

Yermak-McFaul Working Group on Russian Sanctions

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

Progress Update, June 24 compared to Apr 19

Prepared by KSE Institute

#	Sanction Block	Progress	Details
1	Expand Oil and Gas Sanctions #Oil	Yes, but incomplete scope	EU 6th package prohibited to purchase, import or transfer seaborne crude oil or petroleum products originated in RF. Norway (ban on purchase, import or transfer of oil transported by sea and supporting services). G7 made an obligation to ban RF's oil import. They have now started discussing the use of price cap. Poland terminated the agreement on the supply of Russian 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. Slovakia committed to reduce dependence on RF gas by 66% starting from Jun 1. RF cut supplies via NS to Germany by 60%, to Italy by 15%.
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 SOE shipping company & 6 private shipping companies & 1 maritime engineering company & 69 vessels. Norway closed borders and ports to RF trucks and ships from May 7. Canada sanctioned 1 manufacturer. UK denied Aeroflot, Ural Airlines and Rossiya Airlines selling their landing slots. EU 6th package imposes prohibition on insurance and reinsurance of maritime transport of oil and oil products to third countries. Lithuania (applied transit restrictions on goods subject to EU sanctions between Russia and Kaliningrad region).
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. USA didn't renew General License 9C. Before 25th of May, when the license expired, it had been allowing use of "frozen" reserves to make payments on debt + 13 associated with Putin's inner circle + 4 connected with Mordashov + ban on purchasing Russian securities on the secondary market + extended until 5 Dec 2022 license allowing for energy financing transactions via RF banks. UK: 10 defense companies asset freeze (including 4 SOEs & 1 company with controlling stake 25+1 shares owned by RF) & 32 defense and propaganda entities, asset freeze for Evraz plc + ban export of banknotes denominated in sterling or any official currency of the EU. Poland: + 37 entities on top of EU lists. Switzerland: ban on trusts registering by Russians + de-SWIFT 3 RF and 1 RB banks + sanctioned 18 RF and 8 RB 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 RB SOE) and 2 in shipbuilding (1 RF SOE) + sanctions on 44 entities (38 RF and 6 RB, including 32 RF SOEs and 3 RB SOEs). Canada: 5 defense and machine building companies + asset freeze and dealing prohibition on 4 RF financial institutions and banks). EU: (de-SWIFT 3 RF banks + 1 RB; 18 entities that support RF military and security; 8 entities in RB + consider gold as a new sanction target). Japan: asset freeze 2 RF and 1 RB banks. Norway (de-SWIFT 3 RF banks; restrictive measures for 18 entities that support RF military and security). Total RF and RB entities sanctioned since Apr 19 (may overlap): 238 (including CBR and RDIF) + 20 subsidiaries
4	Designate the RF as a Sponsor of State Terrorism #Terorism	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.
5	Strengthen Individual Sanctions against these Categories of Individuals #Individual	Yes	USA: +35 + 18, including A.Mordashov and his family. 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 RB for internal repression and human rights violations). UK: + 31 individuals (politicians, propagandists and managers of designated banks) + 12 Putin "family", incl. Kabaeva + 12 incl. Patriarch Kirill. NCA created a special unit to "create difficulties" for Russians under the sanctions. Poland: +15 with entrance ban, 7 of them with assets freeze. New Zealand: +170 + 5 in media and propaganda + 23 RF senior military leaders incl. Alexander Lukashenko. Australia: +76+34+15. Switzerland: +2 oligarchs +65 RF +12 RB, incl. Kabaeva. Japan: +141. Liechtenstein: +2. Canada: +14 and adopted bill for the imposition of travel ban on family members of sanctioned people + 22, incl. Kabayeva. Proposed G7 to allow RF "oligarchs" to pay their way out of the sanctions lists. 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. New Zealand: 2 RF SOEs and 1 RB SOE in defense and shipbuilding + 3 in media +3 RF SOEs in defense + 32 RF SOEs and 3 RB SOEs). Canada: 4 defense and machine building SOEs + 3 RF SOE financial institutions and banks). Australia: RF PMC Wagner + 12 RF propaganda and disinformation SOEs+ 2 RB SOEs in defense). EU: 3 SOE media + 6 RF SOEs + 4 owned by SOE on 27% and 3 RB SOEs). Switzerland: 6 SOE + 4 owned by SOE on 27% and 3 RB SOEs). Latvia: ban on distribution of 80 audio and audiovisual programs registered in RF, Japan: 1 RF and 1 RB SOE banks. Norway (6 RF SOE + 4 owned by SOE on 27%)
7	Expand Export Controls and Ban Imports #Trade	Yes	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. 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 RB in military + temporary ban on export privileges for Aviastar and Belavia. 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 RB entities + extended the list of prohibited for import from RF goods). 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). Taiwan : strategic high-tech products in 57 categories to RF + ban on export of modern chips to RB 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. 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. Norway (expansion of list of goods subject to export controls / bans that could help increase RF military and technological capabilities + ban on auditing and accounting, financial advice)
8	Impose Secondary Sanctions #Secondary	No	No specific document adopted. USA plans to include secondary sanctions in its financial crime strategy, considers sanctions against unscrupulous banks that help circumvent sanctions. G7 discusses secondary sanctions for oil.
9	Increase Transparency to Discourage Trade with and Investment in RF #Transparency	Yes, but slow	USA : registered a bill to oblige public companies to disclose their ties to RF and other aggressor countries + Corp Fin has posted a <u>sample comment letter</u> about potential disclosure obligations arising out of the Russian invasion of Ukraine). 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 : EC plans to propose recognition of sanctions circumvention as a crime. EU has created a special online mechanism through which whistleblowers can report violations of anti-Russian sanction.
10	Deepen Coordination of Sanctions and Link Sanctions Relief to Peace & Reconstruction #Reconstruction	Yes	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. Baltic countries and Slovakia called on the EU to transfer RF assets to Ukraine . 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.

