

## **SUMMARY**

**Immediate reaction on Russia's intention to hold referendums and preparation for new pool of sanctions in response.** EU, USA, UK, Canada, Germany, France, Estonia, Latvia, Poland, Netherlands, and Czech Republic immediately condemned the so-called "referendums", and called for new sanctions. On Sep 21, J.Borrel announced that the EU started preparing a new sanctions package against Russia. New package might include sanctions on chemicals, machinery, steel products (€12 billion), ban on the import of diamonds and other luxury items and sanctions against those involved in "referendums" (Politico). New package can de-SWIFT Gazprombank, Alfa-Bank, Rosbank and Tinkoff Bank. Kaspersky, Russian cybersecurity company known for its anti-virus, is likely to fall under sanctions along with other companies/products in the Russian IT sector.

Ireland, Poland and the Baltic countries called for a ban on export of smartphones, radar equipment and laser equipment and other high-tech goods. Germany proposes prohibition for EU citizens to hold senior positions in Russian state-owned companies.

However, the new EU package is unlikely to include an oil price cap, since negotiations are still in process. In its turn, the US plans to announce measures that will be taken against Russia in response to the holding of so-called pseudo-referendums in the temporarily occupied territories of Ukraine this week, while the US Congress seeks the exclusion of the Russian Federation from the UN Security Council.

### **New since September 5:**

**#Oil/Energy** Despite the absence of new sanctions, Russia continues to gradually lose its power on the energy market. The EU suggested a price cap on Russian gas at the level of 50 euros/MWh. Hungary so far opposes the idea. Germany transferred the assets of the German "daughters" of Rosneft to the external management of the Federal Network Agency BNetzA. On the other side, Turkey demanded a 25% reduction in the price of Russian gas and seeks to pay in Turkish lira instead of traditional hard currencies, and expressed desire to buy gas from the US on more favourable terms, while India expressed readiness to join the price cap on Russian oil if supplies from alternative countries - Iran or Venezuela - are secured.

**#Financial** The US imposed sanctions against any individual or entity that operates or has operated in the quantum computing sector of the Russian economy, as well as, sanctioned 13 entities operating in the technology sector of Russian economy (inc. microelectronics and quantum computing sector). Besides, the US sanctioned the Main Intelligence Directorate and 17 entities in military and electronics sectors. Also, US sanctioned 4 Iran-based entities involved in production and transport of unmanned aerial vehicles to RF and added 5 cryptocurrency addresses connected to the Russian neo-Nazi paramilitary group to its sanctions blacklist. Switzerland suspended the exchange of tax information with Russia from September 16. While the Finnish customs officers began to execute previously adopted restrictions and started to withdraw cash euros from the Russians at the exit from Finland. As a result, Russians started burying euros in the woods on the Finnish border. The UK sanctioned 3 entities in response to the "sham referendums".

**#Individual** EU approved suspension of the agreement on visa facilitation with Russia from Sep 12. Switzerland introduces suspension starting Sep 19. Latvia, Lithuania, Estonia and Poland prohibited Russian citizens from entering with tourist Schengen visas issued in any EU country from Sep 19. Also, from Sep 26, Poland closed entrance for Russians with Schengen visas via air and sea checkpoints. In addition, 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. Norway suspended the agreement on a simplified visa regime with Russia. On Sep 23, Finland announced that it would ban Russian citizens from entering the country for tourist purposes on any Schengen visa.

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.

USA sanctioned 45 individuals. including R. Kadyrov and his family members, M.Oreshkin (assistant to Putin), V.Komlev (head of Payment System Mir). German Khan became the first Russia's oligarch, who returned to Russia because of Western sanctions. 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). New Zealand sanctioned 19 members of President Putin's inner circle and other representatives of the Russian political elite.

**#Secondary** The US warnings of secondary sanctions started to work – Mir payment system is gradually collapsing abroad. On Sep 15, the US announced its intention to increase pressure on Turkish banks that have become participants in the National Payment Card System (Mir operator) and sanctioned its head. Four days later, the Turkish bank İşbank and Denizbank officially suspended work with the Russian payment system "Mir", also Russians started reporting difficulties in withdrawing cash from Mir cards in Turkey. Russian media reported that three more countries have already stopped working with Mir – Kazakhstan, Vietnam and Armenia. In addition, Turkish Airlines refused to train Russian pilots under the threat of US sanctions. The US

OFAC warned non-US financial institutions of the risk of being sanctioned for work with Russian Mir.

**#Trade** USA 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. 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. Japan banned exports to 21 scientific organisations in Russia, as well as banned export of goods related to chemical weapons to Russia.

**#SOE** On Sep 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.

**#Terorism** On September 14, the US senators Richard Blumenthal (Democratic) and Lindsey Graham (Republican) introduced a law according to which Russia can be recognized as a state sponsor of terrorism, Reuters).

