprise 'Svyaz', Scientific-Production Enterprise Almaz JSC, Scientific-Production Enterprise Salyut JSC, Scientific-Production Enterprise Volna, Scientific-Production Enterprise Vostok JSC, Scientific-Research Institute 'Argon', Scientific-Research Institute and Factory Platan, Scientific-Research Institute of Automated Systems and Communications Complexes Neptune JSC, Special Design and Technical Bureau for Relay Technology, Special Design Bureau Salute JSC, Tactical Missile Company, JSC 'Salute', Tactical Missile Company, JSC 'State Machine Building Design Bureau 'Vypmel' By Name I.I.Toropov', Tactical Missile Company, JSC 'URALELEMENT', Tactical Missile Company, JSC 'Plant Daggiesel', Tactical Missile Company, JSC 'Scientific Research Institute of Marine Heat Engineering', Tactical Missile Company, JSC PA Strela, Tactical Missile Company, JSC Plant Kulakov, Tactical Missile Company, JSC Ravenstvo SSID: 175-55780 Name: Tactical Missile Company, JSC Ravenstvovservice, Tactical Missile Company, JSC Saratov Radio Instrument Plant, Tactical Missile Company, JSC Severny Press, Tactical Missile Company, Joint-Stock Company 'Research Center for Automated Design', Tactical Missile Company, KB Mashinostroeniya, Tactical Missile Company, NPO Electromechanics, Tactical Missile Company, NPO Lightning, Tactical Missile Company, Petrovsky Electromechanical Plant 'Molot', Tactical Missile Company, PJSC 'MBDB ISKRA', Tactical Missile Company, PJSC ANPP Temp Avia, Tactical Missile Company, Raduga Design Bureau, Tactical Missile Corporation, 'Central Design Bureau of Automation', Tactical Missile Corporation, 711 Aircraft Repair Plant, Tactical Missile Corporation, AO GNPP 'Region', Tactical Missile Corporation, AO TMKB 'Soyuz', Tactical Missile Corporation, Azov Optical and Mechanical Plant, Tactical Missile Corporation, Concern 'MPO – Gidropribor', Tactical Missile Corporation, JSC 'KRASNYY GIDROPRESS', Tactical Missile Corporation, JSC Avangard, Tactical Missile Corporation, JSC Concern GranitElectron, Tactical Missile Corporation, JSC Elektrotyaga, Tactical Missile Corporation, JSC GosNIIMash, Tactical Missile Corporation, RKB Globus, Tactical Missile Corporation, Smolensk Aviation Plant, Tactical Missile Corporation, TRV Engineering, Tactical Missile Corporation, Ural Design Bureau 'Detal', Tactical Missile Corporation, Zvezda-Strela Limited Liability Company, Tambov Plant (TZ) 'October', United Shipbuilding Corporation 'Production Association Northern Machine Building Enterprise', United Shipbuilding Corporation '5th Shipyard'

⁴⁶ 140 Repair Plant JSC, 558 Aircraft Repair Plant JSC, 2566 Radioelectronic Armament Repair Plant JSC, AGAT - Control Systems - Managing Company of Geoinformation Control Systems Holding, JSC, AGAT - Electromechanical Plant OJSC, AGAT – SYSTEM, ATE - Engineering LLC, BelOMO Holding, Belpetsvneshtekhnika SFTUE, Beltechexport CJSC, BSVT-New Technologies, Department of Internal Affairs of the Gomel Region Executive Committee, Internal Troops of the Ministry of Internal Affairs of the Republic of Belarus, KGB AFTA, Kidma Tech OJSC, Minotor-Service, Minsk Wheeled Tractor Plant, Oboronnye Initsiativy LLC, OJS KB Radar Managing Company, Peleng JSC, State Authority for Military Industry of the Republic of Belarus, State Security Committee of the Republic of Belarus, Transaviaexport Airlines JSC, Volatavo OJSC

⁴⁷ 5th Shipyard; Alagir Resistor Factory; All-Russian Scientific-Research Institute Etalon JSC; Almaz JSC; Dolgoprudny Design Bureau of Automatics; Electronic Computing Technology Scientific-Research Center; ElectroSignal JSC; Inteltech PJSC; JSC NPO Elektromekhaniki; Kulon Scientific-Research Institute JSC; Lutch Design Office JSC; Meteor Plant JSC; Moscow Communications Research Institute JSC; Moscow Order of the Red Banner of Labor Research Radio Engineering Institute JSC; Omsk Production Union Irtysh JSC; Omsk Scientific-Research Institute of Instrument Engineering JSC; Optron JSC; Polyot Chelyabinsk Radio Plant JSC; Pskov Distance Communications Equipment Plant; Radiozavod JSC; Razryad JSC; Research Production Association Mars; Ryazan Radio-Plant; Scientific-Production Association and Scientific-Research Institute of Radio-Components; Scientific-Production Enterprise Almaz JSC; Scientific-Production Enterprise "Kant"; Scientific Production Enterprise "Radiosviaz"; Scientific-Production Enterprise "Svyaz"; Scientific-Production Enterprise Volna; Scientific-Production Enterprise Vostok JSC; Scientific-Research Institute "Argon"; Scientific Research Institute Ferrite-Domen; Scientific-Research Institute of Automated Systems and Communications Complexes Neptune JSC; Scientific Research Institute of Communication Management Systems; Special Design and Technical Bureau for Relay Technology; Tactical Missile Corporation, 711 Aircraft Repair Plant (711 ARZ); Tactical Missile Corporation subsidiaries - AO GNPP "Region", AO TMKB "Soyuz", Azov Optical and Mechanical Plant, Central Design Bureau of Automation, Concern "MPO—Gidropribor", JSC Avangard, JSC Concern GranitElectron, JSC Elektrotyaga, JSC GosNIIMash, JSC PA Strela, JSC "Plant Daggiesel", JSC Plant Kulakov, JSC Ravenstvo, JSC Ravenstvo-service, JSC "Research Center for Automated Design", JSC "Salute", JSC Saratov Radio Instrument Plant, JSC "Scientific Research Institute of Marine Heat Engineering", JSC Severny Press, JSC "State Machine Building Design Bureau "Vypmel" By Name I.I. Toropov", JSC "URALELEMENT", JSC "KRASNYY GIDROPRESS", KB Mashinostroeniya, NPO Electromechanics, NPO Lightning, Petrovsky Electromechanical Plant "Molot", PJSC ANPP Temp Avia, PJSC "MBDB ISKRA", Raduga Design Bureau, RKB Globus, Smolensk Aviation Plant, TRV Engineering, Ural Design Bureau "Detal", Zvezda-Strela LLC; United Shipbuilding Corporation "Production Association Northern Machine Building Enterprise"

⁴⁸ Target items: Catalyst for oil refining; Quantum computers and other devices that utilize the characteristics of quantum, their accessories, and their components; Electron microscopes, atomic force microscopes and other microscopes and devices designed for use with these microscopes; Equipment for laminated modeling (3D printer) and powdered metals and metal alloys used for this; Equipment for manufacturing organic light emitting diodes, organic field effect transistors, and organic solar cells; Equipment for manufacturing minute electromechanical systems; A device for manufacturing fuels made from hydrogen (limited to those manufactured using solar power, wind power, and other renewable energies) and solar cells with high conversion efficiency; Vacuum pumps and vacuum gauges (quantum technology related); Cooling equipment designed for extremely low temperatures, their accessories, and their components (quantum technology related); A device for removing lids and encapsulants from integrated circuits; Photodetector with high quantum yield (quantum technology related); Numerical control device for machine tools and their parts and machine tools; Materials that improve the function of making detection by electromagnetic waves (metamaterials), alloys composed of multiple elements in almost equal proportions (high entropy alloys) and other advanced materials (some are related to quantum technology); Conductive polymers, semi-conductive polymers and polymers with electroluminescence properties.