Color 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

If a week before Switzerland was the one to catch up with the 6th EU sanction package, then last week Norway fully took this role, however, with exception for sanctioning RB entities. In addition, Canada adopted a law allowing the freezing and confiscation of Russian-sanctioned assets, which moved from the standstill the progress under **#Reconstruction** stream. Among announcements worth watching in upcoming weeks:

- Germany is to create a national registry of assets that are subject to sanctions,
- EU considers gold as one of the new sanction targets (according to Reuters),
- USA endorsed resolution calling to recognize RF as a sponsor of terrorism, final decision rests on State Department and the White House.

At the same time, Lithuania's decision to apply transit restrictions on goods subject to EU sanctions between Russia and Kaliningrad region became the most eye-catching sanction-event last week.

Nonetheless, the work on the 7th EU package should be accelerated as well as the whole sanction process.

Progress over last week:

#Oil: Norway banned purchase, import or transfer of oil transported by sea, as well as supporting services.

#Transport: Lithuania started to apply transit restrictions on goods subject to EU sanctions between Russia and Kaliningrad region.

#Financial: Norway joined the 6th EU package by de-SWIFTing 3 RF and sanctioning 18 RF in line with 6th EU sanction package. UK banned export of banknotes denominated in sterling or any official currency of the EU.

#Individual: Norway sanctioned 65 RF individuals, included in the 6th EU package.

#SOE: Norway sanctioned 6 RF SOEs + 4 owned by SOE on 27% as the EU did under its 6th package.

#Trade: Norway expanded the list of goods subject to export controls / bans that could help increase RF military and technological capabilities and banned provision of auditing and accounting, financial advice to RF. UK 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 origin.

There is **no progress** last week in **#Secondary #Transparency**.

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** (adopted 6th package including the ban of seaborne crude oil and certain petroleum products from RF, pipeline oil supplied is temporarily excluded), **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), **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). **RF** (cut supplies via NS to Germany by 60%, to Italy by 15%).

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 Russian oil from the EU market by the 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.

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

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.

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.

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), **EU** (discussing ban on insurance of vessels carrying RF oil, **but thinks allow EU vessels to transport Russian oil and fuel to 3rd countries**), **EU+UK** (co-ordinated ban on insuring ships carrying Russian oil), **Lithuania** (began to apply transit restrictions on goods subject to EU sanctions between the main part of Russia and the Kaliningrad region).

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.

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.

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.