**No progress in #Transport #Transparency #Coordination & #Reconstruction**

**Lastly, Russian authorities themselves expect serious tightening of Western Sanctions in winter.** As reported by Russian media, Russian authorities plan for: (1) restrictions on the international mobility of Russians - including for the sake of business, science and education; (2) Asian trade partners of Russia and members of the Eurasian Economic Union might join the club of "unfriendly" countries; (3) expansion of secondary sanctions; (4) expansion of prohibited goods and technologies for delivery to Russia; (5) additional restrictions on energy exports. On the other hand, Russian authorities are going to fine Russians for violating counter-sanctions against the West. A draft law that allows the Federal Tax Service and the Federal Customs Service to fine Russians and Russian companies for violating counter-sanctions against the West was developed. CBR will focus on financial institutions. As proposed, Russians and Russian companies will have to pay 20-40% of the operation, which violated the counter-sanctions, and officials - 20-40%, but not more than 30K RUB.

#### Sanctions adopted since April 19 (marked grey - since September 5)

Sanction Type & Progress	Details
<b>1. Expand Oil and Gas Sanctions</b> <b>#Oil/Energy</b>  <b>Progress:</b> Yes, but incomplete scope	<b>EU banned purchase, import or transfer of seaborne crude oil or petroleum products originated in RF</b> (On 3 Aug, the European Commission issued a Notice clarifying that ban covers Russian oil mixed with oil of other origin) + <b>ban on import of RF coal</b> came into force on Aug 1. <b>The EU considers two scenations 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. The European Commission proposed to limit the price of Russian gas by setting it at 50 euros/MWh</b> <b>Norway</b> banned the purchase, import or transfer of oil transported by sea and supporting services. <b>Switzerland</b> banned purchase, import or transfer transit and transport into and through Switzerland of crude oil and petroleum products from RF or originating in RF. <b>G7</b> made an obligation to ban RF's oil imports. <b>G7 agreed to introduce a price cap on Russian oil – from Dec 2022 for oil, and from Feb 2023 - for refined products. Poland</b> terminated the agreement on the supply of RF gas following the announcement made earlier. <b>Bulgaria, Finland, Netherland and Denmark:</b> RF cut off gas supplies due to refusal to pay in rubles. <b>Lithuania</b> cut import of RF's energy, incl. electricity, <b>ban on transit of RF gas to Kaliningrad region. Slovakia</b> committed to reduce dependence on RF gas by 66% starting from Jun 1. <b>Latvia</b> ban on natural gas supplies from RF from Jan 1, 2023, <b>Latvijas Gaze resumed purchase of Russian gas via an unnamed intermediate entity. UK</b> ban on import of RF oil and oil products from 31 Dec, ban on import of RF coal came into force on August 10. <b>Germany</b> (transferred the assets of the German "daughters" of Rosneft to the external management of the Federal Network Agency BNetzA).
<b>2. Increase Transportation and Insurance-Related Sanctions</b> <b>#Transport</b>  <b>Progress:</b> Yes, but incomplete scope	<b>USA</b> 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. <b>Norway</b> 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. <b>Canada</b> sanctioned 1 manufacturer. <b>UK</b> denied Aeroflot, Ural Airlines and Rossiya Airlines selling their landing slots, <b>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</b> 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. <b>EU &amp; 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</b> <b>Switzerland</b> 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. <b>EU + Lithuania</b> (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><b>3. Impose New Financial Sanctions</b> #Financial</p> <p><b>Progress:</b> Yes</p>	<p><b>USA:</b> adds to SDN list Transkapitalbank, Investtradebank, Bitriver AG &amp; 10 RF subsidiaries, Moscow Industrial Bank (SOE) &amp; 10 its subsidiaries. <b>Didn't renew General License 9C. Before 25<sup>th</sup> of May it was allowing use of "frozen" reserves to make payments on debt</b> + 13 associated with Putin's inner circle + 4 connected with Mordashov + <b>ban on purchasing RF securities on the secondary market + extended until 5 Dec 2022 licence allowing for energy financing transactions via RF banks</b> + 70 (SDN List) + 45 RF entities in aerospace, defence and related material sector, financial services or technology sectors (inc. major RF SOEs and their subsidiaries) + asset freeze on Heritage Trust + <b>ban on import of gold from RF</b> - 2 Kazakh subsidiaries of Alfa-Bank were excluded from SDN-list (were bought by Kazakhstan bank) + <b>issued General Licence authorising transactions through Dec 16, 2022 involving Gazprom Germania GmbH</b> + 9 entities (inc. 1 SOE) + 26 entities &amp; 4 subsidiaries (inc. 12 SOEs) in leasing, defense and high-technology sectors to SDN list + <b>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.</b> 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. <b>UK:</b> 10 defence companies asset freeze (inc. 4 SOEs &amp; 1 SOE stake 25+1) &amp; 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 + <b>announced ban on trusts services</b> + 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 + <b>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</b> + 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. <b>Poland:</b> + 37 entities on top of EU lists. The UK sanctioned 3 entities in response to the "sham referendums". <b>Switzerland:</b> ban on trusts registering by Russians + <b>de-SWIFT 3 RF and 1 Belarus banks</b> + 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 + <b>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.</b> <b>New Zealand:</b> 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) + <b>ban on import of RF gold from July 25</b> + 61 entities that support the Russian military (inc. 42 SOEs + 1 collaborationist authority in Kherson). <b>Canada:</b> 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). <b>EU: de-SWIFT 3 RF banks + 1 Belarus;</b> 18 entities that support RF military and security; 8 entities in Belarus + <b>ban on RF gold and jewelries, 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.</b> <b>Japan:</b> 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. <b>Norway:</b> 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. <b>Australia:</b> again announced ban import of Russian gold on Aug 15, previously such ban was announced on Jul 4).</p>
<p><b>4. Designate the RF as a Sponsor of State Terrorism</b> #Terrorism</p> <p><b>Progress:</b> Yes</p>	<p><b>Lithuania</b> officially recognized RF as a state sponsor and perpetrator of terrorism. <b>USA</b> 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 + <b>Blinken said that he is not ready to make such a decision</b> + 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. <b>NATO</b> recognised RF as "the most significant and direct threat". <b>Latvia</b> recognized Russia as a sponsor of terrorism.</p>
<p><b>5. Strengthen Individual Sanctions against these Categories of Individuals</b> #Individual</p>	<p><b>USA:</b> +35 + 18, including A.Mordashov and his family + 58 + visa restrictions for 529 officers of the Russian military and Russian nationals + 2 + <b>13 inc. Kabaeva</b> + visa restrictions on 893 Russian officials + <b>45, inc. R. Kadyrov and his family members, M.Oreshkin (assistant to Putin), V.Komlev (head of NSPK/Mir.</b> <b>EU:</b> 2 + G.Schroeder, M.Waring and K.Kneissl left the BoD of Rosneft threatened by sanctions + <b>65 RF individuals, incl. Kabaeva, P. Kirill was excluded,</b> + 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. <b>UK:</b> + 31 individuals (politicians, propagandists and managers of designated banks +8 +7 propagandists) <b>+12 Putin "family", incl. Kabaeva + 12 incl. Patriarch Kirill.</b> 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</p>