On 5 July, Japan prohibited the export of goods to specific 65 Russian and 25 Belarussian organisations related to the defence sector.

On 5 July, Japan implemented a prohibition on the provision of trust services, accounting / audit services, and management consulting services to RF. This ban applies to service transactions that start on or after 5 September 5, 2022.

Taiwan. On 6 May, Taiwan's GoV imposed controls on exports of strategic high-tech products in 57 categories to Belarus. The restrictions bar Taiwanese companies from exporting a long list of tech products there without special permission. The move is largely symbolic given Taiwan's minimal levels of direct trade with Belarus or RF. The export control list includes equipment for making semiconductors, electronic components, telecommunications equipment, software, as well as lasers and navigation systems. Taiwan's government revised the "List of high-tech goods exported to Russia" to "List of high-tech goods exported to RF and Belarus".

On 2 June, Taiwan imposed a ban on the sale of modern chips to Russia and Belarus in response to the invasion of Ukraine. Taiwan's Ministry of Economic Affairs (MOEA) published a list of strategic high-tech goods that are barred from export to Russia and Belarus. The ministry stated exports of these high-tech commodities are also banned from Belarus because it could help Russia bypass the sanctions. Firms from these two countries are now banned from purchasing Taiwan-made microprocessors or microcircuits which have any of the following specifications: (1) performance speeds of 5 gigaflops or higher and an arithmetic logic unit has access width of 32 bits or more; (2) clock frequency rates in excess of 25 MHz, (3) more than one data or instruction bus or one serial communication port that provide direct external interconnection with a data transfer rate of 2.5 MB/s or greater, (4) more than 144 pins, or a basic propagation delay time of less than 0.4 nanoseconds. These conditions essentially exclude Russia and Belarus from modern technology made in Taiwan. In addition, Taiwan will no longer sell chip production equipment to these countries. Alignment and exposure equipment for wafer production using photo-optical or X-ray methods, such as lithography equipment which includes image projection and transfer, step-and-repeat operation (direct step on wafers) or step-and-scan operation (scanners) processing, as well as scanning electron microscopes designed for automatic inspection of patterns of semiconductor devices are under the ban as well.

8. Impose Secondary Sanctions

USA plans to include secondary sanctions in its financial crime strategy. They are also considering sanctions against unscrupulous banks that help circumvent sanctions. USA sanctioned 7 RF entities and 6 non-RF entities for evading newly imposed export controls on Russia, these companies provided support to Russia's military and/or defence industrial base. The US passed a legislative amendment which allows India to buy a missile defence system from Russia. G7 are discussing secondary sanctions for oil. There are no new sanctions, but companies start to fear the imposition of secondary sanctions.

G7. G7 finance ministers discuss secondary sanctions and other ways to limit Russia's oil revenues in Bonn, minimizing the impact on energy prices.

China. The Chinese UnionPay payment system backs away from Russian banks on secondary sanctions fears. Under the pressure of US sanctions and suppliers, Chinese technology companies are closing down business in Russia without making official statements. According to the Chinese government, China's exports to Russia in Mar fell by a total of 27% compared to Feb. Exports of technological products fell particularly sharply. Thus, the supply of laptops decreased by more than 40%, smartphones - by two thirds, base stations - by 98%. Chinese tech giants such as Lenovo and Xiaomi are publicly refusing to do business with Russia - WSJ.

Due to the potential consequences of financial sanctions, fewer shipowners are willing to let their tankers load in RF. Therefore, the supply of Russian oil to China is becoming more and more congested at sea, despite the short distance between countries, writes Bloomberg.

UK. Revolut cannot obtain a banking license in UK due to links with RF: father of co-founder of Revolut Mykola Storonskiy is the top manager of Gazprom's structure. **Western lawyers start to refuse working with Russians, while RF itself closes its market for them.** According to FT, British lawyers began to refuse to work with the Russians against the background of sanctions.

Germany. German Deutsche Bank has stopped working with a number of large Russian banks, which have opened correspondent accounts in euros, writes RBC. Such a decision, in particular, is associated with the risk of secondary sanctions.

USA. The US Treasury Department is to include **fighting against circumvention of anti-Russian sanctions** in its new strategy to combat various financial violations and crimes. It is noted that a set of measures is aimed at identifying the assets of Russian entrepreneurs "hidden" in the US, as well as to increase the transparency of financial activities related to offshore companies, and counteracting "all forms of illegal financing".

USA may extend the sanctions against foreign banks that provide support to citizens and financial institutions of the RF that are subject to restrictions. USA plans to increase fines and other penalties for companies that violate export control rules for countries like Russia and China. Chinese authorities are extremely negative about US plans to tighten fines for violators of export control rules in RF and China. USA sees no systematic attempts by China to circumvent Western measures to tighten export controls on Russia, US Secretary of Commerce.

The two largest US banks, JPMorgan Chase and Goldman Sachs, have suspended operations servicing Russian debt obligations - Bloomberg.

BIS, effective June 28, added 36 entities from 9 countries to the BIS Entity List, requiring a license for export, reexport, or transfer (in-country) to these listed entities of all items subject to the Export Administration Regulations (EAR), without the possibility of license exceptions. Entities are designated for acting contrary to the US national security or foreign policy interests (including for evading newly imposed export controls on Russia). These newly designated parties are subject to different levels of additional, party-specific licensing requirements under the EAR.

BIS imposed sanctions on 5 Russian entities (Avcom-Technique; FASTAIR; Intertech Rus LLC; KingPai Technology Int'l Co., Limited; and Laboratory Systems and Technologies LTD) for providing support to Russia's military and/or defense industrial base. Another 2 Russia-based entities (Laboratory Systems and Technologies LTD; and Intertech Rus LLC) were listed on the basis of their attempts to procure items, including U.S.-origin items, for acting as agents, fronts or shell companies for another Russian company OOO Intertech Instruments, which was added to the BIS Entity List on March 4, 2021.

BIS also sanctioned 6 non-Russian entities in China, Lithuania, Russia, UK, Uzbekistan and Vietnam for providing support to Russia's military and/or defense industrial base. Specifically, these entities have previously supplied items to Russian entities of concern before February 24, 2022 and continue to contract to supply Russian entity listed and sanctioned parties after Russia's further invasion of Ukraine. These entities include Connec Electronic Ltd. (added under the destinations of China and the United Kingdom); King Pai Technology Co., Ltd. (added under China, Russia, and Vietnam); Sinno Electronics Co., Ltd. (added under China and Lithuania); Winninc Electronic (added under China); World Jetta (H.K.) Logistics Limited (added under China); and Promcomplektlogistic Private Company (added under Uzbekistan).

