

SUMMARY

New since September 26:

#Oil/Energy The EU developed a legal framework for the oil price cap, and so did Norway. The level of the price cap is still negotiated. Reuters reported on US discussing a historical average of \$64-64 with the partners, higher than \$40-50 which was, reportedly, on the table before.

Estonia banned import and purchase of natural gas from Russia, banned provision of associated transmission services from Dec 31 and banned the purchase, import and transfer of petroleum oils from Russia from Dec 5 (comes into force prior EU ban). The UK introduced a ban on import of LNG from Russia from Jan 1, 2023. New Zealand prohibited the import of energy products of Russian origin (coal, oil, or gas products) and banned the export of oil exploration and oil production products to Russia - comes into force Nov 4.

#Financial USA banned the exchange of SDRs of Russia and Belarus and designated 2 entities that procured military and sensitive dual-use technologies from U.S. manufacturers and supplied them to Russian end-users.

UK, EU and Switzerland responded to Iran-Russia military cooperation by sanctioning Shahed Aviation Industries (Iran producer of drones). The EU (8th package) and Norway imposed full ban on provision of crypto-asset wallet, account or custody services to Russians. New Zealand sanctioned Evraz and its subsidiaries. While Australia finally adopted an earlier ban on import of gold from Russia (came into force on 30 Sep).

#Individual Last month was rich on individual sanctions – USA, EU, UK, New Zealand, Australia, Switzerland, Japan and Canada responded to illegal referendums by new pull of individual sanctions (inc. officials of the Central Election Commission of Russia and so-called leaders in areas of Ukraine illegally occupied by Russia). While the UK and EU sanctioned 3 Iranian military nationals - key persons to supply Iranian kamikaze drones to Russia. Finally, sanctions were imposed on E.Nabiullina (Head of CBR; USA, UK) and O.Skorobogatova (First Deputy head of CBR; USA). Also, the list of propagandists under sanctions was replenished by Canada (+34 agents of Russian propaganda and their family members).

In the USA: (1) The US Supreme Court denied billionaire Deripaska to lift the sanctions imposed on him in 2018. Later on Oct 11, the British businessman Graham Bonham-Carter was arrested in the UK on US charges of conspiracy to violate sanctions imposed on Deripaska; (2) an indictment charging 5 Russian nationals in connection with a sanctions evasion and money laundering scheme was unsealed in US federal court on Oct 19 (they are said to have orchestrated a scheme to obtain US military and dual-use technology using shell companies and cryptocurrency).

European countries progress with the so-called “visa ban”. Latvia from Sep 19 restricted entrance to the Schengen area for Russians with EU visas who come for tourist, cultural, sports and business purposes. In addition, the country severed conditions of residence permits: an extension of temporary residence permits for Russians and Belarusians who received them based on investment or the purchase of real estate in Latvia is no longer allowed, while existing permanent residence permits will be valid until Sep 1, 2023 – to receive a new permit a certification of state language proficiency is required. Lithuania from Sep 19 implemented stricter verification procedures for all Russian nationals when crossing the external border of the EU. Poland in its turn complicated employment for Russians - from now entrepreneurs will not be able to employ Russian citizens on simplified terms. Finland from Sep 30 suspended issuing visas for travel purposes to Russians + Russians can no longer enter the territory of the EU from the border of another Schengen country with a visa issued by Finland. Czech Republic closed the entrance for all Russians with valid Schengen visas for tourism, culture and sport issued by any Schengen member state from Oct 2. However, only flights from non-Schengen countries will be monitored, while holders of work or study visas are not subject to the restriction.

#Secondary After the US warning, Mir coverage area in friendly countries collapsed by 90% (according to Russian media) – Kyrgyz Republic and Sri Lanka also started to deny Mir. Russians now face problems with Chinese UnionPay – tourists in Spain, the Czech Republic and Cyprus have encountered problems, Nosto ATMs (Finland) stopped servicing UnionPay cards.

US made two more warnings: (1) BIS warned 3rd-country companies and governments that they could find themselves subject to export controls imposed in response to Russia’s war against Ukraine; (2) OFAC confirmed that non-US individuals and legal entities risk exposure to sanctions for providing ammunition and other military goods to Russia or for supporting Russia’s military-industrial complex, as well as PMCs or paramilitary groups participating in or otherwise supporting Russia’s attack on Ukraine. The EU, under the 8th package, broadened the listing criteria on which specific designations can be based – sanctions could now be imposed on natural or legal persons who facilitate the circumvention of EU sanctions.

#Trade Under the 8th package, the EU: (1) prohibited provision of architectural & engineering, IT consultancy, legal advisory services to the RF GoV, legal persons, entities or bodies established in Russia; (2) banned import of Russian finished and semi-finished steel products (comes into force due three month); (3) prohibited import of iron and steel products when processed in 3rd countries incorporating listed iron and steel products originating in Russia (from Sep 30, 2023); (4) extended the list of goods that generate significant revenues for Russia and are subject to the import ban (included certain coal, lignite, peat and coke products); (5) extended the list of restricted goods and technology which might contribute to Russia’s military and technological enhancement or to the development of its defence and security sector, including in that list: certain goods that can be used for capital

punishment, torture, or other cruel, inhuman, or degrading treatment or punishment; certain chemical substances, and nerve agents; small arms and other goods under the anti-torture Regulation; firearms, their parts and essential components and ammunition; certain electronic components - semiconductor devices, electronic integrated circuits and photographic cameras); (6) added new exemptions for export ban of goods and technology which could contribute in particular to the enhancement of Russian industrial capacities; (7) extended list of goods and technology suited for use in aviation or the space industry; (8) introduced the ability for EU Member States to authorise the operation with titanium goods required in the aeronautic industry, for which no alternative supply is available.

USA sanctioned 4 Iranian cargo aircraft, as well as 57 entities which acquired (or tried to) U.S.-origin items for Russia's military or involvement in the development of quantum computing technologies. While the International Trade Administration continues to examine whether Russia remains a market economy for purposes of U.S. antidumping duty law. If the ITA determines that it is now a non-market economy country, this could result in higher AD duties on imports from Russia. Canada withdrew MFN for Russia, as a result a 35% tariff is now applicable to virtually all goods.

New Zealand extended trade sanctions against Russia: (1) 35% tariff on Russian imports was extended till March 2025 (2) the list of prohibited exports to Russia and Belarus (3) banned export of luxury goods (inc. gold) to RF (for example, wine, seafood) (4) banned import of luxury goods of Russian origin (vodka and caviar) (5) prohibited the import of energy products of Russian origin (coal, oil, or gas products) (6) banned export of oil exploration and oil products to RF (comes into force on Nov 4).

The UK prohibited export, supply and delivery, and making available of goods, critical to the functioning of Russia's economy, in par. manufacturing sector, and prohibited import and acquisition of gold jewellery inc. related technical assistance, financial services and funds, and brokering services.

Norway adopted export restrictions relating to coal, electronic components, technical items in the aviation sector, certain chemicals and firearms; import restrictions on steel products, machinery, plastics, vehicles, textiles, footwear, leather, ceramics, certain chemical products and jewellery (except gold) and restriction on architectural and engineering services, legal advisory services and IT consultancy services.

Japan banned exports to 21 Russian organisations and imposed an export ban on chemical weapons-related goods to RF (came into force on Oct 7).

#Transport Under the 8th package, the EU prohibited provision of maritime transport, inc. through ship-to-ship transfers, technical assistance, brokering services or financing or financial assistance, related to the maritime transport to 3rd countries of crude oil (as of Dec 5, 2022) or petroleum products (as of Feb. 5, 2023) which originate /exported from RF, or which have been exported from RF to 3rd countries. The ban on Russian-flagged vessels accessing EU ports and locks now also applies to vessels certified by the Russian Maritime Register of Shipping.

Norway tightened restrictions on Russian fishing vessels – now access is allowed to only 3 Norwegian ports, where vessels will be inspected by customs officers to avoid illegal transport of goods to Russia.

Russians reported several cases of Kazakh authorities detaining their trucks carrying goods from the EU and scrutinising availability of documents. This is likely to suggest that Kazakhstan is constraining use of their territories by Russian carriers.

#SOE Compared to Sep 26, the USA, EU, New Zealand, Canada, Switzerland, Japan and Poland imposed sanctions on Russian SOEs. Among those - Goznak, Zvezda (propagandist TV-channel), Central Election Commission of Russia, Rostec and Kalashnikov Concern, Gazprom Export (was sanctioned by Poland).

The EU & Norway imposed a ban on EU nationals to hold any posts on the governing bodies of certain Russian state-owned or controlled legal persons, entities or bodies.

#Terrorism On Oct 21, Russia was banned from participating in current and future FATF projects, as well as, from participation in meetings of FATF regional bodies.

Estonian Parliament declared Russia a "state sponsor of terrorism, condemned the annexation of the occupied regions of Ukraine and qualified Russia as "the main threat to peace in Europe". Polish Senate recognized the authorities of the Russian Federation as a terrorist regime. PACE adopted resolution calling RF a terrorist regime.

Weak progress:

#Transparency Swiss Federal Council instructed to draft a bill on increased transparency and easier identification of the beneficial owners of legal entities which would include a register for identifying beneficial owners and new obligations the risk-based updating of information on effective ownership.

#Coordination & #Reconstruction OFSI (UK) and OFAC (USA) announced enhanced co-operation on sanctions. While REPO is going to accelerate oligarch asset forfeiture efforts in response to Russia's illegal war in Ukraine. Czech Republic approved a legislative proposal to freeze foreign assets in case of human rights violations, support of terrorism or participation in cyber-attacks (needs to pass Senate and then office of the President).

Sanctions adopted since April 19 (marked grey - since September 26)

Sanction Type & Progress	Details
1. Expand Oil and Gas Sanctions #Oil/Energy Progress: Yes, but incomplete scope	<p>EU banned purchase, import or transfer of seaborne crude oil or petroleum products originated in RF (On 3 Aug, the European Commission issued a Notice clarifying that ban covers Russian oil mixed with oil of other origin) + ban on import of RF coal came into force on Aug 1. EC proposed to limit the price of Russian gas by setting it at 50 euros/MWh. EC considers introducing a rule, under which any Member State facing an emergency will receive gas from others in exchange for fair compensation. Under the 8th package EU laid the basis for the required legal framework to implement the oil price cap). Norway banned the purchase, import or transfer of oil transported by sea and supporting services + adopted a legal basis for future price cap on Russian oil. Switzerland banned purchase, import or transfer transit and transport into and through Switzerland of crude oil and petroleum products from RF or originating in RF. G7 made an obligation to ban RF's oil imports. G7 agreed to introduce a price cap on Russian oil – from Dec 2022 for oil, and from Feb 2023 - for refined products. As Reuters, the US and Western officials are finalising the details on price cap for Russian oil – the cap might be determined at the historical avg of \$63-64 a barrel. Poland terminated the agreement on the supply of RF gas following the announcement made earlier. Bulgaria, Finland, Netherland and Denmark: RF cut off gas supplies due to refusal to pay in rubles. Lithuania cut import of RF's energy, incl. electricity, ban on transit of RF gas to Kaliningrad region. Estonia (ban on import and purchase of natural gas from Russia as well as providing associated transmission services from 31 Dec 2022 + ban on the purchase, import and transfer of petroleum oils from Russia from Dec 5 (comes into force prior EU ban). Slovakia committed to reduce dependence on RF gas by 66% starting from Jun 1. Latvia ban on natural gas supplies from RF from Jan 1, 2023, Latvijas Gaze resumed purchase of Russian gas via an unnamed intermediate entity. UK ban on import of RF oil and oil products from 31 Dec, ban on import of RF coal came into force on August 10 + ban on import of LNG from Russia from 1 Jan, 23. Germany (transferred the assets of the German "daughters" of Rosneft to the external management of the Federal Network Agency BNetzA). New Zealand (prohibition of the import of energy products of Russian origin (coal, oil, or gas products) into New Zealand; ban of the export of oil exploration and oil production products to Russia) - comes into force 4 Nov)</p>
2. Increase Transportation and Insurance-Related Sanctions #Transport Progress: Yes, but incomplete scope	<p>USA banned RF vessels from US ports, denied all export privileges for RF cargo aircraft carrier Aviastar, SDN for RF shipping SOE & 6 private companies & 1 maritime engineering company & 69 vessels. Norway closed borders and ports to RF trucks and ships from May 7 + extended existing port access ban + allowed the exchange of information within the framework of the ICAO + tightened restrictions on Russian fishing vessels (allowed access to only 3 Norwegian ports, where vessels will be inspected by customs officers to avoid illegal transport of goods to Russia) + extended the port ban to apply to vessels certified by the Russian Maritime Ship Register). Canada sanctioned 1 manufacturer. UK denied Aeroflot, Ural Airlines and Rossiya Airlines selling their landing slots, allowed necessary technical assistance for temporarily detained aircraft + prohibited insurance related to import of RF oil and oil products into the UK after 31 December 2022 (legislation does not ban the provision of services to shipments from Russia to other countries) + adopted amendment to the General Trade Licence that enabled the provision of insurance and reinsurance to individuals who are resident in Russia or are located in Russia as well as entities which are incorporated or constituted under the law of Russia or domiciled in Russia in relation to sea vessels and aircraft, their component parts, as well as aero gas turbine engines. EU prohibited insurance and reinsurance of maritime transport of oil and oil products to 3rd countries with a wind down period of 6 months until 5 Dec for contracts signed before 4 Jun 2022, extended existing port access ban, allowed the exchange of information within the framework of the ICAO + prohibition on provision of maritime transport, inc. through ship-to-ship transfers, technical assistance, brokering services or financing or financial assistance, related to the maritime transport to 3rd countries of crude oil (as of 5 Dec 2022) or petroleum products (as of 5 Feb 2023) which originate /exported from RF, or which have been exported from RF to 3rd countries (purchases at or below a pre-established price cap were allowed) + ban on Russian-flagged vessels accessing EU ports and locks now also applies to vessels certified by the Russian Maritime Register of Shipping). EU & UK agreed co-ordinated ban on insuring ships carrying Russian oil, a plan to shut Moscow out of the vital Lloyd's of London maritime insurance market is delayed in the EU, UK has not adopted agreed restrictions Switzerland banned provision of services, including insurance or reinsurance, connected with transportation of RF oil and certain petroleum products to any destination + allowed the exchange of information within the framework of the ICAO. EU + Lithuania (EU released guidance for transportation from RF to Kaliningrad – road transit is not allowed, railway – allowed in pre-invasion volumes, transportation of sanctioned military and dual-use goods and related technologies are entirely prohibited, regardless of the mode of transport). Kazakhstan (detained Russian trucks carrying goods from the EU - authorities began to demand from Russian drivers permits for cargoes that had been issued not to a domestic, but to a previous carrier - a company from the EU).</p>
3. Impose New Financial Sanctions #Financial Progress: Yes	<p>USA: adds to SDN list Transkapitalbank, Investtradebank, Bitriver AG & 10 RF subsidiaries, Moscow Industrial Bank (SOE) & 10 its subsidiaries. Didn't renew General License 9C. Before 25th of May it was allowing use of "frozen" reserves to make payments on debt + 13 associated with Putin's inner circle + 4 connected with Mordashov + ban on purchasing RF securities on the secondary market + extended until 5 Dec 2022 licence allowing for energy financing transactions via RF banks + 70 (SDN List) + 45 RF entities in aerospace, defence and related materiel sector, financial services or technology sectors (inc. major RF SOEs and their subsidiaries) + asset freeze on Heritage Trust + ban on import of gold from RF - 2 Kazakh subsidiaries of Alfa-Bank were excluded from SDN-list (were bought by Kazakhstan bank) + issued General Licence authorising transactions through Dec 16, 2022 involving Gazprom Germania GmbH + 9 entities (inc. 1 SOE) + 26 entities & 4 subsidiaries (inc.12 SOEs) in leasing, defense and high-technology sectors to SDN list + issued General License No. 45 authorising until 20 October 2022 certain transactions (purchase by</p>

	<p>U.S. persons of debt or equity issued by an entity in RF; facilitating, clearing, and settling of a purchase by U.S. persons of debt or equity issued by an entity in RF), necessary to the wind down of financial contracts or other agreements that were entered into on or before 6 June 2022. Sanctions against all individuals and entities that operate or have operated in the quantum computing sector of Russian economy, sanctions on 33 entities, including Main Intelligence Directorate, 3 leading Russian military space entities that play central roles in strengthening Russia's defence capabilities, 13 entities operating in the technology sector of Russian economy, 14 entities operating in the electronics sector of Russian economy, sanctions on 4 Iran-based entities said to be involved in the production and transport of unmanned aerial vehicles (UAVs) to RF. + 5 cryptocurrency addresses connected to the Russian neo-Nazi paramilitary group to its sanctions blacklist + 10 Russian entities, inc. Federation Council of the Federal Assembly of Russia and 1 Belarusian entities + ban on the exchange of SDRs of Russia and Belarus + designated 2 entities that procured military and sensitive dual-use technologies from U.S. manufacturers and supplied them to Russian end-users (Nord-Deutsche Industrieanlagenbau GmbH (NDA GmbH) and Opus Energy Trading LLC (Opus Energy Trading)). UK: 10 defence companies asset freeze (inc. 4 SOEs & 1 SOE stake 25+1) & 32 defence and propaganda, asset freeze for Evraz plc + ban export of banknotes in sterling or any official currency of the EU + 5 RF entities + announced ban on trusts services + asset freeze on RF propagandist analytical centre + extended existing restrictions on Belarus on dealing with financial instruments and providing loans to a broader range of transferable securities, money market instruments, loans and credit + prohibition on transactions related to the management of FX reserves as well as of assets of CB Belarus and Belarus MinFin + financial sanctions reporting obligations were extended to include crypto asset exchange providers and custodian wallet providers + ban on RF gold and ancillary services, exported from RF after Jul 21, gold exported from RF before 21 July 2022 is not in scope + prohibited investment activities in respect of land located in RF, persons connected with RF, relevant entities, joint ventures, opening a representative office or establishing a branch or subsidiary located in RF + asset freeze Shahed Aviation Industries (Iran) + prohibition on making loans or credits with a maturity of more than 30 days to persons, other than an individual, connected with Russia or persons owned, directly or indirectly, by a person connected with Russia. Poland: + 37 entities on top of EU lists. The UK sanctioned 3 entities in response to the "sham referendums" + asset freeze and ban on access to financial funds and economic assets for Gazprom Export + entity, that operates in the field of cashless settlements and payments in the fuel industry. Switzerland: ban on trusts registering by Russians + de-SWIFT 3 RF and 1 Belarus banks + sanctioned 18 RF and 8 Belarus entities connected with Armed Forces of Russian and GoV + asset freeze for 9 entities, inc. 5 SOEs + asset freeze on Sberbank + ban on import of Russian gold, including jewellery, after Aug 4 + ban on services of any kind, including financial services, brokering and technical assistance + extended the scope of the ban on accepting deposits), suspended the exchange of tax information with Russia + 7 entities, inc. Central Election Commission of Russia and Goznak) + asset freeze Shahed Aviation Industries (Iran). New Zealand: assets freeze and dealing with securities ban CBR, RDIF + 16 RF banks (8 SOEs), + 4 in defence (1 RF SOE and 1 Belarus SOE) and 2 in shipbuilding (1 RF SOE) + sanctions on 44 entities (38 RF and 6 Belarus, including 32 RF SOEs and 3 Belarus SOEs) + ban on import of RF gold from July 25 + sanctioned all associates of 3 defence entities (already sanctioned): Russian Helicopters, Tactical Missiles Corporation, United Shipbuilding Corporation + 61 entities that support the Russian military (inc. 42 SOEs + 1 collaborationist authority in Kherson) + sanctions on Evraz and its subsidiaries, Goznak and 1 more entity + 7 entities (inc. 3 disinformation outlets)). Canada: 5 defence and machine building companies + asset freeze and dealing prohibition on 4 RF financial institutions and banks + 46 RF defence entities, + 2 Belarus entities + import ban on RF gold after Aug 6 + 17 entities in defence sector directly or indirectly supporting the Russian military (inc. 10 SOEs + 1 defence sector entity) + sanctions Salvation Committee for Peace and Order (so-called government body in Kherson) + 1 Russian propaganda channel + 6 entities in energy sector. EU: de-SWIFT 3 RF banks + 1 Belarus; 18 entities that support RF military and security; 8 entities in Belarus + ban on RF gold and jewellery, exported from RF after July 22 + prohibition on accepting deposits was extended to include from legal persons, entities or bodies established in 3rd countries and majority-owned by Russian nationals or natural persons residing in Russia + 9 entities (inc. 7 SOEs) + entering into any transactions with RF public entities necessary to ensure access to judicial, administrative or arbitral proceedings was allowed (further investigation of exemptions needed + 7 entities, inc. Central Election Commission of Russia and Goznak + asset freeze Shahed Aviation Industries (Iran) + full ban of the provision of crypto-asset wallet, account or custody services to Russians + transaction ban for Russian Maritime Shipping Register). Japan: asset freeze 2 RF and 1 Belarus banks + asset freeze for 6 RF entities + embargo on the purchase of RF gold, comes into force on 1 Aug, 2022 + 9 entities, inc. Rostec and Kalashnikov Concern. Norway: de-SWIFT 3 RF banks; restrictive measures for 18 entities that support RF military and security + sanctioned 10 entities, inc. Sberbank, ban on gold and jewellery from August 27, strengthened reporting obligations, expanded the scope of prohibition on accepting deposits, allowed entering into transactions with Russian entities to ensure access to legal, administrative or arbitration matters + 7 entities + additional restrictions on providing services for crypto assets to Russian citizens and entities). Australia: ban on import of gold from Russia after 30 Sep.</p>
<p>4. Designate the RF as a Sponsor of State Terrorism #Terrorism Progress: Yes</p>	<p>Lithuania officially recognized RF as a state sponsor and perpetrator of terrorism. USA US Senate approved a resolution calling to recognizing RF as a sponsor of terrorism + a similar bill on recognizing Russia as a state sponsor of terrorism was presented at the US House of Representatives (the lower house of the US Congress + Blinken said that he is not ready to make such a decision + US State Department called RF a "human trafficking" state, a draft Resolution on recognizing Russia's actions in Ukraine as a genocide was registered in the US Senate. On Sep 14, the US senators Richard Blumenthal (Democratic) and Lindsey Graham (Republican) introduced a law according to which Russia can be recognized as a SST. Russia was banned from participating in current and future FATF projects + from participation in meetings of FATF regional bodies. NATO recognised RF as "the most significant and direct threat". Latvia recognized Russia as a sponsor of terrorism. Estonia Estonian Parliament declared Russia a "state sponsor of terrorism, condemned the annexation of the occupied regions of Ukraine and qualified Russia as "the main threat to peace in Europe". Poland Polish Senate recognized the authorities of the Russian Federation as a terrorist regime) EU PACE adopted resolution calling RF a terrorist regime.</p>

5. Strengthen Individual Sanctions against these Categories of Individuals
#Individual

Progress:
Yes

Russian oligarchs under Western sanctions. The US Supreme Court denied billionaire Deripaska to lift the sanctions imposed on him in 2018. Later on Oct 11, the British businessman Graham Bonham-Carter was arrested on US charges of conspiracy to violate sanctions imposed on Deripaska. **USA:** +35 + 18, including A.Mordashov and his family + 58 + visa restrictions for 529 officers of the Russian military and Russian nationals + 2 + **13 inc. Kabaeva** + visa restrictions on 893 Russian officials + **45, inc. R. Kadyrov and his family members, M.Oreshkin (assistant to Putin), V.Komlev (head of NSPK/Mir** + 303 individuals, inc. E.Nabiullina, O.Skorobogatova, A.Novak (169 members of the Federation Council of Russia, 109 members of the State Duma of Russia, 5 oligarchs, 2 CBR officials, Deputy PM, 15 family members of sanctioned persons) + visa restrictions for 910 persons, inc. members of the Russian military, Belarusian military officials and Russian proxies in Ukraine + designation for Ochur-Suge Mongush for his alleged involvement & 2 daughters of S.Sobyanin + 1 Russian national and procurement agent (Y. Orekhov) + an indictment charging 5 Russian nationals in connection with a sanctions evasion and money laundering scheme was unsealed in US federal court on 19 October (they are said to have orchestrated a scheme unlawfully to obtain US military and dual-use technology using shell companies and cryptocurrency). **EU:** 2 + G.Schroeder, M.Waring and K.Kneissl left the BoD of Rosneft threatened by sanctions + **65 RF individuals, incl. Kabaeva, P. Kirill was excluded,** + 12 individuals in Belarus for internal repression and human rights violations + 47 individuals, inc. Sobyanin + V.Yanukovych and his son O.Yanukovych + decided to suspend visa facilitation agreement + 3 politicians + 30 individuals (10 so-called leaders in areas of Ukraine illegally occupied by Russia, 4 propagandist, 2 oligarchs, 2 officials of the Purins' Administration, 10 military and security government officials, 2 officials of the Central Election Commission of Russia) + financial sanctions, inc. freeze of funds and economic resources against 3 Iranian individuals (for their role in the development and supply of Unmanned Aerial Vehicles used by Russia against Ukraine)). **UK:** + 31 individuals (politicians, propagandists and managers of designated banks +8 +7 propagandists) + **12 Putin "family", incl. Kabaeva + 12 incl. Patriarch Kirill.** NCA created a special unit to "create difficulties" for Russians under the sanctions + 2 top-managers of Rosneft were re-listed in sanction lists + amended the designation criteria under the Russia sanctions regime (positions, official roles and interpretation of being "associated with" a designated person were expanded and clarified + 41 - **Olga Ayziman has been de-listed - removed M.Razvozhayev (Governor of Sevastopol)** + 1 + in response to the "sham referendums", UK sanctioned 89 individuals (inc. 26 Russian "officials and collaborators" involved in the organisation of the referendums, 4 "oligarchs", 55 board members of Russian state-linked organisations + freeze & travel ban on E.Nabiullina + asset freeze 3 Iranian military nationals which key persons to supply Iranian kamikaze drones to Russia)+ 4 individuals (inc. 2 ex-top officials of Evraz). **Poland:** +15 with entrance ban, 7 of them with assets freeze + asset freeze sanctions and entry ban against 4 Russian individuals. **New Zealand:** +170 + 5 in media and propaganda + **23 Belarus senior military leaders incl. Lukashenko** + 48 Russian officials operating in LDPR + sanctioned 19 members of President Putin's inner circle and other representatives of the Russian political elite + broad economic sanctions and travel ban against 74 individuals (Minister of Agriculture, 47 oligarchs, 2 family members of sanctioned persons), 24 so-called 'officials' in illegally annexed regions of Ukraine) and extended further sanctions on 15 individuals with strategic or economic relevance who were previously only travel banned + travel ban against A.Abramov (Former Chair and significant shareholder of Evraz plc) and 4 his family members + 15 (inc. 12 military officials)). **Australia:** +76 +34 +15 +16, incl. Kabaeva + 28 individuals (19 so-called leaders in areas of Ukraine illegally occupied by Russia, 3 GoV officials, 4 heads/ deputy-heads of public bodies, 2 members of the Russian Security Council). **Switzerland:** +2 oligarchs +65 RF +12 Belarus, incl. Kabaeva + 54 + V.Yanukovych and his son O.Yanukovych +3 -3 + assets freeze and travel ban 30 individuals (10 military and security government officials, 2 officials of Putin's Administration, 2 officials of the Central Election Commission of Russia, 10 so-called leaders in areas of Ukraine illegally occupied by Russia, 2 oligarchs, 4 propagandists + financial sanctions and entry and transit ban on 3 Iranian military officials). **Japan:** +141 +62 + 58 individuals (1 representative of Russian national and regional political elite, 18 family members of sanctioned persons, 5 oligarchs, 3 propagandists, 14 Russian military/security officials, 2 leaders of illegal military entities, 14 members of the Interregional Social Organisation Union of Donbas Volunteers) + 23 individuals directly responsible for the unilateral annexation of Donetsk, Luhansk, Kherson and Zaporizhzhia). **Liechtenstein:** +2. **Canada:** +14 and adopted bill for the imposition of travel ban on family members of sanctioned people + 22, incl. **Kabayeva** + 21 + 13 Belarus MinDefence officials. Proposed G7 to allow RF "oligarchs" to pay their way out of the sanctions lists + 30 disinformation and propaganda figures + 43 military staff + 62 Russian officials and their family members + 78 individuals (14 family members of sanctioned persons, 1 businessman, 25 board members of Russian state-linked organisations, 1 GoV official, 1 CBR official, Vice Governor of St. Petersburg, 35 Russia-backed senior officials in Kherson, Zaporizhzhia, Donetsk and Luhansk regions of Ukraine) + 34 agents of Russian propaganda and their family members, and influential individuals spreading disinformation + 35 individuals - senior executives of energy entities (inc. Gazprom) and government officials). **Norway:** + 65 + 54 RF individuals + 30 (inc. actors involved in the so-called referendums). **Lithuania** (ban on entering country for P.Kirill). **Tourist visa ban for ordinary Russians:** EU terminated the Visa Facilitation Agreement from Sep 12; EC recommended members of the EU that Schengen visas should be issued to Russians only in Russia. **Latvia, Lithuania, Estonia and Poland** prohibited Russian citizens from entering with tourist Schengen visas issued in any EU country from Sep 19. From Sep 26, Poland closed entrance for Russians with Schengen visas via air and sea checkpoints. **Poland** has complicated employment for Russians - from now entrepreneurs will not be able to employ Russian citizens on simplified terms. **Switzerland and Norway** terminated the Visa Facilitation Agreement from Sep 19. **Latvia** tightened the procedure for obtaining a residence permit for Russians and Belarusians – now in order to extend the residence permit, citizens of these countries will have to provide a certificate of knowledge of the Latvian language by September next year. From Sep 19, restricted entrance to the Schengen area for Russians with EU visas who come for tourist, cultural, sports and business purposes + no longer allow for an extension of temporary residence permits for Russian and Belarusian citizens who received their residence permit on the basis of investment or the purchase of real estate in Latvia & the permanent residence permits of Russian citizens who were citizens or non-citizens of Latvia prior to obtaining Russian citizenship, will be valid until 1 September 2023. Afterwards, to receive a new permanent residence permit, they will have to provide certification of state language proficiency. **Lithuania.** From 19 Sep implemented stricter verification procedures for all Russian nationals when crossing the external border of the EU to reach Lithuania. From Sep 30, **Finland** suspended issuing visas to Russians if the reason for their travel is tourism + Russians can no longer enter the territory of the EU, for example, from the border of another Schengen country with a visa issued by Finland.

	<p>Czech Republic. From 25 Oct all Russians with valid Schengen visas for tourism, culture and sport issued by any Schengen member state will be denied entry to the Czech Republic. Loophole - only flights from non-Schengen countries will be monitored + holders of work or study visas are not subject to the restriction. After Putin announced mobilization, Russians started to run away from the country. The main destinations – Georgia, Kazakhstan, UAE and Turkey. Kazakhstan already stated that it is not going to provide shelter to Russian evaders and will extradite the RF wanted persons for evading the mobilization. However, the EU, Germany and Spain advocate allowing the entry of Russians fleeing mobilization. Belarus. Belarusian border guards restricting the foreign travel of men subject to mobilization.</p>
<p>6. Intensify Sanctions on State-Owned Enterprises #SOE</p> <p>Progress: Yes</p>	<p>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 + 13 SOEs & 4 subsidiaries. USA: (3 SOEs in media, 1 SOE bank and 10 its subsidiaries + 1 state-supported private weapons manufacturer + 71 (SDN List) + 45 RF entities in aerospace, defence and related materiel sector, financial services or technology sectors (sanction lists mostly consist from major RF SOEs and their subsidiaries + 1 RF financial institution owned by the Russian Federal Agency for State Property Management + 1 Russian State Transportation Leasing Company and its 4 subsidiaries + 11 Russian defence and high-technology entities + 19 SOEs operating in Russian defence and materiel, technology or electronics sectors and contributing to Russia's defence industrial base + 1 Russian (Federation Council of the Federal Assembly of Russia) and 1 Belarusian entities). New Zealand: 2 RF SOEs and 1 Belarus SOE in defense and shipbuilding + 3 in media +3 RF SOEs in defense + 32 RF SOEs and 3 Belarus SOEs + 42 SOEs + 1 SOE - JSC Goznak + 2 entities that operate in the Russian defense and related materiel sector. Canada: 4 defense and machine building SOEs + 3 RF SOE financial institutions and banks + 28 defence SOEs + 15 entities involved in disinformation activities (inc. 12 SOEs) + 10 SOEs in defence + 1 defence sector entity + sanctions Salvation Committee for Peace and Order (so-called government body in Kherson) + 1 channels of Russian propaganda + 3 entities in energy sector. Australia: RF PMC Wagner + 12 RF propaganda and disinformation SOEs+ 2 Belarus SOEs in defense). EU: 3 SOE media + 6 RF SOEs + 4 owned by SOE on 27% and 3 Belarus SOEs + extended prohibition of broadcasting for 3 RF SOE media + 7 SOEs + 7 entities, inc. Central Election Commission of Russia and Goznak + ban on EU nationals to hold any posts on the governing bodies of certain Russian state-owned or controlled legal persons, entities or bodies). Switzerland: 6 SOE + 4 owned by SOE on 27% and 3 Belarus SOEs + prohibition of advertisement of content produced or broadcast by certain RF SOE media + 5 SOEs + Sberbank + 7 entities, inc. Central Election Commission of Russia and Goznak). Latvia: ban on distribution of 80 audio and audiovisual programs registered in RF, Japan: 1 RF and 1 Belarus SOE banks + 9 entities, inc. Rostec and Kalashnikov Concern). Norway (6 RF SOE + 4 owned by SOE on 27% + ban on holding managerial positions in certain companies that are owned or controlled by the Russian state. Poland: sanctioned Gazprom Export.</p>
<p>7. Expand Export Controls and Ban Imports #Trade</p> <p>Progress: Yes</p>	<p>UK: import - silver, wood, high-end; export - internet services and online media services; ban on services exports, including management consulting, accounting and PR services + 35% duty for ~£1.4bn of imports (palladium, platinum and chemicals) & export ban to hit > £250 mln (chemicals, plastics, rubber, and machinery) + export ban on: maritime goods&technology and related services, products&technology that could be used to repress people, goods&technology relating to chemical and biological weapons, restricted goods&technology to, or for use in, non-government controlled Ukrainian territory, jet fuel and fuel additives + extended the list of oil refining goods&technology and the list of energy-related goods banned to export + ban on services relating to iron and steel goods + import ban on: revenue generating goods RF origine + allowed for humanitarian assistance activity in uncontrolled territories of Donetsk and Luhansk oblast + ban on export of goods and items of significant importance to the Russian (such as chemicals, materials, machinery goods and electrical appliances with the exception of licensed humanitarian goods) + expanded the scope of existing energy-related goods and services prohibitions + ban on export of accounting, business and management consulting, and public relations services + 35% duties to a third package of goods originating in RF and Belarus + prohibition of export, supply and delivery, and making available of goods, critical to the functioning of Russia's economy, in par. manufacturing sector + expansion of list of G7 Dependency and Further Goods subject to certain export controls + minor expansion of list of revenue generating goods subject to certain import/purchasing restrictions + prohibition of import and acquisition of gold jewellery (inc. related technical assistance, financial services and funds, and brokering services). USA: ban on exports of accounting and consulting services to RF, license requirement for common industrial and commercial items + export control for 70 entities in RF and 1 in Belarus in military + temporary ban on export privileges for Aviastar and Belavia, Nordwind Airlines, Pobeda Airlines (owned by Aeroflot) and Siberian Airlines + 35% import tariff for 570 categories of RF products worth approximately \$2.3 bn + sanctioned 25 foreign-produced aircraft, that have flown into Russia or Belarus (violated the US export controls) + added new license requirement for exports of sophisticated computer chips to China (incl. Hong Kong) and Russia. Prohibited exportation, reexportation, sale, or supply, directly or indirectly, from the United States, or by a US person, wherever located, of quantum computing services to any person located in Russia, and issued a Final Rule imposing additional export controls on Russia and Belarus on industrial and commercial items that could support Russian and Belarusian military aggression + added 4 Iranian cargo aircraft to US BIS list + 57 entities which acquired (or tried) U.S.-origin items for Russia's military or involvement in the development of quantum computing technologies + renewed Temporary Denial Orders (TDOs) issued against Russian airlines Aeroflot, Azur Air and UTair for a further 180 days + issued an order denying the export privileges of Russian airline Ural Airlines + renewed the export denial order against Russian cargo airlines Aviastar-TU for another 180 days) + the International Trade Administration is continuing to examine whether Russia remains a market economy for purposes of U.S. antidumping duty law. This review could result in higher AD duties on imports from Russia if the ITA determines that it is now a non-market economy country. Switzerland: import - lignite and coal, timber, cement, seafood, caviar; export - industrial robots or certain chemical products + extended the list of dual-use goods banned for export by 91 RF entities and 24 Belarus entities + extended the list of prohibited for import from RF goods) + ban on audit, business and pr consultancy services + export ban for 4 entities (inc. 3 SOEs), extension of lists of goods banned for sale, supply, export, transit and transport to or for use in RF + exclusions to export ban on luxury goods, allowing for personal use of persons travelling from the EU + exclusions to the ban on transactions with SOEs related to the import from or through Russia of petroleum, incl. refined petroleum products, and the import of pharmaceuticals, medical devices and agricultural and foodstuffs, incl. wheat and fertilizers +</p>

	<p>prohibitions to award public contracts to Russian individuals and entities. Amended the list of goods that could help to strengthen the industry prohibited for sale, supply, export, transit and transport to or for use in Russia. Japan: ban on export transactions with 71 entity; ban on export of cutting-edge goods (quantum computers, 3D printers) + ban on export goods that strengthen the industrial base of RF (wood products, steel storage tanks and other similar containers, machinery and electrical equipment components + ban on export of goods to 65 RF and 25 Belarus entities in defence + ban on trust, accounting / audit, and management consulting services + ban on exports to 21 scientific organisations in Russia, as well as banned export of goods related to chemical weapons to Russia + ban on exports to 21 Russian organisations designated as specific organisations + export ban on chemical weapons-related goods to Russia (came into force on the 7th of October. Taiwan: strategic high-tech products in 57 categories to RF + ban on export of modern chips to Belarus and RF. Canada: import - luxury goods; export - luxury goods, goods for weapons manufacture and production + export ban on 28 services in the oil, gas and chemical industries, including technical, management, accounting and advertising services + ban on export for Belarus on products that could be used in the production and manufacturing of weapons, export and import ban on Belarus on luxury goods + existing measures on the oil, gas and chemical sectors to include industrial manufacturing + withdrew MFN for Russia - a 35% tariff applicable to virtually all goods. EU: expansion of export restrictions for dual-use goods&technology, goods&technology that can be used in defense and security + ban of accounting, pr and consultancy to RF + exclusions to export ban on luxury goods, allowing for personal use of persons travelling from the EU + reinforced export controls of dual use goods and advanced technology + added 4 Russian entities to the list of entities subject to export restrictions regarding dual-use goods&technology + extended the exemption from the prohibition to engage in transactions with certain SOEs as regards transactions for agro products and the transport of oil to 3rd countries + prohibition to provide Architectural & engineering, IT consultancy, Legal advisory services to the Government of Russia + ban on the import of Russian finished and semi-finished steel products (come into force due three month) + ban to import into the EU of iron and steel products processed in third countries inc. from Russia (from September 30, 2023) + extension of the ban to import into the EU of iron and steel products processed in third countries inc. from Russia (from September 30, 2023) + introduction of the prohibition on importing or purchasing, as from 30 September 2023, the listed iron and steel products when processed in a third country incorporating listed iron and steel products originating in Russia + extension of the list of goods that generate significant revenues for Russia and are subject to the import ban + export ban on certain coal, lignite, peat and coke products + ban on sell, supply, transfer or export goods which could contribute to the enhancement of Russian industrial capacities + EU included ability for EU Member States authorise the sale, supply, transfer or export of the goods and technology which could contribute in particular to the enhancement of Russian industrial capacities + extension of the list of restricted goods and technology which might contribute to Russia's military and technological enhancement or to the development of its defence and security sector, including in that list + extension of the list of goods and technology suited for use in aviation or the space industry + introduced the ability for EU Member States authorise the operation with titanium goods required in the aeronautic industry, for which no alternative supply is available. Norway: expansion of goods subject to export controls/bans that help RF military and technological capabilities + ban on auditing and accounting, financial advice + added 4 Russian entities to the export ban list regarding dual-use goods&technology + exclusions to export ban on luxury goods, allowing for personal use of persons travelling from the EU + expansion of list of goods and technologies banned for export that can contribute to Russia's military and technological enhancement + expanded the list of goods&technology for use in oil refining + export restrictions relating to coal, electronic components, technical items in the aviation sector, certain chemicals and firearms + Import restrictions relating to steel products, machinery and appliances, plastics, vehicles, textiles, footwear, leather, ceramics, certain chemical products and jewellery that is not made of gold + Restriction on architectural and engineering services, legal advisory services and IT consultancy services. New Zealand: extension of the 35% tariff on Russian imports till March 2025 + significant expansion of the list of prohibited exports to Russia and Belarus + ban of the export of luxury goods (inc. gold) to Russia (for example, wine, seafood) + ban of the import of luxury goods of Russian origin into New Zealand (vodka and caviar)</p>
<p>8. Impose Secondary Sanctions #Secondary</p> <p>Progress: Yes, but slow</p>	<p>No specific document adopted. USA plans to include secondary sanctions in its financial crime strategy, considers sanctions against unscrupulous banks that help circumvent sanctions. USA sanctioned 7 RF entities and 6 non-RF entities for evading newly imposed export controls on Russia, these companies provided support to Russia's military and/or defence industrial base. The US passed a legislative amendment which allows India to buy a missile defence system from Russia. A draft bill on sanctioning China's purchases of oil and other energy supplies from RF was introduced to the Senate. The US Treasury has sent a letter to a number of business associations in Turkey warning them of the risk of being sanctioned if they cooperate with Russians who have already been subject to restrictions -WSJ. After the US warning, banks in Turkey, Kazakhstan, Vietnam, Armenia, Kyrgyz Republic, Sri Lanka started to suspend work with the Russian payment system "Mir". According to Russian media, Mir coverage area in friendly countries collapsed by 90%. Also, Russians face problems with UnionPay (Tourists in Spain, the Czech Republic and Cyprus have encountered problems, Nosto ATMs (Finland) stopped servicing UnionPay cards). BIS warned third-country companies and governments that they could find themselves subject to export controls imposed in response to Russia's war against Ukraine.OFAC confirmed that non-US individuals and legal entities risk exposure to sanctions for providing ammunition and other military goods to Russia or for supporting Russia's military-industrial complex, as well as PMCs or paramilitary groups participating in or otherwise supporting Russia's attack on Ukraine. EU discussion on sanctioning Turkey for assisting RF trade. EU. Norway. Broadened the listing criteria on which specific designations can be based – sanctions could now be imposed on natural or legal persons who facilitate the circumvention of EU sanctions. G7 discusses secondary sanctions for oil.</p>

<p>9. Increase Transparency to Discourage Trade with and Investment in RF #Transparency</p> <p>Progress: Yes</p>	<p>USA: registered a bill to oblige public companies to disclose their ties to RF and other aggressor countries + Corp Fin has posted a <u>sample comment letter</u> about potential disclosure obligations arising out of the RF invasion + released warning of increased export control evasion attempts by entities targeted under RF related programs (16 items with a higher risk of evasion attempts + strengthened enforcement of export controls + an outbound investment review mechanism to protect U.S. technologies (e.g. semiconductors, batteries, AI etc.) against adversaries like China and RF – notification to the federal government 45 days prior to deal closing is required if the investment involves specified sectors) was proposed, <u>draft has not passed either house of Congress yet</u>. Germany: obliged sanctioned persons to report property in Germany under the threat of imprisonment <u>is to create a national registry of assets that are subject to sanctions</u>. EU: EP gave its consent to the draft Decision which identifies the violation of EU sanctions as an EU crime + strengthened reporting requirements - sanctioned people and entities were obliged to declare assets in EU before 1 Sep 2022 or within 6 weeks from the date of listing + share of information on property of sanctioned persons, entities and bodies between EU Member States and the European Commission. The EU has created a special online mechanism through which whistleblowers can report violations of anti-Russian sanction. UK: Register of Foreign Legal Entities began to operate from August – now anonymous foreign companies must disclose their ultimate owners if they seek to purchase real estate in the UK or already own it. Switzerland. Federal Council instructed to draft a bill on increased transparency and easier identification of the beneficial owners of legal entities which will include a register for identifying beneficial owners and new obligations the risk-based updating of information on effective ownership.</p>
<p>10. Deepen Coordination of Sanctions and Link Sanctions Relief to Peace & Reconstruction #Coordinations #Reconstruction</p> <p>Progress: Yes</p>	<p>USA and Canada are preparing legislative acts to use sanctioned assets for compensation to Ukraine. USA: working on policy proposals and legal changes required to move forward with the strategy. EU: works on the possibility of using the frozen RF assets to help Ukraine + EU is ready to create an international platform for the restoration of Ukraine + EU considers it fair and is preparing a legal basis for the frozen RF assets and assets of RF oligarchs. + is working on “Sanction Berau” launch, Justice Commissioner of EC suggests keeping Russian assets frozen until RF agrees to pay for the reconstruction of Ukraine after the war ends. 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. USA-UK. OFSI and OFAC announced enhanced co-operation on sanctions. REPO is going to accelerate oligarch asset forfeiture efforts in response to Russia’s illegal war in Ukraine. Czech Republic approved a legislative proposal to freeze foreign assets in case of human rights violations, support of terrorism or participation in cyber-attacks (needs to pass Senate and then office of the President).</p>

Colour legend

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

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

SANCTION ENFORCEMENT

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

The UK Office for National Statistics (ONS) published a report on the impact of sanctions in response to Russia's aggression against Ukraine on UK trade with Russia, as of June 2022. Key points include:

- Imports of goods from Russia totalled £33 million in June 2022, a decrease of 96.6% compared with the average monthly imports in the 12 months to February 2022. Imports are at the lowest level since records began in January 1997.
- There were no imports of fuels from Russia in June 2022 for the first time since records began. Importers have sought alternatives from Saudi Arabia, the Netherlands, Belgium and Kuwait in recent months.
- Imports of all commodities decreased compared with the monthly average for the 12 months to February 2022.
- Although exports to Russia slightly increased compared with May 2022, their levels have dropped by £168 million (66.9%) compared with the monthly average for the 12 months to February 2022.
- Exports of most commodities to Russia had decreased, with machinery and transport equipment decreasing by £118 million (91.3%).
- Exports of chemicals to Russia increased slightly in June 2022, driven by an increase of £39.1 million (61.8%) in exports of medicinal and pharmaceutical products, which are exempt from sanctions for humanitarian reasons.
- The main driver of decline in import from / exports to Russia is likely to be UK sanctions, but "self-sanctioning", whereby traders voluntarily seek alternatives to Russian goods, is also likely a factor.

OFSI imposed a monetary penalty of £30,000 against UK registered company, Hong Kong International Wine and Spirits Competition Ltd ("HKIWSC") for breaches of Ukraine (European Union Financial Sanctions) (No.2) Regulations 2014 and Council Regulation (EU) No 269/2014 (Ukraine Misappropriation and Human Rights).

The penalty relates to 3 payments and 78 wine bottles HKIWSC received from a designated entity for entry into competitions between September 2017 and August 2020. The total cumulative value of tangible economic resources and funds received by HKIWSC is estimated at £3,919.62. Additionally, HKIWSC made publicity, considered an intangible economic resource, available to that designated entity.

On 26 October, the House of Commons Foreign Affairs Committee today published the Government response to its June 2022 report, *The cost of complacency: illicit finance and the war in Ukraine*. With regard to sanctions, the Government has said that:

- The Overseas Territories have frozen Russian assets with a combined estimated value in excess of \$9 billion, including \$8.4 billion by the Cayman Islands and more than \$400 million by the British Virgin Islands.
- The Crown Dependencies have frozen assets worth over £1 billion, including £1.9 million by the Isle of Man, £5 million by Guernsey and £1.15 billion by Jersey.
- The designation of people / entities and subsequent freezing of their assets does not in itself provide a basis for seizure. However, law enforcement agencies are able to freeze and seize foreign assets with links to criminality or unlawful conduct under the Proceeds of Crime Act 2002.
- The FCDO and partners across government were in close coordination throughout the months leading up to the Russian invasion, allowing for swift designations and the introduction of new sanctions measures within days.
- It agrees with the Committee that imposing new designations at pace is central to an effective sanctions response but says that it is vital to ensure cases are properly prepared and that sufficient evidence is gathered before designations are made.
- The FCDO has established a permanent Sanctions Directorate which will focus on the Government's Russia Ukraine response and the 30+ UN and UK sanctions regimes. In line with the Committee's recommendation, the FCDO has also established a cadre of sanctions experts to build the expertise needed long term.
- In December 2021, there were 48 substantive roles in the Sanctions Unit (now Sanctions Directorate). By the end of April 2022, there were approximately 150 people in the Directorate, reflecting an increased number of substantive roles and staff surged into the team on a temporary basis from other parts of the organisation.
- Work is underway to develop a new Anti-Corruption Strategy and the next Economic Crime Plan, which will go further still to tackle the threat from economic crime, including a specific focus on kleptocracy and sanctions evasion.

It closely follows international efforts to tackle economic crime and to improve the effectiveness of sanctions, and regularly exchanges best practice with partners and allies to improve the collective response to common threats.

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

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

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

The US Commerce Department's Bureau of Industry and Security (BIS) released a summary of the actions it has taken pursuant to export controls imposed on Russia in response to its aggression against Ukraine. BIS has:

- Issued over a dozen regulations imposing new export controls, resulting in a 97% decrease (by value) in exports of items subject to new controls to Russia and Belarus (February 24 – August 12 2022, compared to same time period in 2021).
- Established a coalition of 37 partner countries that have implemented substantially similar controls, including: Australia, Canada, EU Member States, Iceland, Japan, South Korea, Switzerland and the UK.
- Expedited licence approvals cumulatively valued at over \$1 billion in items to support Ukraine's defence capabilities, including: firearms, ammunition, night vision goggles and protective equipment.
- Prevented over 100 shipments to Russia and Belarus.
- Detained or seized 244 shipments, totalling more than \$93 million.
- Added 335 entities to the Entity List for supporting Russia's military.
- Taken joint actions with the Department of Justice against Russian "oligarchs" Roman Abramovich and Andrei Skoch.
- Issued 9 Temporary Denial Orders (TDOs) against Russian and Belarusian commercial and cargo airlines.
- With the Treasury's FinCEN, issued the first joint alert to financial institutions on potential Russian and Belarusian export control evasion attempts.
- Publicly released and maintained a list of commercial and private aircraft operating in likely violation of US export control laws.

On 16 September, Matthew Axelrod, top enforcement official of the Bureau of Industry and Security (BIS), announced that BIS is on pace to detain almost as many exports to Russia this year as the agency detained worldwide in 2021. In the 6 months since Russia's invasion of Ukraine, the U.S. has detained nearly 240 shipments to Russia worth more than \$93 million.

On 20 October, the US State Department published a Factsheet summarising the impact of sanctions and export controls imposed by the US and others on Russia since February 2022. These include:

- Supply shortages for Russian forces in Ukraine.
- Difficulties importing semiconductors and other key components.
- The near cessation of Russian hypersonic ballistic missile production due to the lack of necessary semiconductors.
- Cutting off Russia's military aviation program from resupply provided by global aviation trade.
- The stalling of the production of Russia's next-generation airborne early warning and control military aircraft due to lack of foreign components, including semiconductors.
- The closure of mechanical plants, including those producing surface-to-air missiles, due to shortages of foreign-origin components.
- Reversion to old defence stocks because Russian companies' abilities to replenish domestic supply chains have been interrupted.
- The immobilisation of approximately \$300 billion worth of Russian Central Bank assets.
- Sanctioned Russian "oligarchs" and financial institutions have been forced to divest from long-held assets outside Russia.
- Banks in several countries curtailing ties with the Russian financial sector.
- The contraction of Russia's economy by over 3% this year, according to the IMF.

The US charges Latvian, Ukrainian & Russian nationals with export violations. On 19 October, a superseding indictment was unsealed in the US District Court for the District of Connecticut last week, charging a number of people and entities with violating US export controls by attempting to smuggle a jig grinder that was manufactured in Connecticut to Russia via Latvia, without the necessary licence. A jig grinder is a high-precision grinding machine system that requires a licence for export and reexport to Russia given its potential application in nuclear proliferation and defence programs. It does not require a licence for export to the EU.

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

Latvian nationals Eriks Mamonovs and Vadims Ananics, Ukrainian national Stanislav Romanyuk, Janis Uzbalis and Russian nationals have been charged in connection with the scheme alongside Latvia-based CNC Weld, Estonia-based BY Trade OU and a Russia-based entity.

On 18 October 2022, Ananics, Mamonovs and Uzbalis were arrested in Riga at the request of the US. On 13 June 2022, Romanyuk was arrested in Tallinn, also at the request of the US. The DOJ is seeking their extradition.

On 17 October, the Department of Justice reported that a U.S. company Intertech Trading Corporation, an Atkinson, New Hampshire-based laboratory equipment distributor, was sentenced to pay the maximum allowable fine of \$140,000 after pleading guilty to 14 counts of failure to file export information on shipments to Russia and Ukraine. The company will also be subject to a 2-year term of corporate probation and monitoring.

According to a DOJ press release, between 2015 and 2019 the company exported laboratory equipment to Russia, Ukraine, and elsewhere while falsely describing the nature and value of the items on commercial invoices and shipping forms. The company admitted that it used false, innocuous descriptions and drastically undervalued the shipments, thereby evading the requirement to file electronic export information that would have been reported to the departments of Commerce and Homeland Security.

EU. On 13 September, the EU Council adopted Decision (CFSP) 2022/1506 to support the development and implementation of sanctions information technology tools until December 2024, allocating a budget of €450,000. The Decision says the EU will support technology to provide information on EU sanctions and tools to allow secure information exchanges between the Member States, stakeholders and the Commission. The tools will support the implementation of reporting obligations of Member States.

On 19 September, the European Commission updated its Russia sanctions FAQs on the import, purchase and transfer of listed goods. Referring to its aim to avoid an impact on the food and energy security of third countries around the globe, in particular of the least developed ones, the European Commission confirmed that the transfer (but apparently not the purchase) of the following goods to third countries, as well as financing or financial assistance related to such transfer, carried out by EU operators or via the EU territory (including in transit) "should be allowed" as long as such transfer occurs "from point to point (eg, from Russia to a third country) without transiting via the EU territory. The relevant goods are the following:

- fertilisers falling under CN codes 310420, 310520; 310560; ex31059020 and ex31059080 related, as listed in Annex XXI;
- animal feed falling under CN code 2303, as listed in Annex XXI;
- certain hydrocarbons falling under CN codes ex2901 and 2902, as listed in Annex XXI;
- essential goods falling under CN codes 44 (wood); 2523 and 6810 (cement products), as listed in Annex XXI;
- all the items listed in Annex XXII (coal and related products).

On 7 October, EC again updated its FAQs on the import, purchase and transfer of listed goods to clarify the permitted transfer to third countries of specific agricultural and food products and energy-related goods. The relevant goods are the following:

- fertilisers falling under CN codes 310420, 310520; 310560; ex31059020 and ex31059080 related, as listed in Annex XXI;
- animal feed falling under CN code 2303, as listed in Annex XXI;
- energy goods falling under CN codes 4401 (fuel wood) and 4402 (charcoal), as listed in Annex XXI;
- all the items listed in Annex XXII (coal and related products).

On 6 October, as part of 8th sanctions package, the EU extended the geographical scope of the restrictive measures in response to the recognition of the non-government controlled areas of the Donetsk and Luhansk oblasts of Ukraine and the ordering of Russian armed forces into those areas to cover all the non-government controlled areas of Ukraine in the oblasts of Donetsk, Luhansk, Zaporizhzhia and Kherson.

Third countries aligned with EU Council decisions which constitute part of the EU's 8th package of Russia sanctions:

North Macedonia, Montenegro, Albania, Ukraine, Bosnia and Herzegovina, Georgia, Iceland, Liechtenstein and Norway have aligned themselves with:

- Council Decision (CFSP) 2022/1908, amending Decision (CFSP) 2022/266 concerning restrictive measures in response to the recognition of the non-government controlled areas of the Donetsk and Luhansk oblasts of Ukraine and the ordering of Russian armed forces into those areas

North Macedonia, Montenegro, Albania, Ukraine, Bosnia and Herzegovina, Iceland, Liechtenstein and Norway have aligned themselves with:

- Council Decision (CFSP) 2022/1907, amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine
- Council Decision (CFSP) 2022/1909, amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine.

In response to a parliamentary question, on 18 October the High Representative of the Union for Foreign Affairs and Security Policy Josep Borrell confirmed on behalf of the European Commission that:

- If a person transfers ownership of an asset to a third person before being designated as subject to EU sanctions, that is not a sanctions violation.
- If the person maintains control over the asset after the entry into force of the designation, the asset is frozen.

- Participating in a scheme after sanctions are imposed which was created before sanctions in order to evade the effects of its possible future designation can amount to circumvention.
- The European Commission will review practices that seek to circumvent sanctions.

On 26 Oct 2022, EC adopted a legislative proposal to make instant payment in euro available to all citizens and businesses holding a bank account in the EU and in EEA countries. The proposed legislation would harmonise the sanctions screening procedure for all instant payment providers. Providers would not undertake transaction-based sanctions screening and instead be required to verify whether their clients are EU-sanctioned people or entities on a (minimum) daily basis and when the EU sanctions list is amended. If a provider fails to carry out timely verifications and causes another provider carrying out the same transfer to violate EU sanctions, the latter will be compensated by the former for penalties of non-compliance (imposed by Member States).

Poland. On 5 August, Poland introduced significant amendments to the Act of 13 April on special measures relative to counteracting the support for the aggression against Ukraine and relative to national security protection² ("Polish Sanctions Regulation"). The Act of 5 August that amends the Polish Sanctions Regulation and the Act on the National Revenue Administration ("Amendment") was published on 17 August 2022 and entered into force on 18 August.

The main changes include:

1. Institution of temporary compulsory administration for entities affected by Polish national sanctions ("sanctioned entities");
2. Allowing the State Treasury to acquire assets of sanctioned entities upon reimbursement;
3. Support measures for employees employed at the sanctioned entities.

Finland. Finnish customs officers take money from Russians. Finnish customs began to confiscate cash from citizens of the Russian Federation when leaving the EU to the territory of Russia. The issue is the sanctions of the EU, which banned the export of banknotes denominated in euros to Russia. Russians can transfer the seized money to anyone going to Finland, or leave it for safekeeping at checkpoints.

Switzerland. On 19 September, the Swiss Council of States blocked an amendment to the Federal Act on the Implementation of International Sanctions that would have allowed Switzerland to impose autonomous sanctions on those who have ordered or committed violations of international humanitarian law or international human rights law. The amendment had been passed by the National Council in June. Under the current legislation, Switzerland may only impose sanctions that have already been adopted by the UN, Organisation for Security and Cooperation in Europe (OCSE) or its most significant trading partners (EU).

On 12 October, the EAER extended the application of restrictions already applicable to the areas of the Ukrainian oblasts of Donetsk and Luhansk to the areas of the Ukrainian oblasts of Zaporizhzhia and Kherson not controlled by the Ukrainian government, illegally annexed by Russia. These territories are now subject to the restrictions on importation and exportation of goods from and to the designated territories and the prohibition on financings, investments and services in the designated territories.

Canada. On 29 September, Canada expanded its sanctions under the Special Economic Measure Act to the Russian-occupied areas of the Kherson and Zaporizhzhia regions. Building on similar measures Canada has already imposed on the regions of Donetsk and Luhansk, the Government is prohibiting persons in Canada and Canadians outside Canada from engaging in certain business dealings in or with people from the Kherson and Zaporizhzhia regions - investing, importing and exporting, provision of technical assistance, provision of financial or other services related to tourism, docking of a cruise ship.

Germany. The German government wants to ban cash transactions in real estate purchases as part of the Sanctions Enforcement Act II, the change in the law should take place by the end of the year. Sanctioned persons will have to disclose their assets under threat of fines and up to one year's imprisonment.

A draft bill is currently being coordinated within the government. The planned law will create a central office for sanctions enforcement at the federal level and combine sanctions enforcement under one roof with the fight against money laundering. This office will coordinate all authorities in Germany on this issue. Anonymous transactions are thus to be prevented in the future. This will intensify cooperation between the relevant authorities and create better opportunities to identify and seize assets, and their responsibilities will also be expanded.

On 26 October, Germany published the draft Sanctions Enforcement Act II (SDG II) which aims to make structural improvements in its enforcement of sanctions and anti-money laundering. This second piece of legislation builds on the SDG I, adopted in May 2022. The bill proposes to:

- Establish a Central Office for the Enforcement of Sanctions to enforce EU sanctions in Germany. The Central Office will assume certain enforcement powers introduced by SDG I.

² Poland's Act on special measures preventing support for the aggression against Ukraine and relative to national security protection was announced on 15 April 2022, and became effective 16 April 2022. The Act introduces financial and criminal penalties for violation of EU Regulations 765/2006, 269/2014, 833/2014 and 2022/263, as well as additional, Poland-specific measures.