<p><b>Progress:</b> Yes</p>	<p>Russia sanctions regime (positions, official roles and interpretation of being “associated with” a designated person were expanded and clarified + 41 - <b>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).</b> <b>Poland:</b> +15 with entrance ban, 7 of them with assets freeze. <b>New Zealand:</b> +170 + 5 in media and propaganda +23 <b>Belarus senior military leaders incl. Lukashenko + 48</b> Russian officials operating in LDPR + <b>sanctioned 19 members of President Putin’s inner circle and other representatives of the Russian political elite.</b> <b>Australia:</b> +76 +34 +15 +16, incl. Kabaeva. <b>Switzerland:</b> +2 oligarchs +65 RF +12 Belarus, incl. Kabaeva + 54 + V.Yanukovych and his son O.Yanukovych +3 -3. <b>Japan:</b> +141 +62. <b>Liechtenstein:</b> +2. <b>Canada:</b> +14 and adopted bill for the imposition of travel ban on family members of sanctioned people + 22, <b>incl. Kabayeva + 21 + 13</b> 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. <b>Norway:</b> +65 + 54 RF individuals. <b>Lithuania</b> (ban on entering country for P.Kirill). <b>Tourist visa ban for ordinary Russians: EU terminated the Visa Facilitation Agreement from Sep 12; 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. 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. On Sep 23, Finland announced that it would ban Russian citizens from entering the country for tourist purposes on any Schengen visa. 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.</b></p>
<p><b>6. Intensify Sanctions on State-Owned Enterprises</b> #SOE</p> <p><b>Progress:</b> Yes</p>	<p><b>UK:</b> 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 &amp; 4 subsidiaries. <b>USA:</b> 3 SOEs in media, 1 SOE bank + 10 its subsidiaries + 1 state-supported private weapons manufacturer + 71 (SDN List) + 45 RF entities in aerospace, defence and related materiel sector, financial services or technology sectors (sanction lists mostly consist from major RF SOEs and their subsidiaries + 19 SOEs operating in Russian defence and materiel, technology or electronics sectors and contributing to Russia’s defence industrial base. <b>New Zealand:</b> 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. <b>Canada:</b> 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. <b>Australia:</b> RF PMC Wagner + 12 RF propaganda and disinformation SOEs+ 2 Belarus SOEs in defense). <b>EU: 3 SOE media + 6 RF SOEs + 4 owned by SOE on 27% and 3 Belarus SOEs + extended prohibition of broadcasting for 3 RF SOE media + 7 SOEs. Switzerland:</b> 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). <b>Latvia:</b> ban on distribution of 80 audio and audiovisual programs registered in RF, <b>Japan:</b> 1 RF and 1 Belarus SOE banks. <b>Norway</b> (6 RF SOE + 4 owned by SOE on 27%)</p>
<p><b>7. Expand Export Controls and Ban Imports</b> #Trade</p> <p><b>Progress:</b> Yes</p>	<p><b>UK:</b> 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) &amp; export ban to hit &gt; £250 mln (chemicals, plastics, rubber, and machinery) + export ban on: maritime goods&amp;technology and related services, products&amp;technology that could be used to repress people, goods&amp;technology relating to chemical and biological weapons, restricted goods&amp;technology to, or for use in, non-government controlled Ukrainian territory, jet fuel and fuel additives + extended the list of oil refining goods&amp;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 + <b>allowed for humanitarian assistance activity in uncontrolled territories of Donetsk and Luhansk oblast</b> + 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. <b>USA:</b> 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. <b>Switzerland:</b> import - lignite and coal, timber, cement, seafood, caviar; export - industrial robots or certain chemical products + extended the list of <b>dual-use goods banned for export</b> 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 + <b>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</b> + prohibitions to award public contracts to Russian individuals and entities. Amended the list of goods that</p>

