

Yermak-McFaul Working Group on Russian Sanctions

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

Progress Update, May 11 compared to Apr 19

Prepared by KSE Institute

The **greatest progress** last week was made in the following blocks: 4. Designate the Russian Federation as a Sponsor of State Terrorism (Lithuania recognized RF as a state sponsor and perpetrator of terrorism), 6. Intensify Sanctions on SOEs (USA (3 SOEs in media, 1 SOE bank + 10 its subsidiaries + 1 state-supported private weapons manufacturer), New Zealand (3 in media). Canada (4 defense and machine building companies). In addition, **noticeable progress** is observed in 2. Increase Transportation and Insurance-Related Sanctions (USA, marine), 3. Impose New Financial Sanctions (USA, SDN on Moscow Industrial Bank; UK, asset freeze for Evraz plc; Canada, 5 defense and machine building entities). For the **third week in a row no progress** is observed in Block 8. Impose Secondary Sanctions.

#	Sanction Block	Progress	Details
1	Expand Oil and Gas Sanctions	Yes, but slow	Poland refused from RF gas in response to RF cut off. G7 (made an obligation to introduce a ban of import RF's oil), EU (no consensus on oil embargo yet)
2	Increase Transportation and Insurance-Related Sanctions	Yes	USA (ban RF vessels from US ports, temporary denial of all export privileges for the Russian cargo aircraft carrier AviaStar + 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 from May 7. Canada (1 manufacturer of gas turbine engines)
3	Impose New Financial Sanctions	Yes	USA (SDN on Transkapitalbank, Investtradebank; virtual currency mining company Bitriver AG + 10 RF subsidiaries + SDN on Moscow Industrial Bank (SOE) + 10 its subsidiaries), UK (10 defense companies asset freeze, including 4 SOEs and one with controlling stake 25+1 shares owned by RF + 32 defense and propaganda entities + asset freeze for Evraz plc), Poland (+ 37 entities on top of EU lists), Switzerland (ban on trusts registering by Russians), 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) + 4 in defense (1 RF SOE and 1 RB SOE) and 2 in shipbuilding (1 RF SOE)). Canada (5 defense and machine building companies). Total new from Apr 19: 111 entities + 20 subsidiaries + CBR + RDIF
4	Designate the Russian Federation as a Sponsor of State Terrorism	Yes	Lithuania (Lithuanian Seimas officially recognize RF as a state sponsor and perpetrator of terrorism). USA (registered a resolution recognizing RF as a sponsor of terrorism)
5	Strengthen Individual Sanctions against these Categories of Individuals	Yes	USA (+35), Canada , Australia , EU (2 + considers sanctioning Alina Kabayeva and Patriarch Kirill), UK (+ 31 individuals (politicians, propagandists and managers of designated banks), Poland (+15 with entrance ban, 7 of them with assets freeze), New Zealand (+170 + 5 in media and propaganda), Australia (+76+34), Switzerland (+2 oligarchs). Japan (+141) Liechtenstein (+2). Total new sanctions from Apr 19: new sanctions against 990 persons (overlap between countries and previous sanctions). As of May 11, 1,601 persons under sanctions (NAZK).
6	Intensify Sanctions on State-Owned Enterprises	Yes	UK (4 SOEs defense companies asset freeze plus one with controlling stake 25+1 shares owned by RF, + 8 SOEs and 2 entities with RF ownership). 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). Canada (4 defense and machine building companies)
7	Expand Export Controls and Ban Imports	Yes	UK (import - silver, wood, high-end; export - internet services and online media services, a ban on services exports, including management consulting, accounting and PR services + announced 35% duty for ~£1.4bn of imports (palladium, platinum and chemicals) & export bans to hit > £250 mln (chemicals, plastics, rubber, and machinery)), USA (ban on exports of accounting and consulting services to RF, license requirement for common industrial and commercial items) Switzerland (import - lignite and coal, timber, cement, seafood, caviar; export - industrial robots or certain chemical products). Japan (bans on exports to 71 organizations), Taiwan (strategic high-tech products in 57 categories to RB)
8	Impose Secondary Sanctions	No	No secondary sanctions specific document has been adopted, but companies start to fear imposition of secondary sanctions
9	Increase Transparency to Discourage Trade with and Investment in Russia	Yes, but slow	USA (a bill to oblige public companies to disclose their ties to Russia and other aggressor countries was registered + Corp Fin has posted a sample comment letter about potential disclosure obligations arising out of the Russian invasion of Ukraine). Germany (intends to oblige Russians under sanctions to report property in Germany).
10	Deepen Coordination of Sanctions and Link Sanctions Relief to Peace and Reconstruction	Yes, but slow	USA and Canada are preparing legislative acts to use sanctioned assets for compensation to Ukraine. EU (launched discussion on this issue)