- Provide for administrative procedures to identify funds or economic resources that are owned or controlled by designated people or entities, or to identify the owners or beneficial owners of German assets.
- Provide for the Central Office to appoint a special representative to monitor the sanctions compliance of entities.
- Link approximately 530 land registries to the transparency register (records beneficial owners).
- Require foreign entities to report existing German property to the transparency register.
- Where appropriate, require entities to justify why a 'fictitious beneficial owner' is needed.
- Make ownership and control overviews created by the transparency register available to government agencies.
- Ban the use of cash, cryptocurrency and 'commodities' to purchase real estate.
- Make UN listings directly applicable.
- Extend certain financial supervision regulations to those included on the EU sanctions list.

Netherlands. [RTL Nieuws](#) reported that since the start of the war in Ukraine, in late February, the Dutch government has issued 91 waivers from sanctions imposed by the EU against Russia. The ministries of Foreign Affairs, Economic Affairs, Finance, Infrastructure and Education have the option of granting exemptions. Companies and institutions that receive an exemption do not have to comply with the applicable sanctions. This is done to 'allow a degree of flexibility in specific cases', according to a statement from the Ministry of Foreign Affairs.

Waivers were issued by the following ministries:

- The Ministry of Infrastructure and Water Management in 34 cases allowed ships with certain cargo to access Dutch ports. This concerns, for example, aluminum and food;
- Dutch organizations are also allowed to receive energy from former Gazprom companies. At the beginning of September, Minister Jetten (Climate and Energy) made an exception for organizations with an energy contract with Gazprom Nederland, a subsidiary of the Russian Gazprom. Jetten first wanted the contracts to be terminated, but made an exception. The European Gazprom companies were taken over by the German government and have since been called SEFE Energy (Securing Energy for Europe). According to the German administrators, not a cent goes to Russia;
- The Ministry of Climate and Energy issued 25 exemptions, helping 150 applicants (municipalities, schools and water boards). One waiver can be used by several organizations;
- The Ministry of Foreign Trade gave 13 different organizations a total of 18 exemptions. According to the ministry, the reasons are 'humanitarian grounds' and cooperation between the EU and Russia for 'purely civilian matters';
- The Minister of Finance granted 13 exemptions for frozen assets or financing of goods that fall under the sanctions regime;
- The Ministry of Foreign Affairs once granted an exemption to allow 'diplomatic relations'. For that diplomatic exchange, transactions have been made possible at a Russian financial institution that is on the sanctions list. These are banks in which more than 50 % of the shares are owned by the Russian state, such as Sberbank, VTB, VEB or Gazprombank.

The ministries involved do not want to make company names and sectors public, because it concerns 'company-sensitive information', according to the Ministry of Foreign Affairs. The ministry also does not want to disclose the value of the exemptions.

New Zealand. New Zealand also expanded 2 classes of persons, so that the sanctions regime applies to the persons within those classes: (1) member of the Federation Council of the Federal Assembly of the Russian Federation in 1 or both of the following circumstances: the person is member on 4 October 2022; the person is a member who voted in favour of the recognition of the independence of Donetsk and Luhansk on 22 February 2022; (2) member of the State Duma of the Russian Federation in 1 or both of the following circumstances: the person is a member on 3 October 2022; the person is a member who voted in favour of the recognition of the independence of Donetsk and Luhansk on 15 February 2022.

Norway. On 28 October, Norway extended the geographical scope of the restrictive measures to apply sanctions to the non-government-controlled areas of Kherson and Zaporizhzhya counties.

COUNTER SANCTIONS & ACTIONS

Belarus. Belarus has introduced a ban on the export of equipment to the member states of the Eurasian Economic Union, including Russia. From September 23, it will be impossible to export more than 250 types of goods outside the republic: from smartphones to nuclear reactors. The ban will be in effect for six months, until March 2023. The banned list includes: cars, motorcycles, bicycles, aircraft, medical devices, railway locomotives, wagons, tractors, various tools and equipment, gas generators, nuclear reactors, fuel elements, equipment for agriculture and forestry, batteries, vacuum cleaners, smartphones etc. At the same time, the ban does not apply to goods with a one-time export license, as well as to products whose Belarusian or Russian origin is confirmed by a certificate.

Russia. Putin has given the RF GoV the right to prohibit trucks from the EU and other "unfriendly" countries, which have already closed their borders to Russian trucks, to enter Russia. Document entered into force on Sep 29. If such a ban is established, the government must determine the duration of its validity, the list of states that have imposed similar restrictions on Russia, the types of transportation that will be affected by the restrictions, as well as the conditions under which this ban does not apply.

Russia & Turkey. As an alternative to Mir Moscow and Ankara are discussing the possibility of using the Turkish payment system Troy (newspaper Aydinlik). According to them, the central banks of the two countries are now discussing the topic.

Russia & Turkey agreed to build a gas hub. Erdogan said that the Turkish Ministry of Energy is working on the construction of a new gas hub in the country. Earlier he was approached by Putin with such a proposal. The Turkish president stressed that the hub will be created as soon as possible. The most suitable place for it is in the European part of the country. Despite this might not still solve Putin's problems, creation of such a hub is likely to become another attempt to divide the EU, since Austria, Hungary and the south EU will be able to buy Russian gas at a discount.

Russia & Iran. Iran and Russia Seek New Sanctions Evasion Corridor - they are advancing the idea of a transportation route termed the International North-South Transport Corridor (INSTC). The INSTC can connect the Persian Gulf and Indian ports with Russia. Access to warm water ports works for Russia, and for India and provides an alternative to lengthy sea routes for trade to Russia, Turkey, and the rest of Europe. Ideally, the route would take 18 days from the Baltic Sea to reach India through Azerbaijan and Iran.

In addition, Iranian Finance Minister announced that the national banking and payment systems of Iran and Russia will be united. "Negotiations were held between the Iranian and Russian central banks, and I hope that the connection between banking networks and national payment systems Shetab and Mir will be established within two to three months".

According to the Intelligence data, Iran has already supplied Russia drones, and plans to supply more, while on October 18 an Iranian official confirmed that Russia had indeed signed an agreement under which it would receive ballistic missiles to strike at the territory of Ukraine. After 3 days of negotiations, the EU approved sanctions against Iran for supplying drones to Russia - Czech Presidency of the EU Council. EU countries decided to freeze the assets of 3 individuals and one organisation responsible for the supply of drones to Russia, and are ready to extend sanctions to 4 more Iranian organizations, which appeared in the previous sanctions list.

Russia & Hungary. Hungary received a deferment from Gazprom for payments in the amount of about 1.9 billion euros, which it should have transferred during the 2022-2023 heating season - Bloomberg. In the first year, Hungary will pay 20% of the deferred payment amount, and then 40% in the next two years, two sources said. The deferred payment will be made at 3.5%. In the winter period of 2022/23, without taking into account the postponement, Budapest will probably have to pay 4 billion euros for Russian gas.

Hungary paid the equivalent of UAH 700 mln for a propaganda campaign against the West's anti-Russian sanctions. The contract was signed at the beginning of July, but the documentation was published only on October 13. Last weekend, the Hungarian government's Facebook page changed its cover to the same poster with the image of an aerial bomb and the words "Brussels sanctions are destroying us".

SANCTION

LOOPHOLES

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

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

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

EU – 8th package loopholes.

EU didn't include Russia's largest diamond mining company Alrosa into the 8th package, despite the EC proposal to ban the sale of Russian diamonds in EU. Earlier, Politico reported that Belgium sought to exclude Russian diamonds from sanctions because of concerns about possible damage to its diamond industry. Along with India, Belgium is a key buyer of Russian diamonds.

Hungary succeeded to "squeeze" its demands into the 8th package – in particular, the restriction on the price of Russian oil won't apply to pipeline supplies and in emergency cases - to sea supplies. Hungary also managed to exclude nuclear energy from the package because of the joint construction with Moscow of the new nuclear power plant "Paks".

EU lifted transportation to Japan and related services for crude oil originating in the Sakhalin-2 Project until June 5, 2023.

Russians with a residence permit and permanent residence in EU countries won't be subject to new restrictions on crypto wallets.

The maximum effect of imposed iron & steel sanctions is postponed in time: (2) goods under CN code 7207 11 (billets) and CN code 7207 12 10 (slabs) are subject to exemption based on quotas, the volumes of which will be not restrictive (for slabs during next two years, for billets – for the next year). This means absence/lack of the effect on Russia's trade in these goods, since the aggressor will be able to continue supplying these products with no reductions as compared to 2021 and to enjoy high export revenues at the EU market.

Derogations in 8th package

On 6 October, EU implemented new derogations to earlier imposed sanctions by allowing EU Member States to authorize the release of certain frozen funds or economic resources of, or the making available of certain funds or economic resources to:

- "PJSC KAMAZ", the Russian developer and manufacturer of vehicles and military equipment, for the wind-down, by 31 December 2022, of a joint venture or similar legal arrangement concluded before March 16, 2022, involving certain sanctioned Russian state-owned or state-controlled entities listed in Annex XIX to Council Regulation 833/2014;

"National Settlement Depository (NSD)", Russia's central securities depository, for the termination by 7 January 2023, of operations, contracts or other agreements concluded with, or otherwise involving that entity before 3 June 2022.

Exemptions apply to the provision of services (1) that are strictly necessary for the termination by 8 January 2023 of contracts concluded before 7 October 2022 (or of ancillary contracts necessary for the execution of such contracts), (2) necessary for public health emergencies, the urgent prevention or mitigation of an event likely to have a serious and significant impact on human health and safety or the environment, or as a response to natural disasters, or (3) under certain conditions, necessary for software updates for non-military use and for a non-military end user.

In addition, EU introduced the ability for EU Member States authorise relevant services if this is necessary for (1) humanitarian purposes, (2) civil society activities that directly promote democracy, human rights or the rule of law in Russia, (3) the functioning of diplomatic and consular representations of the EU and of the EU Member States or partner countries in Russia, (4) ensuring critical energy supply within the EU and the purchase, import or transport into the EU of titanium, aluminium, copper, nickel, palladium and iron ore, (5) ensuring the continuous operation of infrastructures, hardware and software which are critical for human health and safety, or the safety of the environment, (6) the establishment, operation, maintenance, fuel supply and retreatment and safety of civil nuclear capabilities, and the continuation of design, construction and commissioning required for the completion of civil nuclear facilities, the supply of precursor material for the production of medical radioisotopes and similar medical applications, or critical technology for environmental radiation monitoring, as well as for civil nuclear cooperation, in particular in the field of research and development, or (7) the provision of electronic communication services by EU telecommunication operators necessary for the operation, maintenance and security, including cybersecurity, of electronic communication services, in Russia, in Ukraine, in the EU, between Russia and the EU, and between Ukraine and the EU, and for data centre services in the EU.

Transport

Introduction of new exemptions for transport to third countries of Russian oil and petroleum products and related services. Prohibitions would not apply in the following cases:

- The purchase price per barrel of such products does not exceed a price to be set in annexes to be adopted;
- The goods originate in a third country and are only being loaded in, departing from or transiting through Russia, provided that both the origin and the owner of those goods are non-Russian;
- Transport or services relating to products mentioned in Annex XXIX of Regulation 833/2014, to the third countries mentioned therein, for the duration specified in that Annex. Currently, this covers transport to Japan and related services for crude oil originating in the Sakhalin-2 Project until 5 June 5 2023.

Extension of existing exemption for services related to the transport to third countries of Russian petroleum products falling under CN code 2710 until 5 February 2023 (the exemption is still valid until 5 December 5 2022 for crude oil falling under CN code 2709 00).

Introduction of new exemptions for services related to the transport to third countries of Russian petroleum products to allow for: (1) the payment of insurance claims after 5 December 5 2022 for crude oil (CN 2709 00) and after 5 February 2023 for petroleum products (CN 2710) on the basis of insurance contracts concluded before 4 June 4 2022, provided the insurance coverage has ceased by the relevant date; (2) the provision of pilot services necessary for reasons of maritime safety.

EU + Russia-friendly countries. According to Bloomberg, there was detected a sudden and surprising spike in European exports of washing machines, refrigerators and even electric breast pumps to Russia's neighbours. Such a boom is raising concerns among officials that the trade boom may be helping Vladimir Putin's war machine in Ukraine. Armenia imported more washing machines from the European Union during the first eight months of the year than the past two years combined, according to data

compiled by Bloomberg from the EU's Eurostat database. Kazakhstan imported \$21.4 million worth of European refrigerators through August, more than triple the amount for the same period last year.

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

The Russian National Settlement Depository (NSD), which keeps records of securities, and the National Clearing Center (NCC), which acts as an intermediary in transactions with currency on the exchange, escaped the last US sanction package. Both companies are part of Moscow Exchange Group. Sanctions against the NCC would have meant a halt to exchange trading in the dollar and euro and would have made settlements in those currencies impossible.

According to Bloomberg, Russia's National Clearing Center has become a vital link in the global financial system, as tens of billions of dollars and euros come from the sale of oil and other commodities. According to the agency's interlocutors, this year, the National Clearing Center has demonstrated an increase in its foreign exchange reserves. Most of the funds at the NCC, which are held on behalf of Russian banks and their clients, are in yuan, transferred from dollars and euros and other "unfriendly" currencies at the behest of CBR sources told Bloomberg.

On Oct 14, Reuters reported that some of oilfield service firm Schlumberger's (SLB.N) more than 9,000 Russian employees have begun receiving military draft notices through work, and the company is not authorising remote employment to escape mobilisation, according to people familiar with the matter and internal documents. Being a US company, Schlumberger continues to operate on the Russian oil market and should be either forced to leave the Russian market, or get under secondary sanctions.

UK. The industrial giant in paper and packaging Mondi Group, registered in London, helped the Russian dairy industry to survive under sanctions. The problem in Russia arose when the Swedish company Tetra Pak, which supplied 7 out of 10 packages of milk and juice to Russia, was forced to leave the market under pressure from Western sanctions. However, Mondi Group came to the aid of the Russians and in June announced its intention to start production of packaging that will replace Tetra Pak.

France. On 5 October, the Paris Court of Appeal in October ordered French customs authorities to release EU-sanctioned Alexey Kuzmichev's impounded yacht 'La Petite Ourse'. The yacht was moored in Antibes when it was raided by customs agents on 16 March 2022, one day after Mr Kuzmichev, one of the main shareholders of Alfa Bank, was added to the EU's Russia sanctions list. The Court said that the agents had not followed correct procedure when searching the vessel and had incorrectly relied on an authority that permitted a search in connection with suspected fraud.

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

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

Turkey. According to Bloomberg, at the end of July, the sanctioned ship Sparta II passed through the Bosphorus, which is controlled by Turkey. The route ran from Syria to Rashist Novorossiysk. As the publication notes, there was military equipment on board, which will be or is already being used in the war against Ukraine.

After the meeting on August 5, Erdogan and Putin agreed a payment scheme in rubles for natural gas trade. Erdogan hopes that this will bring financial benefit to both parties.

Rosatom continues to build a power plant in Turkey, transferring funds through sanctioned banks - according to Bloomberg. In particular, last week the Russians transferred 5 million dollars to the Turkish company Akkuyu Nuclear JSC. It is expected that the cost of the future power plant will be \$20bn. Transactions between companies are carried out through sub-sanctioned banks - Sberbank and Sovcombank. The power plant is considered critically important for Turkey as the country wants to meet its ever-growing energy needs. This nuclear power plant can provide 10% of the country's domestic demand for electricity if all four reactors are operational. Erdoğan announced his intention to personally inspect the Akkuyu nuclear power plant under construction in Turkey, and then tell Putin about the situation at the facility and together determine further steps.

On Aug 27, Russia, despite Turkish restrictions, was able to transport advanced weapons systems such as S-300 missiles across the Bosphorus from its bases in Syria using the Sparta II merchant ship to support the war in Ukraine. The ship (Sparta II) is understood to be owned by Oboronlogistika, which in effect means the Russian Ministry of Defense. The ship has specifically been added to the U.S. Treasury's Office of Foreign Assets Control (OFAC) sanction list. The crew is civilian, but its cargo is often military.

According to New York Times, during the war in Ukraine, at least 32 yachts of Russian oligarchs have found refuge from Western sanctions in Turkey, where they may not fear arrest,

India. India accepts Russian ships in ports under sanctions. At least 7 Russian ships, whose owners were under US sanctions for transporting weapons, docked in India over the past month, Foreign Policy reports. It is not known exactly what cargo is on board, but all of these vessels have been sanctioned by the US Treasury Department due to their connection with shipping companies responsible for transporting weapons for the benefit of the RF GoV. India's actions are not a direct violation of US sanctions, as they prohibit cooperation only with US citizens and companies. However, the country risks falling under secondary sanctions.

According to Bloomberg, Russia earns hundreds of millions of dollars every month by selling diamonds via Indian banks. Now, after months of paralysis when it was hit with US sanctions, Alrosa is back selling more than \$250 million of diamonds a month, with sales currently only about \$50 to \$100 million a month below pre-war levels, according to people familiar with the matter. The sales have restarted as some Indian banks become more comfortable with how to facilitate transactions in currencies other than US dollars, said the people, who asked not to be identified discussing private information. The USA, Ukraine, EU and other countries demand to grant the status of "blood" or "conflict" diamonds mined in Russia, because the proceeds from their sale go to finance Russia's war against Ukraine, according to NYT.

Sudan. According to CNN, Russia smuggles gold out of Sudan disguised as cookies. Workers at the Khartoum International Airport in Sudan discovered that a Russian cargo plane that was supposed to be exporting cookies was actually loaded with boxes of gold. The valuable cargo was discovered a few days after the start of Russia's invasion of Ukraine. The February incident, which several Sudanese official sources told CNN, is one of at least 16 known smuggling flights of Russian gold from Sudan over the past year and a half.

Iran. The Russian Mir system is planned to be integrated with the Iranian Shetab payment system, Russian Foreign Minister Sergei Lavrov said at a press conference with Iranian Foreign Minister Hossein Amir Abdollahian.

South Korea. South Korea has signed a contract with a Russian state-owned company to supply components and build buildings for Egypt's first nuclear power plant. Seoul is pitching a \$2.5 bn contract as a success of its nuclear power technologies.

France. The French oil company Total Energies is suspected of supplying fuel for the needs of the Russian military to circumvent sanctions. In order to establish whether this is the case, the Minister of Transport of France, Clément Beaune, declared the need for an inspection and investigation, Reuters. It is noted that at the beginning of the war, Total Energies declared its intention to keep its assets in the Russian Federation, despite criticism. There are reasons to believe that the fuel purchased through Total Energies is used by the Russian Federation for the needs of Russian aviation.

Canada. Canada will return the remaining five Nord Stream turbines despite sanctions. The head of the Canadian Foreign Ministry, Melanie Joly, said that Ottawa intends to transfer to Germany the remaining turbines of the Russian gas turbine, which were on Canadian territory for maintenance.

Indonesia. On September 12, the Indonesian President said he is considering all options to curb soaring energy prices, with the country exploring the possibility of joining other Asian economies, including India and China, in buying Russian oil to offset a sharp rise in energy costs, reported FT.

North Korea. Russia buys weapons from North Korea, reported NYT on 5 September. According to U.S. Intelligence, the Russian Federation purchased more than a million artillery shells and missiles. This indicates a shortage of ammunition in the Russian Federation for waging an aggressive war, as well as the fact that Russia is no longer able to produce them on its own. Intelligence experts consider the latter to be a consequence of sanctions that continue to weaken Russia's economy.

Hong-Kong. Cut off from Western markets, Russian companies are turning to Hong Kong law firms for help in setting up business through Asia's leading business center. A number of big Russian companies, including SOEs, have turned to Hong Kong lawyers at local firm ONC Lawyers, told Bloomberg: they are looking to do business through "friendlier jurisdictions" than London and New York. Some would like to re-register some of their businesses in Hong Kong. According to three other interlocutors of Bloomberg, at least two other law firms have received requests from Russians and some are interested in raising capital in the Hong Kong market. Most of the requests so far are fairly simple, the sources said, citing a desire to enter into a loan agreement between Russian and Indian organizations.

Switzerland. Trader Glencore, Anglo-Swiss multinational commodity trading and mining company, has placed a significant amount of Russian aluminum produced by Rusal at London Metal Exchange (LME) registered warehouses in Gwangyang, South Korea - Reuters. The supply to LME warehouses underscores the difficulties facing Rusal, the world's biggest aluminum producer outside of China, as 2022 contracts expire and buyers shun Russian metal under 2023 contracts. Some aluminum buyers and end users in the transportation, construction and packaging industries do not want Rusal aluminum in their products. Junk metal, such as Rusal's aluminum, usually ends up in the LME system, "the market of last resort for consumers and producers."

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

<i>Members</i>	<i>EU</i>	<i>UK</i>	<i>USA</i>
Anton Siluanov (RF Minister of Finance) NAZK	Not covered	Not covered	
Denis Manturov (RF Minister of Industry and Trade) NAZK	Not covered	Not covered	Not covered
Alexei Kryvoruchko (RF Deputy Minister of Defence) NAZK	Not covered		
Yuriy Borisov (RF Deputy Prime Minister) NAZK	Not covered	Not covered	Not covered
Alexey Likhachev (Director General of Rosatom); NAZK	Not covered	Not covered	Not covered
Maksym Oreshkin (economic adviser to Putin) NAZK	Not covered		15.09.2022
Ihor Artem'ev (former head of the Federal Antimonopoly Service, assistant to the head of RF Gov) (Not in NAZK)	Not covered	Not covered	Not covered

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

The following are still not under sanctions:

- Ihor Zavyalov (deputy general director, member of the board) (US 28-06-22, Canada 19-08-22) [NAZK](#)
- Vladimir Artyakov (Deputy General Director) (US 28-06-22, Canada 19-08-22) [NAZK](#)
- Dmitry Lelikov (Deputy General Director) (US 28-06-22, Canada 19-08-22) [NAZK](#)
- Maksim Vybornykh (deputy general director) (US 28-06-22, Canada 19-08-22) [NAZK](#)
- Alexander Nazarov (Deputy General Director) (US 28-06-22, Canada 19-08-22) [NAZK](#)
- Nikolai Volobuev (managing director) (US 28-06-22, Canada 19-08-22) [NAZK](#)
- Oleg Yevtushenko (executive director) (US 28-06-22, Canada 19-08-22) [NAZK](#)
- Natalya Borisova (chief accountant, board member) (US 28-06-22, Canada 19-08-22). [NAZK](#)

The whole management team of Almaz-Antey, producer of the Kalibr missile, is still not sanctioned:

- Sergey Druzin [NAZK](#)
- Vitaly Kniazev [NAZK](#)
- Aleksandr Koval [NAZK](#)
- Arkadiy Nedashkovsky [NAZK](#)
- Rustam Ulumbekov [NAZK](#)
- Yan Novikov [NAZK](#) (Canada 19-08-2022)
- Pavel Sozinov [NAZK](#)
- Boris Belozerkivsky [NAZK](#)
- Alexander Vedrov [NAZK](#)
- Viacheslav Dzirkaln [NAZK](#)

Not-sanctioned companies. The corporation of Russia's richest oligarch, according to Forbes, Volodymyr Lisin, systematically cooperates with defence enterprises of the RF and is even involved in the production of nuclear weapons. The United States, the EU, and Ukraine have not imposed sanctions either against the corporation or against Lisin, according to the "Scheme" investigation. Only Australia introduced personal sanctions against Lisin.

According to analysis of the data of public purchases of the RF, the metallurgical group "Novolipetsk metallurgical plant" (NLMK) started working with the defence complex most fruitfully since 2014. The corporation supplied steel and products to the "Electromashina Scientific and Production Association" (manufactures the "Hunter" combat module), the "Mary Machine-Building Plant" (develops anti-aircraft systems), as well as to enterprises that help produce nuclear weapons - this is the "Russian Federal Nuclear the center is the All-Russian Research Institute of Technical Physics named after Academician Zababakhin" and "Sever Production Association".

"NLMK" has subsidiaries in Europe and the USA, as well as enterprises in Denmark, Belgium, Italy and France. The German publication Wirtschaftswoche writes that all these enterprises help to circumvent the ban on importing Russian steel into the EU.

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 + G7 agreed to introduce a price cap on Russian oil – from Dec 2022 for oil, and from Feb 2023 - for refined products.), **EU** (ban of seaborne crude oil and certain petroleum products from RF, pipeline oil supplied is temporarily excluded (on 3 Aug, the European Commission issued a Notice clarifying that ban covers Russian oil mixed with oil of other origin) + ban on import of RF coal came into force on August 1 + EU considers two scenarios on gas price cap – the first “would involve a price cap on imported gas from Russia”, while the 2nd would see the creation of administrative pricing zones for the most severely affected EU countries + European Commission proposed to limit the price of Russian gas by setting it at 50 euros/MWh + EC considers introducing rule, under which any Member State facing an emergency will receive gas from others in exchange for fair compensation + under 8th sanction laid the basis for the required legal framework to implement the oil price cap), **Switzerland** (ban on RF crude oil and petroleum products), **Poland** (refused from RF gas in response to RF cut off, terminated the agreement on the supply of Russian gas), **Bulgaria** (RF cut off gas supplies due to refusal to pay in rubles), **Lithuania** (completely cut import of Russian energy, incl. electricity, ban on transit of RF gas to Kaliningrad region), **Latvia** (ban on natural gas supplies from RF from Jan 1, 2023, **Latvijas Gaze resumed purchase of Russian gas via an unnamed intermediate entity**), **Estonia** (ban on import and purchase of natural gas from Russia as well as providing associated transmission services from 31 December 2022 + ban on the purchase, import and transfer of petroleum oils from Russia from Dec 5 (comes into force prior EU ban), **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 + adopted legal basis for future price cap on Russian oil). **UK** (ban on import of RF oil and oil products from 31 Dec, ban on import of RF coal came into force on August 10 + ban on import of LNG from Russia from 1 Jan, 23). **Germany** (transferred the assets of the German “daughters” of Rosneft to the external management of the Federal Network Agency BNetzA). **New Zealand** (prohibition of the import of energy products of Russian origin (coal, oil, or gas products) into New Zealand; ban of the export of oil exploration and oil production products to Russia) - comes into force 4 Nov)

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.

G7 agreed to introduce a price cap on Russian oil – from December 2022 for oil, and from February 2023 - for refined products. Discussion on the level of price cap is still not finished.

According to the US Department of Treasury, G7's plan to introduce a price cap on oil exported by Russia will allow 50 developing countries to save \$160bn a year (reported by FT).

On September 9, following the G7's announcement of its joint intention to implement a ban on services which enable maritime transportation of Russian-origin crude oil and petroleum products (unless purchased at or below the ‘price cap’), the US Treasury has published Preliminary Guidance on its upcoming domestic ban to this effect.

The Preliminary Guidance says that:

- OFAC anticipates issuing a determination pursuant to Executive Order 14071 which will ban the export, reexport, sale or supply (directly or indirectly) from the US / by a US person of services related to the maritime transportation of seaborne Russian oil, if the oil is purchased above the price cap, with an exception for the purchase of seaborne oil at or below the price cap.
- OFAC anticipates publishing guidance on services subject to the maritime services policy.
- Countries that agree to implement the maritime services ban and price exception and those that commit to implementing a price cap on imports will be able to participate directly in the coalition's consultative process that will determine the price cap.
- The prohibition on the import of Russian-original oil and petroleum into the US pursuant to Executive Order 14066 will not be affected by the new policy.
- The price exception will rely on a recordkeeping and attestation process that allows each party in the supply chain to demonstrate / confirm that oil has been purchased at or below the price cap. The process is designed to create a “safe harbour” of liability for service providers who inadvertently deal in the purchase of seaborne Russian oil above the price cap due to falsified records provided by those who act in bad faith and make material misrepresentations.

Red flags for price cap evasion include evidence of deceptive shipping practices, refusal or reluctance to provide requested price information and unusually favourable payment terms, inflated costs or insistence on using circuitous or opaque payment mechanisms.

EU. The EU leaders agreed in principle on the 6th sanctions package including the ban of seaborne oil from RF. Although the pipeline oil supplied is temporarily excluded from the ban, Germany and Poland supplied via the northern route of Druzhba pipeline committed to phase out Russian oil by the end of 2022. Thus, only landlocked Czech Republic, Hungary and Slovakia will continue

buying Russian oil via southern Druzhba route with a capacity 0.25 mb/d after 2022 which accounts for about 8% of Russian oil supply to the EU in 2021.

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

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

On 1 August, the EU embargo on import of coal from RF came into force. Sanction itself was introduced under the 5th EU sanction package (April 8). As reported, Previously, the EU annually imported Russian coal worth 8 bn euros. The export of Russian coal by sea has actually stopped – Bloomberg. The EU sanctions, which came into effect on August 10, prohibit EU operators from insuring coal supplies, preventing them from being diverted to China and India.

On 3 August, the European Commission issued a Notice to operators concerning the import ban on Russian crude oil and petroleum products imposed by article 3m of Council Regulation 833/2014.

The Notice says that:

- The ban covers Russian oil mixed with oil of other origin, unless the exact share of the non-Russian-origin oil can be clearly demonstrated to the Member State authorities. In this case, the exact portion of oil not originating in Russia can be allowed into the EU and remaining part of the shipment will be refused entry;
- Where Russian crude oil content is identified but it is not possible to determine the exact share of non-Russian oil, the whole shipment will be prevented from entering the EU;
- Economic operators involved in imports of crude oil and / or petroleum products are advised to take all necessary due diligence measures to ensure that no Russian sanctioned crude oil is imported, even if blended with a majority content of a third country-origin oil. Proof may be shown through the origin of a ship or chemical analysis. Importers are advised to write in the purchase contract a clause according to which the exporter confirms that the oil does not contain any Russian oil and that the exporter would be contractually responsible for any misdeclaration.
- Imports of oil will be subject to controls, including documentary checks and as appropriate and if available chemical analysis;
- The customs authorities of the EU's Member States have been advised to take all necessary measures and to exercise particular diligence in order to mitigate the risk of circumvention of the Russian import sanctions on crude oil through the blending with oil originating in third countries;
- Although importers are those primarily responsible for complying with the oil related sanctions, all actors involved in oil imports into the EU – including carriers, insurers and financial institutions opening credit lines or issuing letters of credit – are advised to exercise due diligence.

According to [Euractiv](#), intensive discussion on the price cap on gas takes place in the EU now. As reported, the EU is considering two scenarios – the first "would involve a price cap on imported gas from Russia", while the second would see the creation of administrative pricing zones for the most severely affected EU countries. It is expected that the respective paper will be discussed at a seminar among EU-27 representatives on September 7 and further debated by the bloc's energy ministers at an extraordinary meeting on September 9.

The European Commission proposed to limit the price of Russian gas by setting it at 50 euros/MWh, writes Politico (September 7). Also Politico writes that France supported the establishment of a pan-European price limit for gas supplies from Russia and a tax on surplus profits from energy resources.

EC proposed to beef up its solidarity rules, so that any Member State facing an emergency will receive gas from others in exchange for fair compensation (reported by the Guardian). The measures will next go to leaders for discussion at the EU Council later (during 19-22 October). Ursula von der Leyen says these new steps would improve stability on European gas markets this winter and beyond.

On October 6, the EU adopted the 8th sanction package, which lays the basis for the required legal framework to implement the oil price cap envisaged by the G7. While the EU's ban on importing Russian seaborne crude oil fully remains, the price cap, once implemented, would allow European operators to undertake and support the transport of Russian oil to third countries, provided its price remains under a pre-set "cap". This measure is being closely coordinated with G7 partners. It would take effect after 5 December 2022 for crude and 5 February 2023 for refined petroleum products, after a further decision by the Council.

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

As Reuters reported on Oct 26, the US and Western officials are finalising the details on price cap for Russian oil. Despite there is no final decision on the level, one person familiar with the process said the cap will be determined in line with the historical avg of \$63-64 a barrel.

USA. On 31 October, OFAC published FAQ 1094 concerning the upcoming price cap on Russian oil. According to OFAC:

- Russian-origin crude oil that is loaded onto a vessel at the port of loading for maritime transport before 12:01am (EST) on 5 December 2022 is not subject to the price cap, provided that the oil is unloaded at the port of destination before 12:01am (EST) on 19 January 2023.
- US service providers may continue to provide services related to the maritime transport of Russian-origin crude oil purchased at a price above the price cap where the above temporal conditions are met.

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

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

For the first time, Britain did not import fuel from Russia, — Sky News. Imports of goods also fell to 33 million pounds in June, the lowest level since January 1997, according to the Office for National Statistics.

On October 28, UK introduced prohibition of the import of LNG, which is consigned from or originates in Russia, and the acquisition of LNG (as well as related technical assistance, financial services and funds, and brokering services), which originates or is located in Russia, with the intention of the LNG entering the UK. This restriction will come into force on 1 January 2023.

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. **Bulgaria announced the inevitability of negotiations on the restoration of Russian gas supplies, — Reuters. Bulgaria's interim energy minister did not say when negotiations with the Russian company would begin, but said they would be needed to secure cheaper gas for Bulgaria.**

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.

Gazprom threatened again Moldova to stop gas supplies due to regularly violating the payment deadlines during 2022. If the Moldovan party does not pay for gas until Oct 20, 2022, Gazprom reserves the right to completely cut off gas supplies.

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

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

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

The Seimas of Lithuania officially banned by law the import of Russian natural gas, transit to the Kaliningrad region. The Seimas adopted the relevant amendments to the Law on Natural Gas. According to them, only suppliers from countries that do not pose

a threat to national security will be able to use the gas transmission system of the country and the LNG terminal of Klaipėdos Nafta, except for suppliers transporting gas in transit to Kaliningrad.

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

The gas company of Latvia Latvijas Gaze resumed the purchase of Russian gas. The head of the company said that gas is purchased not from Gazprom, but from an intermediary and for euros.

Estonia. On 29 September, the Estonian GoV took a decision to impose a legally binding national sanction that banned the importing and buying of natural gas (CN code 2711 21 00) from Russia as well as providing associated transmission services. The ban also applies to importing and buying liquefied natural gas (CN code 2711 11 00) with the aim of entering it into the transmission and distribution systems. No other restrictions apply to the purchase and import of liquefied gas. The regulation applies to all legal entities in the territory of the Republic of Estonia and to legal entities registered in the Republic of Estonia outside the territory of the Republic of Estonia. The ban enters into force on 31 December, 2022.

Also, Estonia plans to stop the transit of Russian oil early. EU oil sanctions allowed companies a transition period until February 5, 2023, but the Estonian authorities want to adopt a resolution on October 27 and stop oil business with Russia from December 5 - Delfi.

On 28 October, the Estonian government established a ban on the purchase, import and transfer of goods with commodity code 2710 (Petroleum oils and oils obtained from bituminous minerals, other than crude; preparations not elsewhere specified or included, containing by weight 70 % or more of petroleum oils or of oils obtained from bituminous minerals, these oils being the basic constituents of the preparations; waste oils) originating in Russia ahead of schedule. It is also prohibited to offer technical assistance, intermediary services, financing or financial assistance and other services related to said goods. The ban will come into force on 5 December, before the end of the transition period established by the EU, and will be valid until 4 February 2023. It will completely stop the transit of Russian oil and petroleum products to the country. According to the current EU sanctions, crude oils produced from bituminous minerals can be imported until 5 December 2022 and other petroleum oils - until 5 February 2023. These decisions are valid if the entrepreneurs signed the contract before 4 June.

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.

On 28 October, Norway introduced a legal basis for the implementation of a possible future price cap on Russian oil.

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

Serbia. Starting from November, Serbia will not import Russian oil due to EU sanctions - Telegraf with reference to Serbian President Vučić.

Hungary has agreed with Gazprom to supply another 5.7 mln m³ of gas per day from September 1 through the Turkish Stream, the head of the Hungarian Foreign Ministry said.

The Hungarian Minister of Foreign Affairs stated that the European Commission's plan to limit the price of Russian gas contradicts the interests of Europe and Hungary, reported Reuters on September 9.

Turkey. Erdogan demanded a 25% reduction in the price of Russian gas, Bloomberg. Erdogan was to announce his proposal at talks with Russian President Putin on September 16. Also according to Bloomberg sources, Erdogan intends to seek payment for gas supplies in Turkish lira instead of traditional hard currencies. Also on September 22, Turkish President Erdogan in New York stated his desire to buy gas from the US on more favorable terms and leave it in the countries of the region.

Germany. On 14 September, the federal government placed Rosneft Deutschland GmbH (RDG) and RN Refining & Marketing GmbH on the basis of the Energy Security Act (RNRM) under the trusteeship of the Federal Network Agency. The Federal Network Agency thus takes control of Rosneft Germany and thus also of the respective shares in 3 refineries PCK Schwedt, MiRo (Karlsruhe) and Bayernoil (Vohburg). The reason for the order of the trustee administration is that the continuation of the business

operations of the affected refineries was in danger due to the ownership of the companies. The trustee administration counteracts the impending threat to the security of the energy supply and lays an essential foundation for the preservation and future of the Schwedt location. As a result of the arrangement, the exercise of the voting rights of the shareholders is excluded and their power of disposal and management is limited. The Federal Network Agency is used as a trustee, and the voting rights from the shares are transferred to it.

The trust administration was ordered by the Federal Ministry of Economics and Climate Protection. It became effective on September 16, 2022 and is initially limited to 6 months. RDG and RNRM have to bear the costs of the trust.

India. India says it is ready to give up Russian oil and buy Iranian one. As Economic Times reported on September 6, India is ready to consider joining the price ceiling on Russian oil if supplies from alternative countries - Iran or Venezuela - are secured.

France. French energy giant TotalEnergies will continue to supply LNG from Russia until EU sanctions are imposed. This was stated by the company's CEO on Oct 5th.

Russia. After expositions on both NS-1 and NS-2 on Sep 26, Russia announced on Oct 5, that it is ready to supply gas through the surviving string of NS-2. Gazprom believes that it would be too difficult to restore Nord Stream and it would be easier to build a new pipeline. Gazprom also complained that Germany didn't ask for the restoration of the blown threads.

Italy. Also, Gazprom suspended natural gas deliveries to Italy. Gazprom supplies Italy with gas through a pipeline that passes through Austria. The cutoff appeared to target just Italy, with Austria continuing to receive gas. Higher volumes of Russian gas were allocated to OMV than had been recently, said Andreas Rinofner, a spokesman for OMV, which imports Russian gas to Austria. Gazprom released a statement saying it had suspended gas flows through Austria to Italy because the Austrian operator had refused to confirm "transport nominations" after regulatory changes implemented in Austria in late September. Gazprom said it is working to resolve the issue with Italian buyers. Eni also said it was reaching out to Gazprom to resolve the issue.

New Zealand. On 11 October, New Zealand implemented a range of trade measures, that will enter into force 4 November, including:

- prohibition of the import of energy products of Russian origin (coal, oil, or gas products) into New Zealand;
- ban of the export of oil exploration and oil production products to 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 + **extended existing port access ban + allowed the exchange of information within the framework of the ICAO** + tightened restrictions on Russian fishing vessels (allowed access to only 3 Norwegian ports, where vessels will be inspected by customs officers to avoid illegal transport of goods to Russia) + extended the port ban to apply to vessels certified by the Russian Maritime Ship Register), **Canada** (1 manufacturer of gas turbine engines), **UK** (+3 airlines + extension of transport restrictions for Belarus, as well as, closed UK port for Belarus-related ships + **allowed necessary technical assistance for temporarily detained aircraft** + prohibited insurance relating to import of RF oil and oil products into the UK after 31 Dec 2022 (**legislation does not ban the provision of services to shipments from Russia to other countries**) + adopted amendment to the General Trade Licence that enabled the provision of insurance and reinsurance to individuals who are resident in Russia or are located in Russia as well as entities which are incorporated or constituted under the law of Russia or domiciled in Russia in relation to sea vessels and aircraft, their component parts, as well as aero gas turbine engines), **EU** (prohibited insurance and reinsurance of maritime transport of oil and oil products to 3rd countries with a wind down period of 6 months until 5 Dec for contracts signed before 4 Jun 2022 + extended existing port access ban + allowed the exchange of information within the framework of the ICAO + prohibition on provision of maritime transport, inc. through ship-to-ship transfers, technical assistance, brokering services or financing or financial assistance, related to the maritime transport to 3rd countries of crude oil (as of 5 Dec 2022) or petroleum products (as of 5 Feb 2023) which originate /exported from RF, or which have been exported from RF to 3rd countries (purchases at or below a pre-established price cap were allowed) + ban on Russian-flagged vessels accessing EU ports and locks now also applies to vessels certified by the Russian Maritime Register of Shipping)), **EU+UK** (**agreed co-ordinated ban on insuring ships carrying Russian oil, a plan to shut Moscow out of the vital Lloyd's of London maritime insurance market is delayed in EU, UK have not adopted agreed restrictions**), **Lithuania** (applied transit restrictions on goods subject to EU sanctions between the main part of Russia and the Kaliningrad region), **EU + Lithuania** (**EU released guidance for transportation from RF to Kaliningrad – road transit is not allowed, railway – allowed in volumes compared to pre invasion deliveries, transportation of sanctioned military and dual-use goods and related technologies are entirely prohibited, regardless of the mode of transport**), **Switzerland** (ban on supporting services, including insurance or reinsurance, for transportation of RF oil and certain petroleum products to any destination + **allowed the exchange of information within the framework of the ICAO**), **Kazakhstan** (detained Russian trucks carrying goods from the EU - authorities began to demand from Russian drivers permits for cargoes that had been issued not to a domestic, but to a previous carrier - a company from the EU).

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).

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

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

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

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

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

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

On 21 July, UK prohibited the provision of technical assistance, financial services and funds (including provision of insurance), brokering services relating to import, acquisition, supply or delivery into the UK after 31 December 2022 of oil and oil products which originate in, or consigned from Russia. **The legislation does not ban the provision of services to shipments from Russia to other countries.**

On 1 August, the Export Control Joint Unit of the Department for International Trade revised the "General Trade Licence: Russia Sanctions - Vessels" to remove Regulation 28 (financial services and funds related to restricted goods and restricted technology) from paragraph 1(h). This enables the provision of insurance and reinsurance to a person connected with Russia (individuals who are resident in Russia or are located in Russia as well as entities which are incorporated or constituted under the law of Russia or domiciled in Russia) in relation to the sea vessels and aircraft, their component parts, as well as aero gas turbine engines.

EU. On 3 June, the 6th package imposed a prohibition to provide, directly or indirectly, technical assistance, brokering services or financing or financial assistance (including insurance and reinsurance), related to the transport, including through ship-to-ship transfers, to third countries of crude oil or petroleum products. 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.

However, on July 31, FT reported³ that the EU was delaying a plan to shut Moscow out of the vital Lloyd's of London maritime insurance market and allowing some international shipments amid fears of rising crude prices and tighter global energy supplies. The EU announced a worldwide ban on the provision of maritime insurance to vessels carrying Russian oil two months ago,

³ <https://www.ft.com/content/333f7447-aed8-40d2-87e9-f8d289162707>

expecting co-ordinated action with the British government. However, the UK is yet to introduce similar restrictions. UK participation is pivotal to the effectiveness of any such ban because London is at the centre of the marine insurance industry.

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

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

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

On October 6, the EU adopted 8th sanction package, that included:

- Prohibition on the provision of maritime transport, including through ship-to-ship transfers, and technical assistance, brokering services or financing or financial assistance, related to the maritime transport to third countries of crude oil (as of 5 December 2022) or petroleum products (as of 5 Feb 2023) which originate in or are exported from Russia, or which have been exported from Russia, to third countries. This prohibition only enters into force once the first Council decision relating to the G7-led oil price cap is adopted.
- Introduction of an exemption from the prohibition on the maritime transport by vessel to third countries of crude oil or petroleum products which originate in or are exported from Russia, and on the provision of technical assistance, brokering services or financing or financial assistance related to these products, where they have been **purchased at or below a pre-established price cap** set by the Price Cap Setting Body of the G7+ Price Cap Coalition.
- **Ban on Russian-flagged vessels accessing EU ports and locks** now also applies to vessels certified by the Russian Maritime Register of Shipping.

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

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

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

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

On 31 August, Switzerland introduced an exemption to the existing prohibition on the export of goods suitable for use in the aerospace industry allowing the exchange of information for the purpose of establishing technical standards within the International Civil Aviation Organization.

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.

On 26 August, Norway extended the existing port access ban on mainland Norway to vessels registered under the Russian flag to include locks (after 3 September 2022), except for access to locks with the intention of leaving Norwegian territory.

On 26 August, Norway introduced clarifications to the existing prohibition on the export of goods for use in the aviation or space industry. Norway allows the exchange of information that will contribute to the creation of technical standards within the framework of the International Civil Aviation Organization with regard to aviation or space goods and technology.

On 6 October, Norway GoV tightened restrictions on Russian fishing vessels. Norway manages a number of fish stocks together with Russia, and it is particularly important to ensure sustainable management of the world's largest cod stock. For this reason, certain exemptions to the ban on port access have been granted for Russian fishing vessels. Now, however, the Government decided that all Russian fishing vessels over 500 gross tonnage that are exempt from the ban on port access will only be allowed access to only three Norwegian ports of Tromsø, Kirkenes and Båtsfjord. There all Russian vessels will be inspected by customs officers to ensure that Norway is not used as a transit country for the illegal transport of goods to Russia. The tighter restrictions on Russian fishing vessels will enter into force on 14 October.

On 28 October, Norway extended the port ban to apply to vessels certified by the Russian Maritime Ship Register. The exception for fishing vessels calling at Tromsø, Kirkenes or Båtsfjord will continue.

Kazakhstan. Russian trucks carrying goods from the EU began to be detained in Kazakhstan. The Kazakhstani authorities began to demand from Russian drivers permits for cargoes that had been issued not to a domestic, but to a previous carrier - a company from the EU. The Association of International Automobile Carriers reported that so far there had been eight cases of detention of Russian carriers' trains. According to RF Mintransport, such delays may in future lead to the cessation of parallel imports of goods to Russian from Kazakhstan.

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** + 70 (SDN List) + 45 RF entities in aerospace, defence and related materiel sector, financial services or technology sectors (sanction lists mostly consist from major RF SOEs and their subsidiaries) + asset freeze on Heritage Trust + ban on import of gold from RF + **2 Kazakh subsidiaries of Alfa-Bank were bought by Kazakhstan bank and excluded from SDN list + issued General License authorizing transactions through Dec 16, 2022 involving Gazprom Germania GmbH** + 9 entities (inc. 1 SOE) + 26 entities & 4 subsidiaries (inc. 12 SOEs) in leasing, defense and high-technology sectors to SDN list + **issued General License No. 45 authorising until 20 October 2022 certain transactions (purchase by U.S. persons of debt or equity issued by an entity in RF; facilitating, clearing, and settling of a purchase by U.S. persons of debt or equity issued by an entity in RF), necessary to the wind down of financial contracts or other agreements that were entered into on or before 6 June 2022)**, sanctions against any individual or entity that operate or have operated in the quantum computing sector of Russian economy, sanctions on 33 entities, including Main Intelligence Directorate, 3 leading Russian military space entities that play central roles in strengthening Russia's defence capabilities, 13 entities operating in the technology sector of Russian economy, 14 entities operating in the electronics sector of Russian economy, sanctions on 4 Iran-based entities said to be involved in the production and transport of unmanned aerial vehicles (UAVs) to RF. USA added 5 cryptocurrency addresses connected to the Russian neo-Nazi paramilitary group to its sanctions blacklist + 10 Russian entities, inc. Federation Council of the Federal Assembly of Russia and 1 Belarusian entities + ban on the exchange of SDRs of Russia and Belarus + designated 2 entities that procured military and sensitive dual-use technologies from U.S. manufacturers and supplied them to Russian end-users (Nord-Deutsche Industrieanlagenbau GmbH (NDA GmbH) and Opus Energy Trading LLC (Opus Energy Trading)). **UK** (10 defense companies asset freeze + asset freeze for Evraz plc + ban export of banknotes denominated in sterling or any official currency of the EU, +5 RF entities + **announced ban on trusts services** + asset freeze on RF analytical centre + extended existing restrictions on Belarus on dealing with financial instruments and providing loans to a broader range of transferable securities, money market instruments, loans and credit + prohibited transactions related to the management of reserves as well as of assets of CB Belarus and Belarus MinFin + financial sanctions reporting obligations were extended to include crypto asset exchange providers and custodian wallet providers + ban on RF gold and ancillary services, exported from RF after Jul 21, **but gold exported from RF before 21 July 2022 is not in scope** + prohibited investment activities in respect of land located in RF, persons connected with RF, relevant entities, joint ventures, opening a representative office or establishing a branch or subsidiary located in RF, + 3 entities in response to the "sham referendums" + asset freeze Shahed Aviation Industries (Iran) + prohibition on making loans or credits with a maturity of more than 30 days to persons, other than an individual, connected with Russia or persons owned, directly or indirectly, by a person connected with Russia), **Poland** (+ 37 entities on top of EU lists + asset freeze and ban on access to financial funds and economic assets for Gazprom Export + entity, that operates in the field of cashless settlements and payments in the fuel industry), **Switzerland** (ban on trusts registering by Russians + de-SWIFT 3 RF and 1 Belarus banks + sanctioned 18 RF and 8 Belarus entities connected with Armed Forces of Russian and GoV + ban on audit, business and pr consultancy services + asset freeze for 9 entities, inc. 5 SOEs + asset freeze on Sberbank + ban on import of Russian gold, including jewellery, after August 4 + ban on services of any kind, including financial services, brokering and technical assistance + extended the scope of the ban on accepting deposits + temporarily suspended the exchange of tax information with Russia + 7 entities, inc. Central Election Commission of Russia and Goznak + asset freeze Shahed Aviation Industries (Iran)), **New Zealand** (asset freeze and dealing with securities ban) against the CBR, the Russian

Direct Investment Fund (RDIF) plus against 8 largest and 8 other banks linked to oligarchs (8 SOEs), + 4 in defense (1 RF SOE and 1 Belarus SOE) and 2 in shipbuilding (1 RF SOE) + sanctions on 44 entities (38 RF and 6 Belarus) that are funding or fuelling the war, including 32 RF SOEs and 3 Belarus SOEs + banned import of Russian gold from July 25 + sanctioned all associates of 3 defence entities (already sanctioned): Russian Helicopters, Tactical Missiles Corporation, United Shipbuilding Corporation + 61 entities that support the Russian military (inc. 42 SOEs) + 1 collaborationist authority in Kherson + sanctions on Evraz and its subsidiaries, Goznak and 1 more entity + 7 entities (inc. 3 disinformation outlets)), **Canada** (5 defense and machine building companies + asset freeze and dealing prohibition on 4 RF financial institutions and banks + 46 RF defence entities, + 2 Belarus entities + import ban on RF gold after Aug 6 +17 entities in defence sector directly or indirectly supporting the Russian military (inc. 10 SOEs + 1 defence sector entity + sanctions Salvation Committee for Peace and Order (so-called government body in Kherson) + 1 channels of Russian propaganda +6 entities in energy sector), **EU** (de-SWIFT 3 RF banks + 1 Belarus ; restrictive measures for 18 entities that support RF military and security; restrictive measures for 8 entities in Belarus + ban on RF gold and gold jewelries, exported from RF after July 22 + prohibition on accepting deposits was extended to include those from legal persons, entities or bodies established in 3rd countries and majority-owned by Russian nationals or natural persons residing in Russia + 9 entities (inc. 7 SOEs + entering into any transactions with RF public entities necessary to ensure access to judicial, administrative or arbitral proceedings was allowed (further investigation of exemption is nees + 7 entities, inc. Central Election Commission of Russia and Goznak + asset freeze Shahed Aviation Industries (Iran) + full ban of the provision of crypto-asset wallet, account or custody services to Russians + transaction ban for Russian Maritime Shipping Register). **Japan** (asset freeze 2 RF and 1 Belarus banks + asset freeze for 6 RF entities + Japan MinFin imposed an embargo on the purchase of Russian gold on July 5, comes into force on 1 Aug, 2022 + 9 entities, inc. Rostec and Kalashnikov Concern). **Norway** (de-SWIFT 3 RF banks; restrictive measures for 18 entities that support RF military and security + sanctioned 10 entities, inc. Sberbank, ban on gold and jewellery from August 27, strengthened reporting obligations, expanded the scope of prohibition on accepting deposits, allowed entering into transactions with Russian entities to ensure access to legal, administrative or arbitration matters + 7 entities + additional restrictions on providing services for crypto assets to Russian citizens and entities), **Australia** (again announced ban import of Russian gold on Aug 15, previously such ban was announced on Jul 4 + ban on import of gold from Russia after 30 Sep).

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 GoV⁴.

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

On 3 June, the EU Council imposed restrictive measures (freeze of funds or economic resources and prohibition on the making available of certain funds or economic resources) on 8 legal entities (including 3 SOE) involved in the continuation of internal repression and human rights violations in Belarus⁵.

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

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

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

On 21 July, the Council listed additional 9 entities (inc. 7 SOEs), including AVLITA Stevedoring Company, the nationalist motorcycle club Nightwolves MC, the Alexander Gorchakov Public Diplomacy Fund (SOE), the Federal Agency for the

⁴ (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 KRONSTADT TEKHNologii 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.

⁵ OJSC "Belaruskall" (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).

Commonwealth of Independent States Affairs (SOE), Compatriots Living Abroad and International Humanitarian Cooperation (Rossotrudnichestvo) (SOE), Russkiy Mir Foundation (SOE), JSC Research and Production Association "Kvant" (SOE), Sberbank (SOE), FORSS Group of Companies, All-Russia "Young Army" Military Patriotic Social Movement (SOE).

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

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

On 6 October (8th package), EC imposed sanctions on 7 entities:

- **1 State body of Russia** - Central Election Commission of Russia;

- **1 finance SOE** – JSC Goznak (Russian SOE responsible for the manufacturing of security products including banknotes, coins, stamps, identity cards, secure documents, state orders and medals; responsible for printing all Russian passports);

- **5 entities operate in the Russian defence and related material sector** - OJSC V.A. Degtyarev Plant (defence company which provides weapons to the Russian Armed Forces); MKB "Fakel" named after P.D. Grushin (Russian defence company which designed the S-300, S-400 and TOR missile systems); JSC Irkut Corporation (Russian aircraft manufacturer which provides fighter aircraft to the Russian Armed Forces); MMZ Avangard (Russian defence contractor, which provides weapons to the Russian Armed Forces); JSC A.N. Ganichev Scientific and Production Association "SPLAV" (Russian weapons manufacturer, which provides weapons to the Russian Armed Forces).

Also, under 8th package, the EU introduced:

- A full ban of the provision of crypto-asset wallet, account or custody services to Russian persons and residents, entities, regardless of the total value of those crypto-assets. Previously such services were allowed if the total value of crypto-assets did not exceed €10,000.

The effect of such a sanction was almost immediate. As it was reported by Russian media, Canadian crypto-exchange NFT Dapper Labs announced the suspension of work with Russian clients immediately after the sanctions came into force on Oct 6. The next day the Cryptopay platform acted the same. Another two days later, popular among Russians Finnish crypto-exchange Localbitcoins asked users from Russia to withdraw "all bitcoins in one transaction". Otherwise, they will lose access to the wallets. Also, project Blockchain.com is going to block wallets belonging to users from Russia: since October 28, all accounts of Russians will be closed. The cryptocurrency exchange advised Russian citizens to withdraw funds "as soon as possible)"

- The addition of the Russian Maritime Shipping Register, a 100% SOE which performs activities related to the classification and inspection, including in the field of security, of Russian and non-Russian ships and crafts, to list of SOEs that are subject to the transaction ban.

In addition, the recognition of the Russian Maritime Register of Shipping under rules and standards for ship inspection and survey investigation, as well as technical requirements for inland waterway vessels, is withdrawn.

New exemptions allow: the execution until January 8, 2023, of contracts concluded with the Russian Maritime Shipping Register before 7 October 2022; the reception of payments due from the Russian Maritime Shipping Register pursuant to contracts performed before 8 January 2023.

On 20 October, the EU imposed asset freeze sanctions against Shahed Aviation Industries for their role in the development and supply of Unmanned Aerial Vehicles (UAVs) used by Russia in its aggression against Ukraine.

USA. The US OFAC designated PJSC 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 subsidiaries⁶.

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 25 May. USA announced not to renew the provisions of General License 9C (transactions in debt or equity of Bank Otkritie, Sovcombank, Sberbank,

⁶ Agropromyshlenny Kompleks Voronezhskii OOO, Anninskii Elevator OOO, Auditkonsalt OOO, Belinveststroi OOO, Dve Stolitsy OOO, Kontrakt OOO, Ladoga OOO, Nekommercheskaya Organizatsiya Fond Khimicheskoe Razozhuzhenie I Konversiya, Azovskaya Zernovaya Kompaniya OOO, Eksploatiruyushchaya Kompaniya Tsentr OOO

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

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

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

On June 28, 2022, OFAC added 70 entities to the SDN List, with a focus on Russia's aerospace, defence and related materiel sector, financial services or technology sectors. The designations target major state-owned defense companies, defense research organizations, and military operations in Ukraine implicated in international human rights violations.

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

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

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

OFAC also designated:

- **Kamaz Publicly Traded Company** (Russia's largest truck manufacturer) and its subsidiaries and affiliated entities - **AO Torgovo-finansovaya kompaniya Kamaz** (new and used car dealer engaged in the wholesale and retail sale of vehicle parts, supplies, and equipment), **Begishevo airport JSC** (airport in Republic of Tatarstan), **JSC Krasnodarskiy avtotsentr Kamaz** (official dealer with the authority to sell Kamaz vehicles as well as Nefaz buses), **Leasing company Kamaz Incorporated** (specializes in selling Kamaz vehicles), **MIKAM Holdings Limited** (investment holding company registered in Cyprus), **NEFAZ Publicly traded company** (manufactures buses, trailers, and other largest vehicles for Kamaz), **Non-state pension fund First Industrial Alliance** (pension fund provider), **PJSC Tutaev motor plant** (manufactures internal combustion engines), **Chelnyvodokanal OOO** (operates the on-site water supply facilities of Kamaz).
- several Russian companies in the information-security sector, including **JSC Concern Avtomatika**, and **JSC Information Security Reform**;
- **Advanced Research Foundation (FPI)**, defense research organization;
- **EMC SUD Limited** (legal entity registered in Hong Kong used by KOKOREV, Alexander Aleksandrovich as part of his network and for procurement for or on behalf of the FSB).
- **Zalog OOO, LLC PFMK and LLC Alfa-Invest** (linked to General Director of Kamaz PJSC KOGOGIN Sergei Anatolyevich).