	<p>could help to strengthen the industry prohibited for sale, supply, export, transit and transport to or for use in Russia. <b>Japan:</b> 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 + <b>ban on exports to 21 scientific organisations in Russia, as well as banned export of goods related to chemical weapons to Russia.</b> <b>Taiwan:</b> strategic high-tech products in 57 categories to RF + <b>ban on export of modern chips to Belarus and RF.</b> <b>Canada:</b> import - luxury goods; export - luxury goods, goods for weapons manufacture and production + <b>export ban on 28 services</b> 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. <b>EU:</b> expansion of export restrictions for dual-use goods&amp;technology, goods&amp;technology that can be used in defense and security + ban of accounting, pr and consultancy to RF + <b>exclusions to export ban on luxury goods, allowing for personal use of persons travelling from the EU</b> + 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&amp;technology + <b>extended the exemption from the prohibition to engage in transactions with certain SOEs as regards transactions for agrol products and the transport of oil to 3rd countries.</b> <b>Norway:</b> 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&amp;technology + <b>exclusions to export ban on luxury goods, allowing for personal use of persons travelling from the EU</b> + 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&amp;technology for use in oil refining.</p>
<p><b>8. Impose Secondary Sanctions</b> #Secondary</p> <p><b>Progress:</b> Yes, but slow</p>	<p><b>No specific document adopted.</b> <b>USA</b> plans to include secondary sanctions in its financial crime strategy, considers sanctions against unscrupulous banks that help circumvent sanctions. <b>USA</b> 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. <b>The US passed a legislative amendment which allows India to buy a missile defence system from Russia.</b> 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. As a result of the US Turkish bank İşbank and Denizbank officially suspending work with the Russian payment system "Mir", Russians started to declare difficulties in withdrawing cash from Mir cards in Turkey. According to Russian media three more countries have already stopped working with Mir – Kazakhstan, Vietnam and Armenia. Also, the US OFAC warned non-US financial institutions for risk being sanctioned due to work with russian Mir. <b>EU discussion on sanctioning Turkey for assisting RF trade.</b> <b>G7</b> discusses secondary sanctions for oil.</p>
<p><b>9. Increase Transparency to Discourage Trade with and Investment in RF</b> #Transparency</p> <p><b>Progress:</b> Yes</p>	<p><b>USA:</b> 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, <b>draft has not passed either house of Congress yet.</b> <b>Germany:</b> obliged sanctioned persons to report property in Germany under the threat of imprisonment <b>is to create a national registry of assets that are subject to sanctions.</b> <b>EU:</b> 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. <b>UK:</b> 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.</p>
<p><b>10. Deepen Coordination of Sanctions and Link Sanctions Relief to Peace &amp; Reconstruction</b> #Coordinations #Reconstruction <b>Progress:</b> Yes</p>	<p><b>USA</b> and <b>Canada</b> are preparing legislative acts to use sanctioned assets for compensation to Ukraine. <b>USA:</b> working on policy proposals and legal changes required to move forward with the strategy. <b>EU:</b> 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 + <b>EU</b> 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. <b>Baltic countries and Slovakia</b> called on the EU to transfer RF assets to Ukraine. <b>Germany:</b> Consider the possibility. <b>UK and EU</b> reached an agreement to enact a co-ordinated ban on insuring ships carrying Russian oil. <b>UK.</b> 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. <b>Switzerland</b> adopts new EU sanctions and replicates the EU lists of sanctioned individuals and entities. <b>Canada (adopted a law allowing freezing and confiscation of Russian-sanctioned assets).</b> <b>Norway</b> adopted the 6th EU sanction package.</p>

#### Colour legend

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

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

## 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.

**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 commodities<sup>1</sup>, 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:

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<sup>1</sup> 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.



- 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.

**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 21 September, the EU Commission updated its Russia sanctions FAQs on the import, purchase and transfer of listed goods to confirm that certain listed goods may be transferred to third countries.

The EU Commission stressed that "the Union is committed to avoiding that its sanctions impact food and energy security of third countries around the globe, in particular of the least developed ones. In light of this commitment, ... the transfer to third countries of certain goods listed in Annex XXI and XXII should be allowed "to combat food and energy insecurity around the world" and "in order to avoid any potential negative consequences therefore" in third countries. This applies to the transfer 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) of the following goods:

- 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)."

**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 protection<sup>2</sup> ("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 (the EU).

<sup>2</sup> 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.

## COUNTER SANCTIONS

**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.

## 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.

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

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

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

**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.

**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 September 5. 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.