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**), **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**), **Poland** (+ 37 entities on top of EU lists), **Switzerland** (ban on trusts registering by Russians + de-SWIFT 3 RF and 1 RB banks + sanctioned 18 RF and 8 RB entities connected with Armed Forces of Russian and GoV), **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 RB SOE) and 2 in shipbuilding (1 RF SOE) + sanctions on 44 entities (38 RF and 6 RB) that are funding or fuelling the war, including 32 RF SOEs and 3 RB SOEs), **Canada** (5 defense and machine building companies + asset freeze and dealing prohibition on 4 RF financial institutions and banks), **EU** (de-SWIFT 3 RF banks + 1 RB; restrictive measures for 18 entities that support RF military and security; restrictive measures for 8 entities in RB + **consider gold as a new sanction target**), **Japan** (asset freeze 2 RF and 1 RB banks), **Norway** (de-SWIFT 3 RF banks; restrictive measures for 18 entities that support RF military and security)

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 GoV (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 TEKHNOLIGII 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.

The EU said that any transaction involving payment in favor 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 Belarus - 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).

EU leaders consider gold as a new target for sanctions according to Reuters. At a closed-door meeting of EU envoys last week, Denmark suggested further sanctions could include gold. A person familiar with the work on sanctions told Reuters the EC was working on adding gold to a possible next round, although it was not yet clear whether the measure could ban exports to Russia, imports from Russia or both.

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 subsidiaries: Agropromyshlenny Kompleks Voronezhski OOO, Anninskii Elevator OOO, Auditkonsalt OOO, Belinveststroi OOO, Dve Stolitsy OOO, Kontrakt OOO, Ladoga OOO, Nekommercheskaya Organizatsiya Fond Khimicheskoe Razoruzhenie I Konversiya, Azovskaya Zernovaya Kompaniya OOO, Ekspluatiruyushchaya Kompaniya Tsentr OOO.

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 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.

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

UK. Added 10¹ defense companies to the sanctions list of asset freeze targets.

On May 4, UK additionally sanctioned 32 entities² (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.

Poland. Introduced Poland-specific list of designated parties subject to measures not covered by EU Regulations 765/2014 and 269/2014, covering 37 entities³. 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

¹ 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.

² 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).

³ ACRON PAO, AXIOMA DR IT, BARTER COAL, BELOIL Polska, EUROCHEM POLSKA, „FABERLIC BALTIC 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”.

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 defense 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.

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.

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)

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.

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*).

5. Strengthen Individual Sanctions against these Categories of Individuals - USA (+35 + 18 officials, SOEs management and oligarchs, including A.Mordashov and his family), **Canada** (+40, +14 +22 senior officials of financial institutions and their family members, including Kabayeva), **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 RB for internal repression and human rights violations), **UK** (+31, +12 (Putin's family and friends, incl. Kabayeva + 12 incl. Patriarch Kirill), **Poland** (incl. Putin's, Lavrov's daughters, Nabiullina), **New Zealand** (+170 + 5 in media and propaganda +23 (RB military officials and Luckashenko), **Australia** (+76, +34, +15), **Switzerland** (+2 +65 RF +12 RB), **Japan** (+141), **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 1,305 persons, Canada - 1,213, the EU - 1,174, Switzerland - 1,171, Australia - 990, USA - 858, Japan - 775, New Zealand - 686; Ukraine - 3,642 (NAZK).

Data from [NAZK](#) and KSE Institute.

New personal sanctions – Apr 19, 2022 – June 24, 2022

Country	Number of individuals sanctioned
USA	31 (29 - confirmed number) +35 +18
UK	42 (16 - confirmed number) +31+12+12
EU	2+65+12
Canada	217+40+14+22
Switzerland	+2+65
Australia	147 +76 +34 +15
Japan	+141
Poland	15
Liechtenstein	+2
New Zealand	+170 +23
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 oligarchs⁴.

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 Nabiullina⁵. 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,

⁴ 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; Dmitry 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"), Dmitry 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).

⁵ Petr Olegovich Aven, Oleg Viktorovich Boyko, Mikhail Maratovich Fridman, Mikhail Safarbekovich Gutseriev, Igor Viktorovich Makarov, Elvira Sakhipzadovna Nabiullina, Sergey Roldugin, Alexander Torshin, German Borisovich Khan, Alexander Ponomarenko, Katerina Vladimirovna Tikhonova, Maria Vladimirovna Vorontsova, Maria Aleksandrovna Lavrova, Yekaterina Sergeevna Vinokurova.

and members of their families⁶. On 6 May, Canada added to list an additional 19 individuals who are senior defense officials⁷. 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 Ukraine⁸. 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 bans⁹. 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 members¹⁰.