The US House of Representatives has passed by voice vote a legislative amendment that approves waiver to India against the punitive CAATSA sanctions for its purchase of the S-400 missile defence system from Russia to help deter aggressors like China.

9. Increase Transparency to Discourage Trade with and Investment in Russia

USA (prepares respective bill + published Sample Letter to Companies Regarding Disclosures Pertaining to Russia's Invasion of Ukraine and Related Supply Chain Issues + released warning of increased export control evasion attempts by entities targeted under Russia-related programs (includes 16 items with a higher risk of evasion attempts + strengthened enforcement of export controls + established an outbound investment review mechanism to protect U.S. technologies (e.g. semiconductors, batteries, AI etc.) against adversaries like China and RF – notification to the federal government 45 days prior to deal closing is required if the investment involves specified sectors), EU (EP gave its consent to the draft of European Council Decision which identifies the violation of EU sanctions as an EU crime + strengthened reporting requirements - sanctioned people and entities were obliged to declare assets in EU before 1 Sep 2022 or within 6 weeks from the date of listing + share of information on property of sanctioned persons, entities and bodies between EU Member States and the European Commission), Germany (sanctioned persons are required to report property in Germany under the threat of imprisonment, is to create a national registry of assets that are subject to sanctions).

USA. A bill to oblige public companies to disclose their ties to Russia and other aggressor countries was registered.

The SEC has released an illustrative letter that contains sample comments that the Division of Corporation Finance may issue to companies based on their specific facts and circumstances related to Russia's invasion of Ukraine and related supply chain issues. The SEC notes companies may have disclosure obligations under the federal securities laws related to the direct or indirect impact that Russia's invasion of Ukraine and the international response have had or may have on their business. To satisfy these obligations, the Division of Corporation Finance believes that companies should provide detailed disclosure, to the extent material or otherwise required, regarding:

direct or indirect exposure to Russia, Belarus, or Ukraine through their operations, employee base, investments in Russia, Belarus, or Ukraine, securities traded in Russia, sanctions against Russian or Belarusian individuals or entities, or legal or regulatory uncertainty associated with operating in or exiting Russia or Belarus,

direct or indirect reliance on goods or services sourced in Russia or Ukraine or, in some cases, in countries supportive of Russia, actual or potential disruptions in the company's supply chain, or business relationships, connections to, or assets in, Russia, Belarus, or Ukraine.

The SEC also notes financial statements may also need to reflect and disclose the impairment of assets, changes in inventory valuation, deferred tax asset valuation allowance, disposal or exiting of a business, de-consolidation, changes in exchange rates,

and changes in contracts with customers or the ability to collect contract considerations. In addition, since Russia's invasion of Ukraine, many companies have experienced heightened cybersecurity risks, increased or ongoing supply chain challenges, and volatility related to the trading prices of commodities regardless of whether they have operations in Russia, Belarus, or Ukraine that warrant disclosure.

The SEC urges companies to consider how these matters affect management's evaluation of disclosure controls and procedures, management's assessment of the effectiveness of internal control over financial reporting, and the role of the board of directors in risk oversight of any action or inaction related to Russia's invasion of Ukraine, including consideration of whether to continue or to halt operations or investments in Russia and/or Belarus.

The FBI began questioning US technology companies on how their computer chips ended up in Russian military equipment recovered in Ukraine – The Washington Post.

The U.S. Department of Commerce's Bureau of Industry and Security (BIS) and the Financial Crimes Enforcement Network (FinCEN) released a Joint Alert to U.S. financial institutions warning increased export control evasion attempts by entities targeted under Russia-related programs (Russia and Belarus). The Joint Alert provides an overview of current US export controls targeting Russia, commodities at high risk of export control evasion attempts, transactional and behavioral red flags connected to possible evasion attempts, and reporting requirements related to suspected export control evasion attempts. BIS identified 16 items under various Export Control Classification Numbers (ECCN) controlled under the Export Administration Regulations (EAR) with a higher risk of evasion attempts: Aircraft Parts/ Equipment (ECCN 9A991), Antennas (ECCN 7A994), Breathing Systems (ECCN 8A992), Cameras (ECCN 6A993), GPS Systems (ECCN 7A994), Inertial Measurement Units (ECCN 7A994), Integrated Circuits (ECCNs 3A001, 3A991, and 5A991), Oil Field Equipment (EAR99 and presumably identified in Supplements Nos. 2 or 4 of EAR Part 746), Sonar Systems (ECCN 6A991), Spectrophotometers (ECCN 3A999), Test Equipment (ECCN 3B992), Thrusters (ECCN 8A992), Underwater Communications (ECCN 5A991), Vacuum Pumps (ECCN 2B999), Wafer Fabrication Equipment (ECCNs 3B001 and 3B991), and Wafer Substrates (ECCN 3C00x).

On July 9, the US Commerce Department's Bureau of Industry and Security (BIS) announced 4 policy changes to **strengthen enforcement of export controls** and prioritise cases that it says involve the greatest harm to US national security. These are:

- Imposing significantly higher penalties by ensuring that existing regulatory and statutory authorities are used effectively to identify all egregious cases, and ensuring that existing aggravating penalty factors are applied more uniformly to escalate penalty amounts where appropriate.
- Using non-monetary settlement agreements and remediation through suspended denial orders for less serious violations.
- Ending the use of "no admit, no deny" settlements where people / entities resolve the allegations against them but do not admit their conduct. Resolving parties now must admit to the underlying factual conduct of a settlement to be granted a reduced penalty
- Introducing a dual-track processing system for voluntary self-disclosures, including a fast track for minor / technical infractions that result in a warning or no-action letter and the assignment of field agents and attorneys to disclosures that indicate potentially more serious violations.

On June 13, legislators released a new proposed version of the National Critical Capabilities Defense Act, which would establish an outbound investment review mechanism to protect U.S. technologies against adversaries like China and Russia. The legislation would establish an interagency panel to review and block U.S. investments in foreign countries on national security grounds. U.S. entities and their affiliates would be required to notify the federal government 45 days prior to closing if the investment involves sectors previously specified by the Biden administration as crucial to supply chains or critical and emerging technologies identified by the National Science and Technology Council and the Office of the Director of National Intelligence as vital to maintaining the U.S. position as the world's leading superpower. Relevant industries and technologies include semiconductors, large-capacity batteries, pharmaceuticals, rare-earth elements, biotechnology, artificial intelligence, quantum computing, hypersonics, financial technologies, and autonomous systems.

Germany. The Bundestag passed a law that allows for more thorough implementation of the sanctions imposed against Russian businessmen, DPA reports. The Bundestag obliged those who fell under anti-Russian sanctions to report assets in Germany under the threat of imprisonment. Germany is to create a national registry of assets that are subject to sanctions or have an unclear origin in order to improve the effectiveness of sanctions against Russia, said the German Chancellor.

EU. The EC will propose in two weeks to recognize sanctions circumvention as a crime in the EU - Politico. It would make it easier for EU members to confiscate assets as part of anti-Russian measures. The EU has created a special online mechanism through which whistleblowers can report violations of anti-Russian sanction.