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

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

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

- three Russian Federation military units, the **76th Guards Air Assault Division** and its subordinate **234th Guards Airborne Assault Regiment**, as well as the **64th Separate Motorized Rifle Brigade**, and Russia's **Federal Security Service (FSB)** for violations of international humanitarian law;
- the Uzbekistan-based **Promkomplektlogistic Private Company**, which has actively supported Radioavtomatika in its effort to evade U.S. sanctions. **Promkomplektlogistic Private Company**'s conduct has included providing electronic components such as microcircuits to Radioavtomatika. Additionally, **Promkomplektlogistic Private Company** is being concurrently added to the Department of Commerce's Entity List;

- 40 entities that operate in the defence and related materiel sector of the Russian economy - **JSC Ryazan State Instrument Making Enterprise** (develops and produces airborne avionics for Russia's combat aircraft), **JSC Production Association Strela** (involved in developing and producing missiles for Russia's Ministry of Defense), **JSC Corporation Moscow Institute of Heat Technology** (develops missiles for Russia's Ministry of Defense), **JSC Ramensky Instrument Engineering Plant** (produces navigation systems and other equipment for the Russian military's fighter aircraft and armed unmanned aerial vehicles), **Krylov State Scientific Center Federal State Unitary Enterprise** (shipping research center that conducts R&D on naval shipping topics, including naval weapons, submarines, and other military naval products), **JSC Shipbuilding Corporation Ak Bars** (shipbuilding entity that undertakes activities for Russia's State Defense Order, including producing missile corvette vessels for Russia's Navy), **JSC Research and Production Enterprise Radar MMS** (involved in developing targeting complexes for Russia's Ministry of Defense combat aircraft), **JSC Research Institute Polyus of M.F. Stelmakh** (carries out Russia's State Defense Order, including by making laser systems for Russia's military and developing other military devices), **JSC Obninsk Research and Production Enterprise Tekhnologiya named after A. G. Romashin** (carries out Russia's State Defense Order, including by producing items for the Russian Federation military's fighter aircraft), **JSC Permskiy Zavod Mashinostroitel** (develops and produces missiles for Russia's military), **JSC Machine-Building Engineering Office Fakel Named After Akademika P. D. Grushina** (develops and manufactures missiles for the Russian Federation military's air defense systems), **JSC North Western Regional Center of Almaz Antey Concern Obukhovskiy Plant** (designs and manufactures weapons systems and military equipment and is involved in producing Russia's S-400 air defense missile system), **JSC Radiozavod** (manufacturers control systems for Russia's Ministry of Defense, including for weapon systems), **JSC Arzamassky Priborostroitelny Zavod Imeni Plandina** (manufacturers "special purpose products" and instruments for aircraft), **JSC All Russian Research Institute of Radio Engineering** (carries out tasks for the Russian State Defense Order, including regarding research related to radars, missiles, and other weapons), **Moscow Institute of Electromechanics and Automatics JSC** (conducts avionics R&D for Russia's military airplanes), **LLC Nauchno-Proizvodstvennoye Obyedineniye Radiovolna** (designs and manufactures radomes for Russia's defense applications), **Kizlyar Electromechanical Plant JSC** (manufacturers defense products, including a helicopter for Russia's Aerospace Forces), **JSC Production Association Ural Optical and Mechanical Plant Named After E.S. Yalamov** (develops instruments for Russia's combat aircraft, helicopters, and naval ships), **CJSC Scientific Production Enterprise Topaz** (develops and produces hardware and software used for military aircraft of Russia's Armed Forces), **Kaluga Research Institute of Radio Engineering JSC** (produces electronic warfare systems for Russia's military aircraft), **Aviaavtomatika Named After V. Tarasov JSC** (develops equipment for Russia's military aircraft), **JSC Research and Development Enterprise Almaz** (develops and produces electronic warfare (electronic countermeasures) equipment as well as other electronic products for Russia's military systems), **JSC Center of Research and Technology Services Dinamika** (designs and manufactures flight simulators for Russia's military aircrews), **State Research Institute of Aviation Systems State Research Center of the Russian Federation** (scientific center for military aviation research that focuses on military aviation combat systems and aviation weapons), **Federal Service for Military-Technical Cooperation** (supervises Russian organizations empowered to carry out foreign trade activities regarding military purpose products), **JSC Special Design Bureau Turbina** (produces engines for Russia's armored vehicles, missiles, and artillery systems), **PJSC Research and Production Corporation Istok Named After A.I. Shokin** (produces electronic warfare systems for Russia's Ministry of Defense), **JSC State Scientific Research Institute Kristall** (produces ammunition and bombs), **OJSC Moscow Machinery Building Plant Avangard** (produces missiles for Russia's S-300 and S-400 anti-aircraft systems), **Mariyskiy Machine-Building Plant OJSC** (manufacturers Russia's air defense systems), **OJSC Start Scientific and Production Enterprise Named After A. Yaskin** (produces and services missiles, including for Russia's Navy), **OJSC Khabarovsk Radio Engineering Plant** (specializes in activities related to Russia's anti-aircraft missile systems), **JSC Vyatskoye Mashinostroitelnoye Predpriyatiye Avitek** (manufactures missiles and components for Russia's air defense systems), **JSC All-Russian Research Institute Signal** (develops equipment for Russia's Armed Forces, including combat robots and unmanned ground vehicles), **JSC Radiopribor** (manufactures and installs electronic warfare systems on Russia's military aircraft), **PJSC Vimpel Interstate Corporation** (involved in the development of Russia's missile defense systems),
 - two Russian entities that operate in the aerospace sector of the Russian economy: **JSC Scientific and Production Association of Electro Mechanic** (develops items for Russia's missiles, combat aircraft, and other aerospace systems), **Ramenskoye Design Company JSC** (integrator and supplier of avionics for Russia's aircraft, helicopters, and unmanned aerial vehicles, including manufacturing heads-up displays for Russia's fighter aircraft).
 - **Rosoboronexport JSC** (sole state-controlled intermediary agency for exporting and importing the entire range of military, defense, and dual-use products, technologies, and services) because it is owned or controlled by, or has acted or purported to act for or on behalf of, directly or indirectly, the Government of Russia and because it is a political subdivision, agency, or instrumentality of the Government of Russia.

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

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

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

On July 14, the U.S. House of Representatives passed the National Defense Authorization Act for Fiscal Year 2023 ("NDAA"). One of the amendments included in the House-passed version of the NDAA is a revised version of the "Federal Contracting For Peace And Security Act." The amendment would prohibit the federal government from entering into, extending, or renewing contracts with contractors that conduct business operations in Russia during its war against Ukraine, with certain exceptions and exemptions.

On 29 July, OFAC listed as SDN 4 entities linked to either Mr Ionov or Ms Burlinova: Anti-Globalisation Movement of Russia (AGMR); Ionov Transcontinental, OOO; STOP-Imperialism; and Centre for Support and Development of Public Initiative Creative Diplomacy (PICREADI).

On 2 August, OFAC added 5 entities to SDN List: Dzhi AI Invest OOO (investment entity owned by A.A. Guryev), Investitsionnaya Kompaniya MMK-Finans (investment company, subsidiary of Publichnoe Aktsionernoe Obschestvo Magnitogorskiy Metallurgicheskiy Kombinat (MMK)), JSC Promising Industrial and Infrastructure Technologies (SOE) (financial institution owned by the Russian Federal Agency for State Property Management, attempted to facilitate the circumvention of sanctions imposed on the Russian Direct Investment Fund), MMK METALURJI SANAYI TICARET VE LIMAN ISLETMECILIGI ANONIM SIRKETI (Turkey-based subsidiary of Publichnoe Aktsionernoe Obschestvo Magnitogorskiy Metallurgicheskiy Kombinat (MMK)), Publichnoe Aktsionernoe Obschestvo Magnitogorskiy Metallurgicheskiy Kombinat (one of the world's largest steel producers).

On 2 August, the Department of State designated:

- Salvation Committee for Peace and Order that collaborates with the Government of Russia to support Russia's control of the Kherson region and discourage resistance.
- JSC State Transportation Leasing Company (JSC GTLK) (SOE) and its 4 subsidiaries - GTLK Europe Designated Activity Company (Ireland), GTLK Europe Capital Designated Activity Company (Ireland), GTLK Middle East Free Zone Company (United Arab Emirates), GTLK Asia Limited (Hong Kong).
- numerous Russian defense and high-technology entities as a part of our effort to isolate Russia's technology sector in order to limit its contributions to Russia's war machine.
 - 2 entities operating in the defense and related materiel sector of Russian economy: the Federal State Institution of Higher Vocational Education Moscow Institute of Physics and Technology (Moscow Institute of Physics and Technology) (MIPT) (SOE); Academician A.L. Mints Radiotechnical Institute JSC;
 - 8 entities operating in the technology sector of Russian economy: the Skolkovo Foundation; the Skolkovo Institute of Science and Technology (SKOLTECH); Technopark Skolkovo LLC; JSC Penzensky Nauchno Issledovatel'skiy Elektrotekhnicheskiy Higher Education Institution (SOE); JSC Zelenograd Nanotechnology Center; JSC Institute of Electronic Control Computers Named After I.S. Bruk (SOE); Federal State Institution Federal Scientific Center Scientific Research Institute for System Analysis of The Russian Academy Of Sciences (SOE); Scientific and Production Association of Measuring Equipment JSC (SOE);
 - 12 entities operating in the electronics sector of Russian economy: Mitishinskiy Scientific Research Institute of Radio Measuring Instruments (SOE); JSC Research Institute of Electronic and Mechanical Devices (SOE); JSC Svetlana Poluprovodniki; JSC Design Center Soyuz; OJSC Scientific Research Institute of Precision Mechanical Engineering; PJSC Kremny; JSC Institute for Scientific Research Microelectronic Equipment Progress; JSC Voronezhsky Factory Poluprovodnikovyykh Priborov Sborka; OJSC Scientific and Production Enterprise Pulsar (SOE); LLC Scientific Production Enterprise Digital Solutions; JSC Design Technology Center Elektronika; JSC Vologodsky Optiko Mekhanicheskiy Factory (SOE);
 - 1 entity operating in the technology sector and the electronics sector of Russian economy: Federal State Budgetary Scientific Institution Research and Production Complex Technology Center (SOE);
 - 1 entity operating in the aerospace sector of the Russian economy: JSC Scientific Research Institute Submicron (SOE).

OFAC issued General License No. 45 authorising until 20 October 2022 certain transactions prohibited by Executive Order 14071 that are ordinarily incident and necessary to the wind down of financial contracts or other agreements that were entered into on or before 6 June 2022 and involve, or are linked to, debt or equity issued by an entity in Russia. The authorised transactions include: (1) the purchase by U.S. persons of debt or equity issued by an entity in Russia where that purchase is ordinarily incident and necessary to the wind down of financial contracts or other agreements; (2) the facilitating, clearing, and settling of a purchase by U.S. persons of debt or equity issued by an entity in Russia, where that purchase is ordinarily incident and necessary to the wind down of covered contracts.

The purpose of GL 45 is to authorize the close out of financial contracts entered into on or before June 6, 2022 that might not otherwise be considered a divestment of debt or equity securities issued by entities in Russia.

GL 45 does not authorise any transactions involving blocked persons, unless separately authorised.

On 15 September, OFAC, in consultation with the State Department, issued a Determination pursuant to Executive Order 14024 which authorizes the imposition of blocking economic sanctions against any individual or entity that determined to operate or have operated in the quantum computing sector of Russian economy.

This action builds on previous determinations providing for sanctions against those that operate or have operated in the accounting, trust and corporate formation, management consulting, aerospace, marine, electronics, financial services, technology, and defense and related materiel sectors of Russian economy.

In a series of new FAQs, OFAC states that the definition of the quantum computing sector of the Russian economy includes “activities related to products and services in or involving the Russian Federation in research, development, manufacturing, assembling, maintenance, repair, sale, or supply of quantum computing, quantum computers, electronic assemblies thereof, or cryogenic refrigeration systems related to quantum computing.”

On 15 September, OFAC listed 2 entities, including:

- LLC Firdaws (“national fashion brand” of Chechnya owned by Ayshat KADYROVA but initially launched by Medni KADYROVA).
- Task Force Rusich (Russian neo-Nazi paramilitary group that participated in combat alongside Russia’s military in Ukraine)

The US Department of State imposed sanctions on 31 entities operating in Russian military space, advanced technology or electronics sectors:

- the Main Intelligence Directorate (GRU)⁷ (military intelligence agency of the General Staff of the Russian Armed Forces); SOE

3 leading Russian military space entities that play central roles in strengthening Russia’s defense capabilities:

- JSC Rossiyskiye Kosmicheskiye Sistemy (Russian Space Systems JSC) (Russian space instrument building corporation); SOE
- JSC Academician M. F. Reshetnev Information Satellite Systems (builds satellites to strengthen Russia’s defense capabilities); SOE
- JSC Research and Production Association Named After S. A. Lavochkina (produces space-related items for Russia’s Ministry of Defense; involved in the development of missile defense and space-defense projects for Russia); SOE

13 entities operating in the technology sector of Russian economy:

- Multiclet Corporation (Russian computational technology company that develops and produces computer processors, works directly with Russia’s defense sector);
- Rzhannov Institute of Semiconductor Physics Siberian Branch of Russian Academy of Sciences (Russian institute focused on microsensoric technologies and semiconductors; participated in military robotics activities to benefit the Russian Ministry of Defense); SOE
- JSC Moscow Center of SPARC Technologies (Russian computers and microprocessors firm; involved in the development of microprocessors and supercomputers for Russia’s Ministry of Defense);
- International Center for Quantum Optics and Quantum Technologies LLC (Russian Quantum Center) (Russian science and technology center focused on the development of high-tech products based on quantum technologies);
- JSC Additive Technologies Center (Russian integrator of additive technologies; involved in implementing and using additive technologies); SOE
- Federal State Financed Institution of Science Higher Education Institution Spectroscopy of The Russian Federation Academy of Sciences (conducts activities related to analytical spectroscopy and its applications to technology control, nanotechnologies, and also develops new technologies); SOE
- JSC Research Center Elins (undertakes the development of technologies for Russia’s Armed Forces); SOE
- Joint Venture Quantum Technologies (a part of a consortium of Russian entities involved in Russia’s National Quantum Laboratory; involved in developing quantum technologies);
- JSC Scientific and Technical Center Zaslon (involved in the development of technologies for Russia’s Armed Forces); SOE
- Federal State Financed Institution of Science Physics and Technology Institute Named After A. F. Ioffe of The Russian Federation Academy of Sciences (one of Russia’s largest institutions for research in physics and technology); SOE
- JSC Institute for Scientific Research Vychislitelnykh Kompleksov Named After M. A. Kartseva (radio-electronic industry enterprise of the defense industry of Russia; carries out R&D of basic technologies in the field of computer engineering); SOE
- L. D. Landau Institute for Theoretical Physics of Russian Academy of Sciences (has several areas of research including quantum computing); SOE

⁷ The GRU was previously designated pursuant to E.O. 13694, as amended, in 2016; pursuant to Section 224 of the Countering America’s Adversaries Through Sanctions Act (CAATSA) in 2018; and pursuant to E.O. 13382 in 2021.

- Federal State Financed Institution of Science Physics and Technology Institute Named After K. A. Valieva of The Russian Federation Academy of Sciences (areas of research include ion-beam technologies, micro and nanosystem technologies, and high-performance computing). SOE

14 entities operating in the electronics sector of Russian economy:

- JSC Institute for Scientific Research Elektronnoy Tekhniki (Russian company that develops and produces electronics, including microelectronics and nanoelectronics. electronic components are used in Russian weapons systems); SOE
- JSC Angstrom (Russian electronics entity involved in the design of microelectronics, including the design, development, and manufacture of semiconductors; produces computer chips for a navigation system used by the Russian Ministry of Defense for guided missile targeting); SOE
- Federal State Financed Institution of Science Physical Higher Education Institution Named After P. N. Lebedeva of the Russian Federation Academy of Sciences (engages in research and activities related to microelectronics, vacuum and plasma electronics, and optoelectronics; conducted research related to weapons); SOE
- Baikal Electronics JSC (Russian electronics company that manufactures semiconductors and computer processors; produces computer processors for the Russian military);
- LLC Group of Companies Akvarius (Aquarius) (Russian electronics; involved in the development of secure smartphones for Russian military and intelligence personnel);
- LLC Company Yadro Fab Dubna (Russian electronics entity involved in the manufacture of electronic components; implements a project to create Russia's largest modern production plant for the production of circuit boards); SOE
- Federal Research Center Institute of Applied Physics of The Russian Academy of Sciences (conducts research related to high-power electronics, microwave electronics, and plasma electrodynamics); SOE
- LLC Krokus Nanoelektronika (Crocus Nanoelectronics) (Russian semiconductor manufacturer which specializes in semiconductor development, bio-electronic sensors, and semiconductor wafer processing);
- JSC Element (Russian microelectronics entity that has a leading position in Russia's microelectronic area in sales volume and technology); SOE
- Elvees Research and Development Center JSC (Russian electronics company involved in developing electronics components; produces a radar system for detecting and tracking airborne, ground, and surface targets);
- JSC Research and Development Enterprise Radiosvyaz (Russian electronics entity that designs and develops electronic equipment; carries out activities for Russia's Ministry of Defense);
- Specialized Engineering and Design Bureau of Electronic Systems JSC (Russian electronics entity that designs and produces semiconductor microelectronic products);
- JSC Production Association Sever (Russian electronics entity that develops and manufactures a wide range of radio-electrotechnical products, including electric motors and other electrical products); not SOE
- JSC Research and Development Enterprise Sapfir (conducts research and production related to semiconductor electronics and supplies microprocessors to the Government of Russia, including producing products for computer systems that are used on Russian missiles).

On 8 September, OFAC imposed sanctions on 4 Iran-based entities said to be involved in the production and transport of unmanned aerial vehicles (UAVs). Safrian Airport Services has been designated for its shipment of UAVs to Russia for use in its war against Ukraine, whilst Paravar Pars Company, Design and Manufacturing of Aircraft Engines (DAMA), Baharestan Kish Company have all been designated for their involvement in the research and production of UAVs for Iran's Islamic Revolutionary Guard Corps (IRGC) and its Aerospace Force (IRGC ASF) and Navy.

On 15 September, the US Department of the Treasury added 5 cryptocurrency addresses (were two cryptocurrency addresses for Bitcoin (BTC), two for Ether (ETH) and one for Tether (USDT)) connected to the Russian neo-Nazi paramilitary group – Task Force Rusich – involved in Russia's war on Ukraine to its sanctions blacklist.

On 30 September, OFAC in response to the Russian annexation of Donetsk, Luhansk, Kherson and Zaporizhzhia imposed sanctions on 11 Russian entities:

- **1 national entity** – the Federation Council of the Federal Assembly of Russia;

- **5 entities that operate in the Russian defence and related material sector and the technology sector:** OOO Valtex-ST (technology firm that procures high technology scientific and industrial equipment); Rotek Elpom (technology and defense firm which products are used in the aviation and crowd control sectors); Scientific-Technical Center for Electronic Warfare (AO NTTs REB) (defense firm that engages in R&D for Russia's Ministry of Defense); OAO Radioavionika (technology firm that produces various technological products, including for Russia's Ministry of Defense); ZAO NTTs Modul (technology firm that produces computer equipment and software; Modul's products are used in Russia's aviation and space sectors);

- **1 linked-person company:** OOO Markus (computer programming company owned by Yuriy Chechikhin);

- **OJSC Svetlogorsk Khimvolokno** (Belarusian state-owned textile and fiber manufacturer that provides critical material to Russia's defense industry);

- **3 entities linked to Radioavtomatika:** Sinno Electronics Co., Limited (People's Republic of China supplier of Radioavtomatika); Taco LLC (Armenian supplier of Radioavtomatika); Novastream Limited (supplied goods to Radioavtomatika).

The U.S. Congress approved a bill to ban the exchange of SDRs (special drawing rights issued by the IMF) of Russia and Belarus H.R 6899. The bill was signed by the US President on October 4. The law prohibits the exchange of SDRs owned by Russia and Belarus for US dollars. The law also requires the U.S. Treasury Department and U.S. representatives to the IFIs to make efforts

to ensure that other countries also refuse to exchange SDRs and to object to providing any financial assistance to Russia and Belarus with certain exceptions. The law will enter into force after signing by the President of the United States.

On 30 September, OFAC announced a settlement with Tango Card, Inc., a Seattle, Washington-based company that supplies and distributes electronic rewards. Tango Card agreed to remit \$116,048.60 to settle its potential civil liability for 27,720 apparent violations of multiple U.S. sanctions programs. As a result of deficient geolocation identification processes, Tango Card transmitted stored value products to individuals with Internet Protocol (IP) and email addresses associated with Cuba, Iran, Syria, North Korea, and **the Crimea region of Ukraine**. The settlement amount reflects OFAC's determination that Tango Card's apparent violations were non-egregious and voluntarily self-disclosed.

On 11 October, OFAC announced a settlement with Bittrex, Inc., a private company based in Bellevue, Washington that provides an online virtual currency exchange and hosted wallet services. Bittrex agreed to remit \$24,280,829.20 to settle its potential civil liability for apparent violations of sanctions against Cuba, **Ukraine-related**, Iran, Sudan, and Syria. As a result of deficiencies related to Bittrex's sanctions compliance procedures, Bittrex failed to prevent persons apparently located in the sanctioned jurisdictions from using its platform to engage in over \$263 mln worth of virtual currency-related transactions. Based on internet protocol ("IP") address information and physical address information collected about each customer at onboarding, Bittrex had reason to know that these users were located in jurisdictions subject to sanctions. At the time of the transactions, however, Bittrex was not screening this customer information for terms associated with sanctioned jurisdictions.

On 19 October, OFAC in coordination with the U.S. Department of Justice and the Federal Bureau of Investigation (FBI), designated a Russian network that procured military and sensitive dual-use technologies from U.S. manufacturers and supplied them to Russian end-users. Those designated are two companies of Yury Yuryevich Orekhov - Nord-Deutsche Industrieranlagenbau GmbH (NDA GmbH) and Opus Energy Trading LLC (Opus Energy Trading). NDA GmbH was designated for operating or having operated in the technology sector of the Russian economy. Opus Energy Trading was designated for being owned or controlled by, or having acted or purported to act for or on behalf of, directly, or indirectly, Orekhov. The U.S.-origin technologies that Orekhov and his company NDA GmbH procured included advanced semiconductors and microprocessors used in fighter aircraft, ballistic and hypersonic missile systems, smart munitions, radar, satellites, and other military applications. Orekhov and NDA GmbH ultimately sent these items to Russian end-users, including entities on the BIS's Entity List, in violation of U.S. export controls. U.S. components that Orekhov procured have been found in Russian weapons platforms in Ukraine.

On 26 October, OFAC designated as SDN 12 entities that have been involved in the Kremlin's attempts to interfere in Moldova's elections: 8 entities owned by Igor Yuryevich Chayka - OOO Aqua Solid, OOO BM Proekt-Ekologiya, OOO Ekogrupp, OOO Innovatsii Sveta, OOO Inzhiniring.rf, OOO Khartiya , OOO Mezhmunitsipalnoe ATP , OOO Region-Comfort; 2 entities owned by Ivan Aleksandrovich Zavorotnyi - OOO Agro-Region, OOO Kompaniya Zolotoi Vek; an entity owned by Igor Yuryevich Chayka and Aleksei Valeryevich Troshin - Aktsionernoe Obshchestvo Natsionalnaya Inzhiniringovaya Korporatsiya (National Engineering Corporation (NIK)); Shor Party - a populist Moldovan political party, chaired by Ilan Mironovich Shor.

UK. Added 10⁸ defense companies to the sanctions list of asset freeze targets.

On May 4, UK additionally sanctioned 32 entities⁹ (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, Camrose 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.

⁸ 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.

⁹ 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)

On 29 June, OFSI added 5 entities to its Russia sanctions list - JSC MARSHAL.GLOBAL (Russian investment banking, financial and asset management firm), JSC MOSCOW INDUSTRIAL BANK, JSC KOLMAR GROUP (Russian coal mining and processing company), JSC NEW OPPORTUNITIES (carrying on business in the Russian information, communications and digital technologies sector), R-STYLE SOFTLAB (carrying on business in the Russian information, communications and digital technology sector, able to undermine sanctions and Russian banks' exclusion from the SWIFT payment messaging network through its work on implementing a program to modernise the payment infrastructure and exchange of financial data via the Russian Central Bank's System for Transfer of Financial Messages).

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

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

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

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

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

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

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

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

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

On 5 August, OFSI issued General Licence INT/2022/2055384 "Companies winding down operations in Russia" which, subject to certain conditions, permits until 5 November 2022 a Person to make use of the retail banking services of a designated Credit or Financial Institution to make or receive payments that are exclusively for the purpose of winding down business operations in Russia (including payment of staff salaries, taxes, regulatory fees and other fees to official government bodies, and payment of bills or invoices) provided that no payments are otherwise made to a designated person. Making use of the retail banking services of a designated Credit or Financial Institution does not include selling or transferring a Person's assets to a designated Credit or Financial Institution.

On 16 September, OFSI removed ZAO INTERAVTOMATIKA (IA) from its sanction list.

On 26 September, the Foreign, Commonwealth and Development Office added 3 entities to its Russia sanctions list in response to the "sham referendums" that have taken place in 4 non-government-controlled regions of Ukraine. Those listed include: JSC GOZNAK (security documents company; produces passports for the Russian Federation), JSC IMA CONSULTING (PR agency, awarded a contract to manage the referenda campaigns in non-government controlled areas of Ukraine), LLC Commercial Bank – International Settlements Bank (South Ossetian-registered Bank, which serves clients in the DPR, LPR, Zaporozhye and Kherson regions).

On 20 October, the UK imposed asset freeze sanctions on Shahed Aviation Industries, Iranian manufacturer of unmanned aerial vehicle (UAV) for supply of kamikaze drones for Russia's use in Ukraine.

On 30 September, the UK announced its immediate plan to suspend the process by which actions taken to manage the orderly failure of Russian banks are recognised under the laws of the UK, in cases where the bank is a sanctioned entity.

On October 28, UK introduced new financial sanctions against Russia:

- An expansion on the prohibition on loans or credits to include a new prohibition on making loans or credits with a maturity of more than 30 days to persons, other than an individual, connected with Russia or persons owned, directly or indirectly, by a person connected with Russia, which are first made or granted on or after 29 October 2022 ("category 5 loan"). These amendments bring companies outside Russia owned by a person connected with Russia into scope of the prohibition, including UK companies. The previous restrictions in relation to category 3 loans are phased out.
- Amendment of the 2019 Regulations to provide for exceptions from these measures, additional licensing criteria and minor changes to definitions.

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

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

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

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

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

On 1 August, New Zealand's Government defined a new class of entities to which the sanctions regime may be applied - an independent arm of service of the Armed Forces of the Russian Federation, including Logistical Support of the Russian Armed Forces. On 8 September, the Secretary of Foreign Affairs and Trade issued the Designation notices which came into effect on 9 of September 2022 and provided details on:

- entities that form part of the Russian Armed Forces: Russian Ground Forces, Russian Navy, Russian Aerospace Forces, Russian Missile Forces, Russian Airborne Forces, Special Operations Forces);

- associates of 3 sanctioned defence entities:

- Russian Helicopters (JSC National Helicopter Center Mil and Kamov; JSC Reductor – PM; JSC Stupino Engineering Productive Enterprise; Rostov Helicopter Production Complex; JSC Ulan-Ude Aviation Plant; JSC Kumertau Aviation Production Enterprise; JSC Helicopter Service Company; JSC 150 Aircraft Repair Plant; JSC 356 Aircraft Repair Plant; JSC 810 Aircraft Repair Plant; JSC Progress Arsenyev Aviation Company; JSC Stupino Engineering Productive Enterprise);
- Tactical Missiles Corporation (711 Aircraft Repair Plant (711 ARZ); AO GNPP, Region; AO TMKB, Soyuz; Azov Optomechanical Plant; Central Design Bureau for Automatics Engineering; Concern BPO – Gidropribor; JSC Avangard; JSC Concern Gran it-Electron; JSC Electrotiyaga; JSC GosNIIIMash; JSC KRASNY GIDROPRESS; JSC Zavod "Dagdizel"; JSC Plant Kulakova; JSC Ravenstvo; JSC Ravenstvo service; JSC Scientific Research Center for Automated Systems Design; JSC Satute; JSC Saratovski radiopribornyi zavod; JSC Severniy Press; Vympel State Engineering Design Bureau JSC named after I.I. Toropov; JSC URAELEMENT; NPO Electromechanics; JSC Petrovsky Electromechanical Zavod Molot; Temp-Avia Arzamas Research & Production Association JSC; PJSC MBDB ISKRA; Raduga State Engineering Design Bureau TSC named after A.Y. Berezhnyak; RKB Globus; Smolensk aircraft plant JSC; Ural Design Bureau Detal; Engineering Design Bureau JSC; Scientific Research Institute for Mechanical Engineering

JSC in the name of V.V. Bahirev; Central Design Bureau for Automatics Engineering JSC; TRV-engineering LLC; Military Industrial Corporation NPO Mashinostroenia; Scientific & Production Association of Electromechanics JSC; Ural Research Institute of Composite Materials; Tactical Missile Corporation, Smolensk Aviation Plant JSC; Research & Design Institute Morteplotekhnika JSC);

- United Shipbuilding Corporation (JSC 33 Shipyard; Baltic Shipyard JSC; PJSC Vyborg Shipyard; PJSC Shipbuilding Plant Severnaya Verf; JSC Sredne-Nevisky Shipyard; Severnoe Design Bureau JSC; PJSC Nevskoe Design Bureau; Almaz Central Marine Design Bureau JSC; PJSC Krasnoe Sormovo Shipyard; JSC Central Design Bureau for Marine Engineering Rubin; JSC Research Design and Technological Bureau Onega; JSC The St. Petersburg's Sea Bureau of Mechanical Engineering Malachite; JSC 10 Ordena Trudovogo Krasnogo Znameni Dockyard; JSC Baltic Shipbuilding Plant Yantar; PJSC Amursky Shipbuilding Plant; JSC Shiprepairing Center Zvyozdochka; PJSC Proletarsky Zavod; JSC Khabarovsk Shipbuilding Yard; United Shipbuilding Corporation JSC Aysberg Central Design Building; LLC Kaspiyskaya Energiya Administration Office; JSC Northern Production Association Arktika; JSC Svetlovsky Enterprise ERA; 35 Shipyard, branch of Zvezdochka Ship Repair Center; JSC Shipbuilding Plant Lotos; JSC "Kronstadt Marine Plant"; JSC Sudexport; JSC Design Office for Shipbuilding Vympel).

On 2 August, New Zealand imposed sanctions on 61 entities that support the Russian military, including:

- **2 shipbuilding entities:** Krylov State Research Centre (SOE) (research institute engaged in fundamental research related to the sea, as well as shipbuilding and related activities); Sevmash (the largest shipbuilding complex that builds nuclear submarines for Russian Navy).
- **20 aerospace and aircraft entities:** All-Russian Scientific Research Institute of Aviation Materials (SOE) (metallurgical state research centre, developing composite technologies as well as intermetallic alloys, steels products, heat-resistant coating and super-light alloy used in aerospace industry); Aviaavtomatika Named After V. Tarasov JSC (develops equipment for military aircraft); Aviastar-SP Aircraft Manufacturing Enterprise (aircraft factory); Irkutsk Aviation Plant (SOE) (aircraft manufacturing enterprise); JSC Arzamassky Priborostroitelny Zavod Imeni Plandina (manufacturers "special purpose products" and instruments for aircraft); JSC Center of Research and Technology Services Dinamika (designs and manufactures flight simulators for military aircrews); JSC Obninsk Research and Production Enterprise Tekhnologiya Named After A. G. Romashin (SOE) (carries out Russia's State Defense Order, including by producing items for Russian military's fighter aircraft); JSC ODK-Klimov (SOE) (defense entity that produces engines for attack helicopters for the military); JSC Research and Production Enterprise Radar MMS (involved in developing targeting complexes for Russia's Ministry of Defense combat aircraft); JSC Ryazan State Instrument Making Enterprise (SOE) (develops and produces airborne avionics for combat aircraft); JSC Novosibirsk Aircraft Production Association Plant Named After V.P. Chkalov (SOE) (one of the major aircraft-building enterprises in Russia); Kizlyar Electromechanical Plant JSC (SOE) (manufacturers defense products, including a helicopter for Russia's Aerospace Forces); Komsomolsk-on-Amur Aviation Plant (SOE) (aircraft-manufacturing company); Nizhny Novgorod Aviation Plant Sokol (SOE) (manufactures MiG fighters); ODK-UMPO Engine Building Enterprise (manufacturers aircraft engines); Ramenskoye Design Company JSC (integrator and supplier of avionics for aircraft, helicopters, and unmanned aerial vehicles, including manufacturing heads-up displays for fighter aircraft); State Flight Testing Center Named After V.P. Chkalov (SOE) (aviation research and testing military institution); State Research Institute of Aviation Systems State Research Center of the Russian Federation (SOE) (scientific center for military aviation research that focuses on military aviation combat systems and aviation weapons); PJSC ODK-Kuznetsov (SOE) (defense entity that manufactures engines for bomber aircraft); Moscow Institute of Electromechanics and Automatics JSC (SOE) (conducts avionics R&D for military airplanes);
- **35 entities that operate in the defence and related materiel sector of the Russian economy:** Advanced Research Foundation (FPI) (SOE) (defense research organization); JSC All-Russian Research Institute Signal (SOE) (develops equipment for Russia's Armed Forces, including combat robots and unmanned ground vehicles); JSC Corporation Moscow Institute of Heat Technology (SOE) (develops missiles for Russia's Ministry of Defense); JSC Federal Scientific and Production Center Titan Barrikady (SOE) (defense entity that produces missiles for the Russian military); JSC Machine-Building Engineering Office Fakel Named After Akademika P. D. Grushina (develops and manufactures missiles for the Russian military's air defense systems); JSC North Western Regional Center of Almaz Antey Concern Obukhovskiy Plant (SOE) (designs and manufactures weapons systems and military equipment and is involved in producing Russia's S-400 air defense missile system); JSC Permskiy Zavod Mashinostroyitel (SOE) (develops and produces missiles for Russia's military); JSC Production Association Strela (SOE) (involved in developing and producing missiles for Russia's Ministry of Defense); JSC Special Design Bureau Turbina (SOE) (produces engines for armored vehicles, missiles, and artillery systems); JSC State Scientific Research Institute Kristall (SOE) (produces ammunition and bombs); JSC Vyatskoye Mashinostroyitelnoye Predpriyatiye Avitek (manufactures missiles and components for air defense systems); JSC All Russian Research Institute of Radio Engineering (JSC VNIIRA) (SOE) (carries out tasks for the Russian State Defense Order, including regarding research related to radars, missiles, and other weapons); JSC Central Research Institute of Automation and Hydraulics (SOE) (defense entity that develops and produces missile); Kalashnikov Concern (SOE) (production of civil and military products, combat automatic and sniper weapons, guided artillery shells, high-precision weapons; subsidiary company of Rostec); Kurganmashzavod (SOE) (defense company that develops and produces infantry fighting vehicles); LLC Nauchno-Proizvodstvennoye Obyedineniye Radiovolna (designs and manufactures radomes for defense applications); Mariyskiy Machine-Building Plant OJSC (manufacturers air defense systems); Military Industrial Company LLC (major arms and military equipment provider, part of "Russian Machines" owned by Oleg Deripaska); NPK Tekhmash OAO (Tekhmash) (SOE) (specializes in the development and serial supply of ammunition to ensure the combat capabilities of the main strike groups of the ammunition for the Russian Armed Forces); OJSC Khabarovsk Radio Engineering Plant (SOE) (specializes in activities

related to anti-aircraft missile systems); OJSC Moscow Machine Building Plant Avangard (produces missiles for S-300 and S-400 anti-aircraft systems); Design Bureau of Special Machine Building (space rockets industry enterprise); OJSC Start Scientific and Production Enterprise Named After A. Yaskin (SOE) (produces and services missiles, including for Russia's Navy); PJSC Vypel Interstate Corporation (involved in the development of missile defense systems); Radiozavod JSC (SOE) (manufacturers control systems for Russia's Ministry of Defense, including for weapon systems); Izhevsk Unmanned Systems Research and Production Associated LLC (defense company that makes unmanned aerial vehicles (UAVs) for Russia's military); JSC Production Association Ural Optical and Mechanical Plant Named After E.S. Yalamov (SOE) (develops instruments for combat aircraft, helicopters, and naval ships); CJSC Scientific Production Enterprise Topaz (develops and produces hardware and software used for military aircraft of Russia's Armed Forces); JSC Radiopribor (SOE) (manufactures and installs electronic warfare systems on military aircraft); JSC Ramensky Instrument Engineering Plant (SOE) (produces navigation systems and other equipment for Russian military's fighter aircraft and armed unmanned aerial vehicles); JSC Research and Development Enterprise Almaz (SOE) (develops and produces electronic warfare (electronic countermeasures) equipment as well as other electronic products for military systems); JSC Research and Production Corporation Konstruktorskoye Byuro Mashynostroyeniya (SOE) (design, research and production centre engaged in development, manufacture, tests, and other activities of end-to-end creation of armament and military hardware of various types); JSC Research and Production Association Kvant (SOE) (defense company that produces electronic warfare systems); Kaluga Research Institute of Radio Engineering JSC (SOE) (produces electronic warfare systems for military aircraft); PJSC Research and Production Corporation Istok Named After A.I. Shokin (SOE) (produces electronic warfare systems for Russia's ministry of defense);

- **financial institution:** Gas Industry Insurance Company SOGAZ (the largest insurance company in the Russian corporate sector, insures the oil and gas industry, water and rail transport, the military-industrial complex and metallurgy);
- **intermediary agency:** Rosoboroneksport OAO (Rosoboronexport JSC) (SOE) (sole state-controlled intermediary agency for exporting and importing the entire range of military, defense, and dual-use products, technologies, and services)
- **railway entity:** Russian Railways (SOE) (the largest carrier of the Russian railway network, fully state-owned vertically integrated railway company, both managing infrastructure and operating freight and passenger train services.)
- **chemical industry entity:** JSC Salavat Chemical Plant (SOE) (subsidiary of the Russian state space agency Roskosmos).

On 23 August, New Zealand added The Salvation Committee for Peace and Order to its Russia sanctions list (collaborationist supreme administrative and executive authority in the territory of the Kherson Oblast, formed by the constituent Assembly on 10 March 2022).

On 11 October, New Zealand imposed sanctions against entity with strategic or economic relevance – Evraz plc and any of its subsidiaries that are incorporated or registered in Russia (EVRAZ KGOK, EVRAZ MARKET, EVRAZ NTMK, EVRAZ VANADY TULA, EVRAZ ZSMK, Trading Company EVRAZ), as well as two entities which are supporting Russia's occupation objectives in Ukraine - JSC Goznak (Russian SOE that makes passports for occupied areas of Ukraine) and JSC IMA Consulting (Russian public relations firm involved in managing the public campaign around the sham referenda). These designations enter into force on 12 October 2022.

On 31 October, the New Zealand government imposed broad sanctions on 7 entities:

- **3 Russian-directed disinformation outlets** – InfoRos (Internet news agency that spreads misinformation); NewsFront (disinformation and propaganda outlet); SouthFront (website which has spread disinformation relating to Ukraine and promoted false narrative about the Russian invasion of Ukraine);
- **higher educational institution** - Skolkovo Institute of Science and Technology (Russian non-state technological higher educational institution, for almost a decade Skoltech maintained close ties with the Russian defense sector);
- **2 entities that operate in the Russian defense and related material sector** - JSC Concern Avtomatika (holding company of the Rostec Corporation, which is engaged in the development and production of information protection systems); JSC Ruselectronics (electronics holding company owned by Rostec, manufactures electronic components);
- **illegal military entity** - Task Force Rusich (neo-Nazi paramilitary group).

Poland. Introduced Poland-specific list of designated parties subject to measures not covered by EU Regulations 765/2014 and 269/2014, covering 37 entities¹⁰. 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.

On 28 September, Poland imposed sanctions on the Russian company Gazprom Export, a unit of Russia's gas company that exports natural gas. Under this decision Gazprom Export's assets are frozen and access to its financial funds and economic assets is prohibited.

On 29 October, Poland imposed sanctions on MAGYSTRAL Polska spółka z o.o. (operates in the field of cashless settlements and payments in the fuel industry; the real beneficiary of MAGYSTRAL Polska sp.z o.o. is Olga Piskoppel; MAGYSTRAL Polska

¹⁰ ACRON PAO, AXIOMA DR IT, BARTER COAL, BELOIL Polska, EUROCHEM POLSKA, „FABERLIC BALTIJA SIA” Sp. z o.o., ODDZIAŁ W POLSCE, FABERLIC EUROPE, GO SPORT POLSKA, IRL Polska, KAMAZ, KASPERSKY (KASPERSKY LAB), KASPERSKY Lab Polska, Kaspersky Store, K Dystrybucja, KTK Polska, MAGA DYSTRYBUCJA 2, MAGA FOODS, MEDMIX POLAND (do 3.03.2022 r. – SULZER MIXPAC POLAND), NEGRINIO LIMITED, NORICA HOLDING Sàrl, Novatek Green Energy, OAO NOVATEK, OAO PhosAgro, Opansa Enterprises Limited, PAO Gazprom, PhosAgro POLSKA, PHOSINT LIMITED, Rainbee Holdings Limited, SEVERSTAL DISTRIBUTION, SIA SEVERSTAL DISTRIBUTION, Oddział w Polsce, SUEK Polska, SULZER PUMPS WASTEWATER POLAND, SULZER TURBO SERVICES POLAND, WILDBERRIES, „IC-POLAND”.

sp.z o.o. identifies itself as a branch of the Russian company RN-CARD, one of the leading operators of cashless settlements for fuel, part of the Oil Concern ROSNEFT).

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

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

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

On 28 July, Switzerland imposed asset freeze sanctions on 9 entities: Al-Sayyad Company for Guarding and Protection Services Ltd (Syrian private security company), also known as "ISIS Hunters", active in the recruitment of Syrian mercenaries to Libya and Ukraine), AVLITA Stevedoring Company (provides services related to loading grain onto ships in the port of Sevastopol in Crimea), Nightwolves MC (nationalist motorcycle club), The Alexander Gorchakov Public Diplomacy Fund (established in 2010 by the Russian President Dmitry Medvedev, the founder of the Fund was the Russian Ministry of Foreign Affairs), The Federal Agency for the Commonwealth of Independent States Affairs (SOE), Compatriots Living Abroad and International Humanitarian Cooperation (Rossotrudnichestvo) (SOE) (federal executive body responsible for rendering state services and managing state property to support and develop international relations between Russia and the member-states of the Commonwealth of Independent States and other foreign countries), Russkiy Mir Foundation (SOE) (created and has been financed by the Government of Russia, has been used by Russia to advance its interests in the post-Soviet countries), JSC Research and Production Association "Kvant" (SOE) (Russian company operating in the military sector that produces electronic warfare systems for the Russian Armed Forces), FORSS Group of Companies (Russian company which provides engineering services to the shipbuilding industry), All-Russia "Young Army" Military Patriotic Social Movement (SOE) (Russian paramilitary organization).

On 3 August, Switzerland imposed asset freeze sanctions on Sberbank, the largest Russian bank.

On 3 August, Switzerland prohibited the purchase, import, transfer or transportation, directly or indirectly, into Switzerland of gold and gold products, originating in and exported from Russia after 4 August 2022. This prohibition also covers jewellery.

The purchase of gold that has been processed in a third country using gold originating in and exported from Russia after 4 August 2022, and the import, transit and transport of gold processed in this way into and through Switzerland are also prohibited.

Prohibited are also services of any kind, including financial services, brokering and technical assistance, as well as the granting of financing in connection with the purchase, and the import, transit and transport to and through Switzerland, as well as with the provision, manufacture, repair or use of such gold or gold products.

On 3 August, Switzerland introduced exemptions from the asset freeze and ban on making available assets or economic resources to designated persons, where necessary for:

- the sale or transfer of ownership rights in companies domiciled in Switzerland or an EEA member state;
- the purchase, import or transport of agricultural and food products, including wheat and fertilizers (with regards to certain designated persons).

Switzerland also introduced exceptions from the ban on dealing with SOEs for transactions which are necessary for:

- the direct or indirect purchase, import or transport of oil, including refined oil products, from or through Russia;
- the purchase, import or transport of pharmaceutical and medicinal products.

On 31 August, Switzerland extended the scope of the ban on accepting deposits from Russian nationals, natural persons resident in Russia and banks established in Russia to include banks, companies or organizations established outside of Switzerland or the EEA and majority-owned by Russian nationals or natural persons resident in Russia.

On 16 September the Federal Council decided to temporarily suspend the exchange of tax information with Russia, based on the public policy provision of the Administrative Assistance Convention in tax matters. The temporary suspension affects all forms of tax information exchange vis-à-vis Russia, i.e., automatic exchange of information on financial accounts and on country-by-country reports, exchange of information upon request and spontaneous exchange of information.

On 12 October, the Federal Department of Economic Affairs, Education and Research (EAER) imposed financial sanctions against 7 entities:

- **1 State body of Russia** - the Central Election Commission (CEC) of the Russian Federation (Russian state body responsible for organizing elections and referenda for Russia),

- **1 finance SOE** - JSC Goznak (Russian SOE responsible for the manufacturing of security products including banknotes, coins, stamps, identity cards, secure documents, state orders and medals; responsible for printing all Russian passports, including passports distributed in the occupied regions of Ukraine, including the Donbas, as well as military documents for Russia's Defense Sector),

- **5 entities that operate in the Russian defense and related material sector** - OJSC V.A. Degtyarev Plant (defense company which provides weapons to the Russian Armed Forces), MKB "Fakel" named after P.D. Grushin (Russian defense company which designed the S-300, S-400 and TOR missile systems), JSC Irkut Corporation (Russian aircraft manufacturer which provides fighter aircraft to the Russian Armed Forces), MMZ Avangard (Russian defense contractor, which provides weapons to the Russian Armed Forces), JSC A.N. Ganichev Scientific and Production Association "SPLAV" (Russian weapons manufacturer, which provides weapons to the Russian Armed Forces).

On 31 October, the Federal Department of Economic Affairs EAER imposed financial sanctions on Shahed Aviation Industries (Islamic Revolutionary Guard Corps Aerospace Force-linked company in Iran responsible for the design and development of the Shahed series of Iranian Unmanned Aerial Vehicles (UAVs).

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

On 26 August, Norway added 10 entities, including Sberbank, to the list of natural and legal persons, entities and bodies subject to restrictive measures.

On 26 August, Norway introduced a prohibition on the purchase, import or transfer, directly or indirectly, of gold and jewellery and articles of goldsmiths' or silversmiths' wares, of gold, containing gold, or of metal clad with gold (listed in Annexes XXVI and XXVII) if they originates in Russia or are exported from Russia to Norway, the EU or a third country after 27 August 2022. It is also prohibited to directly or indirectly buy, import or transfer gold products when they has been processed in a third country and contain the aforementioned products.

On 26 August, Norway made possible the release of frozen economic resources if this is necessary for the urgent prevention or mitigation of an event likely to have a serious and significant impact on human health and safety or the environment, and to release funds or economic resources belonging to specified entities (Bank Rossiya, Promsvyazbank, VEB.RF., Otkritie FC Bank, Novikombank, Sovcombank, VTB Bank and Sberbank) when it has been determined that these funds or economic resources are necessary for the purchase, import or transport of agricultural and food products.

On 26 August, Norway strengthened existing reporting obligations, including a new requirement for listed individuals and entities to declare all assets and economic resources that belong to, or are owned, held or controlled by them, and that are within Norwegian jurisdiction (no later than 7 October 2022 or within 6 weeks from the date of entry into the list of sanctioned natural and legal persons, whichever date is the latest).

On 26 August, Norway expanded the scope of the prohibition on accepting any deposits from Russian nationals or natural persons residing in Russia, legal persons, entities or bodies established in Russia to include those from legal persons, entities or bodies established outside the EU or Norway and majority-owned by Russian nationals or natural persons residing in Russia.

On 26 August, Norway allowed an exemption from the prohibition to enter into any transactions with Russian public entities for transactions necessary to ensure access to legal, administrative or arbitration matters in Norway or an EU member state, as well as for the recognition or enforcement of a judgement or an arbitration award handed down in Norway or an EU member state.

On 28 October, Norway introduced asset freeze sanctions against 7 Russian entities.

On 28 October, Norway introduced additional restrictions on providing services for cryptoassets to Russian citizens, persons residing in Russia or entities established in Russia.

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

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

On June 27, the Canada GoV sanctioned 46 defence entities (incl. 38 SOEs) for their role in enabling or supporting Russia's invasion of Ukraine¹¹.

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

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

On 29 July, Canada imposed sanctions on 17 entities in the defence sector directly or indirectly supporting the Russian military: Scientific-Production Enterprise Salyut JSC (SOE) (develops products in the field of shipborne radar); Scientific-Production Enterprise Almaz JSC (SOE) (engaged in the development of anti-aircraft missile systems and air defense systems); Gorizont JSC (manufacturers navigation and radar systems); inostroitel Perm Factory (develops and produces missiles for Russia's military); Ural Research Institute of Composite Materials (specializes in research, development of technologies and production of products from composite materials, participates in various projects on rocket and space technology, part of the Tactical Missiles Corporation JSC); Scientific-Production Enterprise Kant (carries out licensed development, production, implementation and maintenance of radio communications, integrated radio monitoring systems); MashScientific-Production Enterprise Svyaz (SOE) (develops civil and military products); Scientific-Research Institute Argon (SOE) (specializes in the creation of highly reliable compact computing tools for harsh operating conditions); Scientific-Research Institute and Factory Platan (SOE) (subsidiary of Ruselectronics (a Rostec-owned holding company), develops devices and information display systems, mainly electrovacuum and their control devices); Scientific-Research Institute of Automated Systems and Communications Complexes Neptune JSC (SOE) (specializes in scientific research, development and production of automated communication systems and complexes for ships (vessels), coastal facilities of law enforcement and civil departments of Russia); Special Design and Technical Bureau for Relay Technology (SOE) (one of the leading developers and manufacturers of various types of relays and switches, part of the state corporation Rostekh); Production Association Northern Machine Building Enterprise (the largest shipbuilding complex that builds nuclear submarines for Russian Navy, part of the United Shipbuilding Corporation); Concern Morinformsystem-Agat (engages in the development and production of integrated structures for the military-industrial sector, manufactures equipment and instruments for warships); Research and Design Institute Morteplotehnika JSC (SOE) (leading enterprise in Russia that designs and produces underwater weapons, heat (steam) torpedoes and their propulsive power plants, unmanned underwater vehicles, devices for sea tests of weapons and military equipment, part of JSC "Concern "Sea Underwater Weapon - Gidropribor", which is part of Tactical Missiles Corporation); Petrovsky Electromechanical Plant Molot JSC (SOE) (manufactures subcomponents and systems for control fire systems, automatic information control systems, combat automatic control systems for Naval forces training systems, automatic pilot systems for ships and vessels, radiotechnical equipment of navigation, designation, radars, ship automatic systems, ship equipment, part of JSC Concern Granit-Electron", which is part of Tactical Missiles Corporation); Temp-Avia Arzamas Research and Production Association JSC (SOE) (designs control systems and guidance systems for manned and unmanned aircraft; part of the Tactical Missiles Corporation JSC); TRV Engineering (supplies electronic component base of domestic and foreign manufacturers).

On 19 August, Canada imposed sanctions against Concern Avtomatika, a defence sector entity.

On 29 September, the Canadian GoV imposed sanctions on the so-called government body in Kherson – Salvation Committee for Peace and Order (collaborates with the Government of Russia to support Russia's control of the Kherson region and discourage resistance).

On 14 October, Canada imposed sanctions against TV Zvezda (SOE) which is the agent of Russian propaganda.

On 27 October, the Canadian government imposed sanctions on 6 entities involved in the energy sector:

- **electric energy company** - Infrastructure Molzhaninovo LLC (electric energy company located in Russia);
- **transport company** - Transoil LLC (Russian transport company specializing in the rail transportation of oil and petroleum products);
- **2 oil and gas companies** - Lukoil PJSC (Russian multinational energy corporation, specializing in the business of extraction, production, transport, and sale of petroleum, natural gas, and petroleum products); NNK JSC (JSC "INDEPENDENT OIL AND GAS COMPANY") (vertically integrated oil company whose main activities are exploration and development of oil fields, oil refining, as well as the production and marketing of petroleum products);

¹¹ SOE: Pskov Distance Communication Plant, Radiozavod JSC, Razryad JSC, Research Production Association Mars, Ryazan Radio-Plant, Scientific Production Center Vigstar JSC, Scientific Production Enterprise "Radiosviaz", Scientific Research Institute Ferrite-Domen, Scientific Research Institute of Communication Management Systems, Novosibirsk Semiconductor Devices Plant Vostok JSC, State Machine Building Design Bureau "Vypel" By Name I.I. Toropov JSC, Plant Kulakov JSC, Raduga Design Bureau, TAO GNPP "Region", Concern "MPO – Gidropribor", Concern Granit-Electron JSC, Ural Design Bureau "Detal", Tambov Plant (TZ) "October", Engineering Centre Moselectronproekt, Ship Maintenance Centre "Zvezdochka" and 22 entities of JSC Tactical Missiles Corporation - "Uralelement" JSC, "Plant Dagdiesel" JSC, PA Strela JSC, Ravenstvo JSC, Ravenstvovservice JSC, Saratov Radio Instrument Plant JSC, Severny Press JSC, "Research Centre for Automated Design" JSC, NPO Lightning, "MBDB 'ISKRA'" PJSC, "Central Design Bureau of Automation", 711 Aircraft Repair Plant, Azov Optomechanical Plant, "Krasny Gidropress" JSC, Elektrotyaga JSC, GosNIIIMash JSC, RKB Globus, Smolensk Aviation Plant, Private: Scientific-Production Enterprise Volna, Electronic Computing Technology Scientific Research Centre JSC, Elektrosignal JSC, "Salute" JSC, KB Mashinostroeniya, NPO Electromechanics, AO TMKB "Soyuz", Zvezda-Strela LLC

- **financial institution** - Gas Industry Insurance Company SOGAZ (insurance company, provides insurance to the oil and gas sector, water and rail transport, military-industrial complex and metallurgy);

- **coal mining company** - Sibuglemt LLC (coal mining company located in Russia).

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.

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

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

On 7 October, the Japanese government introduced sanctions against 9 Russian entities:

- **1 illegal military entity** - Task Force Rusich;

- **2 entities that operate in the military-defense sector** - Rostec (the cornerstone of Russia's defense, aerospace, industrial, technology, and manufacturing sectors); JSC Kalashnikov Concern (defence manufacturing company and the largest firearms producer in Russia);

- **2 entities that operate in the technology and dual-use goods sector** - JSC Ruselectronic (national electronics vendor, produces military equipment, equipment for the aerospace industry, communication systems and telecommunications equipment); JSC Sozvezdie Concern (developer and manufacturer of electronic warfare, radio communications, electronic countermeasures systems and equipment, as well as dual-use and civilian products);

- **2 entities that operate in the machinery sector** - JSC UEC Klimov (leading developer of gas turbine engines for military and civil aviation); PJSC United Engine Corporation (produces engines used for military, civil, and space purposes);

- **2 entities that operate in the shipbuilding sector** - PO More Shipyard (shipyard in the Crimea, specializes in the production of high-speed ships and vessels with dynamic support principles, yachts and boats); Yantar Shipyard (Russian shipbuilding company).

Australia. On 29 September, Australia expanded the list of 'import sanctioned goods' for Russia to include gold. Gold is defined under tariff code 7108 as 'Gold (including gold plated with platinum) in unwrought or in semi-manufactured forms, or in powder form' if the gold was exported from Russia after 30 September 2022.

Finland. Russians bury euros in the woods on the Finnish border. In late August the Finnish customs officers began to withdraw cash euros from the Russians at the exit from Finland. Travellers have two options: currency can be left in storage at customs until the next trip, or you can give it to someone who stays in Finland. Instead, Russians prefer to bury their euros and keep the coordinates of the hoard.

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** (US Senate approved a resolution calling to recognizing RF as a sponsor of terrorism + a similar bill on recognizing Russia as a state sponsor of terrorism was presented at the US House of Representatives (the lower house of the US Congress + **Blinken said that he is not ready to make such a decision** + US State Department called RF a "human trafficking" state, a draft Resolution on recognizing Russia's actions in Ukraine as a genocide was registered in the US Senate). On Sep 14, the US senators Richard Blumenthal (Democratic) and Lindsey Graham (Republican) introduced a law according to which Russia can be recognized as a SST. **Russia was banned from participating in current and future FATF projects + from participation in meetings of FATF regional bodies.** **NATO** (recognised RF as "the most significant and direct threat"), **Latvia** (recognized Russia as a sponsor of terrorism), **Estonia** (Estonian Parliament declared Russia a "state sponsor of terrorism, condemned the annexation of the occupied regions of Ukraine and qualified Russia as "the main threat to peace in Europe"). **Poland** (Polish Senate recognized the authorities of the Russian Federation as a terrorist regime) **EU** (PACE adopted resolution calling RF a terrorist regime).

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

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

On June 24, the US Senate Foreign Relations Committee endorsed a resolution calling on the State Department to recognize Russia as a state that sponsors terrorism. The Senate notes that this is only a resolution with an appeal. The final decision rests

with the State Department and the administration of US President Joseph Biden, and the resolution itself is a call to the administration, but not the actual recognition of Russia as a sponsor of terrorism.

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

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

On July 28, the US Senate unanimously approved a resolution calling on Secretary of State Anthony Blinken to declare Russia a state sponsor of terrorism for its actions in Chechnya, Georgia, Syria and Ukraine. **According The New York Times, US Secretary of State Anthony Blinken said that he is not ready to make a decision on recognizing Russia as a state sponsor of terrorism, despite the corresponding resolution of the US Senate, because it could force the US to introduce sanctions against some of the US allies and make it difficult further diplomatic contacts with Russia.**

On the July 28, a similar bill on recognizing Russia as a state sponsor of terrorism was presented at the US House of Representatives (the lower house of the US Congress).

The US State Department has informally warned Congress about the negative consequences of recognizing Russia as a state sponsor of terrorism - Politico. They say that this will make it difficult to fulfill any agreements with the RF. The State Department believes that adding Russia to the list of state sponsors of terrorism will jeopardize the implementation of the "grain agreement" between Ukraine, the UN, Turkey and the RF. It is currently working and gradually contributing to solving the global food crisis, but there are no guarantees that Russia will not withdraw from the agreement after recognizing it as a state sponsor of terrorism.

The US senators from the Democratic and Republican parties introduced a law according to which Russia can be recognized as a state sponsor of terrorism, Reuters (September 14).

FATF. Russia was banned from participating in FATF projects. Raja Kumar, chairman of the International Group on Combating Money Laundering (FATF), on October 24 announced a ban on Russia's participation in current and future projects of the Group, as well as a ban on Russia's participation in meetings of FATF regional bodies. Earlier, in June, the Group excluded representatives of Russia from all governing bodies.

EU. On October 13, the Parliamentary Assembly of the Council of Europe (PACE) adopted a resolution calling RF a terrorist regime. The resolution was adopted unanimously. Out of a hundred assembly members present, 99 voted in favour of the resolution and one abstained.

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

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

Latvia On August 11, the Latvian Sejm declared Russia a "sponsor of terrorism. The deputies believed that the Russian Federation purposefully attacked the civilian population of Ukraine and noted that "violence carried out to achieve political goals is terrorism.

Estonia. On October 18, the Estonian Parliament declared Russia a "state sponsor of terrorism. MPs also condemned the annexation of the occupied regions of Ukraine, which occurred on the basis of pseudo-referendums. The parliament qualified Russia as "the main threat to peace in Europe" and condemned the war in Ukraine. The Wagner PMC and the armed formations of the so-called Donetsk and Luhansk people's republics are also designated as "terrorist organizations".

Poland. On October 26, Polish Senate unanimously passed a resolution to recognize the authorities of the Russian Federation as a terrorist regime, in which it once again, condemned Russian aggression in the strongest terms and called on all countries that advocate peace, democracy and human rights to recognize the authorities of the Russian Federation as a terrorist regime.