EU. On 21 April, 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.

UK. On 21 April, added 16 individuals¹¹ 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 Belozyorov 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)

⁶ 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 LUKYANENKO, Anatoly Yurievich PECHATNIKOV, Olga GOLODETS, Bella Ilyinichna ZLATKIS, Stanislav Konstantinovich KUZNETSOV, Boris Viktorovich OBNOSOV

⁷ Andrey Sergeevich IVANAYEV, Igor Yurievich KOROTCHENKO, Andrey Ivanovich SYCHEVOY, Tatiana Viktorovna SHEVTSOVA, Maria Vladimirovna KITAYEVA, Rossiyana Vladimirovna MARKOVSKAYA, Andrey Nikolaevich SERDYUKOV, Valery Ivanovich FLYUSTIKOV, Aleksander Pavlovich LAPIN, Ruslan Khadzhiemlovich TSALIKOV, Gennady Valeryevich ZHIDKO, Sergey Analolievich KOGOGIN, Dmitry Evgenyevich SHUGAEV, Azatbek Asanbekovich OMURBEKOV, Yunus-Bek Bamatgireyevich YEVKUROV, Sharip Sultanovich DELIMKHANOV, Alimbek Sultanovich DELIMKHANOV, Amkhad Sultanovich DELIMKHANOV

⁸ Oleg Valentinovich BELOZYOROV, Grigory Viktorovich BEREZKIN, Elena Petrovna TIMCHENKO, Farkhad AKHMEDOV, Igor Albertovich KESAEV, David Lvovich DAVIDOVICH, Andrey Valeriyevich RYUMIN, Dmitry Arkadievich MAZEPIIN, Nikita Dmitriyevich MAZEPIIN, Ksenia Gennadevna FRANK, Gleb Sergeevich FRANK, Natalya BROWNING, Alexander Yevgeniyevich LEBEDEV, Julia Alexandrovna MATVIYENKO

⁹ 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.

¹⁰ 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 KULJK (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 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).

¹¹ Belozyorov, Oleg Valentinovich (Chief Executive Officer Of Russian Railways), Bogdanovsky, Nikolay Vaselyevich (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 Valeriyevich (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 Olgetovich)

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 individuals¹² with asset freezes and travel bans. Many of sanctioned individuals are actors from mainstream media organisations¹³.

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 Kabaeva¹⁴.

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 Kirill¹⁵.

Poland. Poland-specific list of designated parties subject to measures not covered by EU Regulations 765/2014 and 269/2014 covered **15 individuals**¹⁶. These individuals are added to the list of foreigners whose stay in Poland is undesirable. For 7 of them¹⁷ 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.

¹² (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 Nailiya 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 Mashtalyar, 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, Iliyas Umakhanov, Putin's aide Maxim Oreshkin).

¹³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1073104/Notice_Russia_040522.pdf

¹⁴ 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).

¹⁵ 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 Kyrlo 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.

¹⁶ Bakalczuk Tatiana, Deripaska Oleg, Fridman Michail, Gucerjew Michail, Gucerjew Sait-Salam, Kantor Wiaczeslaw Mosze, Kaspierki Jewgienij, Melniczenko Aleksandra, Melniczenko Andriy, Mordaszow Aleksiej, Nieczajew Aleksiej (Nechayev Alexy Gennadyevich), Nuraliev Boris, Raszidow Timur, Sieczin Igor Iwanowicz (Sechin Igor Ivanovich), Vekselberg Victor.

¹⁷ Bakalczuk Tatiana, Gucerjew Sait-Salam, Kaspierki Jewgienij, Melniczenko Aleksandra, Nuraliev Boris, Raszidow Timur, Vekselberg Victor.

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.

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 RB¹⁸.

Japan. On 10 May, 8 RF officials (Mikhail Mishustin, Rashid Nurgaliev, Aleksandr Dvornikov, Vladimir Bogdanov, Elena Timchenko, Natalya 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.

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 defense SOEs +1 RF Railways + 2 Airlines), **New Zealand** (2 RF SOEs, 1 RB SOE in defense and shipbuilding + 3 in media +3 RB SOEs in defense), **Canada** (4 defense and machine building + 3 RF SOE financial institutions and banks), **Australia** (1 RF PMC Wagner + 2 RB SOEs in defense +12 RF propaganda and desinformations company), **EU** (3 SOE media +6 SOEs + 4 entities owned by SOE on 27% + National Settlement Depository + 3 RB SOE), **Latvia** (ban on distribution of 80 audio and audiovisual programs registered in RF), **Japan** (1 RF and 1 RB SOE banks), **Switzerland** (6 SOE + 4 owned by SOE on 27% and 3 RB SOEs).