DETAILED ANALYSIS

1. Expand Oil and Gas Sanctions - no new sanctions; G7 (made an obligation to introduce a ban of import RF's oil), EU (no consensus yet on oil embargo), Poland refused from RF gas in response to RF cut off

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."

EU. No final decision on 6th package (oil embargo was blocked by Hungary, EU continues to negotiate with Hungary).

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.

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.

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.

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.

2. Increase Transportation and Insurance-Related Sanctions - new sanction from 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)

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.

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 8 May, the Department of State designated 8 Russian maritime-related companies. This includes the RF MinDefense's shipping company, Oboronlogistika OOO, as well as private Russian maritime shipping companies that transport weapons and other military equipment for the 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.

3. Impose New Financial Sanctions - new sanction from USA (SDN on Transkapitalbank, Investtradebank; virtual currency mining company Bitriver AG + 10 RF subsidiaries + SDN on Moscow Industrial Bank (SOE) + 10 its subsidiaries), UK (10 defense companies asset freeze + asset freeze for Evraz plc) and Poland (+ 37 entities on top of EU lists), Switzerland (ban on trusts registering by Russians), 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)), Canada (5 defense and machine building companies).

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 Voronezhskii 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, Eksploatiruyushchaya Kompaniya Tsentri OOO.

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.

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. **However, the 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, the 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.

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 BALTIIJA 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.

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).

4. Designate the Russian Federation as a Sponsor of State Terrorism - new sanctions from Lithuania (Lithuanian Seimas officially recognize RF as a state sponsor and perpetrator of terrorism) + USA (registered a resolution recognizing RF as a sponsor of terrorism)

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*).

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 - new sanction from USA (+35), Canada (+40), Australia, EU (2 + considers adding Alina Kabayeva and Patriarch Kirill), UK (+31) and Poland (Putin's, Lavrov's daughters, Nabiullina in lists), + New Zealand (+170 + 5 in media and propaganda) + Australia (+76 + 34), Switzerland (+2) + Japan (+141) + Liechtenstein (2).

Data from NAZK. As of May 11, 1,601 persons were under Western sanctions.

New personal sanctions – Apr 19, 2022 – May 11, 2022

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

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.

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 Nabiullina⁴. 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

⁴ Petr Olegovich Aven, Oleg Viktorovich Boyko, Mikhail Maratovich Fridman, Mikhail Safarbekovich Gutseriev, Igor Viktorovich Makarov, Elvira Sakhripzadovna Nabiullina, Sergey Roldugin, Alexander Torshin, German Borisovich Khan, Alexander Ponomarenko, Katerina Vladimirovna Tikhonova, Maria Vladimirovna Vorontsova, Maria Aleksandrovna Lavrova, Yekaterina Sergeevna Vinokurova.

the Russian regime, and members of their families⁵. On 6 May, Canada added to list an additional 19 individuals who are senior defense officials⁶.

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.

UK. On 21 April, added 16 individuals⁷ to the sanctions list of asset freeze targets.

Important. In its analytics NAZK notes that the 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) 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 the 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 the 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 the 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, the UK additionally sanctioned +31 individuals⁸ with asset freezes and travel bans. Many of sanctioned individuals are actors from mainstream media organisations (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).

On 9 May, the 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.

Poland. Poland-specific list of designated parties subject to measures not covered by EU Regulations 765/2014 and 269/2014 covered **15 individuals**⁹. These individuals are added to the list of foreigners whose stay in Poland is undesirable. For 7 of them¹⁰ 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.