**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.

Members	EU	UK	USA
Anton Siluanov (RF Minister of Finance) <a href="#">NAZK</a>	Not covered	Not covered	

<b>Denis Manturov</b> (RF Minister of Industry and Trade) <a href="#">NAZK</a>	Not covered	Not covered	Not covered
<b>Alexei Kryvoruchko</b> (RF Deputy Minister of Defence) <a href="#">NAZK</a>	Not covered		
<b>Yuriy Borisov</b> (RF Deputy Prime Minister) <a href="#">NAZK</a>	Not covered	Not covered	Not covered
<b>Alexey Likhachev</b> (Director General of Rosatom); <a href="#">NAZK</a>	Not covered	Not covered	Not covered
<b>Maksym Oreshkin</b> (economic adviser to Putin) <a href="#">NAZK</a>	Not covered		15.09.2022
<b>Ihor Artem'ev</b> (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), **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, Latvian Gas resumed purchase of Russian gas via an unnamed intermediate entity), **Slovakia** (from Jun 1, reduced its dependence on Russian gas supplies by 66%). **Finland, Netherlands and Denmark** (RF cut off gas supplies after refusal to pay in rubles), **Norway** (ban on purchase, import or transfer of oil transported by sea and supporting services). **UK** (ban on import of RF oil and oil products from 31 Dec, ban on import of RF coal came into force on August 10). **Germany** (transferred the assets of the German “daughters” of Rosneft to the external management of the Federal Network Agency BNetzA).

**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.

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-origin 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 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.

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

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

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

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.

**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 m<sup>3</sup>.

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.

**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.**

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

**Switzerland.** Switzerland prohibited the purchase, import or transfer transit and transport into and through Switzerland of crude oil and petroleum products from Russia or originating in Russia. This embargo will be brought into force progressively, as is the case in the EU, taking full effect by the beginning of 2023 following a number of transitional periods. Switzerland imports

Russian petroleum products from European member states; in order to take into account the complex transitional periods foreseen by the EU, exceptions are envisaged in Switzerland for Russian oil and petroleum products that were legally imported into an EU member state prior to the new measures.

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

**Hungary.** Hungary has agreed with Gazprom to supply another 5.7 mln m<sup>3</sup> 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.

## 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), **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), **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).

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



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

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

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

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

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

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

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

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

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

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 6<sup>th</sup> 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 reported<sup>3</sup> 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,**

<sup>3</sup> <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.

**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.** 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.

### 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. **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"), **Poland** (+ 37 entities on top of EU lists), **Switzerland** (ban on trusts registering by Russians + de-SWIFT 3 RF and 1 Belarus banks + sanctioned 18 RF and 8 Belarus entities connected with Armed Forces of Russian and GoV + ban on audit, business and pr consultancy services + 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), **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 +61 entities that support the Russian military (inc. 42 SOEs) + 1 collaborationist authority in Kherson), **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), **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)**), **Japan** (asset freeze 2 RF and 1 Belarus banks + asset freeze for 6 RF entities + Japan MinFin imposed an embargo on the purchase of Russian gold on July 5, comes into force on 1 Aug, 2022). **Norway** (de-SWIFT 3 RF banks; restrictive measures for 18 entities that support RF military and security + 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), **Australia** (**again announced ban import of Russian gold on Aug 15, previously such ban was announced on Jul 4**).

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

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

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.

<sup>4</sup> (JSC GARNIZON (SOE), JSC OBORONENERGO (SOE), OJSC Ulyanovsk Automobile Plant (UAZ), JSC VOENTELECOM (VOYENTELEKOM) (SOE), JSC VOENTORG (SOE), VOENTEKSTILFROM LLC, INDEPENDENT INSURANCE GROUP, PJSC KAMAZ alias KAMAZ PTC (SOE), JSC KRONSHADT 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.



On 3 June, the EU Council imposed restrictive measures (freeze of funds or economic resources and prohibition on the making available of certain funds or economic resources) on 8 legal entities (including 3 SOE) involved in the continuation of internal repression and human rights violations in Belarus<sup>5</sup>.

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

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

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

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

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

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

**USA.** The US OFAC designated 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 subsidiaries<sup>6</sup>.

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

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

OFAC also designated Imperial Yachts SARL - a yacht brokerage that offers a variety of services relating to superyachts, including their design, order, charter, and management. Imperial Yachts provides yacht-related services to Russia's elites,

<sup>5</sup> OJSC "Belaruskali" (private), JSC "Belarusian Potash Company" (private), "Inter Tobacco" LLC (private), OJSC "Naftan" (private), OJSC "Grodno Tobacco Factory Neman" (SOE), Beltamozhservice (SOE), OJSC "Managing Company of Holding 'Belkommunmash'" (private), BelteleRadio Company / National State Television and Radio Company of the Republic of Belarus (SOE).

<sup>6</sup> 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, Ekspluatiruyushchaya Kompaniya Tsentr OOO

including those in President Putin's inner circle. Imperial Yachts conducts business with U.S.-designated oligarchs, including through providing management services to at least one yacht linked to an OFAC-designated individual.

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

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

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

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

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

Additionally FAQ 1054 clarifies that the three Executive Orders do not prohibit the sale or divestment of - or facilitating the sale or divestment of - debt or equity securities issued by an entity in Russia to a nonUS person. The FAQ also states that a US person may continue to hold such previously acquired securities, and to convert depositary receipts to underlying local shares of non-sanctioned Russian issuers.