The European Council has requested the European Parliament's consent to add the violation of sanctions to the list of 'EU crimes'. Currently member states have very different definitions of what constitutes a violation of restrictive measures and what penalties should be applied in the event of violation. This could lead to different degrees of enforcement of sanctions and a risk of these measures being circumvented, potentially allowing sanctioned persons to continue accessing their assets and supporting regimes targeted by EU measures. The Council has said that a unanimous decision to add the crime would allow for the adoption of a directive containing minimum rules on the definition of criminal offences and penalties for the violation of EU sanctions, ensuring

consistency in sanctions enforcement across Member States. Once consent has been given by Parliament and internal national procedures have been finalised, the decision can be formally adopted by the Council.

On 7 July, the European Parliament gave its consent to the draft European Council Decision (10287/1/2022) which identifies the violation of EU sanctions as an EU crime under the Treaty on the Functioning of the European Union. The Council may now adopt the draft Decision unanimously. The Commission may then propose a Directive under the normal legislative procedure containing minimum rules concerning the definition of criminal offences and penalties.

Under the 7th EU package, the European Council strengthened reporting requirements, putting the burden of declaring assets onto sanctioned people and entities, in order to facilitate the freezing of their assets in the EU. EU requires that listed natural or legal persons, entities or bodies disclose before 1 September 2022 or within 6 weeks from the date of listing, whichever is latest, all their assets within the EU's jurisdiction belonging to, owned, held or controlled by them, to the national competent authority. Non-compliance with this obligation – i.e. non-reporting by listees – will be treated as participation in activities the object or effect of which is to circumvent EU sanctions, with the consequences that follow under each Member State's national legislation, including criminal ones.

The competent authorities of the Member States, including enforcement authorities and administrators of official registers where natural persons, legal persons, entities and bodies as well as immovable or movable property are registered, shall process and exchange information including personal data, with other competent authorities of the Member States and the European Commission.

10. Deepen Coordination of Sanctions and Link Sanctions Relief to Peace and Reconstruction

USA and Canada (are preparing legislative acts to use sanctioned assets for compensation to Ukraine), **USA doesn't have legal authority to seize CBR assets frozen due to its invasion of Ukraine**, **EU** (launched discussion on this issue, working on the possibility of using the frozen Russian assets to help Ukraine, the Baltic countries and Slovakia support the idea, EU is ready to create an international platform for the restoration of Ukraine + EU considers it fair and is preparing a legal basis for the frozen RF assets and assets of RF oligarchs + is working on "Sanction Berau" launch, Justice Commissioner of EC suggests keeping Russian assets frozen until RF agrees to pay for the reconstruction of Ukraine after the war ends), **Germany** (considers possibility; Finance Minister said that he does not support the idea of confiscating), **Canada** (passed a law for the freezing and confiscation of Russian-sanctioned assets), **Switzerland** and **Norway** adopted the 6th EU sanction package.

USA. On Apr 29, the Biden Administration announced a legislative proposal aimed at empowering the U.S. GoV to seize and forfeit property linked to Russian elites. Specifically, the proposed system would enhance and streamline the seizure and forfeiture of Russian oligarch assets and provide for the liquidation and redistribution of proceeds to support Ukraine. The US won't lift sanctions on Russia until the special operation is stopped, State Department spokesman Ned Price.

USA doesn't have legal authority to seize CBR assets frozen due to its invasion of Ukraine - US Treasury Secretary. However, USA continues but talks with partners over ways to make Russia foot the bill for Ukraine's post-war reconstruction are starting.

On June 19, the Russian Elites, Proxies, and Oligarchs Task Force (REPO) announced that they had jointly frozen about \$330bn of Russian assets, including \$300bn of international reserves of CBR.

Canada. On 02.05, Canada proposed new power to seek forfeiture of sanctioned persons' assets. Currently, the Special Economic Measures Act ("SEMA") and the Justice for Victims of Corrupt Foreign Officials Act (Sergei Magnitsky Law) ("Magnitsky Law") allow the Governor in Council to make orders under certain conditions, such as where a grave breach of international peace of security has occurred or gross and systematic human rights violations have been committed in a foreign state. Such orders may include causing certain property located in Canada to be "seized, frozen, or sequestered". The proposed amendments to SEMA would allow proceeds received from the disposition of forfeited property to be used for the following purposes: the reconstruction of a foreign state adversely affected by a grave breach of international peace and security; the restoration of international peace and security; and the compensation of victims of a grave breach of international peace and security, gross and systematic human rights violations or acts of significant corruption. Canadian Parliament passed a law that will allow for the freezing and confiscation of Russian-sanctioned assets.

EU. EU countries should consider using frozen Russian foreign exchange reserves to pay for Ukraine's recovery after the war, President of European Diplomacy Josep Borrell said. The EU is working on the possibility of using the frozen Russian assets to help Ukraine. In addition, the European Commission intends to simplify the process of property confiscation that was obtained illegally in order to effectively implement sanctions against RF.

The European Commission intends to simplify the process of property confiscation that was obtained illegally in order to effectively implement sanctions against Russia - Welt am Sonntag. The Baltic countries and Slovakia called on the EU to transfer Russian assets to Ukraine - Reuters.

The EU will not lift anti-Russian sanctions until Moscow reaches a mutually acceptable peace agreement with Kyiv - Scholz.

The EU is ready to create an international platform for the restoration of Ukraine after the end of the war - the head of the European Commission, Ursula von der Leyen at the Lugano conference.

On Jul 6, Ursula von der Leyen stated that "The European Commission considers it fair and is preparing a legal basis for the frozen Russian assets and assets of Russian oligarchs to be transferred for the reconstruction of Ukraine".

The EU is reported to be exploring ways to strengthen sanctions enforcement and render it more consistent across Member States. EU Commissioner for Financial Stability, Financial Services and the Capital Markets Union said that the officials are open to introducing an EU version of OFAC and that the EU is considering various enforcement-related measures, including forcing sanctioned entities to disclose their assets, harmonising definitions of control and widening registers of beneficial ownership, as well as ways to reduce over-compliance by financial institutions. The EU Commission is said to have requested reports from Member States on their enforcement of sanctions.

The Justice Commissioner European Commission suggests keeping Russian assets frozen until Russia agrees to pay for the reconstruction of Ukraine after the war ends.

UK and EU reached an agreement to enact a co-ordinated ban on insuring ships carrying Russian oil.

UK. Introduced an urgent procedure for designations of a person/entity on the basis that they have been sanctioned by the US, the EU, Australia or Canada.

Switzerland adopts new EU sanctions and replicates the EU lists of sanctioned individuals and entities.

Norway. Norway adopted the 6th package of EU sanctions against Russia.

Germany. Country is considering the confiscation of foreign assets of CBR. **The German Finance Minister said that he does not support the idea of confiscating the personal assets of Russians to finance the restoration of Ukraine - FT.**

Ireland. Is working to confiscate Russian assets and transfer them to Ukraine – Speaker of the Parliament.

MONITORING TABLE

Total cumulative progress: ~ 60% (25 sanction-measures) out of 42 in the Action Plan (10 blocks).

12 sanction-measures (29%) with status No progress, 25 sanction-measures (60%) with status Yes, 5 sanction-measures (11%) with status Slow Progress.