5. Strengthen Individual Sanctions against these Categories of Individuals

Russian oligarchs under Western sanctions. **The US Supreme Court denied billionaire Deripaska to lift the sanctions imposed on him in 2018. Later on Oct 11, the British businessman Graham Bonham-Carter was arrested on US charges of conspiracy to violate sanctions imposed on Deripaska. USA (+35 + 18 officials, SOEs management and oligarchs, including A.Mordashov and his family + 58 + visa restrictions for 529 officers of the Russian military and Russian nationals + 2 + 13 inc. Kabaeva + visa**

restrictions on 893 Russian officials + **45, inc. R. Kadyrov and his family members, M.Oreshkin (assistant to Putin), V.Komlev (head of NSPK/Mir)** + 303 individuals, inc. E.Nabiullina, O.Skorobogatova, A.Novak (169 members of the Federation Council of Russia, 109 members of the State Duma of Russia, 5 oligarchs, 2 CBR officials, Deputy PM, 15 family members of sanctioned persons) + visa restrictions for 910 persons, inc. members of the Russian military, Belarusian military officials and Russian proxies in Ukraine + designation for Ochur-Suge Mongush for his alleged involvement & 2 daughters of S.Sobyanin + 1 Russian national and procurement agent (Y. Orekhov) + an indictment charging 5 Russian nationals in connection with a sanctions evasion and money laundering scheme was unsealed in US federal court on 19 October (they are said to have orchestrated a scheme unlawfully to obtain US military and dual-use technology using shell companies and cryptocurrency), **Canada** (+40, +14 +22 senior officials of financial institutions and their family members, including Kabayeva + 21 + 13 Belarus MinDefence officials +30 disinformation and propaganda figures + 43 military staff + 62 Russian officials and their family members + 78 individuals (14 family members of sanctioned persons, 1 businessman, 25 board members of Russian state-linked organisations, 1 GoV official, 1 CBR official, Vice Governor of St. Petersburg, 35 Russia-backed senior officials in Kherson, Zaporizhzhia, Donetsk and Luhansk regions of Ukraine) + 34 agents of Russian propaganda and their family members, and influential individuals spreading disinformation + 35 individuals - senior executives of energy entities (inc. Gazprom) and government officials), **EU** (2 + Gerhard Schroeder, Karin Kneisl and Matthias Waring left board on directors of Rosneft due to threat of sanctioning by EU + 65 RF individuals responsible for atrocities in Bucha and Mariupol, Alina Kabayeva, **Patriarch Kirill was excluded**, + 12 individuals in Belarus for internal repression and human rights violations + 47 individuals, inc. Sobyanin (the mayor of Moscow) + V.Yanukovych and his son O.Yanukovych + decided to suspend visa facilitation agreement + 3 politicians -3 + 30 individuals (10 so-called leaders in areas of Ukraine illegally occupied by Russia, 4 propagandist, 2 oligarchs, 2 officials of the Purins' Administration, 10 military and security government officials, 2 officials of the Central Election Commission of Russia + financial sanctions, inc. freeze of funds and economic resources against 3 Iranian individuals (for their role in the development and supply of Unmanned Aerial Vehicles used by Russia against Ukraine)), **UK** (+31, +12 (Putin's family and friends, incl. Kabayeva) + 12 incl. Patriarch Kirill +8 +7 propagandists + 2 top-managers of Rosneft were re-listed in sanction lists + amended the designation criteria under the Russia sanctions regime (positions, official roles and interpretation of being "associated with" a designated person were expanded and clarified + 41 - **Olga Ayziman has been de-listed - removed M.Razvozhayev (Governor of Sevastopol)** + 1 +89 individuals in response to the "sham referendums" (inc. 26 Russian "officials and collaborators" involved in the organisation of the referendums, 4 "oligarchs", 55 board members of Russian state-linked organisations + asset freeze & travel ban on E.Nabiullina + asset freeze 3 Iranian military nationals which key persons to supply Iranian kamikaze drones to Russia + 4 individuals (inc. 2 ex-top officials of Evraz)), **Poland** (incl. Putin's, Lavrov's daughters, Nabiullina + asset freeze sanctions and entry ban against 4 Russian individuals), **New Zealand** (+170 + 5 in media and propaganda +23 (Belarus military officials and Lukashenko + 48 Russian officials operating in LDPR + financial and travel sanctions on **19 members of President Putin's** inner circle and other representatives of the Russian political elite + broad economic sanctions and travel ban against 74 individuals (Minister of Agriculture, 47 oligarchs, 2 family members of sanctioned persons, 24 so-called 'officials' in illegally annexed regions of Ukraine) and extended further sanctions on 15 individuals with strategic or economic relevance who were previously only travel banned + travel ban against A.Abramov (Former Chair and significant shareholder of Evraz plc) and 4 his family members + 15 (inc. 12 military officials), **Australia** (+76, +34, +15 +16, incl. Kabaeva + 28 individuals (19 so-called leaders in areas of Ukraine illegally occupied by Russia, 3 GoV officials, 4 heads/ deputy-heads of public bodies, 2 members of the Russian Security Council), **Switzerland** (+2 +65 RF +12 Belarus + 54 + V.Yanukovych and his son O.Yanukovych +3 -3 **delisted** + assets freeze and travel ban 30 individuals (10 military and security government officials, 2 officials of Putin's Administration, 2 officials of the Central Election Commission of Russia, 10 so-called leaders in areas of Ukraine illegally occupied by Russia, 2 oligarchs, 4 propagandists + financial sanctions and entry and transit ban on 3 Iranian military officials), **Japan** (+141+62 + 58 individuals (1 representative of Russian national and regional political elite, 18 family members of sanctioned persons, 5 oligarchs, 3 propagandists, 14 Russian military/security officials, 2 leaders of illegal military entities, 14 members of the Interregional Social Organisation Union of Donbas Volunteers) + 23 individuals directly responsible for the unilateral annexation of Donetsk, Luhansk, Kherson and Zaporizhzhia), **Liechtenstein** (2), **Norway** (65 + 54 RF individuals) + 30 (inc. actors involved in the so-called referendums), **Lithuania** (ban on entering country for P.Kirill). **Tourist visa ban for ordinary Russians in EU:** EU terminated the Visa Facilitation Agreement (this will significantly reduce the number of new visas that the EU issues to Russians) from Sep 12; **EC** recommended members of the EU that Schengen visas should be issued to Russians only in Russia. **Latvia, Lithuania, Estonia and Poland** prohibited Russian citizens from entering with tourist Schengen visas issued in any EU country from Sep 19. From Sep 26, Poland closed entrance for Russians with Schengen visas via air and sea checkpoints. **Poland** has complicated employment for Russians - from now entrepreneurs will not be able to employ Russian citizens on simplified terms. **Switzerland and Norway** terminated the Visa Facilitation Agreement from Sep 19. **Latvia** tightened the procedure for obtaining a residence permit for Russians and Belarusians – now in order to extend the residence permit, citizens of these countries will have to provide a certificate of knowledge of the Latvian language by September next year. From Sep 19, restricted entrance to the Schengen area for Russians with EU visas who come for tourist, cultural, sports and business purposes + no longer allow for an extension of temporary residence permits for Russian and Belarusian citizens who received their residence permit on the basis of investment or the purchase of real estate in Latvia & the permanent residence permits of Russian citizens who were citizens or non-citizens of Latvia prior to obtaining Russian citizenship, will be valid until 1 September 2023. Afterwards, to receive a new permanent residence permit, they will have to provide certification of state language proficiency. **Estonia.** From Sep 19 temporarily restricted the crossing of the external border by Russians holding a valid short-stay visa for the purpose of entering Estonia. **Lithuania.** From 19 Sep implemented stricter verification procedures for all Russian nationals when crossing the external border of the EU to reach Lithuania. On Sep 23, **Finland** announced that it would ban Russian citizens from entering the country for tourist purposes on any Schengen visa. From Sep 30, Finland suspended issuing visas to Russians if the reason for their travel is tourism + Russians can no longer enter the territory of the EU, for example, from the border of another Schengen country with a visa

issued by Finland. **Czech Republic.** From 25 Oct all Russians with valid Schengen visas for tourism, culture and sport issued by any Schengen member state will be denied entry to the Czech Republic. **Loophole - only flights from non-Schengen countries will be monitored + holders of work or study visas are not subject to the restriction.** After Putin announced mobilization, Russians started to run away from the country. The main destinations – Georgia, Kazakhstan, UAE and Turkey. **Kazakhstan** already stated that it is not going to provide shelter to Russian evaders and will extradite the RF wanted persons for evading the mobilization. **However, the EU, Germany and Spain advocate allowing the entry of Russians fleeing mobilization.** **Belarus.** Belarusian border guards restricting the foreign travel of men subject to mobilization.

Since 2014, Russian government officials, businessmen and propagandists are currently under Western sanctions: UK sanctioned 1,447 persons, Canada - 1,517, the EU - 1,267, Switzerland - 1,248, Australia - 1,034, USA - 1,272, Japan - 916, Ukraine - 6,414 (NAZK).

Data from NAZK and KSE Institute.

New personal sanctions – Apr 19, 2022 – Nov 03, 2022

Country	Number of individuals sanctioned
USA	+202+307
UK	+241-2+6-1
EU	+131-3+30
Canada	+449+147
Switzerland	+126-3+30
Australia	+288+28
Japan	+203+81
Poland	+15
Liechtenstein	+2
New Zealand	+260+89
Norway	+119+30

Russia's first oligarch returned to Russia because of Western sanctions. Billionaire German Khan, whose fortune is estimated at \$7.7bn, returned to Russia because of the personal sanctions of the West, reported Bloomberg on September 8. He lived in London for nearly a decade, but was forced to move to Moscow a few months after the start of the war in Ukraine.

The US Supreme Court has finally denied billionaire Oleg Deripaska to lift the sanctions that were imposed on him in 2018 under President D.Trump. Later on Oct 11 in the UK, the British businessman Graham Bonham-Carter was arrested on US charges of conspiracy to violate sanctions imposed on Russian oligarch Oleg Deripaska.

On 29 September, the Justice Department announced the unsealing of an indictment charging a U.S. citizen (Olga Shriki) and three citizens of Russia (Oleg Vladimirovich Deripaska, Natalia Mikhaylovna Bardakova, Ekaterina Olegovna Voronina) with violating new U.S. sanctions. Oleg Deripaska, founder of Russian aluminium company Rusal, has been charged in the US District Court for the Southern District of New York with conspiring to violate the US sanctions against him and his company Basic Element, alongside Russian national Natalia Bardakova and a New Jersey resident and naturalised US citizen Olga Shriki. Mr Deripaska and Basic Element have been listed under pursuant to Executive Orders 13661 and 13662 since April 2018. Deripaska's girlfriend Ekaterina Voronina has also been charged with making false statements when attempting to enter the US for the purpose of giving birth to their second child.

Deripaska, through the corporate entity Gracetown Inc., illegally utilized the U.S. financial system to maintain and retain three luxury properties in the US, and further employed Olga Shriki and Natalia Mikhaylovna Bardakova to utilize U.S. financial institutions to provide hundreds of thousands of dollars' worth of services for his benefit in the United States. For example, in or about 2019, Shriki facilitated for Deripaska's benefit the sale of a music studio in California for over \$3 million. Deripaska had owned the studio through a series of corporate shell companies that obscured his actual ownership. Following the sale of the studio, Shriki attempted to expatriate over \$3 million in proceeds through one such shell company, Ocean Studios California LLC, to a Russia-based account belonging to another Deripaska company.

Deripaska is alleged to have conspired with Ms Bardakova and Ms Shriki to evade and violate US sanctions (in violation of the International Emergency Economic Powers Act (IEEPA), which carries a maximum sentence of 20 years' imprisonment) in various ways, including by owning and selling US property through networks of corporate shell companies that obscured his ownership, purchasing and sending flowers and gift deliveries to contacts in the US and Canada and facilitating the birth and life in the US of he and Ms Voronina's first child.

Shriki is further charged with obstruction of justice based on her alleged deletion of electronic records relating to her participation in Deripaska's sanctions evasion scheme following receipt of a grand jury subpoena requiring the production of those records, which carries a maximum sentence of 20 years in prison. Bardakova is charged with one count with making false statements to agents of the FBI and Voronina is charged with making false statements to agents of the U.S. Department of Homeland Security at the time of Voronina's attempted entry into the US for the purpose of giving birth to Deripaska's child, which carries a maximum sentence of 5 years in prison. Shriki was arrested on 29 September.

The indictment also provides notice of the United States' intention to forfeit from Deripaska the proceeds of his offense, including the U.S. properties and the proceeds from the sale of the music studio.

On 12 October, UK businessman Graham Bonham-Carter was arrested in the UK, pursuant to an extradition request from the United States for conspiracy to violate US sanctions imposed on Oleg Deripaska and wire fraud. Mr Deripaska was designated by the USA in April 2018. It is alleged that after this designation, Mr Bonham-Carter, an employee of Mr Deripaska, transmitted over \$1m from a bank account in Russia to bank accounts in New York for the upkeep of residential properties in the US owned by Mr Deripaska. It is also alleged that Mr Bonham-Carter attempted to transfer artwork purchased by Mr Deripaska from an auction house in New York to London, concealing Deripaska's ownership of the artwork.

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 oligarchs¹².

On 28 June, OFAC designated 29 Russian individuals¹³ and State Department 29 Russian individuals as SDNs¹⁴.

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

¹² Yury Slyusar, the President of United Aircraft Corporation (UAC), a Russian state-owned company and major supplier of aircraft to Russia's military, and one of the leading actors in Russia's industry and defense sector with close ties to RF GoV; Vitaly Savelyev, the Minister of Transport of Russia, a member of the Board of Directors of Russian Railways; the Chairman of the Board of Directors of Aeroflot; Maxim Reshetnikov, the Minister of Economic Development of Russia, member of the boards of sanctioned Russian entities, including VTB Bank, VEB.RF, and Russian Railways; Irek Envarovich Faizullin, the Minister of Construction, Housing and Utilities of Russia and a member of the board of directors of Russian Railways; Dmitriy Yuryevich Grigorenko, the Deputy Prime Minister and Chief of the Government Staff of Russia; Sergey Nikolaevich GORKOV (General Director - Chairman of the Board of JSC "Rosgeologiya"), Dmitriy Yuryevich GRIGORENKO (Deputy Prime Minister of Russia - Chief of the Government Staff), God Semenov 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).

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

¹⁴ **The illegitimate Russia-installed "mayor" of Melitopol** - DANYLCHENKO, Halyna Viktorivna; **19 members of the Rostec board of directors** - ANDRIANOV, Nikolay Valentinovich, ARTYAKOV, Vladimir Vladimirovich, BORISOVA, Natalya Vladimirovna, BROVKO, Vasily Yuryevich, EVTUSHENKO, Oleg Nikolaevich, KIRYANOV, Victor Nikolayevich, KOPEV, Yury Nikolayevich, LELIKOV, Dmitry Yuryevich, LITVIN, Vladimir Zalmanovich, NAZAROV, Aleksander Yuryevich, OSIN, Pavel Mikhailovich, POPOV, Aleksandr Nikolaevich, SERDYUKOV, Anatoly Eduardovich, SIERRA, Elena Oduliovna, SMIRNOVA, Natalya Ivanovna, TSYB, Sergey Anatolyevich, VOLOBUEV, Nikolai Anatolevich, VYBORNYYKH, Maksim Vladimirovich, ZAVIYALOV, Igor Nikolaevich; and **9 of their family members** - ARTYAKOV, Dmitriy Vladimirovich, ARTYAKOVA, Tatiana Vladimirovna, KIRYANOVA, Tatiana Borisovna, KANDELAKI, Tina, KONDRACHINA, Melaniya Andreyevna, KONDRACHIN, Leontiy Andreyevich, SERDYUKOV, Sergey Anatolevich, SERDYUKOVA, Natalya Anatolevna, VASILEVA, Evgeniya Nikolaevna;

On 29 July, OFAC added Russian nationals Aleksandr Viktorovich Ionov and Natalya Valeryevna Burlinova to SDN List for support of Russia's global malign influence operations and election interference activities.

On 2 August, OFAC added to SDN List:

- **5 business people** - GURYEV, Andrey Andreevich (A.G. Guryev's son, former CEO of PhosAgro, owner of Dzhi AI Invest OOO (DAI)), GURYEV, Andrey Grigoryevich (founder and former Deputy Chairman of PhosAgro, a leading Russian chemical company), POPOVA, Natalya Valeryevna (First Deputy Director of Non-State Development Institute Innopraktika, a technology company in Russia, spouse of Kirill Aleksandrovich Dmitriev), RASHNIKOV, Viktor Filippovich (majority owner and chairman of the Board of Directors of Publichnoe Aktsionernoe Obschestvo Magnitogorskiy Metallurgicheskiy Kombinat (MMK)), URUSOV, Anton Sergeevich (General Director of JSC Promising Industrial and Infrastructure Technologies (JSC PPIT)),
- KABAEVA, Alina Maratovna (former member of the State Duma, head of the National Media Group, a pro-Kremlin empire of television, radio, and print organizations).

On 2 August, the Department of State designated as SDN:

- **3 oligarchs** - MELNICHENKO, Andrey Igorevich (former member of the board of directors of EuroChem and Siberian Coal Energy Company (SUEK)), PONOMARENKO, Alexander Anatolevich (former Chairman of the Board of Directors of Sheremetyevo Airport), PUMPYANSKIY, Dmitriy Aleksandrovich (former Chairman of the Board of Directors of Pipe Metallurgical Company (TMK) and president of Sinara Group),
- **4 individuals that are or are enabling illegitimate, political leaders installed by Russia or its proxy forces** to undermine political stability in Ukraine in support of Russia's further invasion of Ukraine - Kostyantyn Volodymyrovych IVASHCHENKO (illegitimate mayor of Russia-controlled Mariupol), Volodymyr Vasilyovich SALDO (head of the Russia-created Kherson Military-Civilian Administration), Kyrylo Serhiyovych STREMOUSOV (deputy head of the Russia-created Kherson Military-Civilian Administration), Sergey Vladimirovich YELISEYEV (head of the Russia-installed Kherson regional government).

On 2 August, the Department of State announced visa restrictions on 893 Russian officials, including members of the Federation Council and members of Russia's military, as well as on 31 foreign government officials who have acted to support Russia's purported annexation of the Crimea region of Ukraine, who are believed to have supported, been actively complicit in, or been responsible for ordering or otherwise directing or authorizing actions that threaten or violate the sovereignty, territorial integrity, or political independence of Ukraine.

On 8 September, OFAC imposed sanctions on 1 Iranian national - Rehmatollah Heidari, Managing Director of Baharestan Kish Company - for his involvement in the research and production of UAVs for Iran's Islamic Revolutionary Guard Corps (IRGC) and its Aerospace Force (IRGC ASF) and Navy.

On 15 September, OFAC sanctioned 22 individuals, including:

- **4 finance executives** for operating or having operated in the financial services sector of the Russian economy - KOMLEV Vladimir Valerievich (Chairman of the Management Board and the Chief Executive Officer of NSPK, a Central Bank of Russia owned entity that operates the country's Mir payment card network, ZHIDKOV Viktor Olegovich (Chairman of the Management and Executive Board of Non-Bank Credit Institution JSC National Settlement Depository (NSD), Russia's central securities depository, ASTANIN Eddie Vladimirovich (Chairman of the Management Board and Chairman of the Executive Board of JSC Non-Bank Credit Organization Central Counterparty National Clearing Center (CCP NCC), the Moscow-based stock exchange's clearing service provider; former Chairman of the Executive Board and member of the Supervisory Board of the National Settlement Depository (NSD)), MELNIKOV Andrei Gennadyevich¹⁵ (General Director of Russia's Deposit Insurance Agency, a state-owned entity that the Kremlin uses for liquidating financial institutions and accessing foreign assets);
- **1 representatives of Russian national political elite** - LVOVA-BELOVA Maria Alexeyevna, Russian Presidential Commissioner for Children's Rights;
- **Leader of Russia's Republic of Chechnya and his immediate family members** - KADYROV, Ramzan Akhmatovich¹⁶; KADYROVA Medni Musaevna, KHAZUEVA Fatima Shaykhiyevna, AKHMADOVA Aminat (Kadyrov's wives), KADYROVA Ayshat Ramzanovna, KADYROVA Karina Ramzanovna, KADYROVA Tabarik Ramzanovna (Kadyrov's adult daughters), IBRAGIMOV Turpal-Ali Vakhayevich (Kadyrov's cousin);
- **2 leaders of neo-Nazi paramilitary group Task Force Rusich** - MILCHAKOV Alexey Yurevich and PETROVSKIY Yan Igorevich.
- **7 proxies of Russian occupation authorities operating in the Crimea region of Ukraine** and abusing Ukrainians - BULGAKOV Sergei Viktorovich (purported "Deputy Prosecutor and Senior Counselor of Justice" for the so-called "Republic of Crimea"), DOLGOPOLOV Andrey Nikolayevich (purported Chairman of the Kyiv District Court in Simferopol in the so-called Republic of Crimea), BELOUSOV Mikhail Nikolaevich (judge in the Kyiv District Court in Simferopol in the

¹⁵ Melnikov was previously designated by OFAC in 2017 pursuant to E.O. 13660 for being responsible for or complicit in, or for having engaged in, directly or indirectly, actions or policies that threaten the peace, security, stability, sovereignty, or territorial integrity of Ukraine, and for asserting governmental authority over any part or region of Ukraine without the authorization of the Government of Ukraine.

¹⁶ Kadyrov was previously designated pursuant to E.O. 13818 in December 2020 and in December 2017 pursuant to the Sergei Magnitsky Rule of Law Accountability Act of 2012.

so-called Republic of Crimea), MOZHELYANSKIY Viktor Anatolyevich (judge in the Kyiv District Court in Simferopol in the so-called Republic of Crimea), ERMAKOVA Mariya Gennadevna ("judge" in the Dzhankoi District Court of the so-called Republic of Crimea), KRYLLO Pavel Velerevich ("judge" in the Gagarinskiy District Court in Sevastopol), GRAMASHOV, Dmitry Sergeevich (Russian FSB officer illegally operating in the Crimea region of Ukraine and targeting a journalist for repression).

The Department of State designated:

- **1 Russian Government Official** - ORESHKIN Maksim Stanislavovich (Assistant to the President of Russia);
- **5 'proxy' officials involved in theft of Ukrainian grain on behalf of Russia** - BALYTSKYI Yevhen Vitaliiovich (head of the Zaporizhzhia military-civilian administration appointed by the Government of Russia), SIGUTA Andriy Leonidovich (head of the military-civilian administration of the Melitopol District appointed by the Government of Russia), KOLTSOV Anton Viktorovich (head of the military-civilian government in the Zaporizhzhia Region appointed by the Government of Russia), SAULENKO Oleksandr Fedorovich (mayor of Berdyansk appointed by the Government of Russia), PAKHNYTS Valery Mykhailovich (head of the Starobilsk District of the so-called Luhansk People's Republic appointed by the Government of Russia);
- **17 'proxy' Russian officials operating in Ukraine** - ROGOV Volodymyr Valeriyovich (head of the military-civilian administration in the Zaporizhzhia Region appointed by the Government of Russia), BANDURA Volodymyr Volodymyrovich (Svyatohirsk's mayor, appointed city administrator by pro-Russia separatists), RODIKOV Mikhail Leonidovich (head of the Ministry of Education and Science of the occupational government in the Kherson Region), BESPALOV Vladimir Aleksandrovich (Deputy Head of the occupation government in Kherson), FILIPCHUK Pavlo Ihorovich (head of the city of Kahovka appointed by Russia's forces), TUMILINA Tetyana Yuriivna (rector of Kherson State University appointed with the help of Russia's forces), SHELESTENKO Hennadiy Oleksandrovich (member of the military-civilian administration in the Kherson Region), KOBETS Oleksandr Yuriyovich (mayor of Kherson appointed by Russia's forces), SEMENCHEV Ihor Ihorovich (member of the previously designated Salvation Committee for Peace and Order), KUZ'MYCH Tetyana Oleksandrivna (head of the Department of Education and Science under the Russia-controlled government of Kherson), CHEREVKO Serhiy Mykolayovich (creator and member of the previously designated Salvation Committee for Peace and Order), KOZENKO Andrey Dmitrievich (deputy head of the Zaporizhzhia military-civilian administration), SELIVANOV Oleksiy Sergeevich (Deputy Head of the Ministry of Internal Affairs in the Zaporizhzhia Region), TITSKIY Anton Robertovich (Minister of Youth Policy under the military-civilian administration in the Zaporizhzhia Region appointed by Russia), TROFIMOV Andriy Yuriyovich (deputy head of the Russia-controlled military-civilian administration in the Zaporizhzhia Region), SAMOILENKO Mykyta Ivanovich (deputy mayor of Berdynask appointed by pro-Russia forces), EMELIANENKO Viktor Andriyovich (deputy head of the Russia-controlled military-civilian administration in the Zaporizhzhia Region).

On 30 September, OFAC in response to the Russian annexation of Donetsk, Luhansk, Kherson and Zaporizhzhia added 303 Russian individuals to the SDN List:

- **169 members of the Federation Council of Russia (of which 10 were redesignated);**
- **109 members of the State Duma of Russia (of which 8 of them were redesignated);**
- **5 Oligarchs and businesspeople in Russia's military-industrial complex** – 3 current / former representatives of Radioavtomatika, a US-listed Russian defence procurement firm – Sergey Vyacheslavovich BYZOV (First Deputy General Director), Dmitrii Vladimirovich GALIN (Deputy General Director), Vladimir Aleksandrovich IVANOV (General Director); Andrei Vladimirovich KHOKHLOV (General Director of Novastream Limited, which was established in close coordination with Radioavtomatika officials); Aleksandr Pavlovich SARKISYAN (General Director of Scientific-Technical Center for Electronic Warfare (AO NTTs REB));
- **2 Central Bank of Russia officials** – Elvira Sakhizadovna NABIULLINA (Governor of the Central Bank of Russia); Olga Nikolaevna SKOROBOGATOVA (First Deputy Governor of the Central Bank of Russia);
- **1 national government official** - Aleksandr Valentinovich NOVAK (Russian Deputy Prime Minister of Russia);
- **2 military government officials (both re-designated)** - Viktor Vasiliyevich ZOLOTOV (Russian National Guard head); Sergey Kuzhugetovich SHOIGU (Minister of Defence of Russia, member of the Russian Security Council);
- **15 family members of previously sanctioned persons** – Natalya Vladimirovna BEGLOVA (wife of Aleksandr Beglov); Yuliya Aleksandrovna BELOVA (daughter of Aleksandr Beglov); Olga Aleksandrovna BEGLOVA (daughter of Aleksandr Beglov); Roman Viktorovich ZOLOTOV (son of Viktor Zolotov); Zhanna Viktorovna ZOLOTOVA (daughter of Viktor Zolotov); Yuriy Valeryevich CHECHIKHIN (son-in-law of Viktor Zolotov); Sergey Vladimirovich MATVIYENKO (son of Valentina Matviyenko); Svetlana Vladimirovna MEDVEDEVA (wife of Dmitry Medvedev); Ilya Dmitrievich MEDVEDEV (son of Dmitry Medvedev); Vladlena Yuryevna MISHUSTINA (wife of Mikhail Mishustin); Aleksey Mikhaylovich MISHUSTIN (son of Mikhail Mishustin); Aleksandr Mikhaylovich MISHUSTIN (son of Mikhail Mishustin); Irina Aleksandrovna SHOIGU (wife of Sergey SHOIGU); Yuliya Sergeyevna SHOIGU (daughter of Sergey SHOIGU); Kseniya Sergeyevna SHOIGU (daughter of Sergey SHOIGU);

On 30 September, the State Department in response to the Russian annexation of Donetsk, Luhansk, Kherson and Zaporizhzhia:

- imposed **visa restrictions on 910 people**, inc. members of the Russian military, Belarusian military officials and Russian proxies in Ukraine;
- designated Russian national Ochur-Suge Mongush for his alleged involvement in human rights violations against a Ukrainian prisoner of war, rendering him and his family members ineligible for entry into the US;

- designated Olga Sergeevna Sobyana and Anna Sergeevna Ershova (the adult children of Moscow mayor and Russian Security Council member Sergey Sobyenin).

On 19 October, OFAC in coordination with the U.S. Department of Justice and the Federal Bureau of Investigation (FBI), designated a Russian network that procured military and sensitive dual-use technologies from U.S. manufacturers and supplied them to Russian end-users. Russian national and procurement agent Yury Yuryevich Orekhov was designated as SDN for operating or having operated in the technology sector of the Russian economy.

An indictment charging 5 Russian nationals in connection with a sanctions evasion and money laundering scheme was unsealed in US federal court on 19 October. Those charged include Yury Orekhov, Artem Uss, Svetlana Kuzurgasheva (also known as Lana Neumann), Timofey Telegin and Sergey Tulyakov. They are said to have orchestrated a scheme unlawfully to obtain US military and dual-use technology using shell companies and cryptocurrency.

It is alleged that Mr Orekhov, Mr Uss and Ms Kuzurgasheva used Hamburg-based Nord-Deutsche Industrieanlagenbau GmbH (NDA) as a front company to source and purchase advanced semiconductors and microprocessors used in fighter aircraft, missile systems, smart munitions, radar, satellites and other space-based military applications for Russian end-users, including US-sanctioned companies controlled by Mr Telegin and Mr Tulyakov. Some of the electronic components are alleged to have been found in weapons used by the Russian military in Ukraine.

On October 17, Orekhov was arrested in Germany and Uss was arrested in Italy, both at the request of the United States, and will undergo extradition proceedings.

If convicted, the defendants face a maximum of 30 years' imprisonment. The charges in the indictment are allegations, and the defendants are presumed innocent unless and until proven guilty.

On 26 October, OFAC designated as SDN 9 individuals that have been involved in the Kremlin's attempts to interfere in Moldova's elections. Moldovan politician Ilan Mironovich SHOR (leader of the Shor Party) alongside his wife Sara Lvovna SHOR is designated for his alleged role in a scheme to undermine Moldovan president Maia Sandu and return Moldova to Russia's sphere of influence, Russian national Igor Yuryevich CHAYKA (son of Yuriy Chayka, a member of Russia's Security Council) for being responsible for or complicit in, or for having directly or indirectly engaged or attempted to engage in interference in a United States or other foreign government election for or on behalf of, or for the benefit of, directly or indirectly, the Government of Russia⁶ and 5 of Chaika's associates - Leonid Mikhailovich GONIN (worked as advisors to former Moldovan President Igor Dodon), Olga Yurievna GRAK (worked as advisors to former Moldovan President Igor Dodon), Yuriy Igorevich GUDILIN (political technologist and former Russian FSB officer), Aleksei Valeryevich TROSHIN (Chaika's partner in National Engineering Corporation (NIK)), Ivan Aleksandrovich ZAVOROTNYI (serves on the board of many of Chaika's companies). Former Moldovan government official Vladimir Plahotniuc has been listed pursuant Global Magnitsky sanctions for for being a former government official responsible for or complicit in, or who has directly or indirectly engaged in, corruption.

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 Nabiullina¹⁷. On April 26, Canada amended its sanctions measures by designating an additional **203** individuals determined by the Government of Canada to be current senior officials or current or former members of the People's Councils of the so-called DPR and LPR. On 2 May, Canada further amended the Special Economic Measures (Russia) Regulations to list an additional 21 oligarchs, close associates of the Russian regime, and members of their families¹⁸. On 6 May, Canada added to list an additional 19 individuals who are senior defense officials¹⁹. 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 Ukraine²⁰. 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 bans²¹. 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

¹⁷ 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.

¹⁸ Vagit Yusufovich ALEKPEROV, Alexander Dmitrievich PUMPYANSKY, Sergey Alexandrovich KULIKOV, Andrey Andreevich GURIEV, Dmitri Alekseevich LEBEDEV, Viktor Filippovich RASHNIKOV, Alexey Viktorovich KUZMICHIEV, 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 Vasilyevich LUKYANENKO, Anatoly Yurievich PECHATNIKOV, Olga GOLODETS, Bella Ilyinichna ZLATKIS, Stanislav Konstantinovich KUZNETSOV, Boris Viktorovich OBNOISOV

¹⁹ Andrey Sergeyevich 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 Khadzismelovich TSALIKOV, Gennady Valeryevich ZHIDKO, Sergey Analolievich KOGOGIN, Dmitry Evgenevich SHUGAEV, Azatbek Asanbekovich OMURBEKOV, Yunus-Bek Batmatgireyevich YEVKUROV, Sharip Sultanovich DELIMKHANOV, Alimbek Sultanovich DELIMKHANOV, Amkhad Sultanovich DELIMKHANOV

²⁰ Oleg Valentinovich BELOZYOROV, Grigory Viktorovich BEREZKIN, Elena Petrovna TIMCHENKO, Farkhad AKHMEDOV, Igor Albertovich KESAEV, David Lvovich DAVIDOVICH, Andrey Valerievich RYUMIN, Dmitry Arkadievich MAZEPIN, Nikita Dmitriyevich MAZEPIN, Ksenia Gennadevna FRANK, Gleb Sergeevich FRANK, Natalya BROWNING, Alexander Yevgenievich LEBEDEV, Julia Alexandrovna MATVIYENKO

²¹ 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.

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 members²².

On June 27, Canada sanctioned 6 individuals²³ who are Russian senior defence officials, 13 senior officials of the Ministry of Defence of Belarus²⁴ and 15 former senior officials and their family members, as well as so-called leaders in areas of Ukraine illegally occupied by Russian forces or controlled by Russian-backed proxies²⁵.

On 7 July, Canada sanctioned 30 individuals who are Russian disinformation and propaganda figures²⁶.

On 29 July, Canada imposed sanctions on 43 military staff individuals:

- **42 military staff individuals of the 64th Separate Motorised Rifle Brigade of the 35th Combined Arms Army of Russia responsible for the atrocities committed by Russian troops in Bucha:** Andrei Boevich KURBANOV (Colonel); Viacheslav Sergeevich KLOBUKOV (Colonel); Aleksandr Viktorovich VINS (Colonel); Aleksandr Leonidovich SHERSHNEV (Colonel); Sergei Aleksandrovich VETROV (Lieutenant colonel); Ruslan Ovsepoich MITIAEV (Lieutenant colonel); Andrei Nikolaevich ERMISHKO (Lieutenant colonel); Maksim Alekseevich PLATONENKOV (Lieutenant colonel); Vladimir Viktorovich MATAFONOV (Lieutenant colonel); Dmitrii Ivanovich LVOV (Lieutenant colonel); Evgenii Valerievich LADYZHENSKI (Lieutenant colonel); Dmitrii Viktorovich PAKHANDRIN (Lieutenant colonel); Anatolii Aleksandrovich SHIPITSYN (Lieutenant colonel); Denis Nikolaevich DEEV (Lieutenant colonel); Oleg Yurievich BUKHVALOV (Lieutenant colonel); Dmitrii Aleksandrovich SMOLIAGO (Lieutenant colonel); Aleksei Viacheslavovich BOLSHAKOV (Lieutenant colonel); Roman Vladimirovich NADEZHIN (Lieutenant colonel); Viktor Vladimirovich FILIPPOV (Lieutenant colonel); Faik Sameddin oglu MAMEDOV (Major); Igor Evgenievich FEDOTOV (Major); German Nikolaevich KULEMIN (Major); Roman Victorovich BURDO (Major); Dmitry Arkadyevich KOZLOV (Major); Ivan Alexandrovich KURKIN (Major); Dmitry Yulianovich IONOV (Major); Alexander Vladimirovich KOPYLOV (Major); Maxim Vladimirovich CHERNYSHEV (Major); Stanislav Igorevich MAKAROV (Major); Andrey Nikolaevich IVANOV (Major); Sergei Gennadyevich PERESHIVKIN (Major); Aleksey Vladimirovich PRYSEV (Major); Sergey Viktorovich RUDENKO (Major); Olga Aleksandrovna KHAMENOK (Major); Dmitriy Gennadievich LEVIN (Major); Dmitriy Alekseevich GONCHAR (Major); Sergey Sergeevich ZORIN (Major); Aleksandr Aleksandrovich POTAPOV (Major); Stepan Viktorovich GRIGOROV (Major); Sergey Viktorovich MOSALEV (Major); Valentin Pavlovich LUTSAK (Major); Sergey Nikolaevich BORISENKO (Major);
- **1 Russian military official who led the actions of subordinate forces during the operation to capture Kyiv from the west:** Aleksandr Semyonovich SANCHIK (Commander of the 35th Combined Arms of the Eastern Military District).

On 19 August, Canada imposed sanctions measures against 62 Russian officials and their family members:

- **1 RF government official** - Oleg Mikhailovich SVIRIDENKO (Deputy Minister of Justice of Russia),
- **1 senior military official** - Vladimir Stepanovich ALEKSEEV (First Deputy Chief of the Main Directorate of the General Staff of Russia),
- **1 representatives of Russian national political elite** - Maria Alekseevna LVOVA-BELOVA (Presidential Commissioner for children's rights),
- **2 so-called leaders in areas of Ukraine illegally occupied by Russian forces or controlled by Russian-backed proxies** – Vitaly Pavlovich KHOTSENKO (Prime Minister of the 'Donetsk People's Republic'), Vladislav Vyacheslavovich KUZNETSOV (First Deputy Chairman of the 'Luhansk People's Republic'),
- **27 representatives of Russian regional political elite** - Alexander Viktorovich MOOR (Governor of Tyumen Region), Alexander Vasilievich BOGOMAZ (Governor of Bryansk Region), Roman Vladimirovich STAROVOIT (Governor of Kursk Region), Gleb Sergeyevich NIKITIN (Governor of Nizhny Novgorod Region), Yevgeny Vladimirovich KUYVASHEV (Governor of Sverdlovsk Region), Alexei Leonidovich TEKSLER (Governor of the Chelyabinsk Region), Dmitry Igorevich AZAROV (Governor of Samara Region), Radiy Faritovich KHABIROV (Head of the Republic of Bashkortostan/Bashkiria),

²² Alina Maratovna KABAEVA (Chairman of the Board of Directors of CJSC National Media Group, politician, Russian athlete), Olga AYZIMAN (wife of Mikhail FRIDMAN), Elena Aleksandrovna GEORGIEVA (Chairman of the Board of Novikombank), Larisa Mikhailovna FRIDMAN and Ekaterina FRIDMAN (daughters of Mikhail FRIDMAN), Andrei KOZITSYN (General Director of the Ural Mining and Metallurgical Company), Mikhail Lvovich KUCHMENT (Vice President of Home interior (Hoff); Chairman of the Supervisory Board of Sovcombank), Milana KOROLEVA (Russian blogger, model, TV presenter and journalist; wife of Mikhail KUCHMENT), Anatoly Alexandrovich BRAVERMAN (First Deputy General Director of the Russian Direct Investment Fund; General Director of the Russian Venture Company), Inna Yakovlevna BRAVERMAN (wife of Alexander BRAVERMAN), Alexander Arnoldovich BRAVERMAN (First Deputy Chairman of VEB.RF), Mikhail Nikolaevich ROSSEEV (Deputy Chairman of the Board - Chief Accountant of Gazprom), Vadim KULIK (Deputy Chairman of the Board of the VTB Bank), Natalia Germanovna DIRKS (Member of the Board of VTB Bank), Maxim Dmitriyevich KONDRATENKO (Member of the Board of VTB Bank), Erkin Rakhmatovich NOROV (Member of the Board of VTB Bank), Svyatoslav OSTROVSKY (Member of the Board of VTB Bank), Dmitry PIANOV (Member of the Board of VTB Bank), Sergey Alexandrovich MALTSEV (Member of the 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).

²³ Adam Sultanovich DELIMKHANOV, Mikhail Eduardovich OSEEVSKY, Mikhail Igorevich POLUBOYARINOV, Sergei Alexandrovich MARKOV, Sergey Alexandrovich PAHOMOV, Denis Gennadievich POPOV.

²⁴ Dmitriy Valeryevich PAULICHENKA, Yuri Leandavich SIVAKOV, Viktor Uladzimiravich SHEIMAN, Andrii SICH, Igor Viktorovich PETRISHENKO, Yuri Victorovich NAZAROV, Roman Aleksandrovich GOLOVCHENKO, Vladimir Vladimirovich MAKEY, Yuri Mikhailovich SELIVERSTOV, Aleksander Viktorovich CHERVYAKOV, Viktor Mikhailovich KARANKEVICH, Uladzimir Borisovich PIARTSOV, Kanstantsin Konstantinovich SHULHAN.

²⁵ Galina Viktorovna DANILCHENKO, Illia Volodymyrovych KIVA, Kateryna Illiaovna KIVA, Aleksandr Yurievich KOBETS, Volodymyr Vasylovych SALDO, Kirill Sergeyevich STREMOUSOV, Konstantin Vladimirovich IVASHCHENKO, Tetiana Oleksandrivna KUZMICH, Yevheniy Vitalyevich BALITSKY, Serhiy Mykolayovych CHEREVKO, Ihor Ihorovych SEMENCHEV, Georgiy Dmytrovych KALENOV, Dmytro Mikhailovich SAVLUCHENKO, Pavel Igorevich FILIPCHUK, Vladimir Valeryevich ROGOV.

²⁶ Alexander Yevgenievich LEBEDEV, Aleksei Viktorovich PIMANOV, Andrei Vitalyevich ILYASHENKO, Armen Sumbatovich GASPARYAN, Artyom Grigoryevich SHEYNIN, Dmitry Yevgenievich KULIKOV, Maksut Igorevich SHADAYEV, Vladimir Nikolayevich SENGORKIN, Oleg Borisovich DOBRODEEV, Sergey Vladimirovich MIKHAILOV, Tigran Edmondovich KEOSAYAN, Olga Vladimirovna SKABEYeva, Modest Alexeyevich KOLEROV, Roman Georgievich BABAYAN, Yevgeniy Nikolaevich PRILEPIN, Anton Vyacheslavovich KRASOVSKY, Arkady Viktorovich MAMONTOV, Alexey Lvovich NIKOLOV, Anton Sergeyevich ANISIMOV, Maria Vladimirovna ZAKHAROVA, Irina Vladimirovna VOLK, Vladimir Mikhailovich GUNDYAYEV, Tigran Oganesovich KHUDAVERDYAN, Andrei Yurievich LIPOV, Vladimir Viktorovich LOGUNOV, Oleg Aleksandrovich TERLYAKOV, Vadim Alekseevich SUBBOTIN, Milosh Eduardovich VAGNER, Petr AKOPOV, Ekaterina Sergeevna ANDREEVA.

Oleg Alekseyevich NIKOLAYEV (Head of Chuvashia), Alexander Viktorovich USS (Governor of Krasnoyarsk Territory), Andrei Alexandrovich TRAVNIKOV (Governor of Novosibirsk Region), Roman Viktorovich BUSARGIN (Acting Governor of Saratov Region), Alexander Aleksandrovich AVDEEV (Acting Governor of Vladimir Region), Denis Vladimirovich PASLER (Governor of Orenburg Region), Andrei Ivanovich BOCHAROV (Governor of Volgograd Region), Alexander Yurievich DROZDENKO (Governor of Leningrad Region), Maxim Borisovich EGOROV (Acting Governor of Tambov Region), Oleg Aleksandrovich KUVSHINNIKOV (Governor of Vologda Region), Vladimir Viktorovich UYBA (Head of the Komi Republic), Vladislav Valeryevich SHAPSHA (Governor of Kaluga Region), Vladimir Vladimirovich VLADIMIROV (Governor of Stavropol Territory), Aisen Sergeyevich NIKOLAYEV (Head of Chuvashia), Aleksandr Viktorovich GUSEV (Governor of Voronezh Region), Vasily Aleksandrovich ORLOV (Governor of the Amur Region), Dmitry Andreyevich ARTYUKHOV (Governor of the Yamalo-Nenets Autonomous Area), Igor Georgiyevich ARTAMONOV (Governor of Lipetsk Region), Viktor Petrovich TOMENKO (Governor of the Altai Territory);

- **25 senior officials of previously listed entities** - Vladimir Vladimirovich ARTYAKOV (First Deputy General Director of Rostec State Corporation), Sergey Anatolyevich TSYB (State Secretary of Rostec State Corporation), Nikolai Anatolevich VOLOBUEV (Deputy General Director of Rostec State Corporation), Igor Nikolaevich ZAVIYALOV (Deputy General Director of Rostec State Corporation), Aleksander Yuryevich NAZAROV (Deputy General Director of Rostec State Corporation), Dmitry Yuryevich LELIKOV (Deputy General Director of Rostec State Corporation), Maksim Vladimirovich VYBORNYYKH (Deputy General Director of Rostec State Corporation), Oleg Nikolaevich EVTUSHENKO (Executive Director of Rostec State Corporation), Anatoly Eduardovich SERDYUKOV (Industrial director of Rostec State Corporation), Victor Nikolayevich KIRYANOV (Managing Director of Rostec State Corporation), Vladimir Zalmanovich LITVIN (Managing Director of Rostec State Corporation), Yury Nikolayevich KOPTEV (Chairman of the Scientific and Technical Council, Managing Director of Rostec State Corporation), Natalya Vladimirovna BORISOVA (Chief accountant of Rostec State Corporation), Elena Oduliovna SIERRA (Managing Director for Construction Control of the Rostec State Corporation), Pavel Mikhaylovich OSIN (Member of the Board of Directors of JSC National Center for Helicopter Building Named After M.L. MIL and N.I. KAMOV, Member of the Board of Directors of JSC OPK, Legal Support Director of Rostec State Corporation), Vasily Yuryevich BROVKO (Director for Special Assignments of Rostec State Corporation), Natalya Ivanovna SMIRNOVA (Director for internal audit of Rostec State Corporation), Aleksandr Nikolaevich POPOV (Director of Special Assignments of Rostec State Corporation), Nikolay Valentinovich ANDRIANOV (Director of Special Assignments of Rostec State Corporation), Alan Valeryevich LUSHNIKOV (Nominal owner of the Kalashnikov Concern), Yan Valentinovich NOVIKOV (Chairman of the Board, General Director, Member of the Board of Directors of JSC Concern VKO "Almaz-Antey"), Sergey Viktorovich PITIKOV (General Director of JSC "Scientific and Production Corporation "Design Bureau of Engineering"), Alexander Viktorovich KOCHKIN (Executive Director of JSC "Scientific and production complex "Tehmash"), Alexander Vladimirovich DENISOV (General Director of JSC "NPO "High Precision Complexes"), Alexander Vladimirovich SMIRNOV (General Director of JSC "Scientific and Production Association "SPLAV" Named After A.N. Ganichev"),
- **5 family members of previously sanctioned persons** - Dmitriy Vladimirovich ARTYAKOV (Son of Vladimir Artyakov), Tatiana Vladimirovna ARTYAKOVA (wife of Vladimir ARTYAKOV), Sergey Anatolevich SERDYUKOV (Son of Anatoly Serdyukov), Natalya Anatolevna SERDYUKOVA (Daughter of Anatoly Serdyukov), Evgeniya Nikolaevna VASILEVA (Wife of Anatoly Serdyukov).

On 29 September, the Canadian government imposed sanctions on 78 individuals:

- 14 family members of previously sanctioned persons: Alexander Sergeyevich CHEMEZOV (son of Sergei Chemezov, the head of "Rostec"); Sergey Sergeevich CHEMEZOV (son of Sergei Chemezov, the head of "Rostec"); Boris Yurievich KOVALCHUK (son of Yuri Kovalchuk and Chairman of the Board of PJSC Inter RAO); Kira Valentinovna KOVALCHUK (wife of Yuri Kovalchuk); Stepan Kirillovich KOVALCHUK (son of Kirill Kovalchuk and Senior Vice President on media strategy and service development); Tatyana Aleksandrovna KOVALCHUK (spouse of Yuri Kovalchuk); Tatiana Aleksandrovna NAVKA (wife of Dmitry Peskov); Nikolay Dmitrievich PESKOV (son of Dmitry Peskov); Elizaveta Dmitrievna PESKOVA (daughter of Dmitry Peskov); Olga Viktorovna SHUVALOVA (wife of Igor Shuvalov); Evgeny Igorevich SHUVALOV (son of Igor Shuvalov); Maria Igorevna SHUVALOVA (daughter of Igor Shuvalov); Kirill Konstantinovich MALOFEYEV (son of Konstantin Malofeev); Violetta Kirovna PRIGOZHINA (mother of Yevgeny Prigozhin);

- 1 businessperson: Kirill Mikhailovich KOVALCHUK (Managing Director of JSC "ADB Management" (founder - individuals with JSC "AB" Russia));

- 25 board members of Russian state-linked organisations:

- 1 member of the Supervisory Board of PJSC Sberbank – Mikhail Valentinovich KOVALCHUK;
- 24 members of the Gazprombank Board of Directors and Management Board: Vladimir Aleksandrovich DMITRIEV (Member of the Board of Directors; Member of the Supervisory Board of SME Bank); Famil Kamil SADYGOV (Deputy Chairman of the Board); Vyacheslav Aleksandrovich TYURIN (Member of the Board; General Director of OOO Gazprom Invest); Anatolii Anatolyevich GAVRILENKO (Member of the Board of Directors); Natalya Vladislavovna PUZYRNKOVA (Member of the Board, first Vice President); Aleksei Valeryevich POPOVICH (Member of the Board, first Vice President); Irina Aleksandrovna KAPLUNNIK (Member of the Board, First Vice President); Denis Valentinovich KAMYSHEV (Member of the Board, First Vice President); Vladimir Nikolaevich VINOKUROV (Member of the Board, first Vice President); Tigran Garikovich KHACHATUROV (Deputy Chairman of the Board); Alexander Mikhailovich STEPANOV (Deputy Chairman of the Board); Alexander Ivanovich SOBOL (Deputy Chairman of the Board, Chairman of the Board of Directors of "Credit Ural Bank"); Vladimir Markovich RYSKIN (Deputy Chairman of the Board); Igor Valeryevich RUSANOV (Deputy Chairman of the Board); Aleksander Yuryevich MURANOV (Deputy Chairman of the Board); Aleksei Anatolyevich MATVEEV

(Deputy Chairman of the Board); Viktor Alekseyevich KOMANOV (Chairman of the Management Board); Dmitrii Vladimirovich ZAUERS (Deputy Chairman of the Board); Ilya Vladimirovich YELISEYEV (Member of the Board of Directors, Deputy Chairman of the Board); Elena Adolfova BORISENKO (Deputy Chairman of the Board); Aleksei Petrovich BELOUS (Deputy Chairman of the Board); Yuriy Garunovich GAZARYAN (Member of the Board of Directors); Yurii Nikolayevich SHAMALOV (Deputy Chairman of the Board of Directors); Mikhail Leonidovich SEREDA (Deputy Chairman of the Board of Directors);

- **1 national government official:** Timur Igorevich MAKSIMOV (Deputy Minister of Finance of Russia);

- **1 Central Bank of Russia officials:** Elizaveta Olegovna DANILOVA (Director of the Financial Stability Department of the Bank of Russia);

- **1 representative of regional political elite:** Vladimir Nikolaevich KNYAGININ (Vice Governor of St. Petersburg);

- **35 Russia-backed senior officials in Kherson, Zaporizhzhia, Donetsk and Luhansk regions of Ukraine** – Sergey Vladimirovich YELISEYEV (so-called chairman of the Government of temporarily occupied Kherson region); Vladimir BESPALOV (so-called Deputy Head of the occupation government installed by Russia in temporarily occupied territory of Kherson region); Oleksii Ivanovych KOVALEV (so-called Deputy Head in the illegally created by the occupation administration installed by Russia "government of Kherson region"); Mikhail Leonidovich RODIKOV (so-called 'head' of the Ministry of Education and Science of the occupational government in temporarily occupied Kherson region in Ukraine); Tetyana Yuriiivna TUMILINA (so-called rector of Kherson State University of the occupational government in temporarily occupied Kherson region); Gennadiy Oleksandrovich SHELESTENKO (so-called member of the military-civilian administration of the occupational government in temporarily occupied Kherson region); Oleksandr Fedorovich SAULENKO (so-called mayor of temporarily occupied Berdyansk); Andriy Leonidovich SIGUTA (so-called head of the military-civilian administration of temporarily occupied Melitopol District); Oleksiy Sergeyevich SELIVANOV (so-called Deputy Head of the Ministry of Internal Affairs installed by Russia in temporarily controlled territory in the Zaporizhzhia Region); Anton Viktorovich KOLSTOV (so-called Head of Government of the occupational military-civilian administration of temporarily occupied Zaporizhzhia region); Anton Robertovich TYTSKIY (so-called Minister of Youth Affairs of the military-civil Zaporizhzhia temporarily controlled by Russia in temporarily occupied Zaporizhzhia region); Andrei TROFIMOV (so-called deputy head of the Russia-controlled military-civilian administration in temporarily occupied Zaporizhzhia Region); Vasily Viktorovich NOSKOV (so-called Deputy Minister of Culture, Sports and Youth of the so-called Luhansk People's Republic); Timur Ilgizovich SAMATOV (so-called Minister of Industry and Trade of the so-called Luhansk People's Republic); Konstantin Vladimirovich ZAVIZENOV (so-called Minister of Energy of the so-called Luhansk People's Republic); Vladislav Garievich KUZNETSOV (so-called First Deputy Chairman of the so-called Luhansk People's Republic); Ivan Sergeyevich KUSOV (so-called Minister of Education and Science of the so-called Luhansk People's Republic, former "deputy" of the so-called Legislative Assembly of the city of Sevastopol); Petr Aleksandrovich ISHKOV (so-called Deputy Minister of Education and Science of the so-called Luhansk People's Republic); Andriy Mykolayovych EREMENKO (so-called Minister of Communications and Mass Communications of the so-called Luhansk People's Republic); Oleksandr Mykolayovych KORNIENKO (so-called Head of the Ministry of Internal Affairs of the so-called Luhansk People's Republic); Valerii Mykhailovych PAHNYTS (so-called Acting head, first deputy head of the administration of the Starobelsky district of the Luhansk People's Republic); Evgeniy Aleksandrovich SOLNTSEV (so-called Deputy Chairman of the Government of the so-called Donetsk People's Republic); Aleksandr Konstantinovich KOSTOMAROV (so-called First Deputy Head of the Administration of the Head of the so-called Donetsk People's Republic); Dmitry Vladimirovich SHMELIOV (so-called Minister of Revenue and Fees of the so-called Donetsk People's Republic); Denis Sergeyevich KURASHOV (so-called Deputy Minister of Communications of the so-called Donetsk People's Republic); Vladimir Vladimirovich YEZHNIKOV (so-called Deputy chairperson of the so-called government of the Donetsk People's Republic); Andrei Gennadiyevich CHERTKOV (so-called Minister of coal and energy the so-called Donetsk People's Republic); Olga Pavlovna KOLUDAROVA (so-called Minister of Education and Science of the so-called Donetsk People's Republic); Dmitry Anatolyevich GARTSEV (so-called Minister of Health of the so-called Donetsk People's Republic); Volodymyr Volodymyrovych BANDURA (former mayor of Sviatohirsk, Donetsk region); Viktor Leonidovich BEDRIK (so-called military chief of the Kherson military-civilian administration, a Russian military man); Vitaliy Viktorovich BULYUK (so-called Deputy head of the Kherson regional occupation administration); Andrey Aleksandrovich ZHIDKOV (so-called Head of the Ministry of Internal Affairs for Melitopol and the Melitopol region); Viktor Andriyovych YEMELIANENKO (so-called Deputy head of the temporarily Russian-controlled military-civilian administration in the Zaporizhzhia region); Mykyta Ivanovich SAMOILENKO (so-called Deputy mayor of the administration of the temporarily occupied Berdyansk).

On 14 October, Canada imposed sanctions against 34 individuals who are agents of Russian propaganda and influential individuals spreading disinformation (including actors, journalists, TV presenters, political figures and academics and their family members): Tina KANDELAKI (Acting director of TV channel "TNT"), Melaniya Andreyevna KONDRAKHINA (Co-founder of the company "BRITANI", Daughter of Tinatin Kandelaki and stepdaughter of Vasily Brovko), Leontiy Andreyevich KONDRAKHIN (Son of Tinatin Kandelaki and stepson of Vasily Brovko), Sergei BEZRUKOV (Actor, one of the public faces of the "United Russia" Party and chairman of "United Russia's "Culture of the little homeland project"), Vladimir Lvovich MASHKOV (Russian Actor, Screenwriter, Film Producer, Art-Director of the Oleg Tabakov Moscow Theater), Vladimir MEDINSKY (Assistant to the President of Russia), Pavel GUSEV (Propagandist, editor and owner of "Moskovskiy Komsomolets"), Naila Vagif Kyzy ASKER-ZADE (Russian Journalist, TV-Host), Kirill Alekseevich KLEIMYONOV (Russian Propagandist, TV Presenter, Media Manager, Deputy Director General, Director of the Information Programs Directorate, Member of the Board of Directors of Channel One), Andrei Olegovich KONDRASHOV (Russian propagandist, TV presenter, First Deputy General Director of VGTRK), Vladimir Vladimirovich KORNILOV (Anti-Ukrainian Propagandist, Supporter of the so-called "Russian world", Former Director of the Ukrainian Branch of the Institute of CIS Countries, regular participant in the Russian propaganda TV Shows and Columnist for Russia Today), Sergei Alexandrovich MIKHEEV (Russian political scientist, politician, radio and TV Host, Member of the Central

Council of the Just Russia - Patriots - For Truth party, Head of the Expert Advisory Council under the Head of the Republic of Crimea), Anatoly Alexandrovich KUZICHEV (Russian Propagandist, Radio and TV Presenter of the Channel One), Olesya Alexandrovna LOSEVA (TV Presenter of Channel One), Mikhail Vladimirovich LEONTYEV (Russian Journalist, TV Presenter, Publicist, Vice President, Director of Information and Advertising of the Rosneft), Nikolay Dmitrievich CHINDYAYKIN (Russian theater and film actor, theater director and teacher, TV presenter, host of the Hidden Threats program on the Zvezda TV channel), Andrei Stanislavovich DOBROV (Russian journalist, TV and radio host, publicist, musician, author of the informational and analytical program Dobrov on Air on REN TV), Aleksander Petrovich GAMOV (Author, journalist, political columnist for the Komsomolskaya Pravda newspaper), Aleksey KAZAKOV (Propagandist and presenter of the channel "Russia 24"), Vladimir Petrovich KOZIN (Leading expert of the Center for Military-Political Studies of MGIMO (University) of the Ministry of Foreign Affairs of Russia, Corresponding Member of the Russian Academy of Natural Sciences and Academy of Military Sciences of Russia, Member of the Scientific Council of the National Institute for Global Security Studies of Russia), Irina Vladimirovna LOSIK (News anchor on Zvezda TV channel), Rustem Maksovich KLUPOV (Former soldier, propagandist, member of the Russian Association of Heroes), Nikita Sergeyevich DANYUK (Author and host of the political YouTube show "Metametrica", Permanent expert of analytical programs on federal TV and radio), Aleksandr Igorevich KOTS (Russian journalist and special correspondent for Komsomolskaya Pravda), Maksim Sergeyevich GRIGORIEV (Member of the Public Chamber of Russia, director of the non-profit Foundation for the Study of Democracy), Timofey Nikolaevich SERGEYTSEV (Russian propagandist, columnist at RIA Novosti), Victoria Vitalyevna NIKIFOROVA (Russian propagandist, columnist for RIA Novosti), Aelita Leonidovna MAMAKOVA (SouthFront Employee), Maria Eduardovna SITTEL (Russian TV presenter of the news program "Vesti" on the TV channel "Russia"), Dmitry Viktorovich GUBERNIEV (Russian TV presenter, sports commentator of the Match TV channel, editor-in-chief of the Joint Directorate of Sports TV Channels of VGTRK), Dmitry Anatolyevich PEVTSOV (Deputy of the State Duma of the Federal Assembly of Russia, faction - political party "New People"), Victor Anatolyevich POLYAKOV (Deputy General Director - Managing Director of PJSC "UEC-Saturn"), Alexey Gennadievich NECHAYEV (Deputy of the State Duma of the Federal Assembly of Russia of the VIII convocation, head of the faction of the political party "New People"), Aleksandr Yakovlevich SHKOLNIK (Director of Central Museum of the Great Patriotic War).

On 27 October, the Canadian government imposed sanctions on 35 individuals, targeting senior officials of already sanctioned energy entities, including those of Gazprom and its subsidiaries:

- 30 senior executives of energy entities already under sanction:

- 6 members of the PJSC Gazprom Board of Directors and Management Board - Viktor Alekseevich ZUBKOV (Chairman of the Board of Directors of PJSC Gazprom); Viktor Georgievich MARTYNOV (Member of the Board of Directors of PJSC Gazprom, Member of the Board of Directors of Oil and gas company "RussNeft" PJSC, Member of the Board of JSC "Gazprom Electrogas", Member of the Board of PJSC "Gazprom Gazoraspredelenie Rostov-na-Donu", Rector of the Russian State Oil and Gas University); Yuri Stanislavovich NOSOV (Deputy Chief of Staff of the Management Board, Head of Department 308 of PJSC Gazprom); Sergey Fedorovich KHOMYAKOV (Deputy Chairman of the Board, CEO of Corporate Protection Service of PJSC Gazprom); Vladimir Alexandrovich MAU (Member of the Board of Directors of PJSC Gazprom, Member of the Audit Committee of the Board of Directors of PJSC Gazprom, Member of the Committee of the Board of Directors of PJSC Gazprom for appointments and remuneration, Rector of the Russian Academy of National Economy and Public Administration under the President of Russia); Vyacheslav Aleksandrovich MIKHALENKO (Member of the Board, Head of the Department (transportation and underground gas storage) of PJSC Gazprom, Member of the Management Committee of JSC "Gazprom Space Systems", Member of the Board of JSC "Gazprom Electrogas", Member of the Board of PJSC "Gazprom Gazoraspredelenie Rostov-na-Donu");
- 15 heads and deputy heads of department of PJSC Gazprom - Aleksandr Sergeevich IVANNIKOV (Head of Financial and Economic Department of PJSC Gazprom); Konstantin Valeryevich KHOMENKO (First Deputy Head of Department of PJSC Gazprom); Yuriy Viktorovich NAUMOV (Deputy Head of Department of PJSC Gazprom); Vasily Vladimirovich SAVCHENKO (Head of the Pre-Investment Research Division of the Design Works Department of PJSC Gazprom); Alla Evgenyevna FILATOVA (Head of the Department for Contractual Work and Maintenance of Registers of the Legal Department of PJSC Gazprom); Dmitriy Evgenyevich ZABOROVSKIY (Deputy Head of the Division of Corporate Control of the Department for Property Management and Corporate Relations of PJSC Gazprom); Andrey Petrovich SAMSONENKO (Deputy Head of Department - Head of Department of PJSC Gazprom); Dmitriy Vladimirovich BULGAKOV (Deputy Head of the Corporate Control Department of the Property Management and Corporate Relations Department of PJSC Gazprom); Igor Igorevich SHATALOV (Deputy Head of the Financial and Economic Department of PJSC Gazprom); Svetlana Vladimirovna ANTONOVA (First Deputy Head of the Department for Property Management and Corporate Relations of PJSC Gazprom); Kirill Yurievich POLOUS (Deputy Head of the Department - Head of the Directorate of PJSC Gazprom); Aleksandr Pavlovich DUSHKO (Deputy Head of the Financial and Economic Department of PJSC Gazprom); Anton DEMCHENKO (Head of the Investor Relations Department of PJSC Gazprom); Elena Borisovna KASYAN (Head of the Human Resources Department of PJSC Gazprom); Sergei Vladimirovich KUPRIYANOV (Press Secretary of the Chairman of the Management Board, Head of Department of PJSC Gazprom);
- 4 executives of companies affiliated with PJSC Gazprom - Denis Vladimirovich FEDOROV (CEO of LLC "GAZPROM ENERGOHOLDING"); Sergei Nikolaevich MENSHIKOV (Member of the Board of Directors of LLC "GAZPROMVET"); Alexander Aleksandrovich FROLOV (Head of the Control Department of Settlements with Social Consumers of Gazprom Mezhhregiongaz LLC); Vitaly Yuryevich KHATKOV (General Director of OOO Gazprom Georesurs);
- 4 executives of PJSC "Gazprom Neft" - Gennady Nikolaevich SUKHOV (Member of the Board of Directors of PJSC "Gazprom Neft"); Elena Vladimirovna MIKHAILOVA (Member of the Board of Directors of PJSC "Gazprom Neft"); Sergey

Ivanovich KUZNETS (Member of the Board of Directors of PJSC "Gazprom Neft"); Vladimir Ivanovich ALISOV (Member of the Board of Directors of PJSC "Gazprom Neft");

- 1 executive of other energy entity - Musa Jusupovich BAZHAEV (President of JSC Alliance Group, former chairperson of Russian Platinum);

- **bank executive** - Irina Yurievna KOROBKINA (Member of the Board of Directors of JSC "Velikie Luki Bank");

- **SOE executive** - Anatolyevich MARKELOV (Member of the Board of Directors of JSC United Shipbuilding Corporation);

- **3 Government officials** - Nikolay Grigorievich SHULGINOV (Minister of Energy of Russia); Alexander Valentinovich NOVAK (Deputy Chairman of the Government of Russia); Denis Valentinovich MANTUROV (Deputy Prime Minister of Russia).