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.

¹⁸ 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 Mihalap (Deputy Commander of the Air Force and Air Defense Forces), Anatoliy 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 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 Peyganovich (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).

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 RB SOEs (OJSC "Grodno Tobacco Factory Neman" (SOE), Beltamozhservice (SOE), Belteleradio Company / National State Television and Radio Company of the Republic of Belarus (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 RB 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 RF¹⁹ 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 ownership²⁰ (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 RB 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 RB 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),

¹⁹ 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.

²⁰ 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)

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).

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).

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

Australia. On 17 May, sanctioned 3 SOE - the Private Military Company "Wagner" (PMC Wagner) and two RB 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 disinformation²¹.

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.

²¹ 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 Tsentri Katekhon OOO (Part 2 of Schedule 2)

7. Expand Export Controls and Ban Imports - new sanction from 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), **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 RB + temporary ban on export privileges for Belavia), **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)), **Taiwan** (strategic high-tech products in 57 categories to RB + ban on export of modern chips to RB 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). **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), **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 RB entities + extended the list of prohibited for import from RF goods), **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 RB – 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 goods²² 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-process²³) 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.

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 entities²⁴ 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 entities²⁵ 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

²² 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.

²³ 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.

²⁴ 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.

²⁵ 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

items or foreign-made products derived from certain U.S. technology or software thus further restricting the Russian military's capacity.

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.

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 entities²⁶ and 24 Belarusian entities²⁷. 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.

Canada. 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.

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).

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

²⁶ 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, Dolgoprudnyy 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 'Delta', 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'

²⁷ 140 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

Russian persons and entities concerned by export restrictions regarding dual-use goods and technology by adding 91 Russian entities²⁸ and 24 Belarusian entities²⁹.

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.

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 organizations³⁰ 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, etc³¹) 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.

Taiwan. On 6 May, Taiwan's GoV imposed controls on exports of strategic high-tech products in 57 categories to RB. 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 RB or RF. The export control list includes equipment for making

²⁸ 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, Dolgoprudnyy 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 GIDROPPRESS', 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'

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³⁰ 5th Shipyard; Alagir Resistor Factory; All-Russian Scientific-Research Institute Etalon JSC; Almaz JSC; Dolgoprudnyy 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 GIDROPPRESS", 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"

³¹ 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.

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 RB".

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.

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 Russia, to Russia or to any person. Banned export, sell, supply or shipment of goods that could be used in the production and manufacture of weapons in Russia, to Russia or to any person. And prohibited import, purchase or acquisition of luxury goods, including alcoholic beverages, seafood, fish and non-industrial diamonds, wherever situated, from Russia or from any person in Russia.

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. The 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.

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), **EU** (EC will propose to recognize sanctions circumvention as a crime), **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.

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.

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), **Germany** (considers possibility; Finance Minister said that he does not support the idea of confiscating), **Canada** (is to pass 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.

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 or 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.

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: ~ 50% (21 sanction-measures) out of 42 in the Action Plan (10 blocks).

13 sanction-measures (31%) with status No progress, 21 sanction-measures (50%) with status Yes, 8 sanction-measures (19%) with status Slow Progress. Compared to the previous week only 1 sanction-measure changed status from Slow Progress to Yes (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).

		UPD 24.06 (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. 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). 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. Also, 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. 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).
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.
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 license allowing for energy financing transactions via RF banks). 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). Japan. Asset freeze 2 RF and 1 RB banks. EU. de-SWIFT 3 RF banks + 1 RB + consider gold as a new sanction target Switzerland. Ban on trusts registered by Russians + de-SWIFT 3 RF and 1 RB 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).
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	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). Canada. 14 oligarchs, close associates of the Russian regime, and members of their families. 203 senior officials or current or former members