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

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

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 Ferit 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 Servisez (wholesale business), Sportivno-ozdorovitelnyi 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 avtocentr Kamaz (official dealer with the authority to sell Kamaz vehicles as well as Nefaz buses), Leasing company Kamaz Incorporated (specializes in selling Kamaz vehicles), MIKAM Holdings Limited (investment holding company registered in Cyprus), NEFAZ Publicly traded company (manufactures buses, trailers, and other largest vehicles for Kamaz), Non-state pension fund First Industrial Alliance (pension fund provider), PJSC Tutaev motor plant (manufactures internal combustion engines), Chelnyvodokanal OOO (operates the on-site water supply facilities of Kamaz).
- several Russian companies in the information-security sector, including JSC Concern Avtomatika, and JSC Information Security Reform;
- **Advanced Research Foundation (FPI)**, defense research organization;
- **EMC SUD Limited** (legal entity registered in Hong Kong used by KOKOREV, Alexander Aleksandrovich as part of his network and for procurement for or on behalf of the FSB).
- **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 Arzamas 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** (manufactures Russia's air defense systems), **OJSC Start Scientific and Production Enterprise Named After A. Yaskin** (produces and services missiles, including for Russia's Navy), **OJSC Khabarovsk Radio Engineering Plant** (specializes in activities related to Russia's anti-aircraft missile systems), **JSC Vyatskoye Mashinostroitelnoye Predpriyatiye Avitek** (manufactures missiles and components for Russia's air defense systems), **JSC All-Russian Research Institute Signal** (develops equipment for Russia's Armed Forces, including combat robots and unmanned ground vehicles), **JSC Radiopribor** (manufactures and installs electronic warfare systems on Russia's military aircraft), **PJSC Vypel Interstate Corporation** (involved in the development of Russia's missile defense systems),

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

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

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

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

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 Transkontinental, 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 Sbornik; 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 E.O. 14024 that authorizes the imposition of economic sanctions against any individual or entity that 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.

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 Department of State imposed sanctions on 31 entities operating in Russian defence and materiel, technology or electronics sectors and contributing to Russia’s defense industrial base;

- the Main Intelligence Directorate (GRU)<sup>7</sup> (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
- 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

<sup>7</sup> 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 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). Safiran 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.

**UK.** Added 10<sup>8</sup> defense companies to the sanctions list of asset freeze targets.

On May 4, UK additionally sanctioned 32 entities<sup>9</sup> (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.

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.

<sup>8</sup> 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.

<sup>9</sup> 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 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).

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

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

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

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) (manufactures 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 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 Vyatskoye Mashinostroitelnoye 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 Konstrukorskoye 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).

**Poland.** Introduced Poland-specific list of designated parties subject to measures not covered by EU Regulations 765/2014 and 269/2014, covering 37 entities<sup>10</sup>. In addition to the measures under EU legislation related to freezing assets and suspension of transactions, the Act also foresees the possibility of exclusion from public procurement proceedings.

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

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

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

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

<sup>10</sup> ACRON PAO, AXIOMA DR IT, BARTER COAL, BELOIL Polska, EUROCHEM POLSKA, „FABERLIC BALTIJA SIA” Sp. z o.o., ODDZIAŁ W POLSCE, FABERLIC EUROPE, GO SPORT POLSKA, IRL Polska, KAMAZ, KASPERSKY (KASPERSKY LAB), KASPERSKY Lab Polska, Kaspersky Store, K Dystrybucja, KTK Polska, MAGA DYSTRYBUCJA 2, MAGA FOODS, MEDMIX POLAND (do 3.03.2022 r. – SULZER MIXPAC POLAND), NEGRINIO LIMITED, NORICA HOLDING Sàrl, Novatek Green Energy, OAO NOVATEK, OAO PhosAgro, Opansa Enterprises Limited, PAO Gazprom, PhosAgro POLSKA, PHOSINT LIMITED, Rainbee Holdings Limited, SEVERSTAL DISTRIBUTION, SIA SEVERSTAL DISTRIBUTION, Oddział w Polsce, SUEK Polska, SULZER PUMPS WASTEWATER POLAND, SULZER TURBO SERVICES POLAND, WILDBERRIES, „1C-POLAND”.

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.

**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.

**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 Ukraine<sup>11</sup>.

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 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

<sup>11</sup> SOE: Pskov Distance Communication Plant, Radiozavod JSC, Razryad JSC, Research Production Association Mars, Ryazan Radio-Plant, Scientific Production Center Vigstar JSC, Scientific Production Enterprise "Radiosviyaz", 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, Ravenstvservice 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, Elektrotlyaga 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

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, defence sector entity.

**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.

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

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

On 15 August, Australia's Minister of Foreign Affairs again announced plans to designate gold as an "import sanctioned good" for Russia. The proposed amendment would prohibit the import of gold alongside oil, refined petroleum products, natural gas, coal, and other energy products from Russia.

According to the amendment's exposure draft, the definition of gold will correspond to the Combined Australian Customs Tariff Nomenclature and Statistical Classification code 7108 – "as unwrought or in semi-manufactured forms, or in powder form."

**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. **NATO** (recognised RF as "the most significant and direct threat"), **Latvia** (recognized Russia as a sponsor of terrorism)

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

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).