		UPD 27.07 (compared to 19.04)	Comment
1. Expand Oil and Gas Sanctions			
1.1.	Complete import and export ban and embargo of crude oil, oil products, gas, and coal	Yes	The EU adopted a 6th package including the ban of seaborne oil from RF. Switzerland (ban on RF crude oil and petroleum products) Poland refused from RF gas in response to RF cut off. Poland terminated the agreement on the supply of Russian gas. Lithuania . Completely cut the import of Russian energy, incl. oil, natural gas and electricity (Nord Pool, a pan-European power exchange, has decided to stop trading Russian electricity). Ban on transit of RF gas to Kaliningrad region . Latvia ban on natural gas supplies from RF from Jan 1, 2023. UK ban on import of RF oil and oil products from 31 Dec, ban on import of RF coal from Aug. Bulgaria, Finland, Netherland and Denmark (RF cut off supplies due to refusal to pay in rubles). Norway (ban on purchase, import or transfer of oil transported by sea and supporting services).
1.2.	Commit to ending all EU trade with Russia and Belarus in petroleum products	Yes	EU 6th package envisions the elimination of around 90% of RF oil from the European market by the end of 2022.
1.3.	Set a special and significant import duty, tariff, or tax for Russian crude oil	Slow progress	Poland <u>is going to propose</u> to set a special tax on importing Russian crude oil and other raw materials at the Summit at Brussels.
1.4.	Make payments into escrow accounts	No	-
1.5.	Decreasing imports of Russian petroleum	Yes	REPowerEU plan adopted on May 18, stipulates steps to rapidly reduce dependence on Russian fossil fuels and fast forward the green transition
1.6.	Apply these embargos and limits to all blends	No	Shell . Company announced it would no longer accept refined products with any Russian content, including blended fuels. BP . On Apr 27, during trading stipulated a condition "that the goods shall not be, in whole or in part, produced" in Russia.
2. Increase Transportation and Insurance-Related Sanctions			
2.1.	Prohibition of shipping, land, and rail transport from Russia to the democratic world	Yes	USA . Ban RF vessels from US ports. On 8 May, the Department of State also took action against 69 vessels by adding them to the SDN List. Norway . Close its borders and ports to Russian trucks and ships from 7 May. Russian fishing vessels, which often land their catch at ports in northern Norway, will receive exemptions from sanctions. UK . Aeroflot, Ural Airlines and Rossiya Airlines unable to sell their landing slots in UK airports. Lithuania (applied transit restrictions on goods subject to EU sanctions between Russia and Kaliningrad region). EU + Lithuania . EU released guidance for transportation from RF to Kaliningrad – road transit is not allowed, railway – allowed in pre-invasion volumes, transportation of sanctioned military and dual-use goods and related technologies are entirely prohibited, regardless of the mode of transport. EU . Extended existing port access ban, allowed technical assistance to RF for aviation . UK . allowed necessary technical assistance for temporarily detained aircraft .
2.2.	Blocking sanctions on the state shipping companies	Yes	USA . Oboronlogistika OOO, SC South LLC (a subsidiary of Oboronlogistika OOO) as well as private maritime shipping companies - JSC Northern Shipping Company, Transmorflot LLC, M Leasing LLC, Marine Trans Shipping LLC, Nord Project LLC Transport Company. Russian maritime engineering company (OOO Fertoing).

2.3.	Crewing companies and engine producers	Yes	UK. Zvezda PJSC (manufacture, sales, and service of diesel engines) Canada. UEC Klimov JSC (manufactures gas turbine engines, main gearboxes and accessory drive gearboxes for transport aircraft)
2.4.	Prohibit international insurance	Yes	Western ship insurers <u>are terminating cover</u> for Russia's leading shipping company Sovcomflot. Such insurers are West and North P&I, UK Club, Norway's Gard, EU: 6th package imposes prohibition on insurance and reinsurance of maritime transport of oil and oil products to third countries. Switzerland (ban on services, including insurance or reinsurance, for transportation of RF oil and certain petroleum products to any destination).
3. Impose New Financial Sanctions			
3.1.	Cut off all Russian financial institutions from the global financial system	Yes	USA. SDN on Transkapitalbank, Investtradebank; virtual currency mining company Bitriver AG + 10 RF subsidiaries. Joint Stock Company Moscow Industrial Bank (MIB) (SOE) and 10 of its subsidiaries. USA did not to renew the provisions of General License 9C (transactions in debt or equity of Bank Otkritie, Sovcombank, Sberbank, VTBBank, Alfa-Bank, Alrosa, CBR, NWF and MinFin of RF) that expire on 25 May, which could bring Moscow closer to default + ban on purchasing Russian securities on the secondary market + extended until 5 Dec 2022 licence allowing for energy financing transactions via RF banks + asset freeze on Heritage Trust + ban on import of gold from RF + 2 Kazakh subsidiaries of Alfa-Bank excluded from SDN-list, since were bought by Kazakhstan bank + issued General Licence authorising transactions through Dec 16, 2022 involving Gazprom Germania GmbH. UK. Announced ban on trusts services + extended existing restrictions on Belarus on dealing with financial instruments and providing loans to a broader range of transferable securities, money market instruments, loans and credit + prohibited transactions related to the management of reserves as well as of assets of CB Belarus and Belarus MinFin + introduced new financial sanctions in the form of reporting obligations + ban on RF gold and ancillary services, exported from RF after Jul 21, gold exported from RF before 21 July 2022 is not in scope + prohibited investment activities in respect of land located in RF, persons connected with RF, relevant entities, joint ventures, opening a representative office or establishing a branch or subsidiary located in RF. New Zealand. Assets freeze and dealing with securities ban against the CBR, the Russian Direct Investment Fund, 8 largest and 8 other banks linked to oligarchs (8 SOEs).The sanctioned entities are: Alfa-Bank, Bank Rossiya, Bank Otkritie (SOE), Black Sea Bank for Development and Reconstruction, Credit Bank of Moscow, Gazprombank (SOE, 50+1), GenBank, Industrial Savings Bank, Novikombank (SOE), Russia Agricultural Bank (SOE), Russian National Commercial Bank (SOE), Sberbank (SOE, 50+1), Sovcombank, SMP Bank, Vnesheconombank SOE, VTB (SOE, 60+1). Canada. Asset freeze and dealing prohibition on 4 RF financial institutions and banks + import ban on RF gold after Aug 6. Japan. Asset freeze 2 RF and 1 Belarus banks + Japan MinFin imposed an embargo on the purchase of Russian gold, but details will become available later. EU. de-SWIFT 3 RF banks + 1 Belarus + consider gold as a new sanction target + ban on RF gold and jewelries, exported from RF after July 22 + expanded the scope of the prohibition on accepting deposits + 9 entities (inc. 7 SOEs). Switzerland. Ban on trusts registered by Russians + de-SWIFT 3 RF and 1 Belarus banks. Norway. De-SWIFT 3 RF banks; restrictive measures for 18 entities that support RF military and security.
3.2.	Full SDN sanctions would ban transactions, freeze assets, and forbid business: top 30 banks and financial institutions, including but not limited to Gazprombank	No	-
3.3.	Discourage European banks such as Raiffeisen Bank and Unicredit, from operating in Russia	No	-
4. Designate the Russian Federation as a sponsor of terrorism.			
4.1.	Designate the Russian Federation as a sponsor of terrorism	Yes	Lithuania (officially recognized RF as a state sponsor and perpetrator of terrorism). USA endorsed a resolution calling to recognize RF as a sponsor