⁵ 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

⁶ Andrey Sergeevich IVANAYEV, Igor Yurievich KOROTCHENKO, Andrey Ivanovich SYCHEVOY, Tatiana Viktorovna SHEVTSOVA, Maria Vladimirovna KITAYEVA, Rossiya Vladimirovna MARKOVSKAYA, Andrey Nikolaevich SERDYUKOV, Valery Ivanovich FLYUSTIKOV, Aleksander Pavlovich LAPIN, Ruslan Khadzhiemolovich TSALIKOV, Gennady Valeryevich ZHIDKO, Sergey Analolievich KOGOGIN, Dmitry Evgenevich SHUGAEV, Azatbek Asanbekovich OMURBEKOV, Yunus-Bek Bamatgireyevich YEVKUROV, Sharip Sultanovich DELIMKHANOV, Alimbek Sultanovich DELIMKHANOV, Amkhad Sultanovich DELIMKHANOV

⁷ 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 Valerevich (Captain Of The Frigate "Admiral Essen" Of The Russian Black Sea Fleet), Obnosov, Boris Viktorovich (Linked To: Tactical Missiles Corporation Jsc), Omurbekov, Azatbek (Commanding Officer Of The Russian 64th Separate Motorised Rifle Brigade), Pimanov, Aleksei Viktorovich ((1) Director General Of Managing Organisation Creative Association Red Star (2) Head Of The Krasnaya Zvezda Media Holding), Romanov, Arkadiy Yurevich, Serdyukov, Andrey Nikolayevich (Commander Airborne Forces Of The Russian Federation), Volozhinsky, Andrei Olgertovich "

⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1073104/Notice_Russia_040522.pdf

⁹ Bakalczuk Tatiana, Deripaska Oleg, Fridman Michail, Gucerjew Michail, Gucerjew Sait-Salam, Kantor Wiaczesław Mosze, Kaspierski Jewgienij, Melniczenko Aleksandra, Melniczenko Andrirej, Mordaszow Aleksiej, Nieczajew Aleksiej (Nechayev Alexy Gennadyevich), Nuraliev Boris, Raszdow Timur, Sieczin Igor Iwanowicz (Sechin Igor Ivanovich), Vekselberg Viktor.

¹⁰ Bakalczuk Tatiana, Gucerjew Sait-Salam, Kaspierski Jewgienij, Melniczenko Aleksandra, Nuraliev Boris, Raszdow Timur, Vekselberg Viktor.

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 Government 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".

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)**.

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

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.

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), New Zealand (2 RF SOEs, 1 RB SOE in defense and shipbuilding + 3 in media), Canada (4 defense and machine building)

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 RF¹¹ to the sanctions list of asset freeze targets.

On May 4, UK additionally sanctioned 32 entities, including 8 SOEs + 2 with shares in RF ownership¹² (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.

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).

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).

¹¹ 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.

¹² 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, GARANTEK 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. DOLLEZHALL 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)

7. Expand Export Controls and Ban Imports - new sanction from UK (import - silver, wood, high-end, export - trade sanctions measures relating to internet services and online media services + 35% duty for ~£1.4bn of imports + export bans to hit > £250 mln), USA (ban on exports of accounting and consulting services to RF, license requirement for common industrial and commercial items), Japan (bans on exports to 71 organizations), Taiwan (strategic high-tech products in 57 categories to RB)

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).

On 29 Apr, the UK introduced new trade sanctions measures 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, **the UK announced a ban on services exports to Russia**, including management consulting, accounting and PR services.

On May 9, the 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).

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 the US 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 will suspend general licenses that previously permitted export of source material, special nuclear material, byproduct material, and deuterium to Russia.

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).

Japan. On 10 May, bans on exports to 71 organizations¹³ designated as specific organizations in RF by the Ministry of Foreign Affairs Notification. Also bans on the export of cutting-edge goods to the RF were announced.

¹³ 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 “Radiosvaz”; 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 Elektroyaga, JSC GosNIIMash, JSC PA Strela, JSC “Plant Dagdiesel”, 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 “Vympel” By Name I.I. Toropov”, JSC “URALELEMENT”, JSC “KRASNY GIDROPRESS”, KB Mashinostroeniya, NPO Electromechanics, NPO Lightning, Petrovsky Electromechanical Plant “Molot”, PJSC ANPP Temp Avia, PJSC “MBDB ISKRA”, Raduga Design Bureau, RKB Globus, Smolensk Aviation Plant, TRV Engineering, Ural Design Bureau “Detal”, Zvezda-Strela LLC; United Shipbuilding Corporation “Production Association Northern Machine Building Enterprise”

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 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".