**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, Latvia Saeima recognized Russia as a sponsor of terrorism.

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

**USA** (+35 + 18 officials, SOEs management and oligarchs, including A.Mordashov and his family + 58 + visa restrictions for 529 officers of the Russian military and Russian nationals + 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)**), **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), **EU** (2 + Gerhard Schroeder, Karin Kneisl and Matthias Waring left board on directors of Rosneft due to threat of sanctioning by EU + 65 RF individuals responsible for atrocities in Bucha and Mariupol, Alina Kabayeva, **Patriarch Kirill was excluded**, + 12 individuals in Belarus for internal repression and human rights violations + 47 individuals, inc. Sobyenin (the mayor of Moscow) + V.Yanukovych and his son O.Yanukovych + decided to suspend visa facilitation agreement + 3 politicians) **-3 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), **Poland** (incl. Putin's, Lavrov's daughters, Nabiullina), **New Zealand** (+170 + 5 in media and propaganda +23 (Belarus military officials and Lukashenko + 48 Russian officials operating in LDPR + financial and travel sanctions ion **19 members of President Putin's** inner circle and other representatives of the Russian political elite), **Australia** (+76, +34, +15 +16, incl. Kabaeva), **Switzerland** (+2 +65 RF +12 Belarus + 54 + V.Yanukovych and his son O.Yanukovych +3 **-3 delisted**), **Japan** (+141+62), **Liechtenstein** (2), **Norway** (65 + 54 RF individuals), **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; **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. **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. On Sep 23, **Finland** announced that it would ban Russian citizens from entering the country for tourist purposes on any Schengen visa. 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.

Since 2014, Russian government officials, businessmen and propagandists are currently under Western sanctions: UK sanctioned 1,365 persons, Canada - 1,372, the EU - 1,236, Switzerland - 1,232, Australia - 1,008, USA - 987, Japan - 837, New Zealand - 734; Ukraine - 4,025 (NAZK).

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

**New personal sanctions – Apr 19, 2022 – Sep 20, 2022**

Country	Number of individuals sanctioned
USA	+157+45
UK	+153-2+1+89
EU	+131-3
Canada	+449
Switzerland	+123+3-3
Australia	+288
Japan	+203
Poland	+15
Liechtenstein	+2
New Zealand	+241+19
Norway	+119

**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.

**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 oligarchs<sup>12</sup>.

On 28 June, OFAC designated 29 Russian individuals<sup>13</sup> and State Department 29 Russian individuals as SDNs<sup>14</sup>.

<sup>12</sup> Yury Slyusar, the President of United Aircraft Corporation (UAC), a Russian state-owned company and major supplier of aircraft to Russia's military, and one of the leading actors in Russia's industry and defense sector with close ties to RF GoV; Vitaly Savelyev, the Minister of Transport of Russia, a member of the Board of Directors of Russian Railways; the Chairman of the Board of Directors of Aeroflot; Maxim Reshetnikov, the Minister of Economic Development of Russia, member of the boards of sanctioned Russian entities, including VTB Bank, VEB.RF, and Russian Railways; Irek Envarovich Faizullin, the Minister of Construction, Housing and Utilities of Russia and a member of the board of directors of Russian Railways; Dmitriy Yuryevich Grigorenko, the Deputy Prime Minister and Chief of the Government Staff of Russia; Sergey Nikolaevich GORKOV (General Director - Chairman of the Board of JSC "Rosgeologiya"), Dmitriy Yuryevich GRIGORENKO (Deputy Prime Minister of Russia – Chief of the Government Staff), God Semenovich NISANOV (Russian billionaire and real estate tycoon), Evgeny Grigorievich NOVITSKY (Russian entrepreneur, former president of the AFK Sistema holding (1995-2005); Board member of RTI Systems defense concern).

<sup>13</sup> **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).

<sup>14</sup> **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, BROVOKO, Vasily Yuryevich, EVTUSHENKO, Oleg Nikolaevich, KIRYANOV, Victor Nikolayevich, KOPTEV, Yury Nikolayevich, LELIKOV, Dmitry Yuryevich, LITVIN, Vladimir Zalmanovich, NAZAROV, Aleksander Yuryevich, OSIN, Pavel Mikhaylovich, 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, KONDRAKHINA, Melaniya Andreyevna, KONDRAKHIN, Leontiy Andreyevich, SERDYUKOV, Sergey Anatolevich, SERDYUKOVA, Natalya Anatolevna, VASILEVA, Evgeniya Nikolaevna;



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.

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 Gennadyevich<sup>15</sup> (General Director of Russia's Deposit Insurance Agency, a state-owned entity that the Kremlin uses for liquidating financial institutions and accessing foreign assets);
- Russian Presidential Commissioner for Children's Rights - LVOVA-BELOVA Maria Alexeyevna;
- **Leader of Russia's Republic of Chechnya his immediate family members** - KADYROV, Ramzan Akhmatovich<sup>16</sup>; KADYROVA Medni Musaevna, KHAZUEVA Fatima Shaykhievna, 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);
- **Leaders of neo-Nazi paramilitary group Task Force Rusich** - MILCHAKOV Alexey Yurevich and PETROVSKIY Yan Igorevich.

<sup>15</sup> 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.

<sup>16</sup> 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.