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

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

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

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

- **18 representatives of Russian national and regional political elite** - Adam Sultanovich DELIMKHANOV (Member of the State Duma of RF, First Deputy Chairman of the Committee on Security and Anti-Corruption), Andrey Removich BELOUSOV (First Deputy Prime Minister of RF), Maria Alexeyevna LVOVA-BELOVA (Presidential Commissioner for children's rights, initiated the simplification of the procedure for granting citizenship to orphaned children in Ukraine), Yury Yakovlevich CHAIKA (non-permanent member of the Security Council of RF, the Plenipotentiary Representative of the President of RF in the North Caucasus Federal District), Sergey Semyonovich SOBYANIN (the mayor of Moscow), Aleksey Vladimirovich DENISENKO (member of the Chelyabinsk regional Legislative Assembly, member of the Presidium of the Regional Political Council, member of the Kremlin-aligned ruling party "United Russia"), Alexander Nikolaevich BELSKIY (Chairman of the Legislative Assembly of St. Petersburg, member of the Kremlin-aligned political party "United Russia"), Alexander Valentinovich ISHCHENKO (Chairman of the Legislative Assembly of the Rostov Region, Secretary of the Rostov Regional Branch of the Kremlin-aligned ruling party "United Russia"), Mikhail Vladimirovich STRUK (member of the Legislative Assembly of the Volgograd Oblast, member of the Kremlin-aligned ruling party "United Russia"), Nikolay Nikolaevich ZABOLOTNEV (head of the Regional Executive Committee of the Khanty-Mansiysk Regional Branch of the Kremlin-aligned ruling party "United Russia"), Nikolay Timofeevich VELIKDAN (Chairman of the Stavropol Regional Duma, first Deputy Chairman of the Government of the Stavropol Territory, member of the Kremlin-aligned ruling party "United Russia", member of the Presidium of the Regional Political Council of the Party), Dmitriy Vladimirovich KHOLIN (member of the Samara Provincial Duma, member of the Samara Regional Branch of the all-Russian public organization "Combat Brotherhood" (organization for veterans)), Sergey Evgenievich TSIVILEV (governor of the Kemerovo region), Roman Alexandrovich GOVOR (member of the Legislative Assembly of the Kemerovo Region – Kuzbass, member of the Kremlin-aligned ruling party "United Russia"), Roman Sergeevich CHUYKO (head of the Regional Executive Committee of the All-Russian People's Front, member of the regional Legislative Assembly in Tuymen Oblast, member of the Kremlin-aligned ruling party "United Russia"), Viktor Vladimirovich BABENKO (Chairman of the Sverdlovsk Regional Council of Supporters of the "United Russia" Party, member of the Legislative Assembly of the Sverdlovsk Region and Deputy Secretary of the Sverdlovsk Regional Branch of "United Russia"), Yury Alexandrovich BURLACHKO (chairman of the Legislative Assembly of the Krasnodar Krai, member of the Kremlin-aligned ruling party "United Russia"), Yury Zimelevich KAMALTYNOV (Deputy Chairman of the State Council of the Republic of Tatarstan, previously - Deputy Prime Minister of the Republic of Tatarstan and plenipotentiary representative of the President of the Republic of Tatarstan in the State Council of the Republic of Tatarstan, member of the Kremlin-aligned ruling party "United Russia");
- **12 Russian military officials** - Sharip Sultanovich DELIMKHANOV (Commander of the Chechen branch of the National Guard of RF), Alibek Sultanovich DELIMKHANOV (Deputy Commander of the Chechen branch of the National Guard of RF), Viktor Nikolayevich STRIGUNOV (First Deputy Director of the Federal Service of the National Guard of RF (Rosgvardia) – Commander-in-Chief of Rosgvardia), Oleg Anatolyevich PLOKHOI (Secretary of State, Deputy Director of the Federal Service of the National Guard of RF (Rosgvardia) – Commander-in-Chief of Rosgvardia), Yuriy Viktorovich YASHIN (Chief of the General Staff of the National Guard Troops of RF – Deputy Director of the Federal Service of the

National Guard Troops of RF – Commander-in-Chief of the National Guard Troops of RF), Igor Anatolyevich ILYASH (Deputy Director of the Federal Service of the National Guard of RF (Rosgvardia) – Commander-in-Chief of Rosgvardia), Sergei Anatolyevich LEBEDEV (Deputy Director of the Federal Service of the National Guard of RF (Rosgvardia) – Commander-in-Chief of Rosgvardia), Alexey Mikhailovich KUZMENKOV (Deputy Director of the Federal Service of the National Guard of RF (Rosgvardia) – Commander-in-Chief of Rosgvardia), Alexey Stepanovich BEZZUBIKOV (Deputy Director of the Federal Service of the National Guard of RF (Rosgvardia) – Commander-in-Chief of Rosgvardia), Alexander Anatolievich MAKSIMTSEV (Deputy Commander-in-Chief of the Aerospace Forces for military-political work), Yuri Nikolaevich GREKHOV (Colonel-General, a Deputy Commander-in-Chief of the Russian Aerospace Forces), Zabit Sabirovich KHEIRBEKOV (Lieutenant General of the Russian Aerospace Forces, Deputy Commander-in-Chief of the Russian Aerospace Forces for Logistics);

- **1 security service official** - Sergei Borissovich KOROLEV (the First Deputy Director of the Russian FSB),
- **7 so-called leaders in areas of Ukraine illegally occupied by Russian forces or controlled by Russian-backed proxies** - Yevgeniy Vitalievich BALYTSKIY (the so-called Governor of the Zaporizhzhia region of Ukraine), Konstantin Vladimirovich IVASHCHENKO (the so-called mayor of Mariupol), Aleksandr Yurievych KOBETS (the so-called mayor of the city of Kherson), Vladimir Valeryevich ROGOV (the so-called representative of the main council of Zaporozhzhia region's military-civil administration), Alexandr Fedorovich SAULENKO (the so-called head of the provisional administration of Berdyansk and the Berdyansk region), Andrei Vladimirovich SHEVCHIK (the so-called mayor of Enerhodar), Oleg KRYUCHKOV (the spokesperson for the Russian occupation authority in Crimea and advisor to the Head of Crimea);
- **3 relatives of previously sanctioned businessmen** - Stanislav Sergeyevich CHEMEZOV (son of Sergei Chemezov, a member of the Supreme Council of "United Russia" and chairman of the Rostec conglomerate), Maya Nikolaevna BOLOTOVA (born TOKAREVA) (daughter of Nikolay Tokarev, the CEO of Transneft), Pavel EZOUBOV (cousin of Oleg Deripaska, who owns the Russian Machines industrial conglomerate which includes the Military Industrial Company);
- **4 members of the nationalist motorcycle club Nightwolves MC** - Alexander Sergeyevich ZALDOSTANOV (the leader and founder), Andrey BOBROVSKIY, Jozef HAMBÁLEK (President of the Europe chapter of the club based in Slovakia), Alexei WEITZ;
- **1 businessperson** - Andrey Anatolyevich KOZITSYN (co-founder and CEO of Ural Mining Metallurgical Company);
- **2 actors** - Sergey Vitalyevich BEZRUKOV (Russian actor and politician, chairman of "United Russia"'s "Culture of the little homeland project"), Vladimir Lvovich MASHKOV (Russian actor, director and screenwriter who actively supported Russia's war of aggression against Ukraine).

On 21 July, EU sanctioned 6 individuals²⁷ involved in the recruitment of Syrian mercenaries to fight in Ukraine alongside Russian troops.

On 4 August, the EU added former President of Ukraine Viktor Yanukovych and his son Oleksandr Yanukovych to its Russia sanctions list for their alleged role in undermining or threatening the territorial integrity, sovereignty and independence of Ukraine and the state's stability and security. It is said that Viktor Yanukovych has been involved in operations to replace Ukrainian President Zelensky with himself and Oleksandr Yanukovych has conducted transactions with the separatist groups in the Donbas region of Ukraine.

On August 31, EU decided to suspend the agreement with Russia on the simplification of issuing visas to Russians.

On 1 September, EU added 3 Russian individuals to the list of personal sanctions - Alla Polyakova and Anton Tkachov (both members of the State Duma of Russia), as well as the member of the Federation Council Valeriy Ponomaryev.

EU de-listed 3 individuals - Vladimir Volfovich Zhirinovskiy (deceased), Olga Ayziman and Saodat Narzieva.

On 14 September, the EU renewed its Russia targeted sanctions regime for 6 months, until 15 March 2023.

On 6 October, as a part of 8th package European Council imposed sanctions (asset freeze and a prohibition from making funds and economic resources available to them, as well as a travel ban) on 30 individuals, primarily those involved in illegal referenda in occupied regions of Ukraine, the Russian defense sector or propaganda and disinformation efforts:

- 10 so-called leaders in areas of Ukraine illegally occupied by Russian forces or controlled by Russian-backed proxies - Anton Viktorovich KOLTISOV (appointed so-called "Head of the Government of the Zaporizhzhia Oblast"); Alexey Sergeyevich SELIVANOV (so-called "Deputy Head of the Main Directorate of the Ministry of Internal Affairs of the Zaporizhzhia Military-Civilian Administration"); Anton Robertovich TITSKIY (appointed so-called "Minister of Youth Policy of Zaporizhzhia Oblast" by the government of Russia); Sergey Vladimirovich ELISEEV (appointed so-called "Head of the Kherson Military-Civilian Administration" by the government of Russia); Mikhail Leonidovich RODIKOV (appointed so-called "Minister of Education and Science" of the Kherson Military-Civilian Administration by the government of Russia); Vladimir Alexandrovich BESPALOV (appointed so-called "Minister of Domestic Policy" of the Kherson Military-Civilian Administration by the government of Russia); Vitaliy Pavlovich KHOTSENKO (appointed Prime Minister of the so-called "Donetsk People's Republic"); Vladislav Garievich KUZNETSOV

²⁷ Muhammad AL-SALTI (Commander-in-Chief of the "Palestine Liberation Army"), Abu Hani SHAMMOUT (former Syrian military officer and leader of the "al-Ahdad al-Omariya" faction), Nabeul AL-ABDULLAH (commander of the National Defence Forces in the city of Suqaylabiyah), Simon AL WAKIL (commander of the National Defence Forces in the city of Maharda (Hama)), Fawaz Mikhail GERGES (director of Al-Sayyad Company for Guarding and Protection Services Ltd, a Syrian private security company), Yasar Hussein IBRAHIM (co-owner of Al-Sayyad Company for Guarding and Protection Services Ltd, a Syrian private security company).

(appointed First Deputy Chairman of the government of the so-called “Luhansk People’s Republic”); Evgeniy Alexandrovich SOLNTSEV (so-called Deputy Chairman of the Government of the “Donetsk People’s Republic”); Alexander Konstantinovich KOSTOMAROV (so-called First Deputy Head of the administration of the Head of the “Donetsk People’s Republic”);

- 4 propagandist figures - Yulia Dmitrievna CHICHERINA (prominent Russian singer); Aleksander Gelyevich DUGIN (Russian political philosopher, political scientist, analyst, strategist and long-standing ideologue of the theories of Russky Mir and Eurasianism); Oleg Mikhaylovich GAZMANOV (Russian musician); Nikolay Viacheslavovich RASTORGUEV (Russian singer and member of the Public Council of the Ministry of Defense of Russia);

- 2 oligarchs and businesspeople in Russia’s military-industrial complex - Alan Valerievich LUSHNIKOV (the largest shareholder of arms producer JSC Kalashnikov Concern); Aleksander Viktorovich KOCHKIN (Executive Director of the Tecmash concern);

- 2 officials of the Administration of the President of Russia - Aleksander Dmitrievich KHARICHEV (Head of the Division of Operation of the State Council in the Administration of the President of Russia); Boris Yakovlevich RAPOPORT (Deputy head of the Division of Operation of the State Council in the Administration of the President of Russia);

- 10 military and security government officials - Dmitriy Vitalyevich BULGAKOV (Deputy Minister of Defense of Russia until September 2022 and General in the Russian Army); Yunus-Bek Bamatgireevich EVKUROV (Deputy Minister of Defense of Russia); Ruslan Khadzhismelovich TSALIKOV (Deputy Minister of Defense of Russia); Nikolay Aleksandrovich PANKOV (Deputy Minister of Defense of Russia, general of the Russian army reserve and state secretary of Russia); Yuriy Eduardovich SADOVENKO (Deputy Minister of Defense of Russia, head of the Office of the Russian Defense Minister, and Colonel General of the Russian armed forces); Timur Vadimovich IVANOV (Deputy Minister of Defense of Russia); Sergey Borissovich RYZHKOV (Major General of the Russian armed forces and Commander of the 41st Combined Arms Army); Gennadiy Valeryevich ZHIDKO (key member of the Armed Forces of Russia); Vladimir Grigorevich KULISHOV (Head of Russia’s Border Service and Deputy Director of the Federal Security Service (FSB) of Russia); Dmitry Evgenevich SHUGAEV (Director of the Federal Service for Military-Technical Cooperation of Russia (FSVTS));

- 2 officials of the Central Election Commission of Russia - Ella Aleksandrovna PAMFILOVA (Chairperson of the Central Election Commission of Russia); Nikolay Ivanovich BULAYEV (Deputy chairman of the Central Election Commission of Russia).

On 20 October, the EU imposed sanctions (freeze of funds and economic resources and prohibition to transfer funds or to otherwise directly or indirectly make funds and economic resources) against 3 Iranian individuals Mohammad Hossein Bagheri (Major-General, Chief of Staff of Iran’s Armed Forces), Sayed Hojatollah Qureishi (General, Head of the Supply, Research, and Industrial Affairs Division at the Iranian Ministry of Defence and Armed Forces Logistics) and Saeed Aghajani (Brigadier-General, Commander of the IRGC Aerospace Force UAV Command) for their role in the development and supply of Unmanned Aerial Vehicles (UAVs) used by Russia in its aggression against Ukraine.

On 26 October, the General Court has annulled EU sanctions between 2020 and 2022 designating Dmitry Ovsyannikov on the EU’s Russia sanctions list. The EU Council’s case was that he was responsible for or supported actions or policies undermining or threatening stability in Ukraine by virtue of his former positions in Government since 2017. The Court found the EU could not justify that position because Mr Ovsyannikov resigned from being Governor of Sevastopol in 2019 and stopped being a Deputy Minister in the Russian Government in 2020. The burden was on the EU to show that his links with the Government since then justified his designation, and they had not discharged that burden.

Mr Ovsyannikov remains listed for now by virtue of Council Decision (CFSP) 2022/1530 of September 2022 which was adopted after the hearing in this case.

UK. On 21 April, added 16 individuals²⁸ 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) 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

²⁸ 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”

“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 individuals²⁹ with asset freezes and travel bans. Many of sanctioned individuals are actors from mainstream media organisations³⁰.

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 Kabaeva³¹.

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 Kirill³².

On 29 June, OFSI added 8 individuals to its RF sanctions list³³.

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

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

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

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

On 15 July, OFSI removed 2 individuals from the consolidated list and they are no longer subject to an asset freeze: Didier Casimiro (First Vice President of Rosneft) and Zeljko Runje (Deputy Chairman of the Management Board of Rosneft). The two had been included in an initial wave of sanctions announced in March under rules that allowed the UK to temporarily apply the

²⁹ (Oleg Dobrodeev (Director General of VGTRK), Alexander Malkevich (General Director of the Saint Petersburg TV channel), Sergey Mikhailov (Director General of the Russian News Agency TASS), Vladimir Sungorkin (Director General and Editor-in-Chief of Komsomolskaya Pravda), Eugeny Poddubny (war correspondent at All-Russian State Television and Radio Broadcasting Company), Alexander Kots (war correspondent for Russian newspaper Komsomolskaya Pravda), Dmitry Steshin (journalist and special correspondent for Komsomolskaya Pravda), propagandist Nailya Asker-zade, mistress of banker Kostin, host Mikhail Leontiev), senior executive officers or member of the board of directors of designated banks - Dmitry Gusev (Chairman of Sovcombank), Irina Kashina, Mikhail Kuchment, Oleg 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 Ponomarev, Eduard Rossel, Ilyas Umakhanov, Putin's aide Maxim Oreshkin).

³⁰ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1073104/Notice_Russia_040522.pdf

³¹ 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).

³² 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 Kyrilo 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.

³³ BAYSAROV Ruslan Sulimovich (Chairman of the Board of Directors, BTSMOST JSC), GUTSERIEV Said Mikhailovich (member of the Board of Directors of SFI Investment Holding, an entity carrying on business in the Russian financial services sector), GUTSERIEV Sait-Salam Safarbekovich (Chairman of the Board of Directors of JSC NK Neftisa, an entity carrying on business in the energy sector), PERENČEVIĆ Mihajlo (Croatian businessman and President of the Russian pipeline construction company Velesstroy), POTANIN Vladimir Olegovich (owner of Interros, Rosbank), TSIVILEVA Anna (Putin’s first cousin once removed, Chair of the Board of Directors of JSC Kolmar Group, an entity carrying on business in Russian energy and extractives sector), TSIVILEV Sergei Evgenievich (Governor of Kemerovo), TYRYSHKIN Ivan Aleksandrovich (director at SPB Exchange and JSC NRK-R.O.S.T., both companies are carrying on business in the Russian financial services sector)

same sanctions as those imposed by allies while UK officials gathered their own evidence. The two men were removed from the sanctions list in July when that time-limited justification expired.

On 2 August, UK re-listed the Rosneft Management Board members Didier Casimiro and Zeljko Runje under the Russia financial sanctions regime. UK re-listed the former members of the Management Board of PJSC Rosneft Oil Company Didier Casimiro and Zeljko Runje under the Russia financial sanctions regime. Both were subject to an asset freeze for "obtaining a benefit from or supporting the government of Russia by working as a manager of a government of Russia-affiliated entity". The sanctions were reimposed after the UK decided it had sufficient evidence to list them under their own legal criteria. In addition, Olga Ayziman has been de-listed from the UK's Russia sanctions.

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

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

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

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

- **2 relatives of businessmen against whom sanctions were imposed earlier** - ISMAILOV, Sanjar Zunnurovich (nephew of Alisher Usmanov), ISMAILOV, Sarvar (nephew of Alisher Usmanov);
- **1 UK propaganda figure** - PHILLIPS, Graham William (video blogger who has published media content that supports and promotes actions and policies which destabilise Ukraine).

On 23 August, OFSI removed Mikhail Vladimirovich Razvozhayev (Governor of Sevastopol) from its Russia sanctions list.

On 16 September, OFSI imposed sanctions on ROTENBERG Arkady Romanovich (Previous Chairman of House of Prosvescheniye; Previous owner of Stroygazmontazh).

On 26 September, the Foreign, Commonwealth and Development Office added 89 individuals to its Russia sanctions list in response to the “sham referendums” that have taken place in 4 non-government-controlled regions of Ukraine. Those listed include:

- **26 Russian “officials and collaborators” involved in the organisation of the referendums**, including: BALITSKY, Yevhen Vitaliiovych (Head of the administration installed by Russia in temporarily controlled territory of Zaphorizhzhia region), BESPALOV, Vladimir (so-called Deputy Head for Domestic Policy of the administration installed by Russia in temporarily controlled territory of Kherson region), BUBNOV, Ilya (Deputy Minister of Youth, Sports and Tourism of the so-called Donetsk People's Republic), CHERTKOV, Andrey Gennadievich (so-called Minister of Coal and Energy of the so-called Donetsk People's Republic), FILIPCHUK, Pavlo Ihorovich (so-called Mayor of Kakhovka), GARTSEV, Dmitry Anatolievich (so-called Minister of Health of the so-called Donetsk People's Republic), IVASHCHENKO, Konstantin Vladimirovich (Head of the Mariupol city administration), KOBETS, Alexkandr Yuryevich (Head of Kherson Military-Civilian Administration), KOLTSOV, Anton Viktorovich (so-called Head of Government in temporarily controlled territory of Zaphorizhzhia), KOLUDAROVA, Olga (Minister of Education and Science of the so-called Donetsk People's Republic), KOSTOMAROV, Aleksandr (First Deputy Head of the Administration of the Head of the so-called Donetsk People's Republic), KURASHOV, Denis Sergeevich (Deputy Minister of Communications of the so-called Donetsk People's Republic), KUSOV, Ivan (so-called Minister of Education and Science of the so-called Luhansk People's Republic), MASHKAUTSAN, Semen Alekseevich (so-called Deputy Prime Minister of Kherson), NOSKOV, Vasilii Viktorovich (so-called Deputy Minister of Culture, Sports and Youth of the so-called Luhansk People's Republic), RODIKOV, Mikhail Leonidovich (Russian official Russian-installed administration in occupied Kherson), ROGOV, Vladimir (Member of the so-called Military-Civilian Administration of Russian-occupied Zaporizhzhia Region), SAMATOV, Timur (so-called Minister of Industry and Trade of the so-called Luhansk People's Republic), SAULENKO, Oleksandr (Senior position in the Russian installed administration of Berdyansk, in the temporarily controlled territory of Zaporizhzhia Oblast), SELIVANOV, Alexei Sergeevich (Official in the so-called Ministry of Internal Affairs in the Russian-installed administration in occupied Zaporizhzhia; Deputy Head of Main Directorate), SHMELEV, Dmitry Vladimirovich (Minister of Revenue and Fees of the so-called Donetsk People's Republic), SOLNTSEV, Evgeniy Aleksandrovich (Deputy Chairman of the Government of the so-called Donetsk People's Republic), TITSKIY, Anton Robertovich (Minister of Youth Policy, Occupied Zaporizhzhia), TROFIMOV, Andrei Yuriovych (Deputy head of the military-civilian administration of the temporary controlled region of Zaporozhye), YELISEYEV, Sergei Stanislavovich (Head of Government of the Russian-occupied Kherson region), ZAVIZENOV, Konstantin (so-called Minister of Energy of the so-called Luhansk People's Republic).
- **4 “oligarchs”**: ILIEV, Zarakh Binsionovich (co-owner of Kievskaya Ploshchad, which is carrying on business in sectors of strategic significance to the Government of Russia, namely the Russian construction and transport sectors), MAKAROV, Igor Viktorovich (President of ARETI International Group, an entity operating in the Russian energy sector), MAKHMUDOV, Iskander Kakhramonovich (President of Ural Mining and Metallurgical Company (UMMC)), NISANOV, God Semenovich (Chairman of the Board of Directors of the Kievskaya Ploshchad),
- **55 board members of Russian state-linked organisations**, including:
 - 23 members of the Gazprombank Board of Directors and Management Board; BELOUS, Alexey Petrovich (Member and Deputy Chairman of Management Board), BORISENKO, Elena Adolfovna (Member of Management Board), DMITRIEV, Vladimir Aleksandrovich (Member of the Board of Directors), ELISEEV, Ilya Vladimirovich (Member of the Board of Directors), GAVRILENKO, Anatoly Anatolyevich (Member of the Board of Directors), GAZARYAN, Yury Garunovich (Member of the Board of Directors), KAPLUNNIK, Irina Alexandrovna (Member of Management Board), KHACHATUROV, Tigran Garikovich (Member and Deputy Chairman of Management Board), KOMANOV, Viktor Alekseevich (Member and Deputy Chairman of Management Board), MATVEEV, Alexey Anatolyevich (Member and Deputy Chairman of Management Board), MURANOV, Alexander Yuryevich (Member and Deputy Chairman of Management Board), POPOVICH, Alexey Valerievich (Member of Management Board), PUZYRNIKOVA, Natalia Vladislavovna (Member of Management Board), ROSSEEV, Mikhail Nikolaevich (Member of the Board of Directors), RUSANOV, Igor Valerievich (Member and Deputy Chairman of Management Board), RYSKIN, Vladimir Markovich (Member and Deputy Chairman of Management Board), SADYGOV, Famil Kamil Ogly (Member of the Board of Directors), SEREDA, Mikhail Leonidovich (Deputy Chairman of the Board of Directors), SOBOL, Alexander Ivanovich (Member and Deputy Chairman of Management Board), STEPANOV, Alexander Mikhailovich (Member and Deputy Chairman of Management Board), TYURIN, Vyacheslav Aleksandrovich (Member of the Board of Directors), VINOKUROV, Vladimir Nikolaevich (Member of Management Board; First Vice President), ZAUERS, Dmitry Vladimirovich (Member of Management Board);

- 16 members of the Sberbank Supervisory Board, Executive Board, and other Directors; BARCHUGOV, Pavel Position (Senior Managing Director), BELYANINA, Anastasia Eduardovna (Head of Investor Relations; Managing Director), CHISTYAKOV, Oleg (Director of the Audit Department), GANEEV, Oleg Vladimirovich (Deputy Chairman of Executive Board), GOLODETS, Olga Yurievna (Former Deputy Prime Minister of Russia; Deputy Chairman of Executive Board), KONDRASHOV, Igor (Director of the Legal Department), KOVALCHUK, Mikhail Valentivovich (Member of Supervisory Board), KUDRYAVTSEV, Nikolay (Member of Supervisory Board), KULESHOV, Aleksander (Member of Supervisory Board), KUZNETSOV, Stanislav Konstantinovich (Deputy Chairman of Executive Board), MELIKYAN, Gennady Georgiyevich (Deputy Chairman of Supervisory Board), POPOV, Anatoly Leonidovich (Deputy Chairman of Executive Board), SHARONOV, Andrey Vladimirovich (Vice President), TSAREV, Kirill Aleksandrovich (Deputy Chairman of Executive Board), ZALOMIKHINA, Larisa (Director of the Compliance Department), ZLATAKIS, Bella Illyinichna (Deputy Chairman of Executive Board; Member of Supervisory Board),
 - 10 people from Sovcombank, including the Deputy Chairman and members of the Supervisory Board and Management Board: AVTUKHOV, Mikhail Olegovich (Member of Management Board), BONDAROVICH, Sergey Nikolaevich (Deputy Chairman), BORIS, Albert Alexandrovich (Member of Management Board), BRAVERMAN, Anatoly Alexandrovich (Member of the Supervisory Board), BRODSKIY, Ilya Borisovich (Member of the Supervisory Board), CHERSTVOVA, Elena Alexandrovna (Member of Management Board), FISUN, Aleksey Leonidovich (Member of the Supervisory Board Sovcombank), KHOTIMSKIY, Dmitry Vladimirovich (Chief Investment Officer; Member of the Supervisory Board), KHOTIMSKIY, Sergey Vladimirovich (First Deputy Chairman; Member of the Supervisory Board), KLYUKIN, Mikhail Vasilyevich (Member of the Supervisory Board);
 - 5 members of OTKRITIE Management Board: CHERKASOVA, Nadia Narimanovna, KREMLEVA, Irina Vladimirovna, RUSANOV, Sergey Georgiyevich, STOJNIENKO, Sergey), YEMELYANOVA, Svetlana Petrovna;
 - the members of VTB Bank's Supervisory Board: SIDORENKO, Valeriy Valeryevich;
- **4 individuals which are head or deputy-head of any public body, federal agency or service subordinate to the President of Russia:** BULAEV, Nikolai Ivanovich (Deputy Chairman of the Central Election Commission of Russia), KHARICHEV, Alexander Dmitrievich (Chief of the Presidential Directorate for Supporting Activities of the State Council of Russia (also known as the Office of the President of Russia for ensuring the activities of the State Council of Russia)), YARIN, Andrey Veniaminovich (Head of the Office of the President of Russia for Domestic Policy), RAPOPORT, Boris Yakovlevich (Deputy Head of the Presidential Directorate for Supporting Activities of the State Council of Russia).

On 30 September, OFSI imposed asset freeze and travel ban sanctions on the Governor of the Central Bank of Russia Elvira Sakhipzadovna NABIULLINA.

On 4 October, OFSI added to the consolidated list Sergei Vladimirovich YELISEYEV (Head of Government of the Russian-occupied Kherson region) and removed from the consolidated list Sergei Stanislavovich YELISEYEV (Head of Government of the Russian-occupied Kherson region).

On 20 October, the UK responded to the Iranian supply of kamikaze drones for Russia's use in Ukraine by subjecting 3 Iranian nationals to an asset freeze sanctions - Saeed AGHAJANI (Brigadier General, Iranian Military Officer, Head of the Islamic Revolutionary Guards Corps (IRGC) Aerospace Force UAV Command), Mohammad BAGHERI (Major General, Iranian Military Officer, Chairman of the Armed Forces General (AFGS), the country's top military body), and Seyed Hojjatollah QUREISHI (Brigadier General, Iranian Military Officer, Head of the Supply and Logistics Division of the Iranian Ministry of Defence, who is the key Iranian negotiator in a deal that supplied Russia with Iranian produced UAVs).

On 2 November, UK imposed financial sanctions against 4 Russian individuals - ABRAMOV Alexander Grigoryevich (Former Non-Executive Chairman and Director of Evraz Plc), FROLOV Alexander Vladimirovich (Former Director and Former CEO of Evraz plc), SHAIMIEV Airat Mintimerovich (CEO and a member of the board of directors of OAO Tatavtodor, a Government of Russia-affiliated entity which is carrying on business in Russian construction and transport sectors), SHIGABUTDINOV Albert Kashafovich (General Director and CEO of the AO TAIF Group of companies, entities which are carrying on business in Russian energy, financial services and information, communications and digital technologies sectors).

Poland. Poland-specific list of designated parties subject to measures not covered by EU Regulations 765/2014 and 269/2014 covered **15 individuals**³⁴. These individuals are added to the list of foreigners whose stay in Poland is undesirable. For 7 of them³⁵ 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.

On 27 October, Poland imposed asset freeze sanctions and entry ban against 3 Russian individuals - ALAUDINOV Apti Aronovich (Major General of the Ministry of Internal Affairs of Russia; the secretary of the Chechen Security Council; the commander of the Chechen battalion Ramzan Kadyrov "Akhmat", which conducts combat operations in Ukraine); DAUDOV Magomed

³⁴ Bakalczuk Tatiana, Deripaska Oleg, Fridman Michail, Gucerjew Michail, Gucerjew Sait-Salam, Kantor Wiczeslaw Mosze, Kaspierki Jewgienij, Melniczenko Aleksandra, Melniczenko Andriej, Mordaszow Aleksiej, Nieczajew Aleksiej (Nechayev Alexy Gennadyevich), Nuraliev Boris, Rasizidow Timur, Sieczin Igor Iwanowicz (Sechin Igor Ivanovich), Vekselberg Victor.

³⁵ Bakalczuk Tatiana, Gucerjew Sait-Salam, Kaspierki Jewgienij, Melniczenko Aleksandra, Nuraliev Boris, Rasizidow Timur, Vekselberg Victor.

Hozhakhmedovich (President of the Parliament of the Chechen Republic since 2016 (he is considered the second most influential person in the Republic of Chechnya), member of the Council of Legislators of Russia at the Federal Assembly of Russia); MARTYNOV Daniil Vasilevich (deputy head of the Federal Service Department of the National Guard Troops of the Chechen Republic, adviser to the Russian Minister for Emergency Situations).

On 29 October, Poland imposed asset freeze sanctions and entry ban against PISKOPPEL Olga (citizen of Russia, the real beneficiary of MAGYSTRAL Polska sp.z o.o.).

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.

On 28 July, Switzerland imposed asset freeze sanctions on 54 individuals:

- **6 Syrian individuals responsible for recruiting mercenaries for the benefit of Russian forces in Libya and Ukraine** - Muhammad Al-Salti (Commander-in-Chief of the "Palestine Liberation Army", engaged in the recruitment of Palestinians to fight in Ukraine alongside Russia), Abu Hani Shammout (former Syrian military officer and leader of the "al-Ahdad al-Omariya" faction, responsible for the enrolment of Syrian mercenaries from Yalda, Babila and Beit Sahem, south of Damascus, destined to fight for the Russian forces in Libya and in Ukraine), Nabeul Al-Abdullah (Commander of the National Defence Forces in the city of Suqaylabiyah, overseeing the recruitment of Syrian mercenaries to fight alongside Russia in Ukraine), Simon Al Wakil (Commander of the National Defence Forces in the city of Maharda (Hama), collaborates directly with the command of the Russian forces in Syria), Fawaz Mikhail Gerges (businessman, CEO of Al-Sayyad Company for Guarding and Protection Services Ltd, a Syrian private security company), Yasar Hussein Ibrahim (co-owner of Al-Sayyad Company for Guarding and Protection Services Ltd, a Syrian private security company),
- **1 national government official** - Belousov Andrey Removich (First Deputy Prime Minister of Russia),
- **3 representatives of Russian national political elite** - Delimkhanov Adam Sultanovich (Member of the State Duma of Russia, First Deputy Chairman of the Committee on Security and Anti-Corruption), Chaika Yury Yakovlevich (non-permanent member of the Security Council of Russia and the Plenipotentiary Representative of the President of Russia in the North Caucasus Federal District), Lvova-Belova Maria Alexeyevna (Presidential Commissioner for children's rights),
- **14 representatives of Russian regional political elite** - Sobyenin Sergey Semyonovich (mayor of Moscow), Denisenko Aleksey Vladimirovich (member of the Chelyabinsk regional Legislative Assembly, member of the Presidium of the Regional Political Council, Head of the Department for Interaction with Public Associations and Work with Youth of the Chelyabinsk Regional Branch of "United Russia"), Belskiy Alexander Nikolaevich (Chairman of the Legislative Assembly of St. Petersburg as a member of the Kremlin-aligned political party "United Russia"), Ishchenko Alexander Valentinovich (Chairman of the Legislative Assembly of the Rostov Region and Secretary of the Rostov Regional Branch of the Kremlin-aligned ruling party "United Russia"), Struk Mikhail Vladimirovich (member of the Legislative Assembly of the Volgograd Oblast (region), member of the Kremlin-aligned ruling party "United Russia"), Zabolotnev Nikolay Nikolaevich (head of the Regional Executive Committee of the Khanty-Mansiysk Regional Branch of the Kremlin-aligned ruling party "United Russia"), Velikdan Nikolay Timofeevich (Chairman of the Stavropol Regional Duma, first Deputy Chairman of the Government of the Stavropol Territory, member of the Kremlin-aligned ruling party "United Russia" and member of the Presidium of the Regional Political Council of the Party), Kholin Dmitry Vladimirovich (member of the Samara Provincial Duma, Chairman of the Regulations Committee, former head of the Executive Committee of the Samara Regional Branch of the Kremlin-aligned ruling party "United Russia", member of the Samara Regional Branch of the all-Russian public organization "Combat Brotherhood" (organization for veterans)), Tsivilev Sergey Evgenievich (governor of the Kemerovo region), Govor Roman Alexandrovich (member of the Legislative Assembly of the Kemerovo Region – Kuzbass, member of the Kremlin-aligned ruling party "United Russia"), Chuyko Roman Sergeevich (head of the Regional Executive Committee of the All-Russian People's Front and member of the regional Legislative Assembly in Tuymen Oblast), Babenko Viktor Vladimirovich (Chairman of the Sverdlovsk Regional Council of Supporters of the "United Russia" Party, Member of the Legislative Assembly of the Sverdlovsk Region and Deputy Secretary of the Sverdlovsk Regional Branch of "United Russia"), Burlachko Yury Alexandrovich (chairman of the Legislative Assembly of the Krasnodar Krai (region), member of the Kremlin-aligned ruling party "United Russia"), Kamaltynov Yuri Zimelevich (Deputy Chairman of the State Council of the Republic of Tatarstan, former Deputy Prime Minister of the Republic of Tatarstan and as plenipotentiary representative of the President of the Republic of Tatarstan in the State Council of the Republic of Tatarstan, member of the Kremlin-aligned ruling party "United Russia"),
- **12 Russian military officials** - Delimkhanov Sharip Sultanovich (Commander of the Chechen branch of the National Guard of Russia, responsible for commanding the Chechen forces during Russia's war of aggression against Ukraine, including in the Kyiv and Donbas regions), Delimkhanov Alibek Sultanovich (Deputy Commander of the Chechen branch of the National Guard of Russia, responsible for commanding the Chechen forces during Russia's war of aggression against Ukraine, including in the Kyiv and Donbas), Strigunov Viktor Nikolayevich (First Deputy Director of the Federal Service of the National

Guard of Russia (Rosgvardia) – Commander-in-Chief of Rosgvardia), Plokhoy Oleg Anatolyevich (Secretary of State, Deputy Director of the Federal Service of the National Guard of Russia (Rosgvardia) – Commander-in-Chief of Rosgvardia), Yashin Yuriy Viktorovich (Chief of the General Staff of the National Guard Troops of Russia – Deputy Director of the Federal Service of the National Guard Troops of Russia – Commander-in-Chief of the National Guard Troops of Russia), Ilyash Igor Anatolyevich (Deputy Director of the Federal Service of the National Guard of Russia (Rosgvardia) – Commander-in-Chief of Rosgvardia), Lebedev Sergei Anatolyevich (Deputy Director of the Federal Service of the National Guard of Russia (Rosgvardia) – Commander-in-Chief of Rosgvardia), Kuzmenkov Alexey Mikhailovich (Deputy Director of the Federal Service of the National Guard of Russia (Rosgvardia) – Commander-in-Chief of Rosgvardia), Bezzubikov Alexey Stepanovich (Deputy Director of the Federal Service of the National Guard of Russia (Rosgvardia) – Commander-in-Chief of Rosgvardia), Grekhov Yuri Nikolaevich (Russian military commander, Colonel-General, a Deputy Commander-in-Chief of the Russian Aerospace Forces), Kheirbekov Zabit Sabirovich (Lieutenant General of the Russian Aerospace Forces, Deputy Commander-in-Chief of the Russian Aerospace Forces for Logistics), Maksimtsev Alexander Anatolievich (Russian military leader and a Deputy Commander-in-Chief of the Aerospace Forces for military-political work),

- **1 security service official** - Korolev Sergei Borissovich (First Deputy Director of the Russian FSB)
- **7 so-called leaders in areas of Ukraine illegally occupied by Russian forces or controlled by Russian-backed proxies** - Balytskyi Yevgeniy Vitalievich (cooperated with the Russian authorities in the Ukrainian city of Melitopol, so-called Governor of the Zaporizhzhia region of Ukraine), Ivashchenko Konstantin Vladimirovich (so-called appointed mayor of Mariupol), Kobets Aleksandr Yurievich (so-called mayor of the city of Kherson), Rogov Vladimir Valeryevich (so-called representative of the main council of Zaporozhzhia region's military-civil administration), Saulenko Alexandr Fedorovich (so-called head of the provisional administration of Berdyansk and the Berdyansk region), Shevchik Andrei Vladimirovich (so-called mayor of Enerhodar), Kryuchkov Oleg (spokesperson for the Russian occupation authority in Crimea and advisor to the Head of Crimea),
- **3 relatives of previously sanctioned businessmen** - Chemezov Stanislav Sergeyevich (son of Sergei Chemezov, a member of the Supreme Council of "United Russia" and chairman of the Rostec conglomerate, the leading Russian state industrial manufacturing corporation), Bolotova (Maiden name: Tokareva) Maya Nikolaevna (daughter of Nikolay Tokarev, the CEO of Transneft), Ezubov Pavel (cousin of Oleg Deripaska, who owns the Russian Machines industrial conglomerate),
- **4 members of the nationalist motorcycle club Nightwolves MC** - Zaldostanov Alexander Sergeyevich (leader and founder of the nationalist motorcycle club Nightwolves MC), Bobrovskiy Andrey (member of the nationalist motorcycle club Nightwolves MC), Hambálek Jozef (President of the Europe chapter of the nationalist motorcycle club Nightwolves MC based in Slovakia), Weitz Alexei (member of the nationalist motorcycle club Nightwolves MC),
- **1 businessperson** - Kozitsyn Andrey Anatolyevich (leading Russian businessperson, co-founder and CEO of Ural Mining Metallurgical Company (UMMC/UGMK)),
- **2 actors** - Bezrukov Sergey Vitalyevich (Russian actor and politician, chairman of "United Russia"'s "Culture of the little homeland project"), Mashkov Vladimir Lvovich (Russian actor, director and screenwriter).

On 16 August, Switzerland imposed asset freeze sanctions on former President of Ukraine Viktor Yanukovich and his son Oleksandr Yanukovich.

On 8 September, Switzerland imposed asset freeze sanctions on Polyakova Alla Viktorovna (Member of the State Duma), Tkachev Anton Olegovich (Member of the State Duma), Ponomarev Valery Andreevich (Member of the Federation Council).

On 26 September 2022 the Federal Department of Economic Affairs EAER removed 3 individuals from the Sanction list: Zhirinovskiy Vladimir Volfovich (Member of the Council of the State Duma), Ayziman Olga (ex-wife of Mikhail Fridman), Narzieva Saodat (sister of Alisher Usmanov; Alisher Usmanov transferred considerable assets to his sister, including a single payment or gift of 3 million USD. According to the EU, she also held 27 Swiss bank accounts, holding hundreds of millions of dollars, which can be linked to her brother Alisher Usmanov. She has also been linked to 6 offshore companies whose activities can be linked to Usmanov). The measures come into force on 27 September 2022.

On 12 October, the Federal Department of Economic Affairs, Education and Research (EAER) implemented financial sanctions (asset and economic resource freeze) and a travel ban against 30 individuals, mainly targeting those involved in the so-called 'referendums' organised by Russia in Ukrainian regions at the end of September:

- **10 military and security government officials** - Ivanov Timur Vadimovich (Deputy Minister of Defense responsible for the procurement of military goods and the construction of military facilities), Bulgakov Dmitriy Vitalyevich (Deputy Minister of Defense of Russia until Sep 2022 and General in the Russian Army), Evkurov Yunus-Bek Bamatgireevich (Deputy Minister of Defense of Russia), Tsalikov Ruslan Khadzismelovich (Deputy Minister of Defense of Russia), Pankov Nikolay Aleksandrovich (Deputy Minister of Defense, general of the Russian army reserve and state secretary of Russia), Sadovenko Yuriy Eduardovich (Deputy Minister of Defense of Russia), Ryzhkov Sergey Borissovich (Major General of the Russian armed forces and Commander of the 41st Combined Arms Army), Shugaev Dmitry Evgenevich (Director of the Federal Service for Military-Technical Cooperation of the Russian Federation (FSVTS)), Zhidko Gennadiy Valeryevich (Key member of the Armed Forces of Russia), Kulishov Vladimir Grigorevich (Head of Russia's Border Service and Deputy Director of the Federal Security Service (FSB) of Russia),
- **2 officials of the Administration of the President of Russia** - Kharichev Aleksandr Dmitrievich (Head of the Division of Operation of the State Council in the Administration of the President of Russia), Rapoport Boris Yakovlevich (Deputy head of the Division of Operation of the State Council in the Administration of the President of Russia),

- 2 officials of the Central Election Commission of Russia – Bulayev Nikolay Ivanovich (Deputy chairman of the Russian Central Election Commission), Pamfilova Ella Aleksandrovna (Chairperson of the Central Election Commission (CEC) of the Russian Federation)

- 10 so-called leaders in areas of Ukraine illegally occupied by Russian forces or controlled by Russian-backed proxies

- Koltsov Anton Viktorovich (appointed so-called “Head of the Government of the Zaporizhzhia Oblast”), Selivanov Alexey Sergeyevich (so-called “Deputy Head of the Main Directorate of the Ministry of Internal Affairs of the Zaporizhzhia Military-Civilian Administration”), Titskiy Anton Robertovich (appointed so-called “Minister of Youth Policy of Zaporizhzhia Oblast” by the government of Russia), Eliseev Sergey Vladimirovich (appointed so-called “Head of the Kherson Military-Civilian Administration” by the government of Russia), Rodikov Mikhail Leonidovich (appointed so-called “Minister of Education and Science” of the Kherson Military-Civilian Administration by the government of Russia), Bepalov Vladimir Alexandrovich (appointed so-called “Minister of Domestic Policy” of the Kherson Military-Civilian Administration by the government of Russia), Khotsenko Vitaliy Pavlovich (appointed Prime Minister of the so-called Donetsk People’s Republic), Kuznetsov Vladislav Garievich (appointed First Deputy Chairman of the government of the so-called “Luhansk People’s Republic”), Solntsev Evgeniy Alexandrovich (so-called “Deputy Chairman of the Government of the Donetsk People’s Republic”), Kostomarov Alexander Konstantinovich (so-called “First Deputy Head of the administration of the Head of the Donetsk People’s Republic”),

- 2 oligarchs and businesspeople in Russia’s military-industrial complex - Lushnikov Alan Valerievich (the largest shareholder of arms producer JSC Kalashnikov Concern), Kochkin Aleksander Viktorovich (Executive Director of the Tecmash concern, a key designer and manufacturer of missiles and munitions used by the Russian Armed Forces),

- 4 propagandist figures - Chicherina Yulia Dmitrievna (prominent Russian singer), Rastorguev Nikolay Viacheslavovich (Russian singer and member of the Public Council of the Ministry of Defense of Russia), Gazmanov Oleg Mikhaylovich (Russian musician and a member of the Public Council of the Ministry of Defense of Russia), Dugin Aleksander Gelyevich (Russian political philosopher, political scientist, analyst, strategist and longstanding ideologue of the theories of Russky Mir and Eurasianism).

On 31 October, the Federal Department of Economic Affairs EAER imposed financial sanctions and entry and transit ban on 3 Iranian military officials involved in the development and delivery to Russia of drones used in the war in Ukraine- Bagheri Mohammad Hossein (Major-General, Chief of Staff of Iran’s Armed Forces, supervises the military Unmanned Aerial Vehicle (UAV) programme and plays a fundamental role in Iran’s defence cooperation with Russia, inaugurated an assembly line in Tajikistan destined for the export of Ababil-2 drones, participated in the development of Mohajer-6 drones and their supply to Russia), Qureishi Sayed Hojatollah (General, Head of the Supply, Research, and Industrial Affairs Division at the Iranian Ministry of Defense and Armed Forces Logistics (MODAFL) and responsible for negotiating the agreement with Russia in relation to the supply of Iranian-made Unmanned Aerial Vehicles (UAVs)), Aghajani Saeed (Brigadier-General, Commander of the Islamic Revolutionary Guard Corps - Aerospace Force (IRGC ASF) UAV Command).

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

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

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

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

On 28 June, Australia sanctioned 16 individuals, including Kabaeva³⁶.

On 16 September, Australia removed Alexander Grigoryevich Abramov (a co-founder of Evrazmetall, the former CEO and Chairman of Evraz Group SA and non-executive Chairman of Evraz plc) from the List of Designated persons and entities and declared persons. Mr Abramov made an application for revocation to the Minister in relation to his listing. In order to satisfy herself that Mr Abramov met the legal criteria the Minister decided to revoke Mr Abramov’s listing and consider his listing afresh. By the next decision Australia inserted Alexander Grigoryevich Abramov’s name back into the List.

³⁶ Alina Maratovna Kabaeva (Chair of the Board of the National Media Group), Igor Alexandrovich Putin (Director of Pechenga International Sea Port, and relative of President Putin), Mikhail Evgenievich Putin (Deputy Chairman of the Management Board of Sogaz Insurance and Gazprom, and relative of President Putin), Roman Igorevich Putin (Chair of the board of directors of the MRT Group of Companies LLC, and relative of President Putin), Yuri Nikolayevich Shamalov (President of Gazfond (the pension fund of Gazprom) and a member of the board of directors of Gazprombank), Aleksandr Grigorevich Plekhov (Executive Director of Vital Development Corporation JSC), Mikhail Alekseevich Klislin (Executive of Bank Rossiya, and a member of the Board of Directors at SOGAZ), Sergey Nikolayevich Gorkov (Banker, lawyer and Director-General of Rosegeologia), God Semenovitch Nisanov (Property developer and chairman of Kievskaya Ploschad Group of Companies), Evgeny Grigorievich Novitsky (Former head of Sistema and Chairman of Radiotechnical and Information Systems Concern (RTI)), Grigory Viktorovich Berezkin (Chairman of the Board of Directors of ESN Group), Igor Albertovich Kesaev (Owner and President of Mercury Group), Irek Envarovich Faizullin (Minister for Construction, Housing and Utilities of Russia), Vitaly Gennadyevich Savelyev (Minister for Transport of Russia), Dmitry Nikolayevich Patrushev (Minister for Agriculture of Russian), And Maria Alekseevna Lvova-Belova (Commissioner for Children’s Rights in Russia).

On 29 September, the Australian government imposed sanctions on 28 individuals, including:

- 19 so-called leaders in areas of Ukraine illegally occupied by Russian forces or controlled by Russian-backed proxies

- Aleksandr Yurievich KOBETS (so-called 'mayor' of the city of Kherson); Sergey Vladimirovich ELISEEV (so-called 'chairman' of the government of the Kherson region); Konstantin Vladimirovich IVASHCHENKO (so-called 'mayor' of the city of Mariupol); Yevhen Vitaliiiovych BALYTSKYI (so-called 'governor' of the Zaporizhzhia region); Pavlo Ihorovych FILIPCHUK (so-called 'head' of the occupation administration of the city of Kakhovka); Vladimir Valeryevich ROGOV (so-called 'representative' of the main council of the Zaporizhzhia region's military-civil administration); Alexandr Fedorovich SAULENKO (so-called 'head' of the provisional administration of Berdyansk in the Zaporizhzhia region); Andrei Vladimirovich SHEVCHIK (so-called 'mayor' of the city of Enerhodar); Kyrylo Sergiyovich STREMOUSOV (president of the so-called 'Salvation Committee for Peace and Order' in the Kherson region); Volodymyr Vasilyovich SALDO (so-called 'head' of the military-civilian administration for the Kherson region and member of the so-called 'Salvation Committee for Peace and Order' in the Kherson region); Serhiy Mikolayovich CHEREVKO (member of the so-called 'Salvation Committee for Peace and Order' in the Kherson region); Tetiana KUZMICH (member of the so-called 'Salvation Committee for Peace and Order' in the Kherson region); Vladimir Vladimirovich EZHIKOV (so-called 'Deputy Chairperson' and chief of staff of the self-proclaimed 'government' of the so-called 'People's Republic of Donetsk'); Vitaliy Pavlovich KHOTSENKO (so-called 'Chairperson' or 'Prime Minister' of the self-proclaimed 'government' of the so-called 'People's Republic of Donetsk'); Yuriy Nikolaevich GOVTVIN (so-called 'Deputy Chairperson' of the self-proclaimed 'government' of the so-called 'People's Republic of Luhansk'); Vladislav Garievich KUZNETSOV (so-called 'First Deputy Chairman' of the self-proclaimed 'government' of the so-called 'People's Republic of Luhansk'); Vladimir Aleksandrovich BESPALOV (so-called 'Deputy Head' of the occupation government of the Kherson region); Mikhail Leonidovich RODIKOV (so-called 'head' of the Ministry of Education and Science of the occupational government in the Kherson region); Anton Viktorovich KOLTISOV (so-called 'head' of the 'government' of the Zaporizhzhia region).

- 3 national government officials – Konstantin Anatolevich CHUYCHENKO (Minister for Justice of Russia); Marat Shakirzyanovich KHUSNULLIN (Deputy Prime Minister of Russia for Construction and Regional Development); Maksut Igorevich SHADAYEV (Minister of Digital Development, Communications and Mass Media of Russia);

- 4 individuals which are head or deputy-head of any public body, federal agency or service subordinate to the President of Russia: Vladimir Ivanovich BULAVIN (Head of the Federal Customs Service of Russia); Sergei Vladilenovich KIRIYENKO (First Deputy Chief of Staff of the Presidential Executive Office of Russia); Igor Viktorovich KRASNOV (Prosecutor General of Russia); Andrey Yurevich LIPOV (Head of the Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor) of Russia);

- 2 members of the Russian Security Council – Sergey Semenovich SOBYANIN (Member of the Russian Security Council); Aleksandr Dmitrievich BEGLOV (Member of the Russian Security Council).

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 Belarus³⁷.

On 23 August, New Zealand added 48 Russian officials operating in the so-called LDPR to its Russia sanctions list³⁸.

37

Leonid Viktorovich Kasinsky (Assistant to the Minister of Defense for Ideological Work in the Armed Forces), Igor Vladimirovich Mozhilovsky (Assistant to the Minister of Defense for Military Economy and Finance; Head of the Main Financial and Economic Department in the Ministry of Defense), Oleg Leonidovich Voinov (Head of the International Military Cooperation Department of the Ministry of Defense; Assistant to the Minister of Defense for International Military Cooperation), Ivan Josephovich Boguslavsky (Head of the Chief Military Inspectorate of the Armed Forces in the Ministry of Defense), Dmitry Anatolievich Miholap (Deputy Commander of the Air Force and Air Defense Forces), 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).

38

Galina Viktorivna DANILCHENKO ('Acting mayor' of Melitopol), Aleksandr Yurievich KOBETS (so-called 'Mayor' of Kherson), Konstantin Vladimirovich IVASHCHENKO (so-called 'Mayor' of Mariupol; so-called head of the HQ of the territorial defence of the DPR in Mariupol), Yevheniy Vitalyevich BALITSKY (former people's deputy of Ukraine; so-called 'governor' of the Zaporozhia region), Vladimir Valeryevich ROGOV (so-called representative of the main council of Zaporozhzhia region's military-civil administration), Sergey Vladimirovich YELISEYEV (so-called chairman of the Government of the Kherson region; former First Deputy Chairman of the Government of the Kaliningrad Region – Chief of Staff of the Government of the Kaliningrad region), Andrei Dmitrievich KOZENKO (appointed Deputy Head of the Administration of Zaporizhia), Alexandr Fedorovich SAULENKO (so-called head of the provisional administration of Berdyansk and the Berdyansk region), Andrei Vladimirovich SHEVCHIK (so-called mayor of Enerhodar), Kyrylo Sergiyovich STREMOUSOV (so-called Deputy Chief of Kherson regional military-civil administration), Volodymyr Vasilyovich SALDO (so-called head of the Kherson regional administration), Vladimir PAVLENKO (so-called 'Minister of State Security' of the DPR), Alexander Yevgenyevich ANANCHENKO (so-called 'Prime Minister' of the 'DPR'), Vladimir Nikolaevich ANTONOV (so-called 'Deputy of the Chair of the Government' of the 'DPR'), Anatoliy Andreevich ANTONOV (so-called 'Minister of State Security' of the 'LPR'), Sergey Alekseevich BORODIN (so-called 'Chairman of the State Committee for Taxes and Duties' of the 'LPR'), Yana Sergeevna CHAUSOVA (so-called 'Minister of Finance' of the 'DPR'), Yuriy Anatolievich DEGTAREV (so-called 'Minister of Natural Resources and Environmental Security' of the 'LPR'), Aleksei Alexandrovich DIKIY (so-called 'Minister of Internal Affairs' of the 'DPR'), Ruslan Mihajlovich DUBOVSKIY (so-called 'Minister of Coal and Energy' of the 'DPR'), Oleg Vasilievich FETISOV (so-called 'Minister of Communications and Mass Communications' of the 'LPR'), Aleksandr Yurevich GROMAKOV (so-called 'Minister of Youth, Sports, and Tourism' of the 'DPR'), Igor Nikolaevich HALEPA (so-called 'Acting Minister of Telecommunications' of the 'DPR'), Evgeniy Anatolievich KATSAVALOV (so-called 'Minister of Emergency Situations and Disaster Management' of the 'LPR'), Elena Nikolaevna KOSTENKO (so-called 'Deputy Chairman of the Council of Ministers' of the 'LPR'), Alexei Aleksandrovich KOSTRUBITSKIY (so-called 'Minister for Civil Defence, Emergency Situations and Elimination of Consequences of Natural Disasters' of the 'DPR'), Artem Alexandrovich KRAMARENKO (so-called 'Minister of Agro-Industrial Policy and Food' of the 'DPR'), Mikhail Nikolaevich KUSHAKOV (so-called 'Minister of Education and Science' of the 'DPR'), Evgeniy Evgenievich LAVRENOV

On 27 September, Foreign Minister announced financial and travel sanctions imposed on **19 members of President Putin's inner circle** and other representatives of the Russian political elite. Those sanctioned include:

- 8 Member of the Security Council of Russia: Alexander Dmitriyevich BEGLOV (Governor of St Petersburg), Vladimir Ivanovich BULAVIN (Head of the Federal Customs Service), Konstantin Anatolyevich CHUYCHENKO (Minister of Justice of Russia), Igor Viktorovich KRASNOV (Prosecutor General), Rashid Gumarovich NURGALIEV (Deputy Secretary of the Security Council), Sergei Semyonovich SOBYANIN (Mayor of Moscow), Yury Petrovich TRUTNEV (Presidential Envoy to the Far Eastern Federal District), Vladimir Vasilyevich USTINOV (Presidential Plenipotentiary Envoy to the Southern Federal District);

- 3 representatives of Russian government: Andrei Removich BELOUSOV (First Deputy Prime Minister of Russia), Irek Envarovich FAIZULLIN (Minister of Construction, Housing, and Utilities of Russia), Vitaly Gennadyevich SAVELYEV (Minister of Transport of Russia);

- 1 representative of Russian national political elite - Andrey Aleksandrovich FURSENKO (Aide to the President of Russia);

- 1 representative of regional political elite - Ramzan Akhmadovitch KADYROV (President of the Republic of Chechnya);

- 6 businesspersons: Sergey Aleksandrovich FURSENKO (Vice President of Gazprombank; member of the Gazprom Neft Board of Directors), Alina Maratovna KABAEVA (Chair of the Board of Directors at National Media Group), Igor Alexandrovich PUTIN (Director of Pechenga International Sea Port), Mikhail Evgenievich PUTIN (Russian businessperson), Roman Igorevich PUTIN (Chair of the Board of Directors of the MRT Group of Companies LLC), Nikolay Terentievich SHAMALOV (Russian businessperson).