			<p>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.</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.</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</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 RB</p> <p>Japan. 8 RF officials + 133 individuals from self-proclaimed "DPR/LPR".</p> <p>EU. Switzerland. Liechtenstein 2 oligarchs (Kurchenko, Prigozhin).</p> <p>EU: 2 + G.Schroeder, M.Waring and K.Kneissl left the BoD of Rosneft threatened by sanctions + 65 RF individuals + 12 individuals in RB for internal repression and human rights violations).</p> <p>Switzerland. 65 RF +12 RB.</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	<p>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</p>
5.4.	Key executives and board members of companies that are subject to US or EU sanctions	Yes	<p>USA. 8 members of the Executive Board of Sberbank and 27 members of Gazprombank Board of Directors.</p>
5.5.	Propagandists	Yes	<p>New Zealand. 5 persons in media and propaganda sphere.</p> <p>Australia. 11 individuals in the Russian media industry who promote the Russian Government's false narratives</p>
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	<p>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</p> <p>USA. JSC Channel One Russia, Television Station Russia-1, and JSC NTV Broadcasting Company.</p> <p>New Zealand. 85th Main Special Service Centre (GTsSS) (SOE), Internet</p>

			<p>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, Odná Rodyna, Journal Kamerton, Analiticheskiv Tsentr Katekhon OOO) EU (3 SOE media), Latvia (ban on distribution of 80 audio and audiovisual programs registered in RF).</p>
6.3.	Key state infrastructure and industrial companies	Yes	<p>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. Canada. Zelenodolsk Shipyard JSC, Military Industrial Company LLC, Rosgvardia, UEC Klimov JSC, KAMAZ PTC. 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 RB SOEs) EU, Switzerland (6 SOEs + 4 owned by SOE on 27% and 3 RB SOEs). Norway (6 RF SOE + 4 owned by SOE on 27%).</p>
6.4.	Sanctions on any new project of RosAtom	No	<p>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.</p>
7. Expand Export Controls and Ban Imports			
7.1.	Ban on exports to Russia of all strategically important high-technology products	Slow progress	<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. 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. 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). EU. Ban of accounting, pr and consultancy to RF. 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. 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>
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 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 RB + ban on export of modern chips to RB and RF.</p>
7.4.	Enhance export controls on critical technology systems, components, and materials with potential military dual-use	Slow progress	<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.</p> <p>EU (expansion of export restrictions for dual-use goods and technology, goods & technologies that can be used in defense and security).</p> <p>USA. Export control for 70 entities in RF and 1 in RB</p> <p>Switzerland: extended the list of dual-use goods banned for export by 91 RF entities and 24 RB entities</p>
7.5.	Prohibit the export of metals, minerals, and ores	Slow progress	<p>Switzerland. Certain chemical products. Canada. Luxury goods (incl. alcohol, tobacco, luxury clothing and accessories, jewelry, kitchenware, and art). 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).</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.	No	<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.</p>

			They are also considering sanctions against unscrupulous banks that help circumvent sanctions.
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	<u>Here</u> 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	Slow progress	USA. A bill to oblige public companies to disclose their ties to Russia and other aggressor countries was registered. Corp Fin has posted a <u>sample comment letter</u> to companies about potential disclosure obligations arising out of the Russian invasion of Ukraine. Germany. The Bundestag obliged those who fell under anti-Russian sanctions to report assets in Germany under the threat of imprisonment, DPA reports + <u>is to create a national registry of assets that are subject to sanctions</u> . EU. EC will propose to recognize sanctions circumvention as a crime.
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	UK. <u>Fast-tracked on 19 individuals and entities</u> in alignment with G7 and the EU to target Russia's military and defense capabilities. 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. <u>Norway adopted the 6th EU sanction package.</u>
10.2	Maintain all sanctions until Russia has ended its invasion of Ukraine.	Yes	So far such consensus exists. 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. Germany. The lifting of anti-Russian sanctions is possible only if the withdrawal of Russian troops from the territory of Ukraine. UK. Sanctions against Russia will be lifted only after "complete ceasefire and withdrawal of troops"
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)	USA and Canada are preparing legislative acts to use sanctioned assets for compensation to Ukraine. USA. <u>The USA doesn't have legal authority to seize CBR assets frozen due to its invasion of Ukraine</u> , but continues talks with partners over ways to make Russia foot the bill for Ukraine's post-war reconstruction are starting. <u>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).</u> 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. EU working on the possibility of using the frozen Russian assets to help Ukraine. Germany. Consider the possibility. <u>The Finance Minister does not support the idea of confiscating the personal assets of Russians for Ukraine.</u>