			of terrorism, final decision rests on State Department and the White House), classified RF as "human trafficking" state, a draft Resolution on recognizing Russia's actions in Ukraine as a genocide was registered in the US Senate. NATO (recognised RF as "the most significant and direct threat").
4.2.	Designate the Armed Forces of the Russian Federation as a Foreign Terrorist Organization	No	-
4.3.	Place Russia on the FATF's blacklist	No	-
4.4.	Recognize political parties as terrorist-supporting organizations	No	-
5. Strengthen Individual Sanctions against these Categories of Individuals			
5.1.	Individuals who hold senior governmental positions	Yes	<p>USA. 29 individuals (Deputy Governors of the CBR, Board members of Bank Otkritie, individuals linked to Bank Otkritie, military personnel, a network of individuals that support Malofeyev's activities, including those related to sanctions evasion and misinformation campaigns + 18, including A.Mordashov and his family + 58 + visa restrictions for 529 officers of the Russian military and Russian nationals</p> <p>Canada. 14 oligarchs, close associates of the Russian regime, and members of their families. 203 senior officials or current or former members of the People's Councils of DPR and LPR. 21 oligarchs + 19 senior defense officials + 14 oligarchs and their family and close associates + 22. Deputy PM of Canada proposed G7 to allow Russian "oligarchs" to pay for leaving the sanctions lists. In response, the G7 countries are considering whether to allow Russia's sanctions oligarchs to pay for the release of sanctions: it is expected that the funds will go to rebuild Ukraine. Neither the Russian oligarchs themselves nor the Ukrainian authorities seem to oppose such an idea, which was proposed after a conversation with the oligarchs + 21 + 13 Belarus MinDefence officials.</p> <p>UK. 16 notable individuals, including family members Additionally sanctioned 31 individuals with asset freezes and travel bans. Many of the sanctioned individuals are actors and propagandists, senior executive officers or members of the board of directors of banks, members of the Federation Council. The British National Crime Agency (NCA) has created a special unit whose goal is to "create difficulties" for the Russians under the sanctions. The NCA has already carried out three searches in the homes of people who are relatives or close associates of Russian businessmen who have been sanctioned + 12 incl. Patriarch Kirill + 8 individuals + 7 propagandists + 41</p> <p>Poland (+15 with entrance ban, 7 of them with assets freeze)</p> <p>Australia. 147 individuals, including, Russian senators, and daughters of Vladimir Putin and Sergei Lavrov. 76 members of the State Duma of the Federal Assembly of the Russian Federation. 34 senior members of the Russian-led movements in Ukrainian regions Donetsk and Luhansk. 4 individuals for supporting the invasion - Aleksandr Chupriyan, Sergei Korolyov, Nikolay Bogdanovsky and Illia Kyva +16, incl. Kabaeva.</p> <p>New Zealand. 170 members of the upper house of RF Federation Council + 5 persons for disinformation and cyber attacks (media/defense). President of Belarus Alexander Lukashenko and 22 military officials of Belarus</p> <p>Japan. 8 RF officials + 133 individuals from self-proclaimed "DPR/LPR" + 62</p> <p>EU. Switzerland. Liechtenstein 2 oligarchs (Kurchenko, Prigozhin). EU: 2 + G.Schroeder, M.Waring and K.Kneissl left the BoD of Rosneft threatened by sanctions + 65 RF individuals + 12 individuals in Belarus for internal repression and human rights violations) + 47 individuals, inc. Sobyenin (the mayor of Moscow).</p> <p>Switzerland. 65 RF +12 Belarus.</p> <p>Norway. 65 RF.</p>
5.2.	Family members	Yes	<p>Yet, no US sanctions against Kabaeva. UK sanctioned Kabaeva. She avoided sanctions due to a last-minute decision of the National Security Council.</p> <p>EU. Sanctioned Kabayeva, excluded Patriarch Kirill.</p> <p>UK. Alina KABAEVA, Viktor KHMARIN, Vladimir KOLBIN, Lyudmila OCHERETNAYA (ex-wife of Putin), Aleksandr Grigorevich PLEKHOV, PUTIN Igor Alexandrovich, PUTIN Mikhail Evgenievich, PUTIN Roman Igorevich, SHAMALOV Yuri Nikolayevich, SHELOMOV Mikhail Lvovich, ZATSEPILINA Anna Yakovlena.</p> <p>Canada. The GoV has introduced a Bill to allow for the imposition of travel bans on family members of sanctioned people + A.Kabaeva</p> <p>Switzerland. Sanctioned Kabayeva.</p>

5.3.	Members of governing bodies of Russian state-owned and state-controlled enterprises	Yes	UK. Mikhail KLISHIN (an Executive in Bank Rossiya, and a member of the Board of Directors at SOGAZ). EU. Gerhard Schroeder, Matthias Waring and Karin Kneissl left the BoD of Rosneft threatened by sanctions
5.4.	Key executives and board members of companies that are subject to US or EU sanctions	Yes	USA. 8 members of the Executive Board of Sberbank and 27 members of Gazprombank Board of Directors. UK. Exclude 2 top-managers of Rosneft excluded from sanction list.
5.5.	Propagandists	Yes	New Zealand. 5 persons in media and propaganda sphere. Australia. 11 individuals in the Russian media industry who promote the Russian Government's false narratives. Canada. 30 disinformation and propaganda figures.
5.6.	Senior members of the governing bodies of Russian political parties and every member of Putin's political party, United Russia	Yes	
6. Intensify Sanctions on State-Owned Enterprises			
6.1.	Key state-owned enterprises in the energy industry	No	-
6.2.	Key channels of Russian propaganda	Yes	UK. VGTRK, All-Russian public organization society for the promotion of Russian historical development Tsargrad, Analiticheskii tsentr Katekhon OOO, Inforos, Southfront, Strategic culture foundation, Tsargrad OOO USA. JSC Channel One Russia, Television Station Russia-1, and JSC NTV Broadcasting Company. New Zealand. 85th Main Special Service Centre (GTsSS) (SOE), Internet Research Agency, Main Centre for Special Technologies (GTsST). Australia. 12 RF (Internet Research Agency LLC, New Eastern Outlook, Oriental Review, Strategic Culture Foundation, SouthFront, NewsFront, OOO Inforos, United World International, Geopolitica, Odnа Rodyna, Journal Kamerton, Analiticheskiv Tsentр Katekhon OOO) EU (3 SOE media + extended prohibition of broadcasting for 3 RF SOE media) Latvia (ban on distribution of 80 audio and audiovisual programs registered in RF). Switzerland (prohibition of advertisement of content produced or broadcast by certain RF SOE media). Canada. 15 entities involved in disinformation activities (inc. 12 SOEs).
6.3.	Key state infrastructure and industrial companies	Yes	UK. <u>Machine building:</u> KAMAZ. <u>Defense:</u> Avangard JS, JSC Kalashnikov concern (SOE 25+1), Rocket and space center progress JSC. <u>Shipbuilding:</u> The Dalzavod ship repair centre JSC. <u>Electronics:</u> CROCUS NANO ELECTRONICS (14,32% SOE), JSC MIKRON (6.5% SOE). <u>Leasing:</u> JSC GTLK. <u>Science:</u> Moscow institute of physics and technology, N.A. Dollezhal order of Lenin research and design institute of power engineering JSC, AO NII VEKTOR, Aleksandrov Scientific research technological institute Niti, Federal state unitary enterprise Dukhov automatics research institute. <u>Logistics:</u> RF Railways Evraz plc (steel manufacturing and mining company). New Zealand. <u>Defense:</u> Makeyev Rocket Design Bureau, Minsk Wheel Tractor Plant (MZKT), State authority for military industry of the Republic of Belarus (SAMI), OKB TSP Scientific Production LLC (OKB TSP), Oboronnye Initsiativy, LLC Synesis. <u>Shipbuilding:</u> United Shipbuilding Corporation. USA. State-supported private weapons manufacturer LLC Promtekhlogiya + 71 (SDN List) + 45 RF entities in aerospace, defence and related materiel sector, financial services or technology sectors (sanction lists mostly consist from major RF SOEs and their subsidiaries) Canada. Zelenodolsk Shipyard JSC, Military Industrial Company LLC, Rosgvardiа, UEC Klimov JSC, KAMAZ PTC + 28 defence SOEs Australia: PMC Wagner, Industrial-Commercial Private Unitary Enterprise Minotor-Service and OJSC KB Radar-Managing Company of Radar Systems Holding New Zealand. Sanctions on 44 entities that are funding or fuelling the war, including 32 RF SOEs and 3 Belarus SOEs) EU, Switzerland (6 SOEs + 4 owned by SOE on 27% and 3 Belarus SOEs). Norway (6 RF SOE + 4 owned by SOE on 27%). EU. 7 SOEs.
6.4.	Sanctions on any new project of RosAtom	No	Finland. Finland's Fennovoima has terminated its contract with Rosatom to build a nuclear power plant due to significant delays by RAOS (a subsidiary of Rosatom) and its inability to complete the project. Finnish MinEcon approves the decision.