On 11 October, New Zealand imposed broad economic sanctions and travel ban against 74 individuals and extended further sanctions on 15 individuals with strategic or economic relevance who were previously only travel banned:

- 1 governmental official - Dmitry Nikolayevich PATRUSHEV (Minister of Agriculture);

- 47 Oligarchs and business people – Andrey Igorevich AKIMOV (Chair of the Management Board of Gazprombank); Oleg Yevgenyevich AKSYUTIN (Deputy Chair of the Management Committee of Gazprom; CEO of South Stream Transport BV); Vagit Yusufovich ALEKPEROV (Former President and former CEO Lukoil); Oleg Valentinovich BELOZYOROV (CEO and Chair of the Management Board of Russian Railways); Andrey Removich BOKAREV (Former President and former member of the board of Transmashholding; Chair of the board of Kuzbassrazrezugol); Alexander Valeryevich DYUKOV (Chair of the Management Board and CEO of Gazprom Neft; Vice Chair of Sibur; President of the Russian Football Union); Vladimir Petrovich EVTUSHENKOV (Majority shareholder and former chair of the Board of Directors of Sistema JSFC); Sergey Nikolayevich GORKOV (Chair of Vnesheconombank; CEO and Chair of the management board of Rosgeologia JSC); Andrey Andreevich GURYEV (Former Member of the Board, former CEO and former Chair of the Management Board of PSJC PhosAgro); Andrey Grigoryevich GURYEV ((Founder and former deputy chair of Phosagro); Mikhail Safarbekovich GUTSERIEV (Shareholder and Chair of the board of executives of Safmar and Slavkali); Igor Albertovich KESAEV (Owner and President of Mercury Group; shareholder of V.A Degtyarev Weapons plant); German Borisovich KHAN (Member of Supervisory Board of the Alfa Group Consortium; member of the Board of Directors of ABH Holdings S.A.; Chair of the Supervisory Board of A1 Investment Holding S. A.); Tigran Oganovich KHUDAVERDYAN (Former Executive Director and former Deputy CEO at Yandex NV); Mikhail Alekseevich KLISHIN (Deputy Chair of Bank Rossiya; member of the Board of SOGAZ); Sergey Anatolyevich KOGOGIN (Director General of Kamaz PJSC); Dmitriy Vladimirovich KONOV (Former Chair of the Management Board of PJSC Sibur Holding); Ilgam Gaffarovich KUCHUKOV (Member of the Management Board of Rosneft); Sergey Alexandrovich KULIKOV (Chair of the Board of Management Company RUSNANO LLC; First deputy Chair of the board of the Military-Industrial Commission); Alexey Viktorovich KUZMICHEV (Member of the Supervisory Board of Alfa Group Consortium); Alexey Evgenyevich LIKHACHEV (Director General of ROSATOM); Igor Viktorovich MAKAROV (President of ARETI International Group); Dina Rinatovna MALIKOVA (President and Chair of the board of the Russian Regional Development Bank; member of the Management Board of Rosneft); Valentin Gennadyevich MAMAEV (Former Director General of Samotlorneftegaz; former member of the Management Board of Rosneft); Dmitry Arkadievich MAZEPIN (Former CEO of JSC UCC Uralchem); Andrey Igorevich MELNICHENKO (Former Non-Executive Director of JSC SUEK (until 9 March 2022); Member of the Board of EuroChem Group); Alexander Alexandrovich MIKHEEV (CEO of Rosboronexport); Leonid Viktorovich MIKHELSON (Chair of the board of NOVATEK); Irina Nikolayevna MILYUTINA (Head of the Management Committee Administration and Deputy Chair of the Management Committee, Gazprom), Vadim Nikolaevich MOSHKOVICH (Founder and former Chair of the Board of Directors of Rusagro Group; shareholder of Sberbank); God Semenovich NISANOV (Chair of Kievskaya Ploschad Group of Companies); Evgeny Grigorievich NOVITSKY (Chair of Radiotechnical and Information Systems Concern (RTI); Boris Viktorovich OBNOSOV (Director General of Tactical Missiles Corporation JSC); Mikhail Eduardovich OSEEVSKY (President and member of the board of directors of PJSC Rostelecom); Mikhail Igorevich POLUBOYARINOV (Member of the Board of Directors of State Transport Leasing Company JSC; Member of the Board of Directors of Roseximbank JSC); Andrey Aleksandrovich POLYAKOV (Chief Geologist of Rosneft Oil Company PJSC); former President, Chair, member of the Board of Sistema); Vladimir Olegovich POTANIN (President of Norlisk Nickel); Dmitry Alexandrovich PUMPYANSKY (Chair of the Board of PJSC Pipe Metallurgical (TMK)); Vladimir Valerievich RASHEVSKY CEO and Director of EuroChem Group AG); Viktor Filippovich RASHNIKOV (Owner, Chair of the Board of Directors and Chair of the Committee for Strategic Planning of the Magnitogorsk Iron & Steel Works (MMK)); Andrey Valerievich RYUMIN (Executive

(so-called 'Minister of Income and Fees' of the 'DPR'), Svetlana Anatolievna MALAKHOVA (so-called 'Minister of Labour and Social Policy' of the 'LPR'), Sergei Sergeevich NAUMETS (so-called 'Minister of Construction, Housing, and Communal Services' of the 'DPR'), Aleksandr Aleksandrovich OPRISHCHENKO (so-called 'Acting Minister of Health' of the 'DPR'), Natalya Alexandrovna PASHCHENKO (so-called 'Minister of Health' of the 'LPR'), Tatyana Viktorovna PEREVERZEVA (so-called 'Deputy Minister of Finance' of the 'DPR'), Svetlana Nikolaevna PODLIPAEVA (so-called 'Minister of Economic Development' of the 'LPR'), Dmitriy Viktorovich PODLIPANOV (so-called 'Minister of Transport' of the 'DPR'), Aleksei Vladimirovich POLOVYAN (so-called 'Minister of Economic Development' of the 'DPR'), Yuriy Alexandrovich PRONKO (so-called 'Minister of Agriculture and Food' of the 'LPR'), Maxim Alekseevich PROTASOV (so-called 'Minister of Construction and Housing and Communal Services' of the 'LPR'), Vladimir Mikhailovich RUSHHAK (so-called 'Minister of Industry and Trade' of the 'DPR'), Dmitriy Sergeevich SIDOROV (so-called 'Minister of Culture, Sports and Youth' of the 'LPR'), Yuriy Nikolaevich SIROVATKO (so-called 'Minister of Justice' of the 'DPR'), Anna Yurievna TODOROVA (so-called 'Deputy Chair of the Government' of the 'LPR'), Larisa Valentinovna TOLSTYKINA (so-called 'Minister of Labour and Social Affairs' of the 'DPR'), Mikhail Vasilyevich ZHELTYAKOV (so-called 'Minister of Culture' of the 'DPR'), Vitaly KHOTSENKO (so-called 'prime minister' of the 'DPR'), Vladislav KUZNETSOV (so-called 'First Deputy Chairman' of the 'LPR'), Yuriy Nikolaevich GOVTVIN (s-called 'first deputy chair of the government' of the 'LPR')

Director of Rosetti PJSC); Marina Vladimirovna SECHINA (Owner of LLC Stankoflot); Alexander Nikolayevich SHOKHIN (President of the Russian Union of Industrialists and Entrepreneurs); Aleksandr Aleksandrovich SHULGIN (Former CEO and former Director of Ozon Holdings Plc); Eugene Markovich SHVIDLER (Former Chair of Millhouse LLC; former Board Member of Evraz plc); Khasan Kureyshevich TATRIEV (General Director of Bashneft; member of the Management Board of Rosneft); Alexander Semenovich VINOKUROV (President of Marathon Group; member of the Board of Directors of Magnit);

- 2 family members of previously sanctioned persons - Pavel Evgenyevich PRIGOZHIN (Son of Yevgeniy Prigozhin; businessperson); Polina Evgenievna PRIGOZHINA (Daughter of Yevgeniy Prigozhin; businessperson);

- 24 so-called 'officials' in illegally annexed regions of Ukraine, who are agents of annexation - Vladimir Aleksandrovich BESPALOV (so-called 'Deputy Head' of Kherson); Ilya BUBNOV (so-called Deputy Minister of Youth, Sports and Tourism of the Donetsk People's Republic); Andrey Gennadiyevich CHERTKOV (so-called Minister of Coal and Energy of the Donetsk People's Republic); Pavlo Ihorovych FILIPCHUK (so-called 'Head' of the city of Kakhovka in Kherson); Dmitry Anatolievich GARTSEV (so-called Minister of Health of the Donetsk People's Republic); Anton Viktorovich KOLTISOV (so-called 'Head of Government' of Zaporizhzhia); Olga KOLUDAROVA (so-called Minister of Education and Science of the Donetsk People's Republic); Aleksandr KOSTOMAROV (so-called First Deputy Head of the Administration of the Head of the Donetsk People's Republic); Denis Sergeevich KURASHOV (so-called Deputy Minister of Communications of the Donetsk People's Republic); Ivan KUSOV (so-called Minister of Education and Science of the Luhansk People's Republic); Tetiana Oleksandrivna KUZMICH (so-called Head of the Department of Education and Science of Kherson); Semen Alekseevich MASHKAUTSAN (so-called Deputy Prime Minister of Kherson); Vasiliy Viktorovich NOSKOV (so-called Deputy Minister of Culture, Sports and Youth of the Luhansk People's Republic); Mikhail Leonidovich RODIKOV (so-called Head of the Ministry of Education and Science of Kherson); Timur SAMATOV (so-called Minister of Industry and Trade of the Luhansk People's Republic); Mykyta Ivanovich SAMOILENKO (so-called Deputy mayor of Berdynask in Zaporizhzhia); Alexei Sergeevich SELIVANOV (so-called Deputy Head of the Ministry of Internal Affairs in Zaporizhzhia); Gennadiy Oleksandrovich SHELESTENKO (so-called member of the military-civilian administration in Kherson); Dmitry Vladimirovich SHMELEV (Russian official serving as the so-called Minister of Revenue and Fees of the Donetsk People's Republic); Evgeniy Aleksandrovich SOLNTSEV (so-called Deputy Chair of the Donetsk People's Republic); Anton Robertovich TITSKIY (Russia-appointed so-called Minister of Youth Policy in Zaporizhzhia); Andrei Yuriyovych TROFIMOV (so-called Deputy head of the administration in Zaporizhzhia); Vladimir Vladimirovich YEZHNIKOV (so-called 'Deputy Chairperson' of and chief of staff in the Donetsk People's Republic); Konstantin ZAVIZENOV (so-called Minister of Energy of the Luhansk People's Republic).

- 15 individuals with strategic or economic relevance who were previously only travel banned - Andrei Leonidovich Kostin (CEO of VTB Bank), Andrey Nikolaevich Patrushev (Son of Nikolai Patrushev), Andrey Sergeevich Puchkov (VTB Bank Executive), Denis Aleksandrovich Bortnikov (Deputy President of VTB Bank), Elena Aleksandrovna Georgieva (Chairperson of Novikombank), Galina Olegovna Ulyutina (Wife of Yuri Solovyov), Gennadiy Nikolayevich Timchenko (Owner of OOO Volga Group), Herman Oskarovich Gref (CEO of Sberbank), Igor Arkadyevich Rotenberg (Son of Arkady Rotenberg and nephew of Boris Rotenberg), Lyubov Valentinovna Prigozhina (Wife of Yevgeny Prigozhin), Violetta Kirovna Prigozhina (Mother of Yevgeny Prigozhin), Vladimir Sergeevich Kiriyyenko (CEO of VK Group), Yevgeny Viktorovich Prigozhin (Financier of Internet Research Agency and key leader of Wagner Group), Yuri Alekseevich Solovyov (VTB Bank Executive), Yuri Borisovich Slyusar (CEO of United Aircraft Corporation).

New Zealand also imposed a travel ban against Alexander ABRAMOV (Former Chair and significant shareholder of Evraz plc) and his family members (wife Svetlana Zaporozhskaya, daughter Natalia Alexandrovna Abramova, son Alexander Alexandrovich Abramov, son Egor Alexandrovich Abramov), who have connections to the New Zealand economy. Their aircraft and vessels will be banned from entering New Zealand's airspace and ports. New Zealand has not implemented broad economic sanctions against these individuals considering that the disruption from applying full sanctions on small businesses and livelihoods connected with his business interests would be greater than that felt by Mr Abramov himself, who does not live in New Zealand and only has a small proportion of his wealth invested in New Zealand. New Zealand's authorities hope that these actions will encourage Mr Abramov to voice concerns about Russia's war on Ukraine.

On 31 October, the New Zealand government imposed broad sanctions on 15 individuals:

- 12 military and security officials - Aleksandr Vladimirovich DVORNIKOV (Commander of the Southern Military District of the Russian Armed Forces); Andrey Nikolayevich SERDYUKOV (Commander of the airborne troops of Russia, Colonel-General); Azatbek Asanbekovich OMURBEKOV (Commanding Officer of the Russian 64th Separate Motorised Rifle Brigade); Dmitry Evgenyevich SHUGAEV (Chairman of the Federal Service for Military-Technical Cooperation); Mikhail Yevgenyevich MIZINTSEV (Head of the National Defense Control Center of the General Staff of the Armed Forces of Russia, Colonel General); Nikolay Vaselyevich BOGDANOVSKY (First Deputy Chief of the General Staff of the Armed Forces of Russia); Sergei Borisovich KOROLEV (First Deputy Director of the Federal Security Service of Russia); Sergey Borisovich RYZHKOV (Commander of the 41st Combined Arms Army of the Central Military District); Valery Ivanovich FLYUSTIKOV (Commander of the Special Operations Forces of the Russian Armed Forces); Vladimir Grigorevich KULISHOV (First Deputy Director of the Federal Security Service of Russia - Head of the Border Service of the Federal Security Service of Russia, Army General);

- 2 leaders of illegal military entity - Alexey Yurevich MILCHAKOV (Commander of the "Rusich" unit, an armed separatist group involved in the fighting in eastern Ukraine); Yan Igorevich PETROVSKIY (Conducting military instructor and commander of the operational group "Rusich").

- 3 businesspeople - Alan Valerievich LUSHNIKOV (Beneficiary of JSC "Concern Kalashnikov", General Director/Founder of "TKKH-INVEST" LLC, founder of LLC "PERSPECTIVE", founder of LLC "DREAM IT"); Aleksander Viktorovich KOCHKIN (Executive Director of JSC "Scientific and production complex "Tehmash"); Yury Yuryevich OREKHOV (Owner of Nord-Deutsche Industrieanlagenbau GmbH and Opus Energy Trading LLC).

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.

On 5 July, Japan imposed asset freeze sanctions on 57 Russian individuals³⁹ and 5 Russian-backed proxies in occupied Ukrainian territories⁴⁰.

On 7 October, the Japanese government introduced further sanctions (asset freeze and other measures) against 58 Russian individuals and 23 individuals directly responsible for the unilateral annexation of Donetsk, Luhansk, Kherson and Zaporizhzhia:

- 1 representative of Russian national and regional political elite - Yury Chaika (member of the Security Council of Russia and the Plenipotentiary Representative of the President of Russia in the North Caucasus Federal District);

- 18 family members of previously sanctioned persons - 6 family members of Ramzan Kadyrov (wife Medni Kadyrova, wife Fatima Khazueva, wife Aminat Akhmadova, relative Ayshat Kadyrova, relative Karina Kadyrova, relative Tabarik Kadyrova); 3 family members of Sergey Shoigu (wife Irina Shoigu, relative Yuriya Shoigu, relative Kseniya Shoigu); 3 relatives of Viktor Zolotov (Roman Zolotov, Zhanna Zolotova, Yuriy Chechikhin); Sergey Matviyenko (relative of Valentina Matviyenko); 3 family members of Mikhail Mishustin (wife Vladlena Mishustina, relative Aleksey Mishustin, relative Aleksandr Mishustin), 2 family members of Dmitry Medvedev (wife Svetlana Medvedeva, relative Ilya Medvedev), Natalia Kokoreva (relative of Alexander Kokorev);

- 5 oligarchs and businesspeople - Dmitry Pumpysky (Former Chairman of the board of directors of PJSC Pipe Metallurgic Company, former President and board member of Group Sinara), Viktor Rashnikov (Owner, Chairman of the Board of Directors and Chairman of the Committee for Strategic Planning of the Magnitogorsk Iron & Steel Works (MMK)), Vladimir Komlev (Chairman of the Management Board and the Chief Executive Officer of NSPK), Alina Kabaeva (Head of the National Media Group), Dmitriy Afanasyev (Partner of Alexander Kokorev);

- 3 propagandist figures - Alexander Zaldostanov (the leader and founder of the nationalist motorcycle club Nightwolves MC), Margarita Simonyan (Editor-in-chief of the English language television news network RT (Russia Today)), Konstantin Knyrik (Director and founder of NewsFront);

- 14 Russian military/security officials - Alexander Maksimtsev (Deputy Commander-in-Chief of the Russian Aerospace Forces), Yuri Grekhov (Colonel-General, Deputy Commander-in-Chief of the Russian Aerospace Forces), Zabit Kheirbekov (Lieutenant General of the Russian Aerospace Forces, Deputy Commander-in-Chief of the Russian Aerospace Forces), Viktor Strigunov (First Deputy Director of the Federal Service of the National Guard of Russia (Rosgvardia) – Commander-in-Chief of Rosgvardia), Oleg Plokhov (Secretary of State, Deputy Director of the Federal Service of the National Guard of Russia (Rosgvardia) – Commander-in-Chief of Rosgvardia), Yuriy Yashin (Chief of the General Staff of the National Guard Troops of Russia – Deputy Director of the Federal Service of the National Guard Troops of Russia – Commander-in-Chief of the National Guard Troops of Russia), Igor Ilyash (Deputy Director of the Federal Service of the National Guard of Russia (Rosgvardia) – Commander-in-Chief of Rosgvardia), Sergei Lebedev (Deputy Director of the Federal Service of the National Guard of Russia (Rosgvardia) – Commander-in-Chief of Rosgvardia), Alexey Kuzmenkov (Deputy Director of the Federal Service of the National Guard of Russia (Rosgvardia) – Commander-in-Chief of Rosgvardia), Alexey Bezzubikov (Deputy Director of the Federal Service of the National Guard of Russia (Rosgvardia) – Commander-in-Chief of Rosgvardia), Sharip Delimkhanov (Commander of the Chechen branch of the National Guard of Russia), Alibek Delimkhanov (Deputy Commander of the Chechen branch of the National Guard of Russia), Dmitry Gramashov (Russian FSB officer), Alexander Kokorev (Former FSB office);

- 2 leaders of illegal military entities - Alexey Milchakov (Leader of Task Force Rusich), Yan Petrovskiy (Leader of Task Force Rusich);

- 14 members of the Interregional Social Organization Union of Donbas Volunteers - Viktor Anosov, Aleksey Chumakov, Yuriy Daniltshev, Dmitriy Dzinikashvili, Tamerlan Enaldiev, Dmitriy Khavchenko, Mariya Koleda, Olga Kulygina, Anastasiya Kuznetsova, Nadezhda Lashkaryova, Roman Lenshin, Oleg Pugachyov, Yuriy Shevchenko, Aleksey Sosonnyy;

- 23 individuals directly responsible for the unilateral annexation of Donetsk, Luhansk, Kherson and Zaporizhzhia - Oleg KRYUCHKOV (Spokesperson for the Russian occupation authority in Crimea and Advisor to the Head of Crimea), Sergei BULGAKOV (Self-proclaimed "Deputy Prosecutor and Senior Counselor of Justice for the Republic of Crimea"), Andrey DOLGOPOLOV (Self-proclaimed "Chairman of the Kyiv District Court in Simferopol in the Republic of Crimea"), Mikhail BELOUSOV (Self-proclaimed "Judge of the Kyiv District Court in Simferopol in the Republic of Crimea"), Viktor MEZHEILANSKY (Self-proclaimed "Judge of the Kyiv District Court in Simferopol in the Republic of Crimea"), Mariya ERMAKOVA (Self-proclaimed "Judge of the Dzhankoi District Court of the Republic of Crimea"), Pavel KRYLLO (Self-proclaimed "Judge of the Gagarinskiy District Court of Sevastopol"), Vitaliy KHOTSENKO (Self-proclaimed "Chairperson of the Government of the Donetsk People's Republic"), Vladimir EZHIKOV (Self-proclaimed "Deputy Chairperson of the Government of the Donetsk People's Republic"),

³⁹ Dmitry Grigorenko (Deputy Prime Minister of Russia and Chief of the Government Staff of Russia), Sergei Roldugin (Cellist), Elena Mirtova (Wife of Sergei Roldugin), Marina Mordashova (Wife of Alexey Mordashov), Kirill Mordashov (Relative of Alexey Mordashov), Nikita Mordashov (Relative of Alexey Mordashov), Sergey Gorkov (Director General - Chairman of the Board of RosGeo), Yury Slyusar (President of United Aircraft Corporation), Andrei Gasilov (Solo shareholder of JSC Argument), God Nisanov (Board Chairman of Kievskaya Ploshad Group), Evgeniy (Evgenii) Kochman (CEO of Imperial Yachts SARL), Evgeny (Evgeni) Novitskiy (Novitski) (Chairman of RTI Systems), 45 military officials of the 64th Separate Motorised Rifle Brigade of the 35th Combined Arms Army of Russia - Azatbek Omurbekov (Colonel, commander of the Brigade), Andrei Kurbanov (Colonel), Viacheslav Klobukov (Colonel), Aleksandr Vins (Colonel), Aleksandr Shershnev (Colonel), Sergei Vetrov (Lieutenant colonel), Ruslan Mitiaev (Lieutenant colonel), Andrei Ermishko (Lieutenant colonel), Maksim Platonov (Lieutenant colonel), Vladimir Matafonov (Lieutenant colonel), Dmitrii Lvov (Lviv) (Lieutenant colonel), Evgenii Ladyzhenskii (Lieutenant colonel), Dmitrii Pakhadrin (Lieutenant colonel), Anatolii Shipitsyn (Lieutenant colonel), Denis Deev (Lieutenant colonel), Oleg Bukhvalov (Lieutenant colonel), Dmitrii Smoliago (Lieutenant colonel), Aleksei Bolshakov (Lieutenant colonel), Roman Nadezhdin (Lieutenant colonel), Viktor Filippov (Lieutenant colonel), Faik Mamedov (Mammadov) (Major), Igor Fedotov (Major), German Kulemin (Major), Roman Burdo (Major), Dmitry Kozlov (Major), Ivan Kurkin (Major), Evgeny Vazhenov (Major), Dmitry Ionov (Major), Alexander Kochergin (Major), Alexander Kopylov (Major), Maxim Chernyshev (Major), Stanislav Makarov (Major), Andrey Ivanov (Major), Sergei Pereshivkin (Major), Aleksey Prysev (Major), Sergey Rudenko (Major), Olga Khamenok (Major), Dmitriy Levin (Major), Dmitriy Gonchar (Major), Sergey Zorin (Major), Aleksandr Potapov (Major), Stepan Grigorov (Major), Sergey Mosalev (Major), Valentin Lutsak (Major), Sergey Borisenko (Major).

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

Vladimir BANDURA (Self-proclaimed "Mayor of Svyatohirsk"), Yevgeniy BALYTSKYI (Self-proclaimed "Governor of the Zaporizhzhia Region"), Vladimir ROGOV (Self-proclaimed "Representative of the Main Council of Zaporozhzhia Region's military-civil administration"), Anton KOLTSOV (Self-proclaimed "Head of the Zaporozhye Region"), Anton TITSKIY (Self-proclaimed "Minister of Youth Affairs of the Zaporozhye Region"), Sergey YELISEYEV (Self-proclaimed "Acting Chairman of the Government of the Kherson Region"), Mikhail RODIKOV (Self-proclaimed "Head of the Ministry of Education and Science of the Government of the Kherson Region"), Konstantin IVASHCHENKO (Self-proclaimed "Mayor of Mariupol"), Andrey SIGUTA (Self-proclaimed "Head of the Melitopol District"), Aleksandr KOBETS (Self-proclaimed "Mayor of the City of Kherson"), Aleksandr SAULENKO (Self-proclaimed "Head of Berdyansk and the Berdyansk Region"), Nikita SAMOILENKO (Self-proclaimed "Deputy Mayor of Berdyansk"), Andrei SHEVCHIK (Self-proclaimed "Mayor of Enerhodar"), Alexei SELIVANOV (Self-proclaimed "Deputy Head of the Department of the Ministry of Internal Affairs for the Zaporozhye Region").

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.

On 26 August, Norway added 54 individuals to the list of natural and legal persons, entities and bodies subject to restrictive measures.

On 28 October, Norway introduced sanctions against 30 people, including several actors involved in the so-called referendums in occupied Ukrainian regions.

Lithuania. On July 27, Lithuania banned Patriarch Kirill from entering the country because of his support for the Russian invasion of Ukraine. He was put on the list of undesirables back on June 23, but publicly announced only now.

DISCUSSION ON TOURIST VISA BAN FOR RUSSIANS

On September 1 following agreements were reached:

- the EU will completely terminate the Visa Facilitation Agreement (this will significantly reduce the number of new visas issued by the EU to Russians);
- the EU accepted the idea that in the future Schengen visas will be issued primarily to representatives of vulnerable groups, in particular to those who oppose Russia's war against Ukraine;
- the EU will not recognize Russian passports issued in the recently occupied territories of Ukraine;
- the EU will develop a joint solution on what to do with the millions of visas already issued to Russians;
- the EU countries bordering Russia have received the right to apply their own restrictions, without waiting for major joint decisions of the EU.

On 9 September, the European Council issued a decision suspending the application of the Agreement between the European Community and the Russian Federation on the facilitation of the issuance of visas to the citizens of the European Union and the Russian Federation. The suspension took effect on 12 September 2022.

The EU should allow the entry of Russian citizens who want to avoid mobilization, according to the President of the European Council, Charles Michel. He is convinced that the EU should "show openness to those who do not want the Kremlin to use them for its own purposes."

The EC recommended members of the EU not to accept visa applications from Russians in third countries (Schengen visas should be issued to Russians only in Russia). This statement was made by European Commissioner for Home Affairs Ilva Johansson.

Switzerland. On 16 September, the Federal Council completely suspended the visa facilitation agreement with Russia, which will take effect on September 19, 2022. The suspension of the agreement does not mean a general visa freeze for Russian nationals. The visa procedures for them will again be based on the regular rules of the Visa Code.

From September 19, **Latvia, Lithuania, Estonia and Poland prohibited Russian citizens from entering with tourist Schengen visas issued in any EU country.**

Estonia. On August 9, Prime Minister of Estonia Kaia Kallas called to stop issuing tourist visas to Russians for trips to the EU. Because visiting Europe is a privilege, not a human right. From August 18, Estonia will not allow Russian citizens with Schengen visas to enter the country. As per decision made by Estonian Government on 10.03.2022, starting from 10.03.2022 Embassy of

Estonia in Moscow stopped accepting any visa applications (both Schengen C-type and national D-type visas) from Russian or Belarus citizens.

On 8 September, the Estonian Government decided to temporarily restrict from 19 September the crossing of the external border by citizens of Russia holding a valid short-stay visa for the purpose of entering Estonia.

For the purpose of entering Estonia, the state border is allowed to be crossed by a citizen of Russia:

- 1) who is visiting their direct descendant or ascendant or their spouse who is residing in Estonia and who is an Estonian citizen or holds an Estonian long-term residence permit;
- 2) who is visiting an Estonian citizen or a person holding an Estonian long-term residence permit residing in Estonia with whom they are raising a common underage child;
- 3) who is an employee of a diplomatic mission or a consular post located in the EU, the European Economic Area or the Swiss Confederation, or a family member thereof;
- 4) who is briefly visiting a diplomatic mission or a consular post located in the EU, the European Economic Area or the Swiss Confederation for the purpose of providing technical or professional support;
- 5) who is directly involved in international carriage of goods and passengers, including a crew member and a ship's crew member servicing an international means of transport and a person performing repairs or warranty or maintenance work on such a means of transport;
- 6) who is a person with a right of free movement under EU law;
- 7) who is in immediate transit through the territory of Estonia for reaching their country of residence;
- 8) who holds a valid short-stay visa issued by Estonia and whose short-term employment is registered;
- 9) who holds a valid short-stay visa issued by Estonia for study purposes; or
- 10) whose arrival in Estonia is necessary for humanitarian reasons.

Latvia. On August 11, Latvian parliament called on EU countries to stop issuing visas to citizens of Russia and Belarus. On August 14, the President of Latvia supported this decision. He also suggested reviewing already issued visas and residence permits for Russian citizens who support the war. From August 4, the Latvian Embassy in Russia indefinitely suspended the acceptance of visa applications for Russian citizens, except to attend the funeral of a close relative. From February 25, suspended, for an indefinite period, the issuing of visas to Russian nationals, except for humanitarian reasons and other special cases.

Also, on August 16, Latvian ruling coalition agreed to change the principles for extending temporary residence permits for Russian citizens - in the future they will be extended in rare cases - Latvian PM. The government will make appropriate decisions in the coming days. Since February 24, Latvia has cancelled almost 1,000 residence permits issued to citizens of Russia and Belarus, including 114 - based on the conclusions of the security agencies - BNS. The State Border Guard banned 263 citizens of Russia and 43 citizens of Belarus from entering the country.

On 8 September, the Latvian Government introduced restrictions on entrance to the Schengen area from 19 September for Russian citizens with EU visas who come for tourist, cultural, sports and business purposes.

Latvia will allow to enter the territory of Latvia when crossing the external border of Latvia only for Russian citizens:

- 1.1) who are holders of a residence permit of Latvia, the EU, a State of the European Economic Area or the Swiss Confederation;
- 1.2) holders of a long-stay visa of a Schengen State;
- 1.3) who have been issued a visa in accordance with Regulation No 810/2009 of the European Parliament and of the Council of 13 July 2009 establishing a Community Code on Visas and who are:
 - family members of nationals of Latvia (spouses, parents, grandparents, children, grandchildren, as well as dependents);
 - members of the family of nationals of the EU, a country of the European Economic Area or the Swiss Confederation;
 - employees of transport and passenger transport service providers, cargo or technical flight crew arriving in or departing from Latvia in the performance of their duties;
 - seafarers who need to reach their place of work on board a vessel or need to return from it;
 - persons whose entry is for humanitarian reasons;
- 1.4) employees of diplomatic and consular missions of Russia accredited or posted to Latvia and members of their families;
- 1.5) diplomatic couriers of Russia or ad hoc diplomatic couriers who present an official document stating their status and the number of diplomatic parcels;
- 1.6) persons travelling to the Embassy of Russia in Latvia on a short-term mission for technical support;
- 1.7) employees of diplomatic and consular missions of Russia who transit the territory of Latvia to perform official functions and members of their families, as well as persons who transit the territory of Latvia and go on a short-term mission to the Embassy of Russia in the host country to provide technical support;
- 1.8) persons holding a simplified transit document (FTD) or a simplified rail transit document (FRTD) and travelling from Russia to the Kaliningrad Oblast of Russia and back.

On 22 September, the Saeima supported in the second and final reading urgent amendments to the Immigration Law, changing the procedure of applying for and extending temporary residence permits for Russian and Belarusian citizens.

The amendments no longer allow for an extension of temporary residence permits for Russian and Belarusian citizens who received their residence permit on the basis of investment or the purchase of real estate in Latvia. In addition, Russian citizens will not be eligible for remote work visas.

There are also exceptions, namely, temporary residence permits may be issued on the basis of a family reunion, international protection, interests of the state, or humanitarian considerations.

The Law provides that the extent of restrictions on Belarusian citizens will be less broad.

Moreover, the permanent residence permits of Russian citizens who were citizens or non-citizens of Latvia prior to obtaining Russian citizenship, will be valid until 1 September 2023. Afterwards, if they wish to receive a new permanent residence permit, they will have to provide certification of state language proficiency as set out in the law by the end of the respective period.

On September 21, the Minister of Foreign Affairs stated that Latvia will not issue humanitarian visas to Russians fleeing mobilization. He also noted that the border crossing restrictions for Russians with Schengen visas will not change.

On 22 September, the Saeima supported urgent amendments to the Immigration Law, changing the procedure of applying for and extending temporary residence permits for Russian and Belarusian citizens.

The amendments no longer allow for an extension of temporary residence permits for Russian and Belarusian citizens who received their residence permit on the basis of investment or the purchase of real estate in Latvia.

In addition, Russian citizens will not be eligible for remote work visas. There are also exceptions, namely, temporary residence permits may be issued on the basis of a family reunion, international protection, interests of the state, or humanitarian considerations. The Law provides that the extent of restrictions on Belarusian citizens will be less broad.

Moreover, the permanent residence permits of Russian citizens who were citizens or non citizens of Latvia prior to obtaining Russian citizenship, will be valid until 1 September 2023. Afterwards, if they wish to receive a new permanent residence permit, they will have to provide certification of state language proficiency as set out in the law by the end of the respective period.

Lithuania. The Ministry of Foreign Affairs of Lithuania joined the calls to ban the entry of Russians at the EU level. As reported, back in March Lithuania was one of the first EU countries to limit the issuance of new Schengen and national visas to citizens of Russia. On August 16, According to Landsbergis (Minister of Foreign Affairs) in his comment to DW stated that Lithuania has "effectively stopped issuing all visas to people going on holiday" and only issues visas for "humanitarian reasons". Back on February 22, Lithuanian MFA suspended the issuance of visas to Russian citizens. On August 24, the President of Lithuania also stated that he supports restrictions on issuing tourist visas to citizens of the Russian Federation.

The Government of Lithuania from 19 September implemented stricter verification procedures for all Russian nationals when crossing the external border of the EU to reach Lithuania.

Citizens of Russia who meet at least one of the following conditions are admitted to the territory of Lithuania through the external border of the EU:

1. has a residence permit issued by one of the Schengen Area states or Member States of the EU, or the European Economic Area states, or the Swiss Confederation;
2. have a long-term national visa issued by one of the Schengen states that fully applies Schengen legislation;
3. use the simplified transit for persons from the territory of Russia to the Kaliningrad region of Russia and back and have a simplified transit document or a simplified railway transit document;
4. hold a visa issued in accordance with Regulation (EC) No 810/2009 of the European Parliament and of the Council of 13 July 2009 establishing a Community Code on Visas (Visa Code), as amended, and
 - 4.1. are family members of citizens of Lithuania (spouses, parents, grandparents, children, grandchildren, as well as dependents) or family members of a citizen of another Member State of the EU or of a State of the European Economic Area or of the Swiss Confederation;
 - 4.2. are members of crews and crews employed by undertakings engaged in the international carriage of goods and passengers, or engaged in the international carriage of goods and passengers to or from the Member States of the EU, or in transit through Lithuania, as well as seafarers and members of the crew of merchant seagoing vessels on board a ship on their way to or from their place of work;
 - 4.3. arriving in Lithuania for exceptional humanitarian reasons or family members of such persons;
 - 4.4. enjoying immunities and privileges under the 1961 Vienna Convention on Diplomatic Relations, the 1963 Vienna Convention on Consular Relations, personnel of the missions and consular posts of Russia and accredited to a Member State of the EU or posted to a Member State of the EU, and their family members;
 - 4.5. are diplomatic couriers or ad hoc couriers of Russia who have presented an official document confirming their status and the number of packages in the diplomatic pouch;
 - 4.6. are staff members of diplomatic missions and consular posts of Russia and their family members in transit through the territory of Lithuania for the purpose of carrying out official duties, as well as persons in transit through the territory of Lithuania for a short-term stay in order to provide technical assistance to a diplomatic mission or a consular post of Russia accredited in an EU Member State;
 - 4.7. travelling for a single journey on a passenger train formed by Russia, travelling from the territory of Russia to the Kaliningrad Region of Russia in transit through the territory of Lithuania and back.

Citizens of Russia not referred above shall be subject to individual additional detailed examination on the basis of the threat posed by their entry to the national security, public order, public policy, internal security, public health or international relations of Lithuania.

An official of the State Border Guard Service under the Ministry of the Interior of Lithuania, when refusing to admit a citizen of Russia to the territory of Lithuania, shall have the right to cancel or revoke his/her visa in accordance with the conditions laid down in a Community Code on Visas (Visa Code).

Finland. Finland plans to significantly limit the number of Russian visas. However, according to Foreign Minister Pekka Haavisto, the most important thing would be to get a common EU position on the matter. On August 16, Pekka Haavisto proposed that the number of Russian visa applications be limited to 1/5 or 1/10 of the current number. Finland now accepts about a thousand visa applications from Russia every day. The restriction would therefore mean that applications would be accepted only 100–200 a day in the future.

On September 20, Finland proposed the European Commission to cancel visas of Russians directly at the borders of Schengen countries. They asked the European Commission for a recommendation, according to which countries, while not allowing citizens of the aggressor country on their border, would simultaneously invalidate, cancel their visas or prohibit entry in accordance with Schengen rules. In Helsinki, it was explained that this will help prevent attempts by the same people to enter the Schengen zone through another border. On September 23, Finland announced that it would ban Russian citizens from entering the country for tourist purposes on any Schengen visa.

The president of Finland Niinistö proposes tightening the conditions for obtaining a visa for Russians. Niinistö suggests that owning real estate in Finland would no longer be a special basis for obtaining a visa.

As of 1 September, Finland began to severely restrict the reception of tourist visa applications in Russia.

On 29 September, the GoV of Finland made a decision to significantly restrict the travel of Russians to Finland for tourism purposes. The aim is to stop tourism and related transit completely. Entry restrictions came into force on September 30 and are valid until further notice. Visas will no longer be issued to Russians if the reason for their travel is tourism.

This means that the visas of Russians coming to Finland as tourists are basically invalidated. In this case, the traveller can no longer enter the territory of the EU, for example, from the border of another Schengen country with a visa issued by Finland.

But the country can still be accessed for many special reasons.

According to the Government Resolution, travel on grounds that are essential with respect to fundamental rights should not be prevented. When considering the conditions for issuing a visa and allowing entry to Finland, it is justified to take into account the following special groups in particular:

- 1) family members of Finnish citizens and third-country nationals permanently residing in Finland (spouses, parents, grandparents, children, grandchildren and dependents, as well as those applying for a visa based on an established partnership);
- 2) family members of citizens of a member state of the EU, a member state of the European Economic Area or the Swiss Confederation in the sense of Directive EC/2004/38;
- 3) persons who are coming to Finland for short-term work with a visa;
- 4) personnel in the transport and logistics industry when traveling to Finland in their work duties;
- 5) business travelers who have a necessary reason to travel for business;
- 6) students who come to Finland for short-term (less than 90 days) study, including participation in the entrance exam;
- 7) persons whose entry is based on an established nursing relationship in a nursing facility located in Finland;
- 8) persons who have owned an apartment or property in Finland before September 30, 2022 to the extent that the purpose of the trip is necessary maintenance or care of the apartment or property;
- 9) staff of diplomatic and consular missions of the Russian Federation accredited to or sent to Finland and their family members, diplomatic couriers and personnel of diplomatic and consular missions of the Russian Federation who use the territory of Finland on a transit trip to perform their official duties, and their family members;
- 10) other persons traveling for a special reason based on individual consideration. The Border Guard Agency issues more detailed instructions separately for those special groups whose entry does not pose such a danger to Finland's international relations that entry should be restricted based on these guidelines.

In addition, Finland is not preventing the entry of people with a valid residence permit in Finland, another Schengen country or a non-Schengen country. Russian nationals will not be prevented from returning to Russia.

The resolution does not provide grounds to prevent travelling when it is deemed necessary for humanitarian reasons, for national interests or for meeting Finland's international obligations. This may involve factors relating to an individual's personal situation or circumstances that make it necessary for the person to travel to Finland. In these cases, a regionally limited visa according to Article 25 of the Visa Code can be considered.

Even before the resolution was adopted, owning property no longer made it easier to get a visa. In practice, people who own real estate or shares in housing companies have equal standing with tourists staying in a hotel or rented cabin. When tourist visas cease to be issued, this will also apply to property owners. There may be grounds to permit some exceptions, such as necessary maintenance of property. The important thing is that owning property is not a free pass to a visa or to entry. There is no point in purchasing real estate or a dwelling as a means of gaining entry into Finland.

Poland. Poland is currently working on a mechanism that will allow Russians to be denied visas - Deputy Minister of Foreign Affairs of Poland, Piotr Wawrzyk. He emphasized that a decision on this issue can be expected in the coming weeks, but added that not all EU countries agree to introduce such restrictions for Russians. "However, major member states, including Germany, France and the Netherlands, are against it," he said. - Due to the fact that it is impossible to overcome the resistance of these countries regarding the suspension of the agreement on visa facilitation for citizens of the RF, Poland is working on a new solution."

Pomeranian Voivodeship officials in Poland have already started denying Russians temporary residence and work permits - Trojmiasto. The provision in the law provides for the refusal of temporary stay "when the defence] or security of the country, or the protection of security and public order require considerations."

On 19 September, the Government of Poland introduced restrictions on the entry of Russian citizens into Poland on its external border. The entry ban for citizens of Russia with Schengen visas restrictions through road, rail and river border crossings entered into force on 19 September, through air and sea border crossings - on 26 September.

On 28 October, in the face of Russia's attack on Ukraine and the growing migration risk from Russia, Poland decided to complicate employment for Russians. Poland abolished facilitations in the access of Russians to the Polish labor market. The Minister of Family and Social Policy, Marlena Maląg, signed an ordinance according to which entrepreneurs will not be able to employ Russian citizens on simplified terms. Entrepreneurs, if they want to employ Russian citizens on the basis of a work permit, are no longer exempt from the market test work.

The Ministry of Family and Social Policy announced that Russia was removed from the declaration procedure, which can only be used by citizens of Armenia, Belarus, Georgia, Moldova and Ukraine. It is a quick procedure that allows to legalize employment in Poland within 7 days without extensive verifications. Now a document issued by the employment center is required, without which the employer cannot hire a foreigner.

The ministry emphasized that in order to introduce appropriate changes, it was necessary to amend two regulations - on seasonal work and the regulation of issuing work permits for foreigners.

At the same time, Russians who have already received a permit will be able to continue working in the country without any restrictions – until their permits expire.

Czech Republic. The Czech Republic supported a ban on the issuance of Schengen visas to Russians at the EU level. The Minister of Foreign Affairs of the Czech Republic said that the Czech Republic will seek consensus on this issue at the meeting of the heads of foreign affairs of the EU. From June 22, Czech Republic suspended the issuance of visas and residence permits for citizens of Russia and Belarus until March 2023. From February 25, the acceptance and processing of applications for visas and long-term and permanent residence permits (including so-called stickers) was stopped for nationals of the Russian Federation. This provision also applies to applications for short-term Schengen visas.

On September 25, the president of the Czech Republic said that the republic should accept Russians who are leaving due to mobilization. He disagreed with the Minister of Foreign Affairs, who considered that such circumstances did not meet the conditions for issuing a humanitarian visa to the Czech Republic.

The Czech Republic decided to modify the conditions of entry to the Czech Republic for citizens of Russia. In accordance with this resolution, from 25 October 2022, all citizens of Russia who hold valid Schengen visas for tourism, culture and sport issued by any Schengen member state will be denied for entry to the Czech Republic. However, there is a simple loophole for the Russians to bypass the Czech entry ban. Only flights from non-Schengen countries will be monitored. So only people which fly to the Czech Republic from third countries will be denied for entry. If Russian citizen with a tourist visa are already in the Czech Republic, or will arrive from another Schengen state, which does not have restrictive measure, they will be not restricted to enter the Czech Republic. Holders of work or study visas are not subject to the restriction.

Denmark. Danish Prime Minister Mette Frederiksen noted that "this is an important discussion and we should be able to have it." From May 16, due to staff shortages, the Danish Embassy in Moscow stopped, until further notice, receiving applications for visas and residence permits for Denmark, except e.g. official visas. On August 17, the head of the Danish Foreign Ministry, Jeppe Kofod, stated that Denmark hopes that the EU will make a joint decision to ban the issuance of tourist visas to Russians. However, if there is no success in introducing common EU rules, the government is ready to revise the Danish rules, the minister said.

Belgium. From July 1, the Consulate of Belgium in Russia stopped issuing short-term visas, including tourist visas. The provision will be valid for an indefinite period.

Bulgaria. On August 6, the Bulgarian consulate in Moscow notified about the temporary suspension of accepting documents for tourist visas, as well as for visas for property owners, "in view of the emergency situation that has arisen." On August 5, 14 employees of the diplomatic missions and consular services of Bulgaria in Russia were defiened as persona non grata.

Norway. Norwegian Prime Minister Jonas Gar Stere reminded that his country supported the strict sanctions introduced by the EU, which limited the ability of many Russians to enter Europe. He confirmed that Norway is also participating in the current discussion and will be ready to support "general measures".

As of 22 September 2022, Norway temporarily suspended visa facilitation agreement with Russia. The following have been suspended: easing of documentation requirements; issuance of multiple-entry visas; fee exemption or reduced application fee; reduced case-processing time; visa-free entry when holding a diplomatic passport. This means that Russian nationals are subject to the standard rules regarding documentation, multiple-entry visas, fees and case-processing times. The visa application fee for Russians will increase from €35 to €80. The visa processing time will increase from 10 to 15 days, and in some cases - up to 45.

Sweden. Swedish Prime Minister Magdalena Andersson noted that the country has not yet made a final decision. At the same time, she emphasized that the best solution would be a "joint European approach".

Netherlands. In the end of April, stopped issuing Russians new visas in Moscow after the RF GoV expelled 15 Dutch diplomats from the country.

Germany. According to Reuters, O.Scholz said that while there is room for debate at the European level on the visa ban for Russian tourists, it is important not to make life difficult for Kremlin opponents fleeing Russia. On the other side, Representatives of the largest opposition force in Germany, the bloc of conservative parties (CDU/CSU), support the idea of canceling Schengen visas for Russian tourists while Russian soldiers turn the European country into ruins - reported Bild on August 22. Germany is ready to accept deserters from the Russian army who are "threatened by severe repression". Anyone who opposes the Russian regime and is therefore "in great danger" can apply for asylum due to political persecution.

Portugal. Portugal opposes the ban on entry of Russian tourists to the European Union, the country's Foreign Ministry announced on August 20.

UK. The UK may tighten visa requirements for Russian citizens, but the authorities are not yet convinced that an outright ban is the right way to go, said British Defence Minister Ben Wallace.

Spain. Spain advocated the issuance of Schengen visas to Russians fleeing mobilization.

Mongolia. Mongolia decided to issue residence permits to all Russians who ask for it. This was announced by the head of the country's Immigration Agency. Mongolia was one of the countries where the Russians fled after President Putin's announcement of mobilization.

Georgia. Georgia may consider abolishing the visa-free regime with Russia, President Salome Zurbishvili said on Oct 17th. She expressed concern over the flow of Russians who keep arriving in Georgia amid the war in Ukraine. Earlier Georgian opposition parties and a number of non-governmental organizations called on the authorities to introduce a visa regime for Russian citizens, limiting the time of their stay in the country to three months.

Belarus. As it was reported by Russian media on October 21, Belarusian border guards have joined the efforts of the Russian authorities in restricting the foreign travel of men subject to mobilization.

6. Intensify Sanctions on State-Owned Enterprises

USA (3 SOEs in media, 1 SOE bank and 10 its subsidiaries + 1 state-supported private weapons manufacturer + 71 (SDN List) + 45 RF entities in aerospace, defence and related materiel sector, financial services or technology sectors (sanction lists mostly consist from major RF SOEs and their subsidiaries + 1 RF financial institution owned by the Russian Federal Agency for State Property Management + 1 Russian State Transportation Leasing Company and its 4 subsidiaries + 11 Russian defence and high-technology entities + 19 SOEs operating in Russian defence and materiel, technology or electronics sectors and contributing to Russia's defence industrial base + 1 Russian (Federation Council of the Federal Assembly of Russia) and 1 Belarusian entities), **UK** (sanctions against 5 defence SOEs +1 RF Railways + 2 Airlines + 13 SOEs + 4 subsidiaries), **New Zealand** (2 RF SOEs, 1 Belarus SOE in defence and shipbuilding + 3 in media + 3 Belarus SOEs in defence + 42 SOEs + 1 SOE - JSC Goznak + 2 entities that operate in the Russian defense and related materiel sector), **Canada** (4 defence and machine building + 3 RF SOE financial institutions and banks + 28 defence SOEs + 15 entities involved in disinformation activities (including 12 SOEs) + 10 SOEs in defence + 1 defence sector entity + sanctions Salvation Committee for Peace and Order (so-called government body in Kherson) + 1 channels of Russian propaganda + 3 entities in energy sector), **Australia** (1 RF PMC Wagner + 2 Belarus SOEs in defence +12 RF propaganda and desinformations company), **EU** (3 SOE media +6 SOEs + 4 entities owned by SOE on 27% + National Settlement Depository + 3 Belarus SOE + extended prohibition of broadcasting for 3 RF SOE medias + 7 SOEs + 7 entities, inc. Central Election Commission of Russia and Goznak + ban on EU nationals to hold any posts on the governing bodies of certain Russian state-owned or controlled legal persons, entities or bodies), **Latvia** (ban on distribution of 80 audio and audiovisual programs registered in RF), **Japan** (1 RF and 1 Belarus SOE banks + 9 entities, inc. Rostec and Kalashnikov Concern), **Switzerland** (6 SOE + 4 owned by SOE on 27% and 3 Belarus SOEs + prohibition of advertisement of content produced or broadcast by certain RF SOE media + 5 SOEs + Sberbank + 7 entities, inc. Central Election Commission of Russia and Goznak), **Poland** (sanctioned Gazprom Export), **Norway** (6 RF SOE + 4 owned by SOE on 27% in line with 6th EU package + ban on holding managerial positions in certain companies that are owned or controlled by the Russian state).

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

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

On 3 June, the EU Council imposed restrictive measures (freeze of funds or economic resources and prohibition on the making available of certain funds or economic resources) on 3 Belarus SOEs (OJSC "Grodno Tobacco Factory Neman" ([SOE](#)), Beltamozhservice ([SOE](#)), Belteleradio Company / National State Television and Radio Company of the Republic of Belarus ([SOE](#))).

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

On 6 October, EC imposed sanctions (asset freeze and a prohibition from making funds and economic resources) on 7 entities:

- **1 State body of Russia** - Central Election Commission of Russia;
- **1 finance SOE** – JSC Goznak (Russian SOE responsible for the manufacturing of security products including banknotes, coins, stamps, identity cards, secure documents, state orders and medals; responsible for printing all Russian passports);
- **5 entities operate in the Russian defence and related material sector** - OJSC V.A. Degtyarev Plant (defence company which provides weapons to the Russian Armed Forces); MKB "Fakel" named after P.D. Grushin (Russian defence company which designed the S-300, S-400 and TOR missile systems); JSC Irkut Corporation (Russian aircraft manufacturer which provides fighter aircraft to the Russian Armed Forces); MMZ Avangard (Russian defence contractor, which provides weapons to the Russian Armed Forces); JSC A.N. Ganichev Scientific and Production Association "SPLAV" (Russian weapons manufacturer, which provides weapons to the Russian Armed Forces).

Also as part of 8th package, EU imposed a prohibition on EU nationals from 22 October 2022 to hold any posts in the governing bodies of certain listed Russian state-owned or controlled legal persons, entities or odies (OPK Oboronprom, United Aircraft Corporation, Uralvagonzavod, Rosneft, Transneft, Gazprom Neft, Almaz-Antey, Kamaz, Rostec (Russian Technologies State Corporation), JSC PO Sevmash, Sovcomflot, United Shipbuilding Corporation) and certain of their affiliates.

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

On 28 July, Switzerland imposed asset freeze sanctions on 5 SOEs: Federal Agency for the Commonwealth of Independent States Affairs (SOE), Compatriots Living Abroad and International Humanitarian Cooperation (Rossotrudnichestvo) (SOE) (federal executive body responsible for rendering state services and managing state property to support and develop international relations between Russia and the member-states of the Commonwealth of Independent States and other foreign countries), Russkiy Mir Foundation (SOE) (created and has been financed by the Government of Russia, has been used by Russia to advance its interests in the post-Soviet countries), JSC Research and Production Association "Kvant" (SOE) (Russian company operating in the military sector that produces electronic warfare systems for the Russian Armed Forces), All-Russia "Young Army" Military Patriotic Social Movement (SOE) (Russian paramilitary organization).

On 3 August, Switzerland imposed asset freeze sanctions on Sberbank.

On 12 October, the Federal Department of Economic Affairs, Education and Research (EAER) imposed financial sanctions against 7 entities:

- **1 State body of Russia** - the Central Election Commission (CEC) of the Russian Federation (Russian state body responsible for organizing elections and referenda for Russia),
- **1 finance SOE** - JSC Goznak (Russian SOE responsible for the manufacturing of security products including banknotes, coins, stamps, identity cards, secure documents, state orders and medals; responsible for printing all Russian passports, including passports distributed in the occupied regions of Ukraine, including the Donbas, as well as military documents for Russia's Defense Sector),

- 5 entities that operate in the Russian defense and related material sector - OJSC V.A. Degtyarev Plant (defense company which provides weapons to the Russian Armed Forces), MKB "Fakel" named after P.D. Grushin (Russian defense company which designed the S-300, S-400 and TOR missile systems), JSC Irkut Corporation (Russian aircraft manufacturer which provides fighter aircraft to the Russian Armed Forces), MMZ Avangard (Russian defense contractor, which provides weapons to the Russian Armed Forces), JSC A.N. Ganichev Scientific and Production Association "SPLAV" (Russian weapons manufacturer, which provides weapons to the Russian Armed Forces).

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.

On June 28, 2022, OFAC added 70 entities to the SDN List, with a focus on Russia's aerospace, defence and related materiel sector, financial services or technology sectors. The designations target major state-owned defense companies, defense research organizations, and military operations in Ukraine implicated in international human rights violations.

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

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

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

OFAC also designated:

- **Kamaz Publicly Traded Company** (Russia's largest truck manufacturer) and its subsidiaries and affiliated entities - AO Torgovo-finansovaya kompaniya Kamaz (new and used car dealer engaged in the wholesale and retail sale of vehicle parts, supplies, and equipment), Begishevo airport JSC (airport in Republic of Tatarstan), JSC Krasnodarskiy avtoцентр Kamaz (official dealer with the authority to sell Kamaz vehicles as well as Nefaz buses), Leasing company Kamaz Incorporated (specializes in selling Kamaz vehicles), MIKAM Holdings Limited (investment holding company registered in Cyprus), NEFAZ Publicly traded company (manufactures buses, trailers, and other largest vehicles for Kamaz), Non-state pension fund First Industrial Alliance (pension fund provider), PJSC Tutaev motor plant (manufactures internal combustion engines), Chelnyvodokanal OOO (operates the on-site water supply facilities of Kamaz).
- several Russian companies in the information-security sector, including JSC Concern Avtomatika, and JSC Information Security Reform;
- **Advanced Research Foundation (FPI)**, defense research organization;
- **EMC SUD Limited** (legal entity registered in Hong Kong used by KOKOREV, Alexander Aleksandrovich as part of his network and for procurement for or on behalf of the FSB).
- **Zalog OOO, LLC PFMK and LLC Alfa-Invest** (linked to General Director of Kamaz PJSC KOGOGIN Sergei Anatolyevich).

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

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

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

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

Rosoboronexport JSC (sole state-controlled intermediary agency for exporting and importing the entire range of military, defense, and dual-use products, technologies, and services) because it is owned or controlled by, or has acted or purported to act for or on behalf of, directly or indirectly, the Government of Russia and because it is a political subdivision, agency, or instrumentality of the Government of Russia.

On 2 August, OFAC added 1 RF SOE to SDN List: JSC Promising Industrial and Infrastructure Technologies (SOE) (financial institution owned by the Russian Federal Agency for State Property Management, attempted to facilitate the circumvention of sanctions imposed on the Russian Direct Investment Fund).

On 2 August, the Department of State designated:

- JSC State Transportation Leasing Company (JSC GTLK) (SOE) and its 4 subsidiaries - GTLK Europe Designated Activity Company (Ireland), GTLK Europe Capital Designated Activity Company (Ireland), GTLK Middle East Free Zone Company (United Arab Emirates), GTLK Asia Limited (Hong Kong).
- numerous Russian defense and high-technology entities as a part of our effort to isolate Russia's technology sector in order to limit its contributions to Russia's war machine.
 - 1 SOE operating in the defense and related materiel sector of Russian economy: the Federal State Institution of Higher Vocational Education Moscow Institute of Physics and Technology (Moscow Institute of Physics and Technology) (MIPT) (SOE);
 - 4 SOEs operating in the technology sector of Russian economy: Technopark Skolkovo LLC; JSC Penzensky Nauchno Issledovatel'skiy Elektrotekhnicheskiy Higher Education Institution (SOE); JSC Institute of Electronic Control Computers Named After I.S. Bruk (SOE); Federal State Institution Federal Scientific Center Scientific Research Institute for System Analysis of The Russian Academy Of Sciences (SOE); Scientific and Production Association of Measuring Equipment JSC (SOE);
 - 4 SOEs operating in the electronics sector of Russian economy: Mitishinskiy Scientific Research Institute of Radio Measuring Instruments (SOE); JSC Research Institute of Electronic and Mechanical Devices (SOE); OJSC Scientific and Production Enterprise Pulsar (SOE); JSC Vologodsky Optiko Mekhanicheskiy Factory (SOE);
 - 1 SOE operating in the technology sector and the electronics sector of Russian economy: Federal State Budgetary Scientific Institution Research and Production Complex Technology Center (SOE);
 - 1 SOE operating in the aerospace sector of Russian economy: JSC Scientific Research Institute Submicron (SOE).

On September 15, the Department of State imposed sanctions on 19 SOEs operating in Russian defence and materiel, technology or electronics sectors and contributing to Russia's defence industrial base:

- Main Intelligence Directorate (GRU)⁴¹ (military intelligence agency of the General Staff of the Russian Armed Forces);
- JSC Rossiyskiye Kosmicheskiye Sistemy (Russian Space Systems JSC) (space instrument building corporation);
- JSC Academician M. F. Reshetnev Information Satellite Systems (builds satellites to strengthen Russia's defense capabilities);
- JSC Research and Production Association Named After S. A. Lavochkina (produces space-related items for Russia's Ministry of Defense; involved in the development of missile defense and space-defense projects for Russia);
- Rzhanov Institute of Semiconductor Physics Siberian Branch of Russian Academy of Sciences (Russian institute focused on microsensoric technologies and semiconductors; participated in military robotics activities to benefit the Russian Ministry of Defense);
- JSC Additive Technologies Center (Russian integrator of additive technologies; involved in implementing and using additive technologies);
- Federal State Financed Institution of Science Higher Education Institution Spectroscopy of The Russian Federation Academy of Sciences (conducts activities related to analytical spectroscopy and its applications to technology control, nanotechnologies, and also develops new technologies);
- JSC Research Center Elins (undertakes the development of technologies for Russia's Armed Forces);
- JSC Scientific and Technical Center Zaslon (involved in the development of technologies for Russia's Armed Forces);
- Federal State Financed Institution of Science Physics and Technology Institute Named After A. F. Ioffe of The Russian Federation Academy of Sciences (one of Russia's largest institutions for research in physics and technology);
- JSC Institute for Scientific Research Vychislitel'nykh Kompleksov Named After M. A. Kartseva (radio-electronic industry enterprise of the defense industry of Russia; carries out R&D of basic technologies in the field of computer engineering);
- L. D. Landau Institute for Theoretical Physics of Russian Academy of Sciences (has several areas of research including quantum computing);
- Federal State Financed Institution of Science Physics and Technology Institute Named After K. A. Valieva of The Russian Federation Academy of Sciences (areas of research include ion-beam technologies, micro and nanosystem technologies, and high-performance computing);
- JSC Institute for Scientific Research Elektronnoy Tekhniki (Russian company that develops and produces electronics, including microelectronics and nanoelectronics. electronic components are used in Russian weapons systems);

⁴¹ The GRU was previously designated pursuant to E.O. 13694, as amended, in 2016; pursuant to Section 224 of the Countering America's Adversaries Through Sanctions Act (CAATSA) in 2018; and pursuant to E.O. 13382 in 2021.

- JSC Angstrom (Russian electronics entity involved in the design of microelectronics, including the design, development, and manufacture of semiconductors; produces computer chips for a navigation system used by the Russian Ministry of Defense for guided missile targeting);
- Federal State Financed Institution of Science Physical Higher Education Institution Named After P. N. Lebedeva of the Russian Federation Academy of Sciences (engages in research and activities related to microelectronics, vacuum and plasma electronics, and optoelectronics; conducted research related to weapons);
- LLC Company Yadro Fab Dubna (Russian electronics entity involved in the manufacture of electronic components; implements a project to create Russia's largest modern production plant for the production of circuit boards);
- Federal Research Center Institute of Applied Physics of The Russian Academy of Sciences (conducts research related to high-power electronics, microwave electronics, and plasma electrodynamics);
- JSC Element (Russian microelectronics entity that has a leading position in Russia's microelectronic area in sales volume and technology).

On 30 September, OFAC in response to the Russian annexation of Donetsk, Luhansk, Kherson and Zaporizhzhia imposed sanctions on 1 Russian and 1 Belarusian entities:

- **1 national entity** – the Federation Council of the Federal Assembly of Russia;

- **OJSC Svetlogorsk Khimvolokno** (Belarusian state-owned textile and fiber manufacturer that provides critical material to Russia's defense industry).

UK. Added 4 state owned defense companies plus one with controlling stake 25+1 shares owned by RF⁴² 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 ownership⁴³ (subject to an asset freeze) among sanctioned – VGTRK, Avangard JSC, Moscow institute of physics and technology, N.A. Dollezhal order of Lenin research and design institute of power engineering JSC, The Dalzavod ship repair centre JSC, Zvezda, KAMAZ.

On 13 May, UK imposed sanctions on Russian Railways.

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

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

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

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

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

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

⁴² 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.

⁴³ 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)

On 2 August, New Zealand imposed sanctions on 42 SOEs that support the Russian military, including:

- **1 shipbuilding SOE:** Krylov State Research Centre (SOE) (research institute engaged in fundamental research related to the sea, as well as shipbuilding and related activities);
- **13 aerospace and aircraft SOEs:** All-Russian Scientific Research Institute of Aviation Materials (SOE) (metallurgical state research centre, developing composite technologies as well as intermetallic alloys, steels products, heat-resistant coating and super-light alloy used in aerospace industry); Irkutsk Aviation Plant (SOE) (aircraft manufacturing enterprise); JSC Obninsk Research and Production Enterprise Tekhnologiya Named After A. G. Romashin (SOE) (carries out Russia's State Defense Order, including by producing items for Russian military's fighter aircraft); JSC ODK-Klimov (SOE) (defense entity that produces engines for attack helicopters for the military); JSC Ryazan State Instrument Making Enterprise (SOE) (develops and produces airborne avionics for combat aircraft); JSC Novosibirsk Aircraft Production Association Plant Named After V.P. Chkalov (SOE) (one of the major aircraft-building enterprises in Russia); Kizlyar Electromechanical Plant JSC (SOE) (manufacturers defense products, including a helicopter for Russia's Aerospace Forces); Komsomolsk-on-Amur Aviation Plant (SOE) (aircraft-manufacturing company); Nizhny Novgorod Aviation Plant Sokol (SOE) (manufactures MiG fighters); State Flight Testing Center Named After V.P. Chkalov (SOE) (aviation research and testing military institution); State Research Institute of Aviation Systems State Research Center of the Russian Federation (SOE) (scientific center for military aviation research that focuses on military aviation combat systems and aviation weapons); PJSC ODK-Kuznetsov (SOE) (defense entity that manufactures engines for bomber aircraft); Moscow Institute of Electromechanics and Automatics JSC (SOE) (conducts avionics R&D for military airplanes);
- **25 SOEs that operate in the defence and related materiel sector of the Russian economy:** Advanced Research Foundation (FPI) (SOE) (defense research organization); JSC All-Russian Research Institute Signal (SOE) (develops equipment for Russia's Armed Forces, including combat robots and unmanned ground vehicles); JSC Corporation Moscow Institute of Heat Technology (SOE) (develops missiles for Russia's Ministry of Defense); JSC Federal Scientific and Production Center Titan Barrikady (SOE) (defense entity that produces missiles for the Russian military); JSC North Western Regional Center of Almaz Antey Concern Obukhovskiy Plant (SOE) (designs and manufactures weapons systems and military equipment and is involved in producing Russia's S-400 air defense missile system); JSC Permskiy Zavod Mashinostroitel (SOE) (develops and produces missiles for Russia's military); JSC Production Association Strela (SOE) (involved in developing and producing missiles for Russia's Ministry of Defense); JSC Special Design Bureau Turbina (SOE) (produces engines for armored vehicles, missiles, and artillery systems); JSC State Scientific Research Institute Kristall (SOE) (produces ammunition and bombs); JSC All Russian Research Institute of Radio Engineering (JSC VNIIRA) (SOE) (carries out tasks for the Russian State Defense Order, including regarding research related to radars, missiles, and other weapons); JSC Central Research Institute of Automation and Hydraulics (SOE) (defense entity that develops and produces missile); Kalashnikov Concern (SOE) (production of civil and military products, combat automatic and sniper weapons, guided artillery shells, high-precision weapons; subsidiary company of Rostec); Kurganmashzavod (SOE) (defense company that develops and produces infantry fighting vehicles); NPK Tekhmash OAO (Tekhmash) (SOE) (specializes in the development and serial supply of ammunition to ensure the combat capabilities of the main strike groups of the ammunition for the Russian Armed Forces); OJSC Khabarovsk Radio Engineering Plant (SOE) (specializes in activities related to anti-aircraft missile systems); OJSC Start Scientific and Production Enterprise Named After A. Yaskin (SOE) (produces and services missiles, including for Russia's Navy); Radiozavod JSC (SOE) (manufacturers control systems for Russia's Ministry of Defense, including for weapon systems); JSC Production Association Ural Optical and Mechanical Plant Named After E.S. Yalamov (SOE) (develops instruments for combat aircraft, helicopters, and naval ships); JSC Radiopribor (SOE) (manufactures and installs electronic warfare systems on military aircraft); JSC Ramensky Instrument Engineering Plant (SOE) (produces navigation systems and other equipment for Russian military's fighter aircraft and armed unmanned aerial vehicles); JSC Research and Development Enterprise Almaz (SOE) (develops and produces electronic warfare (electronic countermeasures) equipment as well as other electronic products for military systems); JSC Research and Production Corporation Konstruktorskoye Byuro Mashynostroyeniya (SOE) (design, research and production centre engaged in development, manufacture, tests, and other activities of end-to-end creation of armament and military hardware of various types); JSC Research and Production Association Kvant (SOE) (defense company that produces electronic warfare systems); Kaluga Research Institute of Radio Engineering JSC (SOE) (produces electronic warfare systems for military aircraft); PJSC Research and Production Corporation Istok Named After A.I. Shokin (SOE) (produces electronic warfare systems for Russia's ministry of defense);
- **1 intermediary agency SOE:** Rosoboroneksport OAO (Rosoboroneksport JSC) (SOE) (sole state-controlled intermediary agency for exporting and importing the entire range of military, defense, and dual-use products, technologies, and services)
- **1 railway SOE:** Russian Railways (SOE) (the largest carrier of the Russian railway network, fully state-owned vertically integrated railway company, both managing infrastructure and operating freight and passenger train services.)
- **1 chemical industry SOE:** JSC Salavat Chemical Plant (SOE) (subsidiary of the Russian state space agency Roskosmos).