8. Impose Secondary Sanctions - no new sanctions, but companies start to fear imposition of secondary sanctions

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.

UK. Revolut cannot obtain a banking license in the UK due to links with the RF: father of co-founder of Revolut Mykola Storonskiy is the top manager of Gazprom's structure.

9. Increase Transparency to Discourage Trade with and Investment in Russia - no new sanctions; USA (prepares respective bill + published Sample Letter to Companies Regarding Disclosures Pertaining to Russia's Invasion of Ukraine and Related Supply Chain Issues), Germany (intends to oblige Russians under sanctions to report property in Germany)

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.

Germany. Country wants to oblige Russians who fell under sanctions to report property in Germany.

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, EU (launched discussion on this issue)

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.

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 and 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.

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.

MONITORING TABLE

Total cumulative progress: 33% (14 sanction-measures) out of 42 in the Action Plan(10 blocks).

13 sanction-measures (31%) with status **No progress**, 14 sanction-measures (33%) with status **Yes**, 15 sanction-measures (36%) with status **Slow Progress**. Compared to previous week only 1 sanction-measure changed status from No progress to Yes (2.2 *Blocking sanctions on the state shipping companies*) and 1 sanction-measure changed status from Slow progress to Yes (*Designate the Russian Federation as a sponsor of terrorism*).

		UPD 11.05 (compared to 18.04)	Comment
1. Expand Oil and Gas Sanctions			
1.1.	Complete import and export ban and embargo of crude oil, oil products, gas, and coal	Slow progress	Poland refused from RF gas in response to RF cut off. The EU is to adopt the 6th package, which is likely to include the Russian oil embargo, however, no consensus is achieved yet (Hungary blocks) G7 (made an obligation to introduce a ban of import RF's oil).
1.2.	Commit to ending all EU trade with Russia and Belarus in petroleum products	Slow progress	The 6th package of the EU is to provide for phase-out of petroleum products by the end of 2022 (with exceptions for Hungary and Slovakia which are to phase-out by the end of 2023).
1.3.	Set a special and significant import duty, tariff, or tax for Russian crude oil	Slow progress	Poland is going to propose 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	Slow progress	The 6th package of the EU is to provide for phase-out of petroleum by the end of 2022 (with exceptions for Hungary and Slovakia which are to phase-out by the end of 2023).
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.
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	Slow progress	Western ship insurers are terminating cover for Russia's leading shipping company Sovcomflot. Such insurers are West and North P&I, UK Club, Norway's Gard,
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. 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).
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 (registered a resolution recognizing RF as a sponsor of terrorism)
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. Canada. 14 oligarchs, close associates of the Russian regime, and members of their families. 203 senior officials or current or former members of the People's Councils of DPR and LPR. 21 oligarch + 19 senior defense officials. 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. Poland (+15 with entrance ban, 7 of them with assets freeze) 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 New Zealand. 170 members of the upper house of RF Federation Council + 5 persons for disinformation and cyber attacks (media/defense) Japan. 8 RF officials + 133 individuals from self-proclaimed "DPR" and "LPR". EU. Switzerland. Liechtenstein 2 oligarchs (Kurchenko, Prigozhin).
5.2.	Family members	Yes	Yet, no sanctions against Kabaeva. She avoided sanctions due to a last-minute decision of the National Security Council. EU. Considers adding Alina Kabayeva and Patriarch Kirill.
5.3.	Members of governing bodies of Russian state-owned and state-controlled enterprises	Yes	
5.4.	Key executives and board members of companies that are subject to U.S. or EU sanctions	Yes	USA. 8 members of the Executive Board of Sberbank and 27 members of Gazprombank Board of Directors.
5.5.	Propagandists	Yes	New Zealand. 5 persons in media and propaganda sphere.