7. Expand Export Controls and Ban Imports

7.1.	Ban on exports to Russia of all strategically important high-technology products	Yes	<p>UK. Ban on services exports, including management consulting, accounting and PR services. ICAEW (incl. KPMG, EY, Deloitte and PwC) is asking UK GoV for exceptions to the ban on providing services to Russian companies. Export ban on maritime goods&technology and related services. Extended the list of oil refining goods&technology and the list of energy-related goods banned to export. Export restrictions for Belarus on goods and technology relating to critical industry, quantum computing, oil refining, luxury goods including dual-use good and technology (will block trade of ~£60 mln of goods with Belarus).</p> <p>Ban on export of goods and items of significant importance to the Russian (such as chemicals, materials, machinery goods and electrical appliances with the exception of licensed humanitarian goods) + expanded the scope of existing energy-related goods and services prohibitions + ban on export of accounting, business and management consulting, and public relations services.</p> <p>USA. Export ban on accounting, trust and corporate formation, and management consulting services (will take effect on June 7, 2022). The U.S. Nuclear Regulatory Commission will suspend general licenses that previously permitted export of source material, special nuclear material, byproduct material, and deuterium to Russia.</p> <p>the US Department of Commerce's Bureau of Industry and Security (BIS) issued an order temporarily denying all export privileges for the Russian cargo aircraft carrier AviaStar due to "ongoing violations" of the United States' export controls on Russia. Temporary ban on export privileges for Belavia, Nordwind Airlines, Pobeda Airlines (owned by Aeroflot) and Siberian Airlines</p> <p>Japan. Bans on exports to 71 specific organizations + ban on export goods that strengthen the industrial base of RF (wood products, steel storage tanks and other similar containers, machinery and electrical equipment components).</p> <p>EU. Ban of accounting, pr and consultancy to RF. Exclusions to export ban on luxury goods, allowing for personal use of persons travelling from the EU.</p> <p>Canada. Imposed an export ban on 28 services vital for the operation of the oil, gas and chemical industries, including technical, management, accounting and advertising services. Luxury goods (incl. alcohol, tobacco, luxury clothing and accessories, jewelry, kitchenware, and art), export ban on Belarus on luxury goods. Expanded existing measures on the oil, gas and chemical sectors to include industrial manufacturing.</p> <p>Norway (expansion of list of goods subject to export controls / bans that could help increase RF military and technological capabilities + ban of accounting, pr, consulting services.</p> <p>Switzerland: ban on audit, business and pr consultancy services.</p> <p>Japan. Ban on trust, accounting / audit, and management consulting services + ban on export of goods to 65 RF and 25 Belarus entities in defence.</p>
7.2.	Ban on the export and supply to Russia of catalysts used for oil production, the telecom industry, and agriculture	Slow progress	<p>UK. Internet services and online media services</p>
7.3.	Tighten the sanctions on technologies and equipment (microchips, semiconductors)	Yes	<p>Switzerland. Industrial robots</p> <p>USA. License requirement on exports of hundreds of common industrial and commercial items, including "wood products, industrial engines, boilers, motors, fans, and ventilation equipment, bulldozers, and many other items with industrial and commercial applications."</p> <p>Japan. Export ban of cutting-edge goods (quantum computers, 3D printers, etc).</p> <p>UK. Export bans targeted on Russia's manufacturing and heavy machinery sectors announced.</p> <p>Taiwan. Imposed controls on exports of strategic high-tech products in 57 categories to Belarus + ban on export of modern chips to Belarus and RF.</p>
7.4.	Enhance export controls on critical technology systems, components, and materials with potential military dual-use	Yes	<p>UK. <u>Announced</u> an export ban on products used to repress the Ukrainian people (announced but not yet implemented). Products targeted could include interception and monitoring equipment (dual-use products). Export ban on products&technology that could be used to repress people, Export ban on goods and technology relating to chemical and biological weapons. Export ban on jet fuel and fuel additives.</p> <p>Canada. Ban on export of goods that could be used by RF production and manufacture of weapons. Ban on export for Belarus on products that could be used in the production and manufacturing of weapons.</p>