On 11 October, New Zealand imposed sanctions against JSC Goznak (Russian SOE that makes passports for occupied areas of Ukraine).

On 31 October, the New Zealand government imposed broad sanctions on 2 entities:

- **2 entities that operate in the Russian defense and related material sector** - JSC Concern Avtomatika (holding company of the Rostec Corporation, which is engaged in the development and production of information protection systems); JSC Ruselectronics (electronics holding company owned by Rostec, manufactures electronic components).

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

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

On June 27, the Canada GoV sanctioned 28 defence SOEs for their role in enabling or supporting Russia's invasion of Ukraine⁴⁴.

On 29 July, Canada imposed sanctions on 10 SOEs in the defence sector directly or indirectly supporting the Russian military: Scientific-Production Enterprise Salyut JSC (SOE) (develops products in the field of shipborne radar); Scientific-Production Enterprise Almaz JSC (SOE) (engaged in the development of anti-aircraft missile systems and air defense systems); MashScientific-Production Enterprise Svyaz (SOE) (develops civil and military products); Scientific-Research Institute Argon (SOE) (specializes in the creation of highly reliable compact computing tools for harsh operating conditions); Scientific-Research Institute and Factory Platan (SOE) (subsidiary of Ruselectronics (a Rostec-owned holding company), develops devices and information display systems, mainly electrovacuum and their control devices); Scientific-Research Institute of Automated Systems and Communications Complexes Neptune JSC (SOE) (specializes in scientific research, development and production of automated communication systems and complexes for ships (vessels), coastal facilities of law enforcement and civil departments of Russia); Special Design and Technical Bureau for Relay Technology (SOE) (one of the leading developers and manufacturers of various types of relays and switches, part of the state corporation Rostekh); Research and Design Institute Morteplotekhnika JSC (SOE) (leading enterprise in Russia that designs and produces underwater weapons, heat (steam) torpedoes and their propulsive power plants, unmanned underwater vehicles, devices for sea tests of weapons and military equipment, part of JSC "Concern "Sea Underwater Weapon - Gidropribor", which is part of Tactical Missiles Corporation); Petrovsky Electromechanical Plant Molot JSC (SOE) (manufactures subcomponents and systems for control fire systems, automatic information control systems, combat automatic control systems for Naval forces training systems, automatic pilot systems for ships and vessels, radiotechnical equipment of navigation, designation, radars, ship automatic systems, ship equipment, part of JSC Concern Granit-Electron", which is part of Tactical Missiles Corporation); Temp-Avia Arzamas Research and Production Association JSC (SOE) (designs control systems and guidance systems for manned and unmanned aircraft; part of the Tactical Missiles Corporation JSC).

On 19 August, Canada imposed sanctions against Concern Avtomatika (SOE), defence sector entity.

On 29 September, the Canadian GoV imposed sanctions on the so-called government body in Kherson – Salvation Committee for Peace and Order (collaborates with the Government of Russia to support Russia's control of the Kherson region and discourage resistance).

On 14 October, Canada imposed sanctions against TV Zvezda (SOE) which is the agent of Russian propaganda.

On 27 October, the Canadian government imposed sanctions on 3 entities involved in the energy sector:

- **electric energy company** - Infrastructure Molzhaninovo LLC (electric energy company located in Russia);
- **financial institution** - Gas Industry Insurance Company SOGAZ (insurance company, provides insurance to the oil and gas sector, water and rail transport, military-industrial complex and metallurgy);
- **coal mining company** - Sibuglemt Group LLC (coal mining company located in Russia).

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

On 7 October, the Japanese government introduced sanctions against 9 Russian entities:

- **1 illegal military entity** - Task Force Rusich;
- **2 entities that operate in the military-defense sector** - Rostec (the cornerstone of Russia's defense, aerospace, industrial, technology, and manufacturing sectors); JSC Kalashnikov Concern (defence manufacturing company and the largest firearms producer in Russia);
- **2 entities that operate in the technology and dual-use goods sector** - JSC Ruselectronic (national electronics vendor, produces military equipment, equipment for the aerospace industry, communication systems and telecommunications equipment); JSC Sozvezdie Concern (developer and manufacturer of electronic warfare, radio communications, electronic countermeasures systems and equipment, as well as dual-use and civilian products);
- **2 entities that operate in the machinery sector** - JSC UEC Klimov (leading developer of gas turbine engines for military and civil aviation); PJSC United Engine Corporation (produces engines used for military, civil, and space purposes);

⁴⁴ SOE: Pskov Distance Communication Plant, Radiozavod JSC, Razryad JSC, Research Production Association Mars, Ryazan Radio-Plant, Scientific Production Center Vigstar JSC, Scientific Production Enterprise "Radiosvaz", Scientific Research Institute Ferrite-Domen, Scientific Research Institute of Communication Management Systems, Novosibirsk Semiconductor Devices Plant Vostok JSC, State Machine Building Design Bureau "VympeL" By Name I.I. Toropov JSC, Plant Kulakov JSC, Raduga Design Bureau, TAO GNPP "Region", Concern "MPO – Gidropribor", Concern Granit-Electron JSC, Ural Design Bureau "Detal", Tambov Plant (TZ) "October", Engineering Centre Moselectronproekt, Ship Maintenance Centre "Zvezdochka" and 22 entities of JSC Tactical Missiles Corporation - "Uralelement" JSC, "Plant Dagdiesel" JSC, PA Strela JSC, Ravenstvo JSC, Ravenstvostservice JSC, Saratov Radio Instrument Plant JSC, Severny Press JSC, "Research Centre for Automated Design" JSC, NPO Lightning, "MBDB 'ISKRA'" PJSC, "Central Design Bureau of Automation", 711 Aircraft Repair Plant, Azov Optomechanical Plant, "Krasny Gidropress" JSC, Elektrotyaga JSC, GosNII Mash JSC, RKB Globus, Smolensk Aviation Plant,

- 2 entities that operate in the shipbuilding sector - PO More Shipyard (shipyard in the Crimea, specializes in the production of high-speed ships and vessels with dynamic support principles, yachts and boats); Yantar Shipyard (Russian shipbuilding company).

Australia. On 17 May, sanctioned 3 SOE - the Private Military Company "Wagner" (PMC Wagner) and two Belarus defense enterprises (Industrial-Commercial Private Unitary Enterprise Minotor-Service and OJSC KB Radar-Managing Company of Radar Systems Holding). Both companies produce sophisticated equipment used by the Armed Forces of Belarus, who have in turn provided significant strategic support to Russian forces. And imposed sanctions on 12 entities for promoting Russian propaganda and disinformation⁴⁵.

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.

Poland. On 28 September, Poland imposed sanctions on the Russian company Gazprom Export, a unit of Russia's gas company that exports natural gas. Under this decision Gazprom Export's assets are frozen and access to its financial funds and economic assets is prohibited.

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

On 28 October, Norway introduced a ban on holding managerial positions in certain companies that are owned or controlled by the Russian state.

PROPAGANDA

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

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

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

7. Expand Export Controls and Ban Imports

UK (import - silver, wood, high-end + 35% duty for ~£1.4bn of imports, revenue generating goods RF origine, export - restrictions relating to internet services and online media services + export bans to hit > £250 mln + maritime goods&technology + goods&technology that could be used to repress people + goods&technology relating to chemical/biological weapons + restricted goods&technology + jet fuel and fuel additives + extended lists of oil refining goods&technology and energy-related goods banned to export + ban on services relating to iron and steel goods + export restrictions for Belarus on goods and technology relating to critical industry, quantum computing, oil refining, luxury goods including dual-use good and technology (will block trade of ~£60 mln of goods with Belarus + **allowed for humanitarian assistance activity in uncontrolled territories of Donetsk and Luhansk oblast** + ban on export of goods and items of significant importance to the Russian (such as chemicals, materials, machinery goods and electrical appliances with the exception of licensed humanitarian goods) + expanded the scope of existing energy-related goods and services prohibitions + ban on export of accounting, business and management consulting, and public relations services + 35% duties to a third package of goods originating in RF and Belarus + prohibition of the export, supply and delivery, and making available of goods, critical to the functioning of Russia's economy, in particular the manufacturing sector + expansion of the list of so-called G7 Dependency and Further Goods subject to certain export controls + minor expansion of the list of revenue generating goods subject to certain import/purchasing restrictions + prohibition of the import and acquisition of gold jewellery (as well as related technical assistance, financial services and funds, and brokering services), which originates in Russia, is located in Russia and has been exported from Russia (with an exception for personal use)), **USA** (ban on exports of accounting and consulting services to RF, license requirement for common industrial and commercial items + export control for 70 entities in RF and 1 in Belarus + temporary ban on export privileges for Belavia, Nordwind Airlines, Pobeda Airlines (owned by Aeroflot) and Siberian Airlines + 35% import tariff for 570 categories of RF products worth approximately \$2.3 bn + sanctioned 25 foreign-produced

⁴⁵ 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)

aircraft, that have flown into Russia or Belarus (violated the US export controls + added new license requirement for exports of sophisticated computer chips to China (incl. Hong Kong) and Russia), Prohibited exportation, reexportation, sale, or supply, directly or indirectly, from the United States, or by a US person, wherever located, of quantum computing services to any person located in Russia, and issued a Final Rule imposing additional export controls on Russia and Belarus on industrial and commercial items that could support Russian and Belarusian military aggression + added 4 Iranian cargo aircraft to US BIS list + 57 entities which acquired (or tried) U.S.-origin items for Russia's military or involvement in the development of quantum computing technologies + renewed Temporary Denial Orders (TDOs) issued against Russian airlines Aeroflot, Azur Air and UTair for a further 180 days + issued an order denying the export privileges of Russian airline Ural Airlines + renewed the export denial order against Russian cargo airlines Aviastar-TU for another 180 days) + the International Trade Administration is continuing to examine whether Russia remains a market economy for purposes of U.S. antidumping duty law. This review could result in higher AD duties on imports from Russia if the ITA determines that it is now a non-market economy country. **Japan** (bans on exports to 71 organizations and a ban on the export of cutting-edge goods (quantum computers, 3D printers, etc) + ban on export goods that strengthen the industrial base of RF (wood products, steel storage tanks and other similar containers, machinery and electrical equipment components) + ban on export of goods to 65 RF and 25 Belarus entities in defence + ban on trust, accounting / audit, and management consulting services + banned exports to 21 scientific organisations in Russia, banned export of goods related to chemical weapons to Russia + ban on exports to 21 Russian organisations designated as specific organisations + export ban on chemical weapons-related goods to Russia (came into force on the 7th of October), **Taiwan** (strategic high-tech products in 57 categories to Belarus + ban on export of modern chips to Belarus and RF), **Canada** (ban on import – luxury goods; ban on export – luxury goods, goods for weapons manufacture and production + export ban on 28 services vital for the operation of the oil, gas and chemical industries, including technical, management, accounting and advertising services + ban on export for Belarus on products that could be used in the production and manufacturing of weapons, export and import ban on Belarus on luxury goods + expanded existing measures on the oil, gas and chemical sectors to include industrial manufacturing + withdrew MFN for Russia - a 35% tariff applicable to virtually all goods). **EU** (expansion of entities list with export restrictions for dual-use goods and technology + expansion of list of goods and technologies that can be used in defense and security sectors banned for export + ban of accounting, pr and consultancy services to RF + **exclusions to export ban on luxury goods, allowing for personal use of persons travelling from the EU** + reinforced export controls of dual use goods and advanced technology + added 4 Russian entities to the list of entities subject to export restrictions regarding dual-use goods&technology + **extended the exemption from the prohibition to engage in transactions with certain SOEs as regards transactions for agro products and the transport of oil to 3rd countries** + prohibition to provide Architectural & engineering, IT consultancy, Legal advisory services to the Government of Russia + ban on the import of Russian finished and semi-finished steel products (come into force due three month) + ban to import into the EU of iron and steel products processed in third countries inc. from Russia (from 30 September 2023) + extension of the ban to import into the EU of iron and steel products processed in third countries inc. from Russia (from 30 September 2023) + introduction of the prohibition on importing or purchasing, as from 30 September 2023, the listed iron and steel products when processed in a third country incorporating listed iron and steel products originating in Russia + extension of the list of goods that generate significant revenues for Russia and are subject to the import ban + export ban on certain coal, lignite, peat and coke products + ban on sell, supply, transfer or export goods which could contribute to the enhancement of Russian industrial capacities + EU included ability for EU Member States authorise the sale, supply, transfer or export of the goods and technology which could contribute in particular to the enhancement of Russian industrial capacities + extension of the list of restricted goods and technology which might contribute to Russia's military and technological enhancement or to the development of its defence and security sector, including in that list + extension of the list of goods and technology suited for use in aviation or the space industry + introduced the ability for EU Member States authorise the operation with titanium goods required in the aeronautic industry, for which no alternative supply is available. **Switzerland** (import - lignite and coal, timber, cement, seafood, caviar; export - industrial robots or certain chemical products + extended the list of dual-use goods banned for export by 91 RF entities and 24 Belarus entities + extended the list of prohibited for import from RF goods + ban on trust, accounting / audit, and management consulting services + export ban for 4 entities (inc. 3 SOEs), extension of lists of goods banned for sale, supply, export, transit and transport to or for use in RF + **exclusions to export ban on luxury goods, allowing for personal use of persons travelling from the EU** + **exclusions to the ban on transactions with SOEs related to the import from or through Russia of petroleum, incl. refined petroleum products, and the import of pharmaceuticals, medical devices and agricultural and foodstuffs, incl. wheat and fertilizers** + prohibitions to award public contracts to Russian individuals and entities), Amended the list of goods that could help to strengthen the industry prohibited for sale, supply, export, transit and transport to or for use in Russia. **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 + added 4 Russian entities to the export ban list regarding dual-use goods&technology + **exclusions to export ban on luxury goods, allowing for personal use of persons travelling from the EU** + expansion of list of goods and technologies banned for export that can contribute to Russia's military and technological enhancement + expanded the list of goods&technology for use in oil refining) + Export restrictions relating to coal, electronic components, technical items in the aviation sector, certain chemicals and firearms + Import restrictions relating to steel products, machinery and appliances, plastics, vehicles, textiles, footwear, leather, ceramics, certain chemical products and jewellery that is not made of gold + Restriction on architectural and engineering services, legal advisory services and IT consultancy services. **New Zealand** (extension of the 35% tariff on Russian imports till March 2025 + significant expansion of the list of prohibited exports to Russia and Belarus + ban of the export of luxury goods (inc. gold) to Russia (for example, wine, seafood) + ban of the import of luxury goods of Russian origin into New Zealand (vodka and caviar).

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

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

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

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

On 23 June, UK prohibited: the export of maritime goods and technology for the placing on board of a Russian-flagged vessel; supply or delivery of maritime goods or technology from a third country for the placing on board of a Russian-flagged vessel; the making maritime goods or technology available for the placing on board of a Russian-flagged vessel; the transfer of maritime technology to a Russian-flagged vessel. Related technical assistance, financial services, funds and brokering services are also prohibited.

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

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

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

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

UK prohibited the import, acquisition or supply and delivery of revenue generating goods⁴⁶ 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-process⁴⁷) 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.

⁴⁶ 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.

⁴⁷ 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.

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

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

New import restrictions also were imposed:

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

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

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

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

On 18 July, UK introduced a new exception from trade sanctions measures (the prohibition on outward trade in goods and infrastructure-related services) for humanitarian assistance activity (the work of international and non-governmental organisations carrying out relief activities for the benefit of the civilian population) in the non-government controlled areas of the Donetsk and Luhansk oblasts.

On 20 July, the UK introduced additional duties of 35% to a third package of goods originating in Russia and Belarus (fish and crustaceans, molluscs and other aquatic invertebrates; certain preparations of meat, of fish, of crustaceans, molluscs or other aquatic invertebrates, or of insects; certain inorganic chemicals; organic or inorganic compounds of precious metals, of rare-earth metals, of radioactive elements or of isotopes; certain organic chemicals; certain plastics; platinum, including palladium, rhodium, iridium, osmium and ruthenium; nickel). Measure was announced on May 9.

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

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

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

NOTE. So far the UK introduced additional duties of 35% to 3 packages of goods originating in Russia and Belarus

Packages	Announcement	Implementation	Items
1	15 March	25 March	cereals, beverages, oil seeds, spirits and vinegar, residue/food waste products, fur skins and artificial fur, wood, paper and paperboard, cement, glass and glassware, iron ore, iron, steel, copper, aluminium, lead, silver, certain fertilisers, tyres, machinery (nuclear reactors, boilers, machinery and mechanical appliances; electrical machinery and equipment and parts thereof; sound recorders and reproducers, television image and sound recorders and reproducers), ships, railway containers, works of art, antiques.
2	9 May	20 July	certain live animals; animal products; certain vegetable products; certain animal or vegetable fats and oils; certain prepared foodstuffs; tobacco and manufactured tobacco substitutes; products; certain mineral products (unroasted iron pyrites, Natural graphite, Siliceous fossil meals and similar siliceous earths; granite, porphyry, basalt, sandstone and other monumental or building stone; vermiculite, perlite and other mineral

			substances, precious-metal ores and concentrates), certain pharmaceutical products; certain products of the chemical or allied industries; certain rubber; certain articles of leather, saddlery and harness, travel goods, handbags and similar containers; chemical wood pulp, soda or sulphate; certain printed books and other products of the printing industry; certain textiles and textile articles; certain footwear, headgear, umbrellas, sun umbrellas; certain articles of stone, plaster, cement, asbestos, mica or similar materials, ceramic products; certain precious or semi-precious stones, precious metals, metals clad with precious metal, jewellery; certain other base metals (molybdenum, magnesium, cobalt, beryllium, chromium, hafnium, rhenium, thallium, cadmium, germanium, vanadium, gallium, indium and niobium "columbium"), certain tools, implements, cutlery, spoons and forks, of base metal, miscellaneous articles of base metal; certain vehicles other than railway or tramway rolling stock, and parts and accessories thereof; certain aircraft, spacecraft, and parts thereof; certain optical, photographic, cinematographic, measuring, checking, precision, medical or surgical instruments and apparatus; clocks and watches; musical instruments; parts and accessories thereof; certain arms and ammunition; parts and accessories thereof; certain miscellaneous manufactured articles.
3	27 May	1 June	fish and crustaceans, molluscs and other aquatic invertebrates; certain preparations of meat, of fish, of crustaceans, molluscs or other aquatic invertebrates, or of insects; certain inorganic chemicals; organic or inorganic compounds of precious metals, of rare-earth metals, of radioactive elements or of isotopes; certain organic chemicals; certain plastics; platinum, including palladium, rhodium, iridium, osmium and ruthenium; nickel

On 30 September, in response to the Russian annexation of Donetsk, Luhansk, Kherson and Zaporizhzhia, the UK **announced** its immediate plans to adopt further Russia sanctions, including:

- export bans on the provision of IT consultancy, including designing IT systems and software applications, architectural, engineering, advertising, transactional legal advisory and auditing services;
- export bans on nearly 700 goods that are crucial to Russia's industrial and technological capabilities.

From Oct 6, the London Metal Exchange (LME) limited new supplies of copper and zinc from the Russian Ural Mining and Metallurgical Company (UMMC) and its Chelyabinsk Zinc Plant. The LME explained that the restrictions are related to the sanctions imposed by the UK on Sep 26 against the Russian billionaire, ex-president of UMMC Iskander Makhmudov.

As it was reported by [Bloomberg](#), more than half of the copper in LME warehouses -- much of which was of Russian origin -- has been ordered out for delivery in the past three weeks, mostly by traders planning to deliver it to Chinese buyers, according to people familiar with the matter.

On October 28, UK introduced new trade sanctions against Russia:

- Prohibition of the export, supply and delivery, and making available of listed goods (as well as related technical assistance, financial services and funds, and brokering services) to, or for use in Russia, that are critical to the functioning of Russia's economy, in particular the manufacturing sector. The prohibited goods will form a new list of Russia Vulnerable Goods to which these controls relate..
- Expansion of the list of so-called G7 Dependency and Further Goods, to which certain export controls apply. This aims to further align UK and EU prohibitions, including on oil refining technology and manufacturing products.
- Minor expansion of the list of revenue generating goods, to which certain import/purchasing restrictions apply, to align with the EU on 2 Russian product groups: beverages, spirits and vinegar (including vodka); and food waste products (primarily beet pulp).
- Prohibition of the import of gold (as well as related technical assistance, financial services and funds, and brokering services), which has been processed in a third country and incorporates gold that, on or after 21 July 2022, originated in Russia and has been exported from Russia.
- Prohibition of the import and acquisition of gold jewellery (as well as related technical assistance, financial services and funds, and brokering services), which originates in Russia, is located in Russia and has been exported from Russia (with an exception for personal use), with the intention of that jewellery entering the UK.

All but the provisions relating to a ban on the import of LNG entering into force on 29 October.

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 entities⁴⁸ 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 entities⁴⁹ were added to the Entity List for acquiring and attempting to acquire U.S.-origin items in support of activities contrary to U.S. national security and foreign policy interests. These entities are added to the Entity List with a license requirement for all items subject to the EAR. BIS will review license applications under a policy of denial, and no license exceptions are available for these entities being added. Such measures will effectively cut them off from obtaining U.S.-origin items or foreign-made products derived from certain U.S. technology or software thus further restricting the Russian military's capacity.

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

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

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

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

On 2 August, the US Commerce Department updated its list of aircraft that have flown into Russia or Belarus in apparent violation of U.S. export controls under Export Administration Regulations (EAR) by adding the first 25 foreign-produced aircraft. The Bureau of Industry and Security identified that the commercial planes apparently violated the EAR's de minimis threshold for US components (greater than 25 % of controlled US-origin content by value) by flying into Russia or Belarus. Accordingly, subsequent actions taken with respect to the listed aircraft, including maintenance, repair, refueling, and the provision of spare parts and services, are now subject to restrictions outlined in General Prohibition 10 of the EAR.

The newly identified foreign-manufactured aircraft consist of Airbus A330-300 in the fleet of I-Fly, A321-200 and A330-200 aircraft in the fleet of Nordwind, A321-200 aircraft in the fleet of Red Wings, A320-200 and A321-200 aircraft in the fleet of S7 Airlines, A320-200 and A321-200 aircraft in the fleet of Ural Airlines, and A320-200 and A321-200 aircraft in the fleet of Yamal Airlines.

The US U.S. Department of Defense adopted as final, with changes, an interim rule amending the Defense Federal Acquisition Regulation Supplement (DFARS) to implement a section of the National Defense Authorization Act for Fiscal Year 2020 that

⁴⁸ AO Rubin; Branch of AO Company Sukhoi Yuri Gagarin Komsomolsk on Amur Aircraft Plant; Branch of PAO Il – 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 SPMDDB 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 Lukhovitsk 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."

⁴⁹ 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

prohibits acquisition of tantalum metals and alloys from North Korea, China, Russia, and Iran. The prohibition is effective on August 25, 2022.

On August 26, according to a Securities and Exchange Commission filing by NVIDIA, the largest producer of graphics processing units (GPUs), Commerce's Bureau of Industry and Security (BIS) implemented new restrictions on exports of certain microchips to China and Russia. Under Section 744.21 of the Export Administration Regulations, BIS may send an "is informed" letter to NVIDIA imposing a licensing requirement for certain exports, reexports, or transfers because there is an unacceptable risk of use by or diversion to a military end use or military end user in Belarus, Burma, Cambodia, China, Russia, or Venezuela. BIS rarely uses is-informed letters, which in certain circumstances allow BIS to impose licensing requirements to address specific national security or foreign policy concerns. The U.S. government indicated that the new license requirement will address the risk that the covered products may be used in, or diverted to, a 'military end use' or 'military end user' in China and Russia.

On 15 September, OFAC issued a Determination pursuant to E.O. 14071 that prohibits from 15 October 2022 the exportation, reexportation, sale, or supply from the United States, or by a US person, wherever located, of quantum computing services to any person located in Russia.

OFAC interprets quantum computing services to include any of the following services when related to quantum computing: infrastructure, web hosting or data processing services; custom computer programming services; computer systems integration design services; computer systems and data processing facilities management services; computing infrastructure, data processing services, web hosting services, and related services; repairing computer, computer peripherals, and communication equipment; other computer-related services; as well as the exportation, reexportation, sale, or supply, directly or indirectly, of quantum computing, quantum computers, electronic assemblies thereof, or cryogenic refrigeration systems related to quantum computing to or from Russia.

This ban excludes: (i) any services provided to an entity located in Russia that is owned or controlled by a U.S. person, or (ii) any services related to the wind-down or divestiture of an entity located in Russia that is not owned or controlled by a Russian person.

On 15 September, the Department of Commerce's Bureau of Industry and Security (BIS) issued a Final Rule imposing additional export controls on Russia and Belarus on industrial and commercial items that could support Russian and Belarusian military aggression. The Rule:

- Expands the scope of the Russian industry sector sanctions to add lower-level items that may be useful for Russia's chemical and biological weapons production capabilities and items needed for advanced production and development capabilities to enable advanced manufacturing across a number of industries. These items consist of discrete chemicals, biologics, fentanyl and its precursors, and related equipment.
- Imposes additional export controls on quantum computing-related hardware, software and technology.
- Adds Belarus to the scope of industry sector sanctions that currently apply to Russia due to concerns of diversion from this country to Russia.
- Expands the 'military end user' and 'military-intelligence end user' controls under the Export Administration Regulations to "more effectively target" military and/or military-intelligence support for Russia and Belarus by expanding: (i) the "is informed" provisions for entities acting contrary to U.S. national security and foreign policy interests under § 744.11; (ii) the "military end user" controls under § 744.21 to reach Belarusian, Burmese, Cambodian, Chinese, Russian, and Venezuelan military end users located anywhere in the world; (iii) and the "military-intelligence end user" controls under § 744.22 to also reach Belarusian, Burmese, Cambodian, Chinese, Russian, and Venezuelan military-intelligence end users or military-intelligence end users of countries in Country Group E:1 or E:2, wherever located. As a result of this broadening of terms, BIS applied the Russian / Belarusian-Military End User Foreign Direct Product (FDP) rule to 6 entities under the destinations of China, Lithuania, Russia, the UK, Uzbekistan, and Vietnam that were previously added to the Entity List for having continued to supply sanctioned Russian entities or Russian entities on the Entity List following Russia's aggression against Ukraine.
- Adds additional dollar value exclusion thresholds for certain 'luxury goods.' BIS determined its earlier dollar value exclusions were more permissive than those implemented by allies; however, even with these revisions, certain luxury goods entries continue to not warrant a dollar value exclusion and those entries remain unchanged by this rule.

On 19 September, the US BIS added 3 Iranian cargo aircraft to its entity list, for apparent violations for US export controls on Russia – 'providing cargo flight services on U.S.-origin aircraft to Russia.' US-origin aircraft operated by Mahan Air, Qeshm Fars Air and Iran Air were identified as having flown and transported goods, including electronic items, to Russia. In consequence of their addition to the entity list, 'Any subsequent actions taken with regard to any of the listed aircraft, including, but not limited to, refueling, maintenance, repair, or the provision of spare parts or services, are subject to the prohibitions outlined in General Prohibition Ten of the EAR.'

On 26 September, the US BIS updated its list of aircraft that have flown into Russia in apparent violation of the Export Administration Regulations (EAR) by adding a 4th Iranian-owned and -operated US-origin aircraft owned by Saha Airlines, itself owned by the Iranian Air Force, providing cargo flight services to Russia.

On 30 September, BIS issued a final rule adding 57 entities (56 entities located in Russia and 1 in Crimea Region of Ukraine) to the Entity List. These entities are added for a variety of reasons, including acquiring or attempting to acquire U.S.-origin items in support of Russia's military or involvement in the development of quantum computing technologies. BIS imposed a license requirement for exports to these entities of all items subject to the Export Administration Regulations (EAR) and provided that applications for such licenses will be reviewed under a presumption of denial (with exceptions for some with respect to food and medicine designated as EAR99 and items for U.S. government-supported use in the International Space Station applications for which will be reviewed on a case-by-case basis).

50 of the 57 entities receive footnote 3 designations because they are determined as Russian 'military end users' and are subject to the Russia / Belarus Military End User Foreign Direct Product (FDP) Rule, which imposes significant restrictions on their access to certain foreign-produced items.

Companies added to the list include:

- 1 entity for acquiring and attempting to acquire U.S.-origin items in support of Russia's military: the Russian Institute of Radio Navigation and Time. This entity receive a footnote 3 designation;

- 7 entities for acquiring and attempting to acquire U.S.-origin items in support of the Russian military, as well as their involvement in the development of quantum computing technologies, which would further enable Russia's malicious cyber activities, or are otherwise important to Russia in developing advanced production and development capabilities: the Federal Technical Regulation and Metrology Agency; the Federal State Budgetary Institution of Science P.I. K.A. Valiev RAS of the Ministry of Science and Higher Education of Russia; the Federal State Unitary Enterprise All-Russian Research Institute of Physical, Technical and Radio Engineering Measurements; the Institute of Physics Named After P.N. Lebedev of the Russian Academy of Sciences; the National Research Center Kurchatov Institute; the Institute of Solid-State Physics of the Russian Academy of Sciences; the Rzhzanov Institute of Semiconductor Physics, Siberian Branch of Russian Academy of Sciences;

- 49 Russian institutes or companies for acquiring and attempting to acquire U.S.-origin items in support of Russia's military - A. Lyulki Experimental-Design Bureau; A. Lyulki Science and Technology Center; AO Aviaagregat; Central Aerohydrodynamic Institute; CJSC Turborus; Federal Autonomous Institution Central Institute of Engine-Building N.A. P.I. Baranov; Federal State Budgetary Institution National Research Center Institute n.a. N.E. Zhukovsky; Federal State Unitary Enterprise State Scientific-Research Institute for Aviation Systems; JSC 121 Aviation Repair Plant; JSC 123 Aviation Repair Plant; JSC 218 Aviation Repair Plant; JSC 360 Aviation Repair Plant; JSC 514 Aviation Repair Plant; JSC 766 UPTK; JSC Aramil Aviation Repair Plant; JSC Aviaremont; JSC Flight Research Institute N.A. M.M. Gromov; JSC Metallist Samara; JSC Moscow Machinebuilding Enterprise named after V. V. Chernyshev; JSC NII Steel; JSC Remdizel; JSC Special Industrial and Technical Base Zvezdochka; JSC STAR; JSC Votkinsk Machine Building Plant; JSC Yaroslavl Radio Factory; JSC Zlatoustovsky Machine Building Plant; LLC Center for Specialized Production OSK Propulsion; Lytkarino Machine-Building Plant; Moscow Aviation Institute; Moscow Institute of Thermal Technology; Omsk Motor-Manufacturing Design Bureau; OJSC 170 Flight Support Equipment Repair Plant; OJSC 20 Aviation Repair Plant; OJSC 275 Aviation Repair Plant; OJSC 308 Aviation Repair Plant; OJSC 32 Repair Plant of Flight Support Equipment; OJSC 322 Aviation Repair Plant; OJSC 325 Aviation Repair Plant; OJSC 680 Aircraft Repair Plant; OJSC 720 Special Flight Support Equipment Repair Plant; OJSC Volgograd Radio-Technical Equipment Plant; PJSC Agregat; Salute Gas Turbine Research and Production Center; Scientific-Production Association Vint of Zvezdochka Shipyard; Scientific Research Institute of Applied Acoustics; Siberian Scientific-Research Institute of Aviation N.A. S.A. Chaplygin; Software Research Institute; Subsidiary Sevastopol Naval Plant of Zvezdochka Shipyard; Tula Arms Plant. These entities receive footnote 3 designations.

Subsidiary Sevastopol Naval Plant of Zvezdochka Shipyard will be listed under the destination of the Crimea Region of Ukraine; all others will be listed under the destination of Russia.

On 7 October, BIS renewed Temporary Denial Orders (TDOs) issued against Russian airlines Aeroflot, Azur Air and UTair for a further 180 days. The orders, which deny the airlines US export privileges, were originally issued on 7 April 2022 because the airlines were operating controlled aircraft on flights into / out of Russia and within Russia, without the necessary licences.

The International Trade Administration is continuing to examine whether Russia remains a market economy for purposes of U.S. antidumping duty law. This review could result in higher AD duties on imports from Russia if the ITA determines that it is now a non-market economy country. The ITA had been conducting this investigation in the context of a changed circumstances review of the AD investigation of urea ammonium nitrate solutions from Russia but is now terminating that review. Instead, the investigation will be continued in the context of an AD investigation of emulsion styrene-butadiene rubber from Russia, with a final determination anticipated by Nov. 9.

The ITA determined to continue market economy status for Russia in October 2021 following a similar review but in May 2022 said that in light of developments in Russia's economy (largely associated with its invasion of Ukraine) reforms related to the six statutory factors governing NME determinations may have backtracked. Examples include restrictions on currency conversion that may have influenced the value of the ruble, increased restrictions on investments by firms of foreign countries, and a potential increase in the size of the state sector and its influence over commercial activities.

On 17 October, the US Department of Commerce's Bureau of Industry and Security (BIS) issued an order denying the export privileges of Russian airline Ural Airlines due to ongoing violations of US export controls on Russia. Ural is said to have operated multiple aircraft subject to the Export Administration Regulations (EAR) on flights into and out of Russia and within Russia, without the necessary BIS licences. This is the 10th Temporary Denial Order (TDO) issued against a Russian or Belarusian airline since February 2022.

On 25 October, BIS renewed the export denial order against Russian cargo airlines Aviastar-TU for another 180 days. A Temporary Denial Order (TDO) was initially issued on 21 April 2022 on the basis that Aviastar had committed violations of the Export Administration Regulations (EAR) by operating controlled aircraft on flights between Russia and China after 2 March 2022 and without the required BIS authorisation. It is alleged that the airline has continued to operate controlled aircraft on flights into, out of and within Russia since April.

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 entities⁵⁰ and 24 Belarusian entities⁵¹. Moreover, the EU expanded the list of goods and technology which may contribute to the technological enhancement of Russia’s defense and security sector. This will include 80 chemicals which can be used to produce chemical weapons. In addition, the EU prohibited the provision of accounting, public relations and consultancy services to Russia.

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

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

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

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

Under the 8th sanction package, the EU adopted:

Broader scope of services that can no longer be provided to the government of Russia or legal persons, entities or bodies established in Russia. These now include architectural and engineering services, legal advisory services and IT consultancy services:

Services banned	Ban covers	Ban NOT covers
Architectural & engineering	Both architectural and engineering services as well as integrated engineering services, urban planning and landscape architectural services and engineering -related scientific and technical consulting services	Provision of technical assistance related to goods exported to Russia remains allowed, provided that the sale, supply, transfer or export of such goods is not prohibited under this Regulation at the time at which such technical assistance is provided

⁵⁰ Krayushin Evgeny, 46th TSNII Central Scientific Research Institute, Alagir Resistor Factory, All-Russian Research Institute of Optical and Physical Measurements, All-Russian Scientific-Research Institute Etalon JSC, Almaz JSC, Arzam Scientific Production Enterprise Temp Avia, Automated Procurement System for State Defense Orders, LLC, Dolgoprudniy Design Bureau of Automatics (DDBA JSC), Electronic Computing Technology Scientific-Research Center JSC, Electrosignal JSC, Energiya JSC, Engineering Center Moselectronproekt, Etalon Scientific and Production Association, Foreign Trade Association Mashpriborintorg, Ineko LLC, Informakustika JSC, Institute of High Energy Physics, Institute of Theoretical and Experimental Physics, Inteltech PJSC, ISE SO RAN Institute of High-Current Electronics, Kaluga Scientific-Research Institute of Telemechanical Devices JSC, Kulon Scientific-Research Institute JSC, Lutch Design Office JSC, Meteor Plant JSC, Moscow Communications Research Institute JSC, Moscow Order of the Red Banner of Labor Research Radio Engineering Institute JSC, NPO Elektromechaniki 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 'Radiosvaz', 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 'Vypel' By Name I.I.Toropov', Tactical Missile Company, JSC 'URALELEMENT', Tactical Missile Company, JSC 'Plant Dagdiessel', 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 Ravenstvservice, Tactical Missile Company, JSC Saratov Radio Instrument Plant, Tactical Missile Company, JSC Severny Press, Tactical Missile Company, Joint-Stock Company 'Research Center for Automated Design', Tactical Missile Company, KB Mashinostroeniya, Tactical Missile Company, NPO Electromechanics, Tactical Missile Company, NPO Lightning, Tactical Missile Company, Petrovsky Electromechanical Plant 'Molot', Tactical Missile Company, PJSC 'MBDB 'ISKRA'', Tactical Missile Company, PJSC ANPP Temp Avia, Tactical Missile Company, Raduga Design Bureau, Tactical Missile Corporation, 'Central Design Bureau of Automation', Tactical Missile Corporation, 711 Aircraft Repair Plant, Tactical Missile Corporation, AO GNPP 'Region', Tactical Missile Corporation, AO TMKB 'Soyuz', Tactical Missile Corporation, Azov Optical and Mechanical Plant, Tactical Missile Corporation, Concern 'MPO – Gidropribor', Tactical Missile Corporation, JSC 'KRASNY 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'

⁵¹ 140 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 Initiativy 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

IT consultancy	Consultancy services related to the installation of computer hardware, including assistance services to the clients in the installation of computer hardware (i.e. physical equipment) and computer networks, and software implementation services, including all services involving consultancy services on, development of and implementation of software	
Legal advisory	Provision of legal advice to customers in non-contentious matters, including commercial transactions, involving the application or interpretation of law; participation with or on behalf of clients in commercial transactions, negotiations and other dealings with third parties; and preparation, execution and verification of legal documents	Any representation, advice, preparation of documents or verification of documents in the context of legal representation services, namely in matters or proceedings before administrative agencies, courts or other duly constituted official tribunals, or in arbitral or mediation proceedings

Exemptions apply to the provision of services that are strictly necessary for the termination by 8 January 2023 of contracts concluded before 7 October 2022 (or of ancillary contracts necessary for the execution of such contracts).

For the provision of newly added services previously implemented exemptions are applied: (1) if strictly necessary for the exercise of the right of defense in judicial proceedings and the right to an effective legal remedy; (2) if intended for the exclusive use of legal persons, entities or bodies established in Russia that are owned by, or solely or jointly controlled by, a legal person, entity or body which is incorporated or constituted under the law of a Member State, a country member of the European Economic Area, Switzerland or a partner country (the USA, Japan, the UK, South Korea).

EU also introduced a new exemption applicable to all prohibited services: if the provision of services is strictly necessary to ensure access to judicial, administrative or arbitral proceedings in a Member State, or for the recognition or enforcement of a judgment or an arbitration award rendered in a Member State.

As well EU introduced new exemptions applicable to the provision of newly prohibited services: (1) if necessary for public health emergencies, the urgent prevention or mitigation of an event likely to have a serious and significant impact on human health and safety or the environment, or as a response to natural disasters, or (2) under certain conditions, necessary for software updates for non-military use and for a non-military end user.

In addition, EU introduced the ability for EU Member States authorise relevant services if this is necessary for (1) humanitarian purposes, (2) civil society activities that directly promote democracy, human rights or the rule of law in Russia, (3) the functioning of diplomatic and consular representations of the EU and of the EU Member States or partner countries in Russia, (4) ensuring critical energy supply within the EU and the purchase, import or transport into the EU of titanium, aluminium, copper, nickel, palladium and iron ore, (5) ensuring the continuous operation of infrastructures, hardware and software which are critical for human health and safety, or the safety of the environment, (6) the establishment, operation, maintenance, fuel supply and retreatment and safety of civil nuclear capabilities, and the continuation of design, construction and commissioning required for the completion of civil nuclear facilities, the supply of precursor material for the production of medical radioisotopes and similar medical applications, or critical technology for environmental radiation monitoring, as well as for civil nuclear cooperation, in particular in the field of research and development, or (7) the provision of electronic communication services by EU telecommunication operators necessary for the operation, maintenance and security, including cybersecurity, of electronic communication services, in Russia, in Ukraine, in the EU, between Russia and the EU, and between Ukraine and the EU, and for data centre services in the EU.

New import restrictions:

- Extension of the list of iron and steel products that either originate in Russia or have been exported from Russia. The list now covers all products categorized as "iron and non-alloy steel" (CN headings 7206 to 7217), "stainless steel" (CN headings 7218 to 7223), "other alloy steel; hollow drill bars and rods, of alloy or non-alloy steel" (CN headings 7224 to 7229) and "articles of iron or steel" (CN headings 7301 to 7326). This prohibition applies with longer phase-in periods for: products incorporating steel products of CN code 7207 11, covered as from 1 April 2024; products incorporating steel products of CN code 7207 12 10, covered as from 1 October 2024, subject to a specific exemption based on quotas. A 3-month wind-down period until 8 January 2023 is envisaged to allow for the execution of contracts concluded before 7 October 2022, when the import ban on the semi-finished steel products was adopted (except for goods falling under CN codes 7207 11 (billets) and 7207 12 10 (slabs)).
- Introduction of the prohibition on importing or purchasing, as from 30 September 2023, the listed iron and steel products when processed in a third country incorporating listed iron and steel products originating in Russia. With respect to listed products processed in a third country incorporating steel products originating in Russia of CN Code 720711 or 72071210 (certain semi-finished products of iron or non-alloy steel), this prohibition applies as of 1 April 2024 for CN Code 720711 and as of 1 October 2024 for CN Code 72071210. Also, in that regard there is the prohibition on providing related technical assistance, brokering services, financing or financial assistance (including financial derivatives) and insurance and re-

insurance;

- Extension of the list of goods that generate significant revenues for Russia and are subject to the import ban. It now includes, inter alia, such items as cigars and cigarettes, certain chemical products, including cosmetics, plastics, wood pulp and paper, ceramics and articles of stone, certain elements used in the jewellery industry such as stones and precious metals, vehicles and parts, certain machinery and appliances. A 3-month wind-down period until 8 January 2023 is envisaged to allow for the execution of contracts concluded before 7 October 2022. Furthermore, there is the ability for EU Member States to authorise the purchase, import or transfer of the listed iron and steel products if this is necessary for the establishment, operation, maintenance, fuel supply and retreatment and safety of civil nuclear capabilities, and the continuation of design, construction and commissioning required for the completion of civil nuclear facilities, the supply of precursor material for the production of medical radioisotopes and similar medical applications, or critical technology for environmental radiation monitoring, as well as for civil nuclear cooperation, in particular in the field of research and development.

New export restrictions which aim to reduce Russia's access to military, industrial and technological items, as well as its ability to develop its defence and security sector:

- Extension of the list of goods which could contribute to the enhancement of Russian industrial capacities to include certain coal, lignite, peat and coke products.

EU also introduced new exemption as regard to the prohibition to sell, supply, transfer or export goods which could contribute to the enhancement of Russian industrial capacities with respect to coal, briquettes, ovoids and similar solid fuels manufactured from coal (goods falling under CN Code 2701), lignite, whether or not agglomerated, excluding jet (goods falling under CN Code 2702), peat (including peat litter), whether or not agglomerated (goods falling under CN Code 2703) and coke and semi-coke of coal, of lignite or of peat, whether or not agglomerated as well as retort carbon (goods falling under CN Code 2704), to the execution until 8 January 2023 of contracts concluded before 7 October 2022 (or of ancillary contracts necessary for the execution of such contracts).

In addition, EU introduced the ability for EU Member States authorise the sale, supply, transfer or export of the goods and technology which could contribute in particular to the enhancement of Russian industrial capacities or the provision of related technical or financial assistance for necessary transactions related to civil nuclear capabilities or facilities, medical radioisotopes and similar medical applications, environmental radiation monitoring and civil nuclear cooperation.

- Extension of the list of restricted goods and technology which might contribute to Russia's military and technological enhancement or to the development of its defence and security sector, including in that list:
 - o certain goods that can be used for capital punishment, torture, or other cruel, inhuman, or degrading treatment or punishment;
 - o certain chemical substances, and nerve agents;
 - o small arms and other goods under the anti-torture Regulation.
 - o firearms, their parts and essential components and ammunition;
 - o certain electronic components - semiconductor devices, electronic integrated circuits and photographic cameras (found in Russian weapons),

The prohibition also applies to the provision of technical assistance, brokering services and other services as well as of financing or financial assistance related to the specified goods.

- Extension of the list of goods and technology suited for use in aviation or the space industry to cover certain hydraulic oils, tires, brakes, linings, reflectors, aerials parts and control and testing machineries, instruments and apparatus for measuring.

For newly added items an exemption applies to the execution until 6 November 2022 of contracts concluded before 7 October (or of ancillary contracts necessary for the execution of such contracts).

In addition, EU introduced the ability for EU Member States authorise the sale, supply, transfer or export of the listed goods or related technical assistance, brokering services, financing or financial assistance for transactions necessary for the production of titanium goods required in the aeronautic industry, for which no alternative supply is available.

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

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

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

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

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

The Government of Canada repealed the current Most-Favoured-Nation Tariff Withdrawal Order (2022-1) which withdrew MFN Tariff preferences from goods originating in Russia and Belarus on 2 March 2022, which resulted in a 35% tariff applicable to virtually all goods, and simultaneously made the new Most-Favoured-Nation Tariff Withdrawal Order (2022-2), which withdraws eligibility for the MFN Tariff from goods originating in Russia and Belarus, but exempts goods of tariff item No. 2844.43.00 that contains certain radioactive compounds, elements and isotopes, among them cobalt-60. The exclusion of goods under this tariff item is designed to allow these imports to benefit from MFN Tariff treatment, given that applying the General Tariff to these goods would not meet the intended objective of inciting alternative sourcing, but would instead result in increased costs.

Goods of tariff item No. 2844.43.00 are: Other radioactive elements and isotopes and compounds; other alloys, dispersions (including cermets), ceramic products and mixtures containing these elements, isotopes or compounds.

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

On 10 June, the Federal Council decided to adopt new EU sanctions against Russia and Belarus and instructed the The Federal Department of Economic Affairs, Education and Research (EAER) to adapt the Ordinance on measures in connection with the situation in Ukraine. Switzerland extended the list of goods banned for export that could help to strengthen Russia in military and technological terms or to develop its defence and security sector, namely certain chemicals. Switzerland expanded the list of Russian persons and entities concerned by export restrictions regarding dual-use goods and technology by adding 91 Russian entities⁵² and 24 Belarusian entities⁵³.

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

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

⁵² Krayushin Evgeny, 46th TSNII Central Scientific Research Institute, Alagir Resistor Factory, All-Russian Research Institute of Optical and Physical Measurements, All-Russian Scientific-Research Institute Etalon JSC, Almaz JSC, Arzam Scientific Production Enterprise Temp Avia, Automated Procurement System for State Defense Orders, LLC, Dolgoprudny Design Bureau of Automatics (DDBA JSC), Electronic Computing Technology Scientific-Research Center JSC, Electrosignal JSC, Energiya JSC, Engineering Center Moselectronproekt, Etalon Scientific and Production Association, Foreign Trade Association Mashpriborintorg, Ineko LLC, Informakustika JSC, Institute of High Energy Physics, Institute of Theoretical and Experimental Physics, Inteltech PJSC, ISE SO RAN Institute of High-Current Electronics, Kaluga Scientific-Research Institute of Telemechanical Devices JSC, Kulon Scientific-Research Institute JSC, Lutch Design Office JSC, Meteor Plant JSC, Moscow Communications Research Institute JSC, Moscow Order of the Red Banner of Labor Research Radio Engineering Institute JSC, NPO Elektromechaniki 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 'Radiosvaz', 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 'Vympe' By Name I.I. Toropov', Tactical Missile Company, JSC 'URALELEMENT', Tactical Missile Company, JSC 'Plant Dagdiessel', Tactical Missile Company, JSC 'Scientific Research Institute of Marine Heat Engineering', Tactical Missile Company, JSC PA Strela, Tactical Missile Company, JSC Plant Kulakov, Tactical Missile Company, JSC Ravenstvo SSID: 175-55780 Name: Tactical Missile Company, JSC Ravenstvovservice, Tactical Missile Company, JSC Saratov Radio Instrument Plant, Tactical Missile Company, JSC Severny Press, Tactical Missile Company, Joint-Stock Company 'Research Center for Automated Design', Tactical Missile Company, KB Mashinostroeniya, Tactical Missile Company, NPO Electromechanics, Tactical Missile Company, NPO Lightning, Tactical Missile Company, Petrovsky Electromechanical Plant 'Molot', Tactical Missile Company, PJSC 'MBDB 'ISKRA'', Tactical Missile Company, PJSC ANPP Temp Avia, Tactical Missile Company, Raduga Design Bureau, Tactical Missile Corporation, 'Central Design Bureau of Automation', Tactical Missile Corporation, 711 Aircraft Repair Plant, Tactical Missile Corporation, AO GNPP 'Region', Tactical Missile Corporation, AO TMKB 'Soyuz', Tactical Missile Corporation, Azov Optical and Mechanical Plant, Tactical Missile Corporation, Concern 'MPO – Gidropribor', Tactical Missile Corporation, JSC 'KRASNY GIDROGRESS', 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'

⁵³ 140 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, Belspetsvneshtekhnika SFTUE, Beltelexport CJSC, BSVT-New Technologies, Department of Internal Affairs of the Gomel Region Executive Committee, Internal Troops of the Ministry of Internal Affairs of the Republic of Belarus, KGB Alpha, Kidma Tech OJSC, Minotor-Service, Minsk Wheeled Tractor Plant, Oboronnye Initsiativy LLC, OJS KB Radar Managing Company, Peleng JSC, State Authority for Military Industry of the Republic of Belarus, State Security Committee of the Republic of Belarus, Transaviaexport Airlines JSC, Volatavto OJSC

On 28 July, Switzerland added 4 entities to its export ban list - Federal Center for Dual-Use Technology (FTsDT) Soyuz (SOE), Turayev Machine Building Design Bureau Soyuz, Zhukovskiy Central Aerohydrodynamics Institute (TsAGI) (SOE), Rosatomflot (SOE).

On 28 July, Switzerland extended three lists of goods (goods that could help to strengthen Russia in military and technological terms or to develop its defence and security sector; goods for oil refining and natural gas liquefaction; goods that could help to strengthen the industry), which are banned for sale, supply, export, transit and transport to or for use in Russia.

On 31 August, Switzerland added exclusions to the export ban on luxury goods by allowing articles of jewellery, articles of goldsmiths' or silversmiths' wares and parts thereof, of precious metal or of metal clad with precious metal, intended for personal use of natural persons leaving Switzerland or of immediate family members travelling with them, owned by those persons and not intended for sale.

On 31 August, Switzerland added exclusions to the ban on transactions with state-owned companies regarding transactions directly or indirectly necessary for the purchase, import or transportation of petroleum, including refined petroleum products, from or through Russia, as well as transactions required for the purchase, importation or transportation of pharmaceuticals, medical devices and agricultural and foodstuffs, including wheat and fertilizers.

On 31 August, Switzerland introduced prohibitions in connection with the award of public contracts to Russian nationals or natural persons resident in Russia, legal persons, companies or organizations established in Russia, legal persons, companies or organizations majority-owned by aforementioned natural or legal persons, companies or organizations, legal persons, companies or organizations acting on behalf of or at the direction of aforementioned natural or legal persons, companies or organizations.

On 8 September, Switzerland amended the list of goods that could help to strengthen the industry prohibited for sale, supply, export, transit and transport to or for use 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.

On 26 August, Norway expanded the list of entities subject to export restrictions regarding dual-use goods and technology by adding 4 Russian entities - Federal Center for Dual-Use Technology (FTsDT) Soyuz, Turayev Machine Building Design Bureau Soyuz, Zhukovskiy Central Aerohydrodynamics Institute (TsAGI) and Rosatomflot.

On 26 August, Norway added exclusions to the export ban on luxury goods by allowing articles of jewellery, articles of goldsmiths' or silversmiths' wares and parts thereof, of precious metal or of metal clad with precious metal, intended for personal use of natural persons travelling from Norway or the EU, or members of their immediate families travelling with them, owned by those individuals and not intended for sale.

On 26 August, Norway extended and revised the list of goods and technology that are prohibited from being exported to Russia because they could contribute to Russia's military and technological enhancement, or the development of the defence and security sector.

On 26 August, Norway expanded the list of goods and technology for use in oil refining (relating to LNG-process) that are subject to a ban on exports.

Japan. On 10 May, bans on exports to 71 organizations⁵⁴ 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, etc⁵⁵) destined for Russia. Based on this, the Cabinet Order to partially revise the Export Trade Control Ordinance was approved by the

⁵⁴ 5th Shipyard; Alagir Resistor Factory; All-Russian Scientific-Research Institute Etalon JSC; Almaz JSC; Dolgoprudniy 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 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 "Vypel" 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"

⁵⁵ 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

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.

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

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

On 26 September, the Japanese government implemented a ban on exporting products of Japanese origin to 1 Russian individual – Evgeny Krayushin – and 20 Russian designated entities and – 46th TSNII Central Scientific Research Institute, All Russia Scientific Research Institute of Optical Physical Measurements, Arzamas Scientific Production Enterprise Temp Avia, Automated Procurement System for State Defense Orders, LLC, 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, ISE SO RAN Institute of High-Current Electronics, JSC Energiya, Kaluga Scientific-Research Institute of Telemachanical Devices JSC, OJSC Pella Shipyard, Scientific Production Center Vigstar JSC, Scientific-Production Enterprise Salyut JSC, Scientific-Research Institute and Factory Platan, Special Design Bureau Salute JSC, Tambov Plant (TZ) “October”. The ban came into force on the 3rd of October.

Japan also introduced a ban on the export of goods related to chemical weapons to Russia.

On 26 September, the Japanese government implemented a ban on exports to 21 Russian organizations designated as specific organisations by the Ministry of Foreign Affairs - 46th TSNII Central Scientific Research Institute, All Russia Scientific Research Institute of Optical Physical Measurements, Arzamas Scientific Production Enterprise Temp Avia, Automated Procurement System for State Defense Orders, LLC, Engineering Center Moselectronproekt, Etalon Scientific and Production Association, Evgeny Krayushin, Foreign Trade Association Mashpriborintorg, Ineko LLC, Informakustika JSC, Institute of High Energy Physics, Institute of Theoretical and Experimental Physics, ISE SO RAN Institute of High-Current Electronics, JSC Energiya, Kaluga Scientific-Research Institute of Telemachanical Devices JSC, OJSC Pella Shipyard, Scientific Production Center Vigstar JSC, Scientific-Production Enterprise Salyut JSC, Scientific-Research Institute and Factory Platan, Special Design Bureau Salute JSC, Tambov Plant (TZ) “October”.

On 26 September, the Japanese government introduced the export ban on chemical weapons-related goods to Russia. The ban came into force on the 7th of October.

Eligible items include:

1. Substances used as raw materials for chemical preparations, substances with toxicity equivalent to chemical preparations for military use, and substances used as raw materials for them (73 items) - acetylene, acetone, benzaldehyde, chlorine, ethylene, ethylene glycol (aka ethanediol), sodium hypochlorite, yellow phosphorus, red phosphorus, methanol, ethanol, dichloromethane (aka methylene dichloride), pyridine, arsenic, diethyl ether, isopropanol, picric acid, etc.
2. Equipment used in the manufacture of chemical preparations and their parts and accessories (11 items) - reactors, storage vessels, heat exchangers and condensers, distillation and absorption columns, agitators, valves, pumps and their parts, local exhaust systems, equipment used for the analysis or detection of chemical substances and their parts and accessories Equipment, electrolytic cells and their parts, compressors.
3. Equipment and parts thereof used for manufacturing bacterial preparations (5 items) - equipment and components thereof used for physical containment, fermenters, centrifuges, equipment for protection used in physical containment facilities, equipment for the synthesis of nucleic acids or for the binding of nucleic acids to nucleic acids.

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

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.

systems. Taiwan's government revised the "List of high-tech goods exported to Russia" to "List of high-tech goods exported to RF and Belarus".

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

New Zealand. On 11 October, New Zealand implemented a range of trade measures, that will enter into force 4 November, including:

- extension of the 35% tariff on Russian imports till March 2025 which was due to expire in November 2022;
- significant expansion of the list of prohibited exports to Russia and Belarus;
- ban of the export of luxury goods (including, without limitation, gold) to Russia, like wine and seafood;
- ban of the import of luxury goods of Russian origin into New Zealand, like vodka and caviar;

Norway. On 28 October, Norway introduced new trade sanctions against Russia:

- new export restrictions relating to coal, electronic components, technical items in the aviation sector, certain chemicals and firearms;
- new import restrictions relating to steel products, machinery and appliances, plastics, vehicles, textiles, footwear, leather, ceramics, certain chemical products and jewelry that is not made of gold;
- further restrictions on providing several types of services, including architectural and engineering services, legal advisory services and IT consultancy services.

8. Impose Secondary Sanctions

USA plans to include secondary sanctions in its financial crime strategy. They are also considering sanctions against unscrupulous banks that help circumvent sanctions. USA sanctioned 7 RF entities and 6 non-RF entities for evading newly imposed export controls on Russia, these companies provided support to Russia's military and/or defence industrial base. **The US passed a legislative amendment which allows India to buy a missile defence system from Russia.** A draft bill on sanctioning China's purchases of oil and other energy supplies from RF was introduced to the Senate. The US Treasury has sent a letter to a number of business associations in Turkey warning them of the risk of being sanctioned if they cooperate with Russians who have already been subject to restrictions -WSJ. After the US warning, banks in Turkey, Kazakhstan, Vietnam, Armenia, Kyrgyz Republic, Sri Lanka started to suspend work with the Russian payment system "Mir". According to Russian media, Mir coverage area in friendly countries collapsed by 90%. Also, Russians face problems with UnionPay (Tourists in Spain, the Czech Republic and Cyprus have encountered problems, Nosto ATMs (Finland) stopped servicing UnionPay cards). BIS warned third-country companies and governments that they could find themselves subject to export controls imposed in response to Russia's war against Ukraine. OFAC confirmed that non-US individuals and legal entities risk exposure to sanctions for providing ammunition and other military goods to Russia or for supporting Russia's military-industrial complex, as well as PMCs or paramilitary groups participating in or otherwise supporting Russia's attack on Ukraine. **EU a discussion on sanctioning Turkey for assisting RF trade is being born.** **EU. Norway.** The EU broadened the listing criteria on which specific designations can be based – Sanctions could now be imposed on natural or legal persons who facilitate the circumvention of EU sanctions. **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 largest payment system UnionPay has limited work with sanctioned Russian banks. In particular, UnionPay introduced a ban on servicing its cards issued by foreign banks, including at POS terminals. According to interlocutors of the Russian publication, UnionPay could make such a decision due to the risk of secondary sanctions. Another interlocutor of the publication clarified that the cards stopped working "in April-May, after the introduction of sanctions."

Under the pressure of US sanctions and suppliers, Chinese technology companies are closing down business in Russia without making official statements. According to the Chinese government, China's exports to Russia in Mar fell by a total of 27% compared to Feb. Exports of technological products fell particularly sharply. Thus, the supply of laptops decreased by more than 40%,

smartphones - by two thirds, base stations - by 98%. Chinese tech giants such as Lenovo and Xiaomi are publicly refusing to do business with Russia - WSJ.