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 Research Agency, Main Centre for Special Technologies (GTsST).</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. Evraz plc (steel manufacturing and mining company).</p> <p>New Zealand. <u>Defense:</u> Makeyev Rocket Design Bureau, Minsk Wheel Tractor Plant (MZKT). <u>Shipbuilding:</u> United Shipbuilding Corporation.</p> <p>USA. State-supported private weapons manufacturer LLC Promtekhlogiya.</p> <p>Canada. Zelenodolsk Shipyard JSC, Military Industrial Company LLC, Rosgvardia, UEC Klimov JSC, KAMAZ PTC.</p>
6.4.	Sanctions on any new project of RosAtom	No	Finland's Fennovoima has terminated its contract with Rosatom to build a nuclear power plant due to significant delays by RAOS (a subsidiary of Rosatom) and its inability to complete the project. Finnish MinEcon approves the decision.
7. Expand Export Controls and Ban Imports			
7.1.	Ban on exports to Russia of all strategically important high-technology products	Slow progress	<p>UK. Ban on services exports, including management consulting, accounting and PR services</p> <p>USA. Export ban on accounting, trust and corporate formation, and management consulting services (will take effect on June 7, 2022). The U.S. Nuclear Regulatory Commission will suspend general licenses that previously permitted export of source material, special nuclear material, byproduct material, and deuterium to Russia.</p> <p>Japan. Bans on exports to 71 specific organizations organizations.</p>
7.2.	Ban on the export and supply to Russia of catalysts used for oil production, the telecom industry, and agriculture	Slow progress	UK. Internet services and online media services
7.3.	Tighten the sanctions on technologies and equipment (microchips, semiconductors)	Slow progress	<p>Switzerland. Industrial robots</p> <p>USA. License requirement on exports of hundreds of common industrial and commercial items, including "wood products, industrial engines, boilers, motors, fans, and ventilation equipment, bulldozers, and many other items with industrial and commercial applications."</p> <p>Japan. Announced bans on the export of cutting-edge goods to the RF.</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.</p>
7.4.	Enhance export controls on critical technology systems, components, and materials with potential military dual-use	Slow progress	The UK has announced 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).
7.5.	Prohibit the export of metals, minerals, and ores	Slow progress	Switzerland. Certain chemical products
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	UK (silver, wood, high-end; additional 35% import duty, including on palladium, platinum and chemicals is to be imposed), Switzerland (lignite and coal, timber, cement, seafood, caviar).
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. 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.</p> <p>UK. Revolut cannot obtain a banking license in the UK due to links with the RF: father of co-founder of Revolut Mykola Storonskiy is the top manager of Gazprom's structure.</p>
9. Increase Transparency to Discourage Trade with and Investment in Russia			
9.1.	A registry of all international companies still operating in Russia and Belarus	Slow progress	Here can be found a registry of both companies still operating and ones who have already left Russia. The registry is created and administered by Yale School of Management.
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 sample comment letter to companies about potential disclosure obligations arising out of the Russian invasion of Ukraine. Germany. Country wants to oblige Russians who fell under sanctions to report property in Germany.
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.	Slow progress	UK. Fast-tracked on 19 individuals and entities in alignment with G7 and the EU to target Russia's military and defense capabilities.
10.2	Maintain all sanctions until Russia has ended its invasion of Ukraine.	Yes	<p>So far such consensus exists.</p> <p>USA. Merely stopping the invasion of Ukraine may not be enough for RF to gain relief from Western economic sanctions. The U.S. also wants an assurance that there will never be another such invasion.</p> <p>Germany. The lifting of anti-Russian sanctions is possible only if the withdrawal of Russian troops from the territory of Ukraine.</p> <p>UK. Sanctions against Russia will be lifted only after "complete ceasefire and withdrawal of troops"</p>
10.3	After the war has ended, coordinate closely any lifting of sanctions with the Ukrainian government and its assessment of (1) progress in peace talks and negotiations, (2) Russia's recognition of Ukraine's sovereignty and territorial integrity, and (3) Russian cooperation in contributing substantially to a Ukraine reconstruction fund as compensation for all the material and human damage inflicted as a result of its invasion.	Slow progress (3)	USA and Canada are preparing legislative acts to use sanctioned assets for compensation to Ukraine. 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.