			<p>EU. Expansion of export restrictions for dual-use goods and technology, goods & technologies that can be used in defense and security. Reinforced export controls of dual use goods and advanced technology + expanded the list of entities subject to export restrictions regarding dual-use goods and technology by adding 4 Russian entities</p> <p>USA. Export control for 70 entities in RF and 1 in Belarus</p> <p>Switzerland: extended the list of dual-use goods banned for export by 91 RF entities and 24 Belarus entities</p>
7.5.	Prohibit the export of metals, minerals, and ores	Slow progress	<p>Switzerland. Certain chemical products.</p> <p>UK. Ban on services relating to iron and steel goods.</p>
7.6.	Ban on the export of semi-finished metals, industrial software, shipbuilding technology, and oil storage	No	-
7.7.	Introduce a full embargo on the import from Russia and Belarus of metals, minerals, related manufactured goods, chemical products, plastic and rubber, wood and timber, and precious stones	Slow progress	<p>UK (silver, wood, high-end; additional 35% import duty, including on palladium, platinum and chemicals is to be imposed + import ban on: revenue generating goods RF origin). Switzerland (lignite and coal, timber, cement, seafood, caviar + extended the list of prohibited for import from RF goods). Canada (luxury goods, incl. alcoholic beverages, seafood, fish and non-industrial diamonds + import ban on Belarus on luxury goods). USA (35% import tariff for 570 categories of RF products worth approximately \$2.3 bn).</p> <p>EU (extended the exemption from the prohibition to engage in transactions with certain SOEs as regards transactions for agro products and the transport of oil to 3rd countries).</p>
7.8.	Prohibit the export of critical items such as high-powered gas turbines, turbine maintenance services, and the supply of their components to Russia	No	-
7.9.	Stop the implementation of long-term contracts and issuance of licenses defense industries	No	-
8. Impose Secondary Sanctions			
8.1.	Introduce secondary sanctions against all foreign individuals and entities that facilitate significant transactions or investments for the designees to prevent any potential transactions facilitated with Russian-related shell entities and offshore jurisdictions.	Yes	<p>No specific act for secondary sanctions has been adopted. USA plans to include secondary sanctions in its financial crime strategy. G7 discuss secondary sanction for oil) But companies start to fear imposition of secondary sanctions.</p> <p>China. UnionPay backs away from Russian banks on secondary sanctions fears. China's state-owned refineries are reluctant to sign new deals to buy Russian oil. Under the pressure of US sanctions and suppliers, Chinese technology companies are closing down business in Russia without making official statements. According to the Chinese government, China's exports to Russia in Mar fell by a total of 27% compared to Feb. Exports of technological products fell particularly sharply. Thus, the supply of laptops decreased by more than 40%, smartphones - by two thirds, base stations - by 98%. Chinese tech giants such as Lenovo and Xiaomi are publicly refusing to do business with Russia - WSJ. Due to the potential consequences of financial sanctions, fewer shipowners are willing to let their tankers load in RF. Supply of Russian oil to China becomes more and more congested at sea, despite the short distance between countries, Bloomberg.</p> <p>UK. Revolut cannot obtain a banking license in UK due to links with RF: father of co-founder of Revolut Mykola Storonskiy is the top manager of Gazprom's structure.</p> <p>Western lawyers start to refuse working with Russians, while RF itself closes its market for them. According to FT, British lawyers began to refuse to work with the Russians against the background of sanctions.</p> <p>Germany. German Deutsche Bank has stopped working with a number of large Russian banks, which have opened correspondent accounts in euros, writes RBC. Such a decision, in particular, is associated with the risk of secondary sanctions.</p> <p>USA. Plans to include secondary sanctions in its financial crime strategy. They are also considering sanctions against unscrupulous banks that help circumvent sanctions. USA sanctioned 7 RF entities and 6 non-RF entities for evading newly imposed export controls on Russia, these companies provided support to Russia's military and/or defense industrial base.</p>
9. Increase Transparency to Discourage Trade with and Investment in Russia			

9.1.	A registry of all international companies still operating in Russia and Belarus	Slow progress	Here can be found a registry of both companies still operating and ones who have already left Russia. The registry is created and administered by Yale School of Management. EU created a special online mechanism through which whistleblowers can report violations of anti-Russian sanction.
9.2.	Obligate legal entities and organizations to disclose information regarding existing business relations with enterprises and their subsidiaries inside and outside of Russia and Belarus	Yes	<p>USA. A bill to oblige public companies to disclose their ties to Russia and other aggressor countries was registered. Corp Fin has posted a sample comment letter to companies about potential disclosure obligations arising out of the Russian invasion of Ukraine. Released warning of increased export control evasion attempts by entities targeted under RF related programs (includes 16 items with a higher risk of evasion attempts. Strengthened enforcement of export controls + established an outbound investment review mechanism to protect U.S. technologies (e.g. semiconductors, batteries, AI etc.) against adversaries like China and RF – notification to the federal government 45 days prior to deal closing is required if the investment involves specified sectors).</p> <p>Germany. The Bundestag obliged those who fell under anti-Russian sanctions to report assets in Germany under the threat of imprisonment, DPA reports + is to create a national registry of assets that are subject to sanctions. EU. The European Council has requested the European Parliament's consent to add the violation of sanctions to the list of 'EU crimes'. The European Parliament gave its consent to the draft of the European Council Decision which identifies the violation of EU sanctions as an EU crime. Strengthened reporting requirements - sanctioned people and entities were obliged to declare assets in EU before 1 Sep 2022 or within 6 weeks from the date of listing. Share of information on property of sanctioned persons, entities and bodies between EU Member States and the European Commission.</p>
10. Deepen Coordination of Sanctions and Link Sanctions Relief to Peace and Reconstruction			
10.1	Continue to coordinate sanctions across the EU, United States, and other allied countries and partners to ensure that, if an individual or entity is sanctioned in one jurisdiction, then they should be sanctioned in all jurisdictions.	Yes	<p>UK. Fast-tracked on 19 individuals and entities in alignment with G7 and the EU to target Russia's military and defense capabilities.</p> <p>UK and EU reached an agreement to enact a co-ordinated ban on insuring ships carrying Russian oil.</p> <p>UK. Introduced an urgent procedure for designations of a person/entity on the basis that they have been sanctioned by the US, the EU, Australia or Canada.</p> <p>Switzerland adopts new EU sanctions and replicates the EU lists of sanctioned individuals and entities. Norway adopted the 6th EU sanction package.</p>
10.2	Maintain all sanctions until Russia has ended its invasion of Ukraine.	Yes	<p>So far such consensus exists.</p> <p>USA. Merely stopping the invasion of Ukraine may not be enough for RF to gain relief from Western economic sanctions. The U.S. also wants an assurance that there will never be another such invasion. USA won't lift sanctions on Russia until the special operation is stopped, State Department spokesman Ned Price.</p> <p>Germany. The lifting of anti-Russian sanctions is possible only if the withdrawal of Russian troops from the territory of Ukraine.</p> <p>UK. Sanctions against Russia will be lifted only after "complete ceasefire and withdrawal of troops"</p>
10.3	After the war has ended, coordinate closely any lifting of sanctions with the Ukrainian government and its assessment of (1) progress in peace talks and negotiations, (2) Russia's recognition of Ukraine's sovereignty and territorial integrity, and (3) Russian cooperation in contributing substantially to a Ukraine reconstruction fund as compensation for all the material and human damage inflicted as a result of its invasion.	Yes (3)	<p>USA and Canada are preparing legislative acts to use sanctioned assets for compensation to Ukraine. USA. The USA doesn't have legal authority to seize CBR assets frozen due to its invasion of Ukraine, but continues talks with partners over ways to make Russia foot the bill for Ukraine's post-war reconstruction are starting. The Baltic countries and Slovakia called on the EU to transfer Russian assets to Ukraine. Canada passed a law for the freezing and confiscation of Russian-sanctioned assets). EU. EU countries should consider using frozen Russian foreign exchange reserves to pay for Ukraine's recovery after the war, Borrell said. EU working on the possibility of using the frozen Russian assets to help Ukraine. EU is ready to create an international platform for the restoration of Ukraine. EU considers it fair and is preparing a legal basis for the frozen RF assets and assets of RF oligarchs. EU is working on "Sanction Berau" launch, Justice Commissioner of EC suggests keeping Russian assets frozen until RF agrees to pay for the reconstruction of Ukraine after the war ends. Germany. Consider the possibility. The Finance Minister does not support the idea of confiscating the personal assets of Russians for Ukraine.</p>