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

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

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

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

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

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

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

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

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

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

On July 27, Bloomberg reported that Senator Marco Rubio wants the US to sanction China's purchases of oil and other energy supplies from Russia in an effort to cut off funding for that country's war against Ukraine. Rubio introduced a bill along with fellow Republicans Rick Scott and Kevin Cramer that would impose penalties on any entity insuring or registering tankers shipping oil or liquefied natural gas to China from Russia, according to Rubio's office.

On August 22, the US threatened Turkish business with sanctions in case of cooperation with sanctioned Russians, — WSJ. Deputy Finance Minister Wally Adeyemo said Turkish companies risk being hit by US sanctions if they do business with sanctioned Russian individuals. The US Treasury sent a letter to a number of business associations in Turkey warning them of the risk of being sanctioned if they cooperate with Russians who have already been subject to restrictions.

On September 19, Turkish Airlines refused to train Russian pilots, The Insider. In connection with the tightening of sanctions by the European Aviation Safety Agency (EASA), the Turkish Airlines training center is forced to stop working with companies from Russia. Experts say that this is a serious blow to the pilot training system, since the door to training in Europe is already closed.

On September 15, the USA and the EU demanded Turkey to stop accepting "Mir" cards, reports FT. The U.S. intends to increase pressure on Turkish banks that have become members of the NSPC payment system (the operator of the Mir) - V.Komlev, head of Mir was sanctioned on September 15. The EU is going to send a delegation to Ankara for direct talks with representatives of the Turkish government, writes FT. So far, five Turkish banks are members of the Mir system: Vakıfbank, Ziraat Bank, İş Bank, DenizBank and Halkbank. DenizBank, Halkbank. As reported by FT, after the US warnings banks and hotels in Turkey began to refuse to accept the cards "Mir", there were problems in three major hotel chains: Crystal Hotels, Nirvana Hotel and Titanic.

On 15 September, OFAC published a FAQ to provide additional guidance on the heightened risk of facilitating Russia's efforts to evade sanctions through the expanded use of the National Payment Card System (NSPK) or the Mir National Payment System, given the broad sanctions imposed on Russia's financial system.

NSPK is the operator of Russia's MIR National Payment System, which clears and settles payments between consumers, merchants, and banks for debit and credit card payments, primarily in Russia. NSPK and the MIR National Payment System process transactions for designated Russian banks and may be used to process transactions involving other sanctioned persons or activity under the Russian Harmful Foreign Activities Sanctions Regulations (RuHSR). Accordingly, those non-U.S. financial institutions that enter into new or expanded agreements with NSPK risk supporting Russia's efforts to evade U.S. sanctions through the expanded use of the MIR National Payment System outside the territory of Russia.

The RuHSR authorizes OFAC to impose blocking sanctions on persons determined to have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of (i) any activity sanctionable under the RuHSR, including deceptive or structured transactions or dealings to circumvent any United States sanctions or (ii) any person whose property and interests in property are blocked pursuant to the RuHSR. OFAC is prepared to use these targeting authorities in response to supporters of Russia's sanctions evasion, including Russia's efforts to expand the use of NSPK or the MIR National Payment System outside of the territory of Russia.

Later, on September 19, **the Turkish bank İşbank and Denizbank officially suspended work with the Russian payment system "Mir".** At the same time, dozens of Russians at tourist forums in Istanbul, Antalya, Fethiye, Mersin, Side declare difficulties in withdrawing cash from Mir cards.

On September 21, Russian media reported that as a result of US warnings, **four countries have already stopped working with Mir – banks in Turkey, Kazakhstan, Vietnam and Armenia**, which previously accepted "Mir" cards, have suspended their acceptance (From Sep 21, Mir cards stopped being accepted by Halyk Bank of Kazakhstan and Vietnamese BIDV). At this time Russian payment cards "Mir" are still accepted by banks in South Korea, Uzbekistan, Belarus, Kazakhstan, Kyrgyzstan, Tajikistan, as well as unrecognized South Ossetia and Abkhazia.

On September 26, one of the largest banks in **Tajikistan**, Dushanbe City Bank, stopped servicing "Mir" cards due to technical problems that began on September 24.

In an FAQ issued on September 15, 2022, OFAC cautioned non-U.S. financial institutions, warning that they could be sanctioned for materially assisting sanctions targets or sanctioned activities, including for entering certain agreements with the National Payment Card System (NSPK), an entity owned by the Central Bank of Russia that operates Russia's MIR National Payment System. OFAC noted that any such agreements that expand the use of the MIR National Payment System, which clears and settles payments primarily in Russia, could support evasion of U.S. sanctions and result in an SDN designation.

Russians complained that some countries in the EU have stopped accepting Chinese UnionPay cards issued by Russian banks. Tourists in Spain, the Czech Republic and Cyprus have encountered problems. Also, UnionPay cards may stop working in Bulgaria - reported Russian media. Besides, from Oct 3, Nosto ATMs (Finland) stopped servicing UnionPay cards. It was the only network in Finland that worked with the Chinese payment system. The decision was made due to increased demand for cash from Russians.

Kyrgyz bank "Kompanion", the 9th largest bank by assets in the country, since October 4, doesn't serve cards of the Mir card, issued by 21 banks from Russia, according to a press release of the organization. On October 17, the Kyrgyz commercial bank "Dos-Kredobank" made the same decision - they stopped operations with some Russian banks. Also, since October 18, the Kyrgyz "Bakai Bank" completely stopped cooperation with all Russian financial institutions. In turn, the official representative of the National Bank of the Kyrgyz Republic said in a conversation with Azattyk that each commercial bank makes its own decisions. In September, it was also reported that the acceptance of cards of the Russian payment system "Mir" in Kazakhstan was suspended by Halyk Bank, as well as Bank CenterCredit.

Sri Lankan authorities won't use its infrastructure to accept cards of the Russian payment system "Mir" because of possible sanctions. This was reported by the Central Bank of Sri Lanka on Twitter.

According to Russian media, Mir card coverage area in friendly countries collapsed by 90% after the US threat of secondary sanctions.

On September 18, Biden warned Chinese leader Xi Jinping about the risk of stopping "American and other" investments in China if Beijing violates sanctions against Russia.

On 30 September, the BIS warned third-country companies and governments that they could find themselves subject to export controls imposed in response to Russia's war against Ukraine. As part of a rule that went into effect September 15, the 'military end-user' controls under the Export Administration Regulations (EAR) have been expanded to allow BIS to (1) designate entities in third countries that support 'military end-uses' in Russia or Belarus as Russian and Belarusian military end-users on the Entity List and (2) apply the Russian/Belarusian Military End User (MEU) Foreign Direct Product (FDP) rule to these entities.

BIS stated that it is prepared to "aggressively apply" these export controls against any entities, whether inside or outside of Russia, that seek to provide material support for Russia's and Belarus's military and industrial sectors, including to replenish (backfill) technologies and other items prohibited by the U.S. and the 37 allies and partners that have implemented substantially similar controls.

According to BIS, entities in third countries designated on the Entity List as Russian 'military end users' will have a footnote 3 designation in the license requirement column. A license is required when a footnote 3 entity is a party to any export, reexport, or transfer (in-country) – e.g., as a purchaser, intermediate consignee, ultimate consignee, or end-user, involving not only U.S.-origin items or items located in the U.S. but also foreign-produced items that are (1) the direct product of any software or technology subject to the EAR and specified in any ECCN in product groups D or E on the CCL, or (2) produced by any plant or major component of a plant located outside the U.S. when the plant or major component of a plant itself is a direct product of U.S.-origin technology or software that is specified in any ECCN in product groups D or E in any categories of the CCL. Any foreign-produced item meeting these criteria, including items that would be designated EAR99, would require a license.

On 30 September, OFAC released a Frequently Asked Question, FAQ 1091, which warns that OFAC is ready to act against persons providing political or economic support for Russian efforts to annex Ukrainian territory. FAQ 1091 provides the following examples of activities that would attract OFAC scrutiny:

- providing material support for the organization of Russia's referenda or annexation, as well as economic or other activity that seeks to legitimize Russia's referenda or annexation;
- providing material support to Russia's military and defense industrial base, including significant transactions by entities in third countries that provide material support to Russia's military, defense industrial base, and designated entities and persons operating in Russia's defense industrial base;
- attempting to circumvent or evade US sanctions on Russia and Belarus; and
- providing material support to Russian entities or individuals subject to certain blocking sanctions.

FAQ 1091 reiterates that OFAC sanctions do not prohibit transactions related to the sale or transport of crude oil, petroleum products, liquefied natural gas, and coal products of Russian origin, unless such products are imported into the US.

On 14 October OFAC published Frequently Asked Question (FAQ 1092) confirming that non-US individuals and legal entities risk exposure to sanctions for providing ammunition and other military goods to Russia or for supporting Russia's military-industrial complex, as well as private military companies (PMCs) or paramilitary groups participating in or otherwise supporting Russia's attack on Ukraine. OFAC may block (i.e., designate as a Specially Designated National (SDN)) any person determined to operate or have operated in the defense and related materiel sector of the Russian economy pursuant to Executive Order 14024 (EO 14024), "Blocking Property With Respect To Specified Harmful Foreign Activities of the Government of the Russian Federation." OFAC may also block persons determined to have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of certain sanctionable activities enumerated in EO 14024 or SDNs blocked pursuant to EO 14024.

The US Senate introduced a bill to suspend arms sales to Saudi Arabia for one year. This is happening against the backdrop of accusations of Arabia of facilitating financing of Russia after OPEC+ announced a reduction in oil production.

Turkey. South Stream Transport BV, the operator of the Turkish Stream gas pipeline, has announced that its export license has been revoked early due to EU sanctions against Russia. The license was revoked on Sep 18. The company said in a statement that gas supplies through the pipeline will not stop. South Stream Transport B.V. has applied for license renewal. The application states that the supply is important for the energy security of Europe. The official notification of the revocation of the license was sent by the authorities of the Netherlands, referring to the paragraphs of the EU resolution.

EU. According to FT, the EU is watching precisely the development of Russia-Turkey relationships and may impose sanctions on Turkey since the country might become a platform for trade with Russia. Since imposing sanctions on Turkey may become a tough decision for the bloc, one of the interlocutors of the publication suggested that Western companies and banks may be called to either end cooperation with Turkey or cut ties with it.

On 6 October, as part of the 8th sanctions package, the EU broadened the listing criteria on which specific designations can be based. Sanctions could now be imposed on natural or legal persons who facilitate the circumvention of EU sanctions.

Norway. On 28 October, Norway broadened the listing criteria on which specific designations can be based to list persons and entities that facilitate violations of the prohibition against circumventing the sanctions.

Other. Many global oil traders and banks stopped cooperation with the Indian oil refining company Nayara Energy - an affiliate of Rosneft - due to Western sanctions against the Russian Federation, writes Reuters.

UAE. Sheikh Mansour bin Zayed Al Nahyan, deputy prime minister of the UAE, is facing a criminal investigation in Britain for helping Russian billionaires circumvent sanctions. The British Foreign Office has received evidence from international criminal defence lawyers Reece Davis and Ben Keith that Sheikh Mansour plays a "central role" in the flow of sanctioned money to the UAE, Middle East Eye writes. In particular, the sheikh helped Roman Abramovich and other unnamed Russian billionaires. According to their data, more than 38 businessmen and officials who are directly related to the Russian president own more than \$314bn worth of property in the UAE. The U.K. investigation against the UAE sheikh will increase pressure on the monarchy's authorities, but it could strain relations that have until now been allied. At the same time, lawyers are seeking sanctions against the sheikh himself from the British Foreign Office.

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

USA (prepares respective bill + published Sample Letter to Companies Regarding Disclosures Pertaining to Russia's Invasion of Ukraine and Related Supply Chain Issues + released warning of increased export control evasion attempts by entities targeted under Russia-related programs (includes 16 items with a higher risk of evasion attempts + strengthened enforcement of export controls + an outbound investment review mechanism to protect U.S. technologies (e.g. semiconductors, batteries, AI etc.) against adversaries like China and RF – notification to the federal government 45 days prior to deal closing is required if the investment involves specified sectors) was proposed, draft has not passed either house of Congress yet, **EU** (EP gave its consent to the draft of European Council Decision which identifies the violation of EU sanctions as an EU crime + strengthened reporting requirements - sanctioned people and entities were obliged to declare assets in EU before 1 Sep 2022 or within 6 weeks from the date of listing + share of information on property of sanctioned persons, entities and bodies between EU Member States and the European Commission), **Germany** (sanctioned persons are required to report property in Germany under the threat of imprisonment, is to create a national registry of assets that are subject to sanctions). **UK** (Register of Foreign Legal Entities began to operate from August – now anonymous foreign companies must disclose their ultimate owners if they seek to purchase real estate in the UK or already own it). **Switzerland.** Federal Council instructed to draft a bill on increased transparency and easier identification of the beneficial owners of legal entities which will include a register for identifying beneficial owners and new obligations the risk-based updating of information on effective ownership.

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

The SEC has released an illustrative letter that contains sample comments that the Division of Corporation Finance may issue to companies based on their specific facts and circumstances related to Russia's invasion of Ukraine and related supply chain issues.

The SEC notes companies may have disclosure obligations under the federal securities laws related to the direct or indirect impact that Russia's invasion of Ukraine and the international response have had or may have on their business. To satisfy these obligations, the Division of Corporation Finance believes that companies should provide detailed disclosure, to the extent material or otherwise required, regarding:

direct or indirect exposure to Russia, Belarus, or Ukraine through their operations, employee base, investments in Russia, Belarus, or Ukraine, securities traded in Russia, sanctions against Russian or Belarusian individuals or entities, or legal or regulatory uncertainty associated with operating in or exiting Russia or Belarus, direct or indirect reliance on goods or services sourced in Russia or Ukraine or, in some cases, in countries supportive of Russia, actual or potential disruptions in the company's supply chain, or business relationships, connections to, or assets in, Russia, Belarus, or Ukraine.

The SEC also notes financial statements may also need to reflect and disclose the impairment of assets, changes in inventory valuation, deferred tax asset valuation allowance, disposal or exiting of a business, de-consolidation, changes in exchange rates, and changes in contracts with customers or the ability to collect contract considerations. In addition, since Russia's invasion of Ukraine, many companies have experienced heightened cybersecurity risks, increased or ongoing supply chain challenges, and volatility related to the trading prices of commodities regardless of whether they have operations in Russia, Belarus, or Ukraine that warrant disclosure.

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

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

The U.S. Department of Commerce's Bureau of Industry and Security (BIS) and the Financial Crimes Enforcement Network (FinCEN) released a Joint Alert to U.S. financial institutions warning increased export control evasion attempts by entities targeted under Russia-related programs (Russia and Belarus). The Joint Alert provides an overview of current US export controls targeting Russia, commodities at high risk of export control evasion attempts, transactional and behavioral red flags connected to possible evasion attempts, and reporting requirements related to suspected export control evasion attempts. BIS identified 16 items under

various Export Control Classification Numbers (ECCN) controlled under the Export Administration Regulations (EAR) with a higher risk of evasion attempts: Aircraft Parts/ Equipment (ECCN 9A991), Antennas (ECCN 7A994), Breathing Systems (ECCN 8A992), Cameras (ECCN 6A993), GPS Systems (ECCN 7A994), Inertial Measurement Units (ECCN 7A994), Integrated Circuits (ECCNs 3A001, 3A991, and 5A991), Oil Field Equipment (EAR99 and presumably identified in Supplements Nos. 2 or 4 of EAR Part 746), Sonar Systems (ECCN 6A991), Spectrophotometers (ECCN 3A999), Test Equipment (ECCN 3B992), Thrusters (ECCN 8A992), Underwater Communications (ECCN 5A991), Vacuum Pumps (ECCN 2B999), Wafer Fabrication Equipment (ECCNs 3B001 and 3B991), and Wafer Substrates (ECCN 3C00x).

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

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

On June 13, legislators released a new proposed version of the National Critical Capabilities Defense Act, which would establish an outbound investment review mechanism to protect U.S. technologies against adversaries like China and Russia. The legislation would establish an interagency panel to review and block U.S. investments in foreign countries on national security grounds. U.S. entities and their affiliates would be required to notify the federal government 45 days prior to closing if the investment involves sectors previously specified by the Biden administration as crucial to supply chains or critical and emerging technologies identified by the National Science and Technology Council and the Office of the Director of National Intelligence as vital to maintaining the U.S. position as the world's leading superpower. Relevant industries and technologies include semiconductors, large-capacity batteries, pharmaceuticals, rare-earth elements, biotechnology, artificial intelligence, quantum computing, hypersonics, financial technologies, and autonomous systems. Currently, the legislation remains in draft form and has not passed either house of Congress, but bipartisan support for it is reportedly growing.

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

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

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

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

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

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

UK. On 1 August, a new Register of Overseas Entities under the Economic Crime (Transparency and Enforcement) Act 2022 came into force, requiring overseas entities that currently own land in the UK to register verified information relating to their beneficial owners or managing officers at Companies House by 31 January 2023. While the Act affects the UK, this note sets out the position in England and Wales. Those foreign entities that already own land in the UK subject to the Act will be given 6 months to register their beneficial owners or directors. This is done in particular for "rooting out Russian oligarchs and kleptocrats who use British territory to hide illicit wealth."

Switzerland. During its meeting on 12 October, the Federal Council instructed the Federal Department of Finance (FDF), in collaboration with the Federal Department of Justice and Police (FDJP), to draft a bill on increased transparency and easier identification of the beneficial owners of legal entities by the second quarter of 2023. In particular, the bill should introduce a central register for identifying beneficial owners and new obligations regarding the risk-based updating of information on effective ownership. The register will be accessible to the relevant authorities but not publicly available. Moreover, the FDF should incorporate measures to strengthen the current mechanisms for combating money laundering into the bill. In particular, it should be assessed, together with the relevant stakeholders, whether further adjustments should be made to the anti-money laundering toolkit, for instance in the area of legal professions. In this way, the Federal Council wishes to increase transparency of legal entities and to strengthen prevention and prosecution in the area of financial crime.

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

USA and Canada (are preparing legislative acts to use sanctioned assets for compensation to Ukraine), **USA doesn't have legal authority to seize CBR assets frozen due to its invasion of Ukraine**, **EU** (launched discussion on this issue, working on the possibility of using the frozen Russian assets to help Ukraine, the Baltic countries and Slovakia support the idea, EU is ready to create an international platform for the restoration of Ukraine + EU considers it fair and is preparing a legal basis for the frozen RF assets and assets of RF oligarchs + is working on "Sanction Berau" launch, Justice Commissioner of EC suggests keeping Russian assets frozen until RF agrees to pay for the reconstruction of Ukraine after the war ends), **Germany** (considers possibility; **Finance Minister said that he does not support the idea of confiscating**), **Canada** (passed a law for the freezing and confiscation of Russian-sanctioned assets), **Switzerland** and **Norway** adopted the 6th EU sanction package. **USA-UK.** OFSI and OFAC announced enhanced co-operation on sanctions. **REPO** is going to accelerate oligarch asset forfeiture efforts in response to Russia's illegal war in Ukraine. **Czech Republic** approved a legislative proposal "The Magnitsky Act" to freeze foreign assets in case of human rights violations, support of terrorism or participation in cyber-attacks (needs to pass to the Senate and then to the office of the President).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

USA-UK. On 17 October, OFSI and OFAC announced enhanced co-operation on sanctions. The Directors of OFSI and OFAC, Giles Thomson and Andrea Gacki, have announced the details of an enhanced partnership between the 2 organisations. OFSI and OFAC officials will:

- further exchange best practices and strengthen working relationships at all levels;
- identify opportunities to pool expertise, to think creatively about the challenges they face, to explore opportunities to align the implementation of sanctions and to assist stakeholders either through joint products or by providing guidance resulting from collaboration; and
- continue to work together to develop approaches to address shared priorities like cyber threats and the misuse of virtual assets, improving information sharing and ensuring that UK and US sanctions do not prevent humanitarian trade and assistance from reaching those in need.

REPO Task Force. On 30 September, US Treasury Deputy Secretary Wally Adeyemo and US Deputy Attorney General Lisa O. Monaco convened the Russian Elites, Proxies, and Oligarchs (REPO) Task Force Deputies to accelerate oligarch asset forfeiture efforts in response to Russia's illegal war in Ukraine. Participants from Australia, Canada, the European Commission, France, Germany, Japan, Italy, the UK, and the US discussed ongoing initiatives to tailor already robust asset forfeiture tools and maximize the impact of joint work on Russian elites and their cronies for their complicity in Putin's illegal invasion. Participants noted legislative efforts, including the Administration's proposals to forfeit oligarch assets on an expedited timeline, to forfeit property used to facilitate sanctions evasion, to expand ability to enforce foreign forfeiture judgments in U.S. courts, and to include sanctions and export control violations among the crimes that fall within the definition of racketeering. Together, these proposals would expand ability to forfeit assets, including those of entire criminal enterprises.

Czech Republic. On 14 October, the Czech Republic's Chamber of Deputies, the lower house of the Parliament of the Czech Republic, approved unopposed a legislative proposal "The Magnitsky Act" to freeze foreign assets in case of human rights violations, support of terrorism or participation in cyber-attacks. The measure provides for the freezing of assets of both natural and legal persons in the event of a crime, as well as a ban on entering the country. The text is based on US legislation of the same name. The text must now pass to the Senate and then to the office of the President for its definitive implementation.

MONITORING TABLE

Total cumulative progress: ~70% (29 sanction-measures) out of 42 in the Action Plan (10 blocks).

8 sanction-measures (19%) with status No progress, 29 sanction-measures (70%) with status Yes, 5 sanction-measures (11%) with status Slow Progress.

		UPD 03.11 (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	<p>EU banned purchase, import or transfer seaborne crude oil or petroleum products originated in RF (on 3 Aug, the European Commission issued a Notice clarifying that ban covers Russian oil mixed with oil of other origin + ban on import of RF coal came into force on Aug 1. Switzerland (ban on RF crude oil and petroleum products).</p> <p>Poland refused from RF gas in response to RF cut off. Poland terminated the agreement on the supply of Russian gas.</p> <p>Lithuania. Completely cut the import of Russian energy, incl. oil, natural gas and electricity (Nord Pool, a pan-European power exchange, has decided to stop trading Russian electricity). Ban on transit of RF gas to Kaliningrad region.</p> <p>Latvia ban on natural gas supplies from RF from Jan 1, 2023, Latvijas Gaze resumed purchase of Russian gas via an unnamed intermediate entity.</p> <p>UK ban on import of RF oil and oil products from 31 Dec, ban on import of RF coal came into force on August 10) + ban on import of LNG from Russia from 1 Jan, 23.</p> <p>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).</p> <p>Estonia banned import and purchase of natural gas from Russia as well as providing associated transmission services from 31 Dec 2022 + also plans to stop oil business with Russia from December 5 (earlier than EU embargo) + ban on the purchase, import and transfer of petroleum oils from Russia from Dec 5 (comes into force prior EU ban).</p> <p>New Zealand prohibition of the import of energy products of Russian origin (coal, oil, or gas products) into New Zealand; ban of the export of oil exploration and oil production products to Russia) - comes into force 4 Nov.</p>
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	Yes, but incomplete scope	<p>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.</p> <p>EU. EC proposed to limit the price of Russian gas by setting it at 50 euros/MWh. Under the 8th package EU laid the basis for the required legal framework to implement the oil price cap).</p> <p>India. India says it is ready to give up Russian oil and buy Iranian one. As Economic Times reported on September 6, India is ready to consider joining the price ceiling on Russian oil if supplies from alternative countries - Iran or Venezuela - are secured</p> <p>G7 agreed to introduce a price cap on Russian oil – from December 2022 for oil, and from February 2023 - for refined products. Discussion on the level of price cap is still not finished. As Reuters, the US and Western officials are finalising the details on price cap for Russian oil – the cap might be determined at the historical avg of \$63-64 a barrel.</p> <p>Norway adopted a legal basis for the future price cap on Russian oil.</p>
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	<p>USA. Ban RF vessels from US ports. On 8 May, the Department of State also took action against 69 vessels by adding them to the SDN List.</p> <p>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 + extended existing port access ban + allowed the exchange of information within the framework of the ICAO. Tightened restrictions on Russian fishing vessels (allowed access to only 3 Norwegian ports of were vessels will be inspected by customs officers to avoid illegal transport of goods to Russia) + extended the port ban to apply to vessels certified by the Russian Maritime Ship Register).</p> <p>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).</p> <p>EU + Lithuania. EU released guidance for transportation from RF to Kaliningrad – road transit is not allowed, railway – allowed in pre-invasion volumes, transportation of sanctioned military and dual-use goods and related technologies are entirely prohibited, regardless of the mode of transport.</p> <p>EU. Extended existing port access ban, allowed the exchange of information within the framework of the ICAO. prohibition on provision of maritime transport, inc. through ship-to-ship transfers, technical assistance, brokering services or financing or financial assistance, related to the maritime transport to 3rd countries of crude oil (as of 5 Dec 2022) or petroleum products (as of 5 Feb 2023) which originate /exported from RF, or which have been exported from RF to 3rd countries (purchases at or below a pre-established price cap were allowed) + ban on Russian-flagged vessels accessing EU ports and locks now also applies to vessels certified by the Russian Maritime Register of Shipping)</p> <p>UK. allowed necessary technical assistance for temporarily detained aircraft.</p> <p>Switzerland. Allowed the exchange of information within the framework of the ICAO.</p>
2.2.	Blocking sanctions on the state shipping companies	Yes	<p>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).</p>
2.3.	Crewing companies and engine producers	Yes	<p>UK. Zvezda PJSC (manufacture, sales, and service of diesel engines)</p> <p>Canada. UEC Klimov JSC (manufactures gas turbine engines, main gearboxes and accessory drive gearboxes for transport aircraft)</p>
2.4.	Prohibit international insurance	Yes	<p>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,</p> <p>EU. 6th package imposes prohibition on insurance and reinsurance of maritime transport of oil and oil products to third countries, with a wind down period of 6 months until 5 December for contracts signed before 4 June 2022.</p> <p>Switzerland. Ban on services, including insurance or reinsurance, for transportation of RF oil and certain petroleum products to any destination.</p> <p>EU & UK a plan to shut Moscow out of the vital Lloyd's of London maritime insurance market is delayed in the EU, UK has not adopted agreed restrictions.</p> <p>UK. Prohibited insurance relating to import of RF oil and oil products into the UK after 31 December 2022 + adopted amendment to the General Trade Licence that enabled the provision of insurance and reinsurance to individuals who are resident in Russia or are located in Russia as well as entities which are incorporated or constituted under the law of Russia or domiciled in Russia in relation to sea vessels and aircraft, their component parts, as well as aero gas turbine engines.</p>

3. Impose New Financial Sanctions

3.1.	Cut off all Russian financial institutions from the global financial system	Yes	<p>USA. SDN on Transkapitalbank, Investtradebank; virtual currency mining company Bitriver AG + 10 RF subsidiaries. Joint Stock Company Moscow Industrial Bank (MIB) (SOE) and 10 of its subsidiaries. USA did not to renew the provisions of General License 9C (transactions in debt or equity of Bank Otkritie, Sovcombank, Sberbank, VTBBank, Alfa-Bank, Alrosa, CBR, NWF and MinFin of RF) that expire on 25 May, which could bring Moscow closer to default + ban on purchasing Russian securities on the secondary market + extended until 5 Dec 2022 licence allowing for energy financing transactions via RF banks) + asset freeze on Heritage Trust +</p>
------	---	-----	--

			<p>ban on import of gold from RF + 2 Kazakh subsidiaries of Alfa-Bank excluded from SDN-list, since were bought by Kazakhstan bank + issued General Licence authorising transactions through Dec 16, 2022 involving Gazprom Germania GmbH + 9 entities (inc. 1 SOE) + 26 entities & 4 subsidiaries (inc. 12 SOEs) in leasing, defense and high-technology sectors to SDN list + issued General License No. 45 authorising until 20 October 2022 certain transactions (purchase by U.S. persons of debt or equity issued by an entity in RF; facilitating, clearing, and settling of a purchase by U.S. persons of debt or equity issued by an entity in RF), necessary to the wind down of financial contracts or other agreements that were entered into on or before 6 June 2022. Sanctions against any individual or entity that operate or have operated in the quantum computing sector of Russian economy, sanctions on 33 entities, including Main Intelligence Directorate, 3 leading Russian military space entities that play central roles in strengthening Russia's defence capabilities, 13 entities operating in the technology sector of Russian economy, 14 entities operating in the electronics sector of Russian economy, sanctions on 4 Iran-based entities said to be involved in the production and transport of unmanned aerial vehicles (UAVs) to RF + 10 Russian entities, inc. Federation Council of the Federal Assembly of Russia and 1 Belarusian entities + ban on the exchange of SDRs of Russia and Belarus + designated 2 entities that procured military and sensitive dual-use technologies from U.S. manufacturers and supplied them to Russian end-users (Nord-Deutsche Industrieranlagenbau GmbH (NDA GmbH) and Opus Energy Trading LLC (Opus Energy Trading)).</p> <p>UK. Announced ban on trusts services + extended existing restrictions on Belarus on dealing with financial instruments and providing loans to a broader range of transferable securities, money market instruments, loans and credit + prohibited transactions related to the management of reserves as well as of assets of CB Belarus and Belarus MinFin + introduced new financial sanctions in the form of reporting obligations + ban on RF gold and ancillary services, exported from RF after Jul 21, gold exported from RF before 21 July 2022 is not in scope + prohibited investment activities in respect of land located in RF, persons connected with RF, relevant entities, joint ventures, opening a representative office or establishing a branch or subsidiary located in RF. The UK sanctioned 3 entities in response to the "sham referendums" + asset freeze Shahed Aviation Industries (Iran) + prohibition on making loans or credits with a maturity of more than 30 days to persons, other than an individual, connected with Russia or persons owned, directly or indirectly, by a person connected with Russia.</p> <p>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) + sanctioned all associates of 3 defence entities (already sanctioned): Russian Helicopters, Tactical Missiles Corporation, United Shipbuilding Corporation + 61 entities that support the Russian military (inc. 42 SOEs) + 1 collaborationist authority in Kherson + sanctions on Evraz and its subsidiaries, Goznak and 1 more entity) + 7 entities (inc. 3 disinformation outlets)).</p> <p>Canada. Asset freeze and dealing prohibition on 4 RF financial institutions and banks + import ban on RF gold after Aug 6 + 17 entities in the defence sector directly or indirectly supporting the Russian military (inc. 10 SOEs) + 1 defence sector entity + sanctions Salvation Committee for Peace and Order (so-called government body in Kherson) + 1 Russian propaganda channel + 6 entities in energy sector.</p> <p>Japan. Asset freeze 2 RF and 1 Belarus banks + Japan MinFin imposed an embargo on the purchase of Russian gold, ban comes into force on 1 August, 2022 + 9 entities, inc. Rostec and Kalashnikov Concern.</p> <p>EU. de-SWIFT 3 RF banks + 1 Belarus + consider gold as a new sanction target + ban on RF gold and jewelries, exported from RF after July 22 + expanded the scope of the prohibition on accepting deposits + 9 entities (inc. 7 SOEs) + 7 entities, inc. Central Election Commission of Russia and Goznak + asset freeze Shahed Aviation Industries (Iran) + full ban of the provision of crypto-asset wallet, account or custody services to Russians + transaction ban for Russian Maritime Shipping Register).</p> <p>Switzerland. Ban on trusts registered by Russians + de-SWIFT 3 RF and 1 Belarus banks + asset freeze for 9 entities, inc. 5 SOEs + asset freeze on Sberbank + ban on import of Russian gold, including jewellery, after Aug 4 + ban on services of any kind, including financial services, brokering and technical assistance + extended the scope of the ban on accepting deposits + suspended the exchange of tax information with Russia + 7 entities, inc. Central Election Commission of Russia and Goznak) + asset freeze Shahed Aviation Industries (Iran).</p> <p>Norway. De-SWIFT 3 RF banks; restrictive measures for 18 entities that</p>
--	--	--	--

			<p>support RF military and security + de-SWIFT 3 RF banks; restrictive measures for 18 entities that support RF military and security + sanctioned 10 entities, inc. Sberbank, ban on gold and jewellery from August 27, strengthened reporting obligations, expanded the scope of prohibition on accepting deposits, allowed entering into transactions with Russian entities to ensure access to legal, administrative or arbitration matters + 7 entities + additional restrictions on providing services for crypto assets to Russian citizens and entities).</p> <p>Australia. Again announced ban import of Russian gold on Aug 15, previously such ban was announced on Jul 4 + ban on import of gold from Russia after 30 Sep.</p> <p>Poland. + 37 entities on top of EU lists. The UK sanctioned 3 entities in response to the "sham referendums" + asset freeze and ban on access to financial funds and economic assets for Gazprom Export + sanctioned entities that operate in the field of cashless settlements and payments in the fuel industry.</p>
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, but incomplete scope	<p>Lithuania officially recognized RF as a state sponsor and perpetrator of terrorism.</p> <p>USA US Senate approved a resolution calling to recognizing RF as a sponsor of terrorism + a similar bill on recognizing Russia as a state sponsor of terrorism was presented at the US House of Representatives (the lower house of the US Congress + Blinken said that he is not ready to make such a decision + US State Department called RF a "human trafficking" state, a draft Resolution on recognizing Russia's actions in Ukraine as a genocide was registered in the US Senate. On Sep 14, the US senators Richard Blumenthal (Democratic) and Lindsey Graham (Republican) introduced a law according to which Russia can be recognized as a SST.</p> <p>NATO recognised RF as "the most significant and direct threat".</p> <p>Latvia recognized Russia as a sponsor of terrorism.</p> <p>Estonia Estonian Parliament declared Russia a "state sponsor of terrorism, condemned the annexation of the occupied regions of Ukraine and qualified Russia as "the main threat to peace in Europe".</p> <p>Poland Polish Senate recognized the authorities of the Russian Federation as a terrorist regime)</p> <p>EU PACE adopted resolution calling RF a terrorist regime.</p>
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	Slow progress	Russia was banned from participating in current and future FATF projects + from participation in meetings of FATF regional bodies.
4.4.	Recognize political parties as terrorist-supporting organizations	No	-
5. Strengthen Individual Sanctions against these Categories of Individuals			
5.1.	Individuals who hold senior governmental positions	Yes	<p>USA. 29 individuals (Deputy Governors of the CBR, Board members of Bank Otkritie, individuals linked to Bank Otkritie, military personnel, a network of individuals that support Malofeyev's activities, including those related to sanctions evasion and misinformation campaigns + 18, including A.Mordashov and his family + 58 + visa restrictions for 529 officers of the Russian military and Russian nationals + 2 + 13 inc. Kabaeva + visa restrictions on 893 Russian officials + 45, inc. R. Kadyrov and his family members, M.Oreshkin (assistant to Putin), V.Komlev (head of NSPK/Mir + 303 individuals, inc. E.Nabiullina, O.Skorobogatova, A.Novak + visa restrictions for 910 persons, inc. members of the Russian military, Belarusian military officials and Russian proxies in Ukraine + designation for Ochur-Suge Mongush for his alleged involvement & 2 daughters of S.Sobyanin + 1 Russian national and procurement agent (Y. Orekhov) + an indictment charging 5 Russian nationals in connection with a sanctions evasion and money laundering scheme was unsealed in US federal court</p>

			<p>on 19 October</p> <p>Canada. 14 oligarchs, close associates of the Russian regime, and members of their families. 203 senior officials or current or former members of the People's Councils of DPR and LPR. 21 oligarchs + 19 senior defense officials + 14 oligarchs and their family and close associates + 22. Deputy PM of Canada proposed G7 to allow Russian "oligarchs" to pay for leaving the sanctions lists. In response, the G7 countries are considering whether to allow Russia's sanctions oligarchs to pay for the release of sanctions: it is expected that the funds will go to rebuild Ukraine. Neither the Russian oligarchs themselves nor the Ukrainian authorities seem to oppose such an idea, which was proposed after a conversation with the oligarchs + 21 + 13 Belarus MinDefence officials + 43 military staff + 62 russian officials and their family members + 78 individuals.</p> <p>UK. 16 notable individuals, including family members Additionally sanctioned 31 individuals with asset freezes and travel bans. Many of the sanctioned individuals are actors and propagandists, senior executive officers or members of the board of directors of banks, members of the Federation Council. The British National Crime Agency (NCA) has created a special unit whose goal is to "create difficulties" for the Russians under the sanctions. The NCA has already carried out three searches in the homes of people who are relatives or close associates of Russian businessmen who have been sanctioned + 12 incl. Patriarch Kirill + 8 individuals + 7 propagandists + 41 + removed M.Razvozhayev (Governor of Sevastopol) + 1 + in response to the "sham referendums", UK sanctioned 89 individuals (inc. 26 Russian "officials and collaborators" involved in the organisation of the referendums, 4 "oligarchs", 55 board members of Russian state-linked organisations) + freeze & travel ban on E.Nabiullina + asset freeze 3 Iranian military nationals which key persons to supply Iranian kamikaze drones</p> <p>Poland. +15 with entrance ban, 7 of them with assets freeze) + asset freeze sanctions and entry ban against 4 Russian individuals + has complicated employment for Russians - from now entrepreneurs will not be able to employ Russian citizens on simplified terms.</p> <p>Australia. 147 individuals, including, Russian senators, and daughters of Vladimir Putin and Sergei Lavrov. 76 members of the State Duma of the Federal Assembly of the Russian Federation. 34 senior members of the Russian-led movements in Ukrainian regions Donetsk and Luhansk. 4 individuals for supporting the invasion - Aleksandr Chupriyan, Sergei Korolyov, Nikolay Bogdanovsky and Illia Kyva +16, incl. Kabaeva + 28 individuals</p> <p>New Zealand. 170 members of the upper house of RF Federation Council + 5 persons for disinformation and cyber attacks (media/defense). President of Belarus Alexander Lukashenko and 22 military officials of Belarus + 48 Russian officials operating in LDPR) + sanctioned 19 members of President Putin's inner circle and other representatives of the Russian political elite + broad economic sanctions and travel ban against 74 individuals, 24 so-called 'officials' in illegally annexed regions of Ukraine) and extended further sanctions on 15 individuals with strategic or economic relevance who were previously only travel banned + travel ban against A.Abramov (Former Chair and significant shareholder of Evraz plc) and 4 his family members + 15 (inc. 12 military officials).</p> <p>Japan. 8 RF officials + 133 individuals from self-proclaimed "DPR/LPR" + 62 + 58 individuals + 23 individuals directly responsible for the unilateral annexation of Donet, sk, Luhansk, Kherson and Zaporizhzhia</p> <p>EU. Switzerland. Liechtenstein 2 oligarchs (Kurchenko, Prigozhin) + V.Yanukovich and his son O.Yanukovich.</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 Belarus for internal repression and human rights violations) + 47 individuals, inc. Sobyenin (the mayor of Moscow) + decided to suspend visa facilitation agreement + 3 politicians + 30 individuals + financial sanctions, inc. freeze of funds and economic resources against 3 Iranian individuals.</p> <p>Switzerland. 65 RF +12 Belarus + 54 + 3 - 3 + assets freeze and travel ban 30 individuals + financial sanctions and entry and transit ban on 3 Iranian military officials).</p> <p>Norway. 65 + 54 RF individuals + 30 (inc. actors involved in the so-called referendums).</p> <p>Lithuania. Ban on entering the country for P.Kirill.</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>

			Canada. The GoV has introduced a Bill to allow for the imposition of travel bans on family members of sanctioned people + A.Kabaeva USA. Sanctioned Kabayeva. Switzerland. Sanctioned Kabayeva.
5.3.	Members of governing bodies of Russian state-owned and state-controlled enterprises	Yes	UK. Mikhail KLISHIN (an Executive in Bank Rossiya, and a member of the Board of Directors at SOGAZ). EU. Gerhard Schroeder, Matthias Waring and Karin Kneissl left the BoD of Rosneft threatened by sanctions Canada. 35 individuals - senior executives of energy entities (inc. Gazprom) and government officials.
5.4.	Key executives and board members of companies that are subject to US or EU sanctions	Yes	USA. 8 members of the Executive Board of Sberbank and 27 members of Gazprombank Board of Directors. UK. + 2 top-managers of Rosneft were re-listed in sanction lists - Olga Ayziman has been de-listed + 4 individuals (inc. 2 ex-top officials of Evraz).
5.5.	Propagandists	Yes	New Zealand. 5 persons in media and propaganda sphere. Australia. 11 individuals in the Russian media industry who promote the Russian Government's false narratives. Canada. 30 disinformation and propaganda figures + 34 agents of Russian propaganda and their family members, and influential individuals spreading disinformation.
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	Slow progress	Poland: sanctioned Gazprom Export. Canada. sanctioned 3 entities in the energy sector.
6.2.	Key channels of Russian propaganda	Yes	UK. VGTRK, All-Russian public organization society for the promotion of Russian historical development Tsargrad, Analiticheskii tsentr Katekhon OOO, Inforos, Southfront, Strategic culture foundation, Tsargrad OOO USA. JSC Channel One Russia, Television Station Russia-1, and JSC NTV Broadcasting Company. New Zealand. 85th Main Special Service Centre (GTsSS) (SOE), Internet Research Agency, Main Centre for Special Technologies (GTsST). Australia. 12 RF (Internet Research Agency LLC, New Eastern Outlook, Oriental Review, Strategic Culture Foundation, SouthFront, NewsFront, OOO Inforos, United World International, Geopolitica, Odná Rodyna, Journal Kamerton, Analiticheskiv Tsentr Katekhon OOO) EU (3 SOE media + extended prohibition of broadcasting for 3 RF SOE media) Latvia (ban on distribution of 80 audio and audiovisual programs registered in RF). Switzerland (prohibition of advertisement of content produced or broadcast by certain RF SOE media). Canada. 15 entities involved in disinformation activities (inc. 12 SOEs). + 1 channels of Russian propaganda - Zvezda
6.3.	Key state infrastructure and industrial companies	Yes	UK. + 13 SOEs & 4 subsidiaries. <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. + 42 SOEs. <u>Defence:</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 + 70 (SDN List) + 45 RF entities in aerospace, defence and related materiel sector, financial services or technology sectors (sanction lists mostly consist from major RF SOEs and their subsidiaries) + 19 SOEs operating in Russian defence and materiel, technology or electronics sectors and contributing to Russia's defence industrial base + Federation Council of the Federal Assembly of Russia) and 1 Belarusian entity Canada. Zelenodolsk Shipyard JSC, Military Industrial Company LLC, Rosgvardia, UEC Klimov JSC, KAMAZ PTC + 28 defence SOEs + 10

			<p>SOEs in defence + 1 defence sector entity + sanctions Salvation Committee for Peace and Order (so-called government body in Kherson)</p> <p>Australia: PMC Wagner, Industrial-Commercial Private Unitary Enterprise Minotor-Service and OJSC KB Radar-Managing Company of Radar Systems Holding</p> <p>New Zealand. Sanctions on 44 entities that are funding or fuelling the war, including 32 RF SOEs and 3 Belarus SOEs) + JSC Goznak + 2 entities that operate in the Russian defense and related material sector.</p> <p>EU, Switzerland (6 SOEs + 4 owned by SOE on 27% and 3 Belarus SOEs).</p> <p>Norway. 6 RF SOE + 4 owned by SOE on 27% + ban on holding managerial positions in certain companies that are owned or controlled by the Russian state.</p> <p>EU. 7 SOEs + 7 entities, inc. Central Election Commission of Russia and Goznak + ban on EU nationals to hold any posts on the governing bodies of certain Russian state-owned or controlled legal persons, entities or bodies</p> <p>Switzerland: + 5 SOEs + Sberbank + 7 entities, inc. Central Election Commission of Russia and Goznak).</p> <p>Japan: + 9 entities, inc. Rostec and Kalashnikov Concern.</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	Yes	<p>UK. Ban on services exports, including management consulting, accounting and PR services. ICAEW (incl. KPMG, EY, Deloitte and PwC) is asking UK GoV for exceptions to the ban on providing services to Russian companies. Export ban on maritime goods&technology and related services. Extended the list of oil refining goods&technology and the list of energy-related goods banned to export. Export restrictions for Belarus on goods and technology relating to critical industry, quantum computing, oil refining, luxury goods including dual-use good and technology (will block trade of ~£60 mln of goods with Belarus.</p> <p>Ban on export of goods and items of significant importance to the Russian (such as chemicals, materials, machinery goods and electrical appliances with the exception of licensed humanitarian goods) + expanded the scope of existing energy-related goods and services prohibitions + ban on export of accounting, business and management consulting, and public relations services + prohibition of export, supply and delivery, and making available of goods, critical to the functioning of Russia's economy, in par. manufacturing sector + expansion of list of G7 Dependency and Further Goods subject to certain export controls + minor expansion of list of revenue generating goods subject to certain import/purchasing restrictions + prohibition of import and acquisition of gold jewellery (inc. related technical assistance, financial services and funds, and brokering services).</p> <p>USA. Export ban on accounting, trust and corporate formation, and management consulting services (will take effect on June 7, 2022). The U.S. Nuclear Regulatory Commission will suspend general licenses that previously permitted export of source material, special nuclear material, byproduct material, and deuterium to Russia.</p> <p>the US Department of Commerce's Bureau of Industry and Security (BIS) issued an order temporarily denying all export privileges for the Russian cargo aircraft carrier Aviastar due to "ongoing violations" of the United States' export controls on Russia. Temporary ban on export privileges for Belavia, Nordwind Airlines, Pobeda Airlines (owned by Aeroflot) and Siberian Airlines + sanctioned 25 foreign-produced aircraft, that have flown into Russia or Belarus (violated the US export controls).</p> <p>Japan. Bans on exports to 71 specific organizations + ban on export goods that strengthen the industrial base of RF (wood products, steel storage tanks and other similar containers, machinery and electrical equipment components) + prohibited exportation, reexportation, sale, or supply, directly or indirectly, from the United States, or by a US person, wherever located, of quantum computing services to any person located in Russia, and issued a Final Rule imposing additional export controls on Russia and Belarus on industrial and commercial items that could support Russian and Belarusian military aggression + added 4 Iranian cargo aircraft to US BIS list + renewed Temporary Denial Orders (TDOs) issued against Russian airlines Aeroflot, Azur Air and UTair for a further 180 days + issued an order denying the export privileges of Russian airline Ural Airlines + renewed the export denial order against Russian cargo airlines Aviastar-TU for another 180 days).</p> <p>EU. Ban of accounting, pr and consultancy to RF. Exclusions to export ban on luxury goods, allowing for personal use of persons travelling from</p>

			<p>the EU + prohibition to provide Architectural & engineering, IT consultancy, Legal advisory services to the Government of Russia + extension of the list of goods and technology suited for use in aviation or the space industry + EU included ability for EU Member States authorise the sale, supply, transfer or export of the goods and technology which could contribute in particular to the enhancement of Russian industrial capacities + extension of the list of goods that generate significant revenues for Russia and are subject to the import ban + ban on sell, supply, transfer or export goods which could contribute to the enhancement of Russian industrial capacities + export ban on certain coal, lignite, peat and coke products.</p> <p>Canada. Imposed an export ban on 28 services vital for the operation of the oil, gas and chemical industries, including technical, management, accounting and advertising services. Luxury goods (incl. alcohol, tobacco, luxury clothing and accessories, jewelry, kitchenware, and art), export ban on Belarus on luxury goods. Expanded existing measures on the oil, gas and chemical sectors to include industrial manufacturing + withdrew MFN for Russia - a 35% tariff applicable to virtually all goods.</p> <p>Norway. Expansion of list of goods subject to export controls / bans that could help increase RF military and technological capabilities + ban of accounting, pr, consulting services + exclusions to export ban on luxury goods, allowing for personal use of persons travelling from the EU + expansion of list of goods and technologies banned for export that can contribute to Russia's military and technological enhancement + expanded the list of goods&technology for use in oil refining + export restrictions relating to coal, electronic components, technical items in the aviation sector, certain chemicals and firearms + restriction on architectural and engineering services, legal advisory services and IT consultancy services.</p> <p>Switzerland: ban on audit, business and pr consultancy services + export ban for 4 entities (inc. 3 SOEs), extension of lists of goods banned for sale, supply, export, transit and transport to or for use in RF + exclusions to export ban on luxury goods, allowing for personal use of persons travelling from the EU + exclusions to the ban on transactions with SOEs related to the import from or through Russia of petroleum, incl. refined petroleum products, and the import of pharmaceuticals, medical devices and agricultural and foodstuffs, incl. wheat and fertilizers + prohibitions to award public contracts to Russian individuals and entities + amended the list of goods that could help to strengthen the industry prohibited for sale, supply, export, transit and transport to or for use in Russia.</p> <p>Japan. Ban on trust, accounting / audit, and management consulting services + ban on export of goods to 65 RF and 25 Belarus entities in defence + ban on exports to 21 Russian organisations designated as specific organisations + export ban on chemical weapons-related goods to Russia (came into force on the 7 Oct).</p> <p>New Zealand. Extension of the 35% tariff on Russian imports till Mar 2025 + significant expansion of the list of prohibited exports to Russia and Belarus + ban of the export of luxury goods (inc. gold) to Russia (for example, wine, seafood) + ban of the export of oil exploration and oil production products to Russia (came into force on 4 Nov).</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)	Yes	<p>Switzerland. Industrial robots</p> <p>USA. License requirement on exports of hundreds of common industrial and commercial items, including "wood products, industrial engines, boilers, motors, fans, and ventilation equipment, bulldozers, and many other items with industrial and commercial applications." Added new license requirement for exports of sophisticated computer chips to China (incl. Hong Kong) and Russia.</p> <p>Japan. Export ban of cutting-edge goods (quantum computers, 3D printers, etc).</p> <p>UK. Export bans targeted on Russia's manufacturing and heavy machinery sectors announced.</p> <p>Taiwan. Imposed controls on exports of strategic high-tech products in 57 categories to Belarus + ban on export of modern chips to Belarus and RF.</p>
7.4.	Enhance export controls on critical technology systems, components, and materials with potential military dual-use	Yes	<p>UK. <u>Announced</u> an export ban on products used to repress the Ukrainian people (announced but not yet implemented). Products targeted could include interception and monitoring equipment (dual-use products). Export ban on products&technology that could be used to repress people, Export ban on goods and technology relating to chemical and biological weapons. Export ban on jet fuel and fuel additives + 57 entities which acquired (or tried) U.S.-origin items for Russia's military or involvement in the development of quantum computing technologies.</p>

			<p>Canada. Ban on export of goods that could be used by RF production and manufacture of weapons. Ban on export for Belarus on products that could be used in the production and manufacturing of weapons.</p> <p>EU. Expansion of export restrictions for dual-use goods and technology, goods & technologies that can be used in defense and security. Reinforced export controls of dual use goods and advanced technology + added 4 Russian entities to the list of entities subject to export restrictions regarding dual-use goods&technology + extension of the list of restricted goods and technology which might contribute to Russia's military and technological enhancement or to the development of its defence and security sector, including in that list.</p> <p>USA. Export control for 70 entities in RF and 1 in Belarus.</p> <p>Switzerland: extended the list of dual-use goods banned for export by 91 RF entities and 24 Belarus entities.</p> <p>Norway: added 4 Russian entities to the export ban list regarding dual-use goods&technology.</p>
7.5.	Prohibit the export of metals, minerals, and ores	Slow progress	<p>Switzerland. Certain chemical products.</p> <p>UK. Ban on services relating to iron and steel goods.</p>
7.6.	Ban on the export of semi-finished metals, industrial software, shipbuilding technology, and oil storage	No	-
7.7.	Introduce a full embargo on the import from Russia and Belarus of metals, minerals, related manufactured goods, chemical products, plastic and rubber, wood and timber, and precious stones	Yes	<p>UK (silver, wood, high-end; additional 35% import duty, including on palladium, platinum and chemicals is to be imposed + import ban on: revenue generating goods RF origin). Switzerland (lignite and coal, timber, cement, seafood, caviar + extended the list of prohibited for import from RF goods). Canada (luxury goods, incl. alcoholic beverages, seafood, fish and non-industrial diamonds + import ban on Belarus on luxury goods). USA (35% import tariff for 570 categories of RF products worth approximately \$2.3 bn).</p> <p>EU (extended the exemption from the prohibition to engage in transactions with certain SOEs as regards transactions for agro products and the transport of oil to 3rd countries) + introduced the ability for EU Member States to authorise the operation with titanium goods required in the aeronautic industry, for which no alternative supply is available + ban to import into the EU of iron and steel products processed in third countries inc. from Russia (from September 30, 2023) + extension of the ban to import into the EU of iron and steel products processed in third countries inc. from Russia (from September 30, 2023) + introduction of the prohibition on importing or purchasing, as from 30 September 2023, the listed iron and steel products when processed in a third country incorporating listed iron and steel products originating in Russia + ban on the import of Russian finished and semi-finished steel products (come into force due three months).</p> <p>Japan. banned exports to 21 scientific organisations on Russia, banned export of goods related to chemical weapons to Russia</p> <p>New Zealand. Ban of the import of luxury goods of Russian origin into New Zealand (vodka and caviar) + prohibition of the import of energy products of Russian origin (coal, oil, or gas products) into New Zealand.</p> <p>Norway. Import restrictions relating to steel products, machinery and appliances, plastics, vehicles, textiles, footwear, leather, ceramics, certain chemical products and jewellery that is not made of gold</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	Yes	<p>USA. On 16 August, BIS issued an interim rule imposing new export controls on four emerging and foundational technologies. The new rules control two substrates of ultra-wide gap semiconductors; Electric Computer-Aided Design (ECAD) software specially designed for the development of integrated circuits with Gate-All-Around Field-Effect Transistor (GAAFET) structure; and Pressure Gain Combustion (PGC) technology for national security and antiterrorism reasons, which means that exports of the items to most countries will require an export license or the use of a license exception. Release of controlled technology to most foreign nationals will similarly require authorization under U.S. export control rules.</p>
7.9.	Stop the implementation of long-term contracts and issuance of licenses defense industries	Yes	<p>USA. On July 14, the U.S. House of Representatives passed the NDAA for Fiscal Year 2023. One of the proposed amendments is to prohibit the federal government from entering into, extending, or renewing contracts with contractors that conduct business operations in RF during its war against Ukraine, with certain exceptions and exemptions.</p> <p>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 entities were determined as</p>

			<p>'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 entities were added to the Entity List for acquiring and attempting to acquire U.S.-origin items in support of activities contrary to U.S. national security and foreign policy interests. These entities are added to the Entity List with a license requirement for all items subject to the EAR. BIS will review license applications under a policy of denial, and no license exceptions are available for these entities being added. Such measures will effectively cut them off from obtaining U.S.-origin items or foreign-made products derived from certain U.S. technology or software thus further restricting the Russian military's capacity.</p>
8. Impose Secondary Sanctions			
8.1.	<p>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.</p>	Yes	<p>No specific act for secondary sanctions has been adopted. USA plans to include secondary sanctions in its financial crime strategy. G7 discuss secondary sanction for oil) But companies start to fear imposition of secondary sanctions.</p> <p>China. UnionPay backs away from Russian banks on secondary sanctions fears. China's state-owned refineries are reluctant to sign new deals to buy Russian oil. Under the pressure of US sanctions and suppliers, Chinese technology companies are closing down business in Russia without making official statements. According to the Chinese government, China's exports to Russia in Mar fell by a total of 27% compared to Feb. Exports of technological products fell particularly sharply. Thus, the supply of laptops decreased by more than 40%, smartphones - by two thirds, base stations - by 98%. Chinese tech giants such as Lenovo and Xiaomi are publicly refusing to do business with Russia - WSJ. Due to the potential consequences of financial sanctions, fewer shipowners are willing to let their tankers load in RF. Supply of Russian oil to China becomes more and more congested at sea, despite the short distance between countries, Bloomberg.</p> <p>UK. Revolut cannot obtain a banking license in UK due to links with RF: father of co-founder of Revolut Mykola Storonskiy is the top manager of Gazprom's structure.</p> <p>Western lawyers start to refuse working with Russians, while RF itself closes its market for them. According to FT, British lawyers began to refuse to work with the Russians against the background of sanctions.</p> <p>Germany. German Deutsche Bank has stopped working with a number of large Russian banks, which have opened correspondent accounts in euros, writes RBC. Such a decision, in particular, is associated with the risk of secondary sanctions.</p> <p>USA. Plans to include secondary sanctions in its financial crime strategy. They are also considering sanctions against unscrupulous banks that help circumvent sanctions. USA sanctioned 7 RF entities and 6 non-RF entities for evading newly imposed export controls on Russia, these companies provided support to Russia's military and/or defense industrial base. A draft bill on sanctioning China's purchases of oil and other energy supplies from RF was introduced to the Senate. The US Treasury has sent a letter to a number of business associations in Turkey warning them of the risk of being sanctioned if they cooperate with Russians who have already been subject to restrictions -WSJ.</p> <p>After the US warning, banks in Turkey, Kazakhstan, Vietnam, Armenia, Kyrgyz Republic, Sri Lanka started to suspend work with the Russian payment system "Mir". According to Russian media, Mir coverage area in friendly countries collapsed by 90%. Also, Russians face problems with UnionPay (Tourists in Spain, the Czech Republic and Cyprus have encountered problems, Nosto ATMs (Finland) stopped servicing UnionPay cards). BIS warned third-country companies and governments that they could find themselves subject to export controls imposed in response to Russia's war against Ukraine. OFAC confirmed that non-US individuals and legal entities risk exposure to sanctions for providing ammunition and other military goods to Russia or for supporting Russia's military-industrial complex, as well as PMCs or paramilitary groups participating in or otherwise supporting Russia's attack on Ukraine.</p> <p>On Sep 18, Biden warned Chinese leader Xi Jinping about the risk of stopping "American and other" investments in China if Beijing violates sanctions against Russia.</p> <p>On Sep 19, Turkish Airlines refused to train Russian pilots.</p> <p>EU discussion on sanctioning Turkey for assisting RF trade is being born.</p> <p>EU. Norway. The EU broadened the listing criteria on which specific designations can be based – Sanctions could now be imposed on natural or legal persons who facilitate the circumvention of EU sanctions.</p>

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

9.1.	A registry of all international companies still operating in Russia and Belarus	Slow progress	Here can be found a registry of both companies still operating and ones who have already left Russia. The registry is created and administered by Yale School of Management. EU created a special online mechanism through which whistleblowers can report violations of anti-Russian sanction.
9.2.	Obligate legal entities and organizations to disclose information regarding existing business relations with enterprises and their subsidiaries inside and outside of Russia and Belarus	Yes	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. Released warning of increased export control evasion attempts by entities targeted under RF related programs (includes 16 items with a higher risk of evasion attempts. Strengthened enforcement of export controls + established an outbound investment review mechanism to protect U.S. technologies (e.g. semiconductors, batteries, AI etc.) against adversaries like China and RF – notification to the federal government 45 days prior to deal closing is required if the investment involves specified sectors) was proposed, draft has not passed either house of Congress yet. Germany. The Bundestag obliged those who fell under anti-Russian sanctions to report assets in Germany under the threat of imprisonment, DPA reports + is to create a national registry of assets that are subject to sanctions. EU. The European Council has requested the European Parliament's consent to add the violation of sanctions to the list of 'EU crimes'. The European Parliament gave its consent to the draft of the European Council Decision which identifies the violation of EU sanctions as an EU crime. Strengthened reporting requirements - sanctioned people and entities were obliged to declare assets in EU before 1 Sep 2022 or within 6 weeks from the date of listing. Share of information on property of sanctioned persons, entities and bodies between EU Member States and the European Commission. UK. Register of Foreign Legal Entities began to operate from August – now anonymous foreign companies must disclose their ultimate owners if they seek to purchase real estate in the UK or already own it. Switzerland. Federal Council instructed to draft a bill on increased transparency and easier identification of the beneficial owners of legal entities which will include a register for identifying beneficial owners and new obligations the risk-based updating of information on effective ownership.

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. Fast-tracked on 19 individuals and entities 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. Norway adopted the 6th EU sanction package. USA-UK. OFSI and OFAC announced enhanced co-operation on sanctions. REPO is going to accelerate oligarch asset forfeiture efforts in response to Russia's illegal war in Ukraine. Czech Republic approved a legislative proposal to freeze foreign assets in case of human rights violations, support of terrorism or participation in cyber-attacks (needs to pass Senate and then office of the President).
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	<p>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.</p>	<p>Yes (3)</p>	<p>USA and Canada are preparing legislative acts to use sanctioned assets for compensation to Ukraine. USA. The USA doesn't have legal authority to seize CBR assets frozen due to its invasion of Ukraine, but continues talks with partners over ways to make Russia foot the bill for Ukraine's post-war reconstruction are starting. The Baltic countries and Slovakia called on the EU to transfer Russian assets to Ukraine. Canada passed a law for the freezing and confiscation of Russian-sanctioned assets). EU. EU countries should consider using frozen Russian foreign exchange reserves to pay for Ukraine's recovery after the war, Borrell said. EU working on the possibility of using the frozen Russian assets to help Ukraine. EU is ready to create an international platform for the restoration of Ukraine. EU considers it fair and is preparing a legal basis for the frozen RF assets and assets of RF oligarchs. EU is working on "Sanction Berau" launch, Justice Commissioner of EC suggests keeping Russian assets frozen until RF agrees to pay for the reconstruction of Ukraine after the war ends. Germany. Consider the possibility. The Finance Minister does not support the idea of confiscating the personal assets of Russians for Ukraine.</p>
------	--	-----------------------	---