- **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 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 Vitaliiyovych (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 Mykhailovych (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 Valeriyovych (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 Oleksandrovych (member of the military-civilian administration in the Kherson Region), KOBETS Oleksandr Yuriyovych (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 Mykolayovych (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 Yuriyovych (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 Andriyovych (deputy head of the Russia-controlled military-civilian administration in the Zaporizhzhia Region).

**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 Nabiullina<sup>17</sup>. 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 families<sup>18</sup>. On 6 May, Canada added to list an additional 19 individuals who are senior defense officials<sup>19</sup>. 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 Ukraine<sup>20</sup>. 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 bans<sup>21</sup>. 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

<sup>17</sup> Petr Olegovich Aven, Oleg Viktorovich Boyko, Mikhail Maratovich Fridman, Mikhail Safarbekovich Gutseriev, Igor Viktorovich Makarov, Elvira Sakhripzadovna Nabiullina, Sergey Roldugin, Alexander Torshin, German Borisovich Khan, Alexander Ponomarenko, Katerina Vladimirovna Tikhonova, Maria Vladimirovna Vorontsova, Maria Aleksandrovna Lavrova, Yekaterina Sergeevna Vinokurova.

<sup>18</sup> Vagit Yusufovich ALEKPEROV, Alexander Dmitrievich PUMPYANSKY, Sergey Alexandrovich KULIKOV, Andrey Andreevich GUR'YEV, Dmitri Alekseevich LEBEDEV, Viktor Filippovich RASHNIKOV, Alexey Viktorovich KUZMICH'EV, 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 Yuriyevich PECHATNIKOV, Olga GOLODETS, Bella Ilyinichna ZLATKIS, Stanislav Konstantinovich KUZNETSOV, Boris Viktorovich OBNOSOV

<sup>19</sup> Andrey Sergeevich IVANAYEV, Igor Yuriyevich KOROTCHENKO, Andrey Ivanovich SYCHEVOY, Tatiana Viktorovna SHEVTSOVA, Maria Vladimirovna KITAYEVA, Rossiya Vladimirovna MARKOVSKAYA, Andrey Nikolaevich SERDYUKOV, Valery Ivanovich FLYUSTIKOV, Aleksander Pavlovich LAPIN, Ruslan Khadzhismelovich TSALIKOV, Gennady Valeryevich ZHIDKO, Sergey Analolievich KOGOGIN, Dmitry Evgenievich SHUGAEV, Azatbek Asanbekovich OMURBEKOV, Yunus-Bek Bamatgireyevich YEVKUROV, Sharip Sultanovich DELIMKHANOV, Alimbek Sultanovich DELIMKHANOV, Amkhad Sultanovich DELIMKHANOV

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

<sup>21</sup> 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 members<sup>22</sup>.

On June 27, Canada sanctioned 6 individuals<sup>23</sup> who are Russian senior defence officials, 13 senior officials of the Ministry of Defence of Belarus<sup>24</sup> 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 proxies<sup>25</sup>.

On 7 July, Canada sanctioned 30 individuals who are Russian disinformation and propaganda figures<sup>26</sup>.

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 Ovsepovich 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 LADYZHENSKII (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 NADEZHDIN (Lieutenant colonel); Viktor Vladimirovich FILIPPOV (Lieutenant colonel); Faik Sameddin ogly 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 Gennadiyevich 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), Oleg Alekseyevich NIKOLAYEV (Head of Chuvashia), Alexander Viktorovich USS (Governor of Krasnoyarsk Territory), Andrei Alexandrovich TRAVNIKOV (Governor of Novosibirsk Region), Roman Viktorovich

<sup>22</sup> 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 Aleksandrovich 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).

<sup>23</sup> Adam Sultanovich DELIMKHANOV, Mikhail Eduardovich OSEEVSKY, Mikhail Igorevich POLUBOYARINOV, Sergei Alexandrovich MARKOV, Sergey Alexandrovich PAHOMOV, Denis Gennadiyevich POPOV.

<sup>24</sup> Dzmitry Valeryevich PAULICHENKA, Yury Leonidovich SIVAKOV, Viktor Uladzimiravich SHEIMAN, Andrii SICH, Igor Viktorovich PETRISHENKO, Yury Viktorovich NAZAROV, Roman Aleksandrovich GOLOVCHENKO, Vladimir Vladimirovich MAKEY, Yury Mikhailovich SELIVERSTOV, Aleksander Viktorovich CHERVYAKOV, Viktor Mikhailovich KARANKEVICH, Uladzimir Borisovich PIARTSOU, Kanstantsin Konstantinovich SHULHAN.

<sup>25</sup> 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 Vitaliyevich BALITSKY, Serhiy Mykolayovych CHEREVKO, Ihor Ihorovych SEMENCHEV, Georgiy Dmytrovych KALENOV, Dmytro Mikhailovich SAVLUCHENKO, Pavel Igorevich FILIPCHUK, Vladimir Valeryevich ROGOV.

<sup>26</sup> Alexander Yevgenievich LEBEDEV, Aleksei Viktorovich PIMANOV, Andrei Vitaliyevich ILYASHENKO, Armen Sumbatovich GASPARYAN, Artyom Grigoryevich SHEYNIN, Dmitry Yevgenievich KULIKOV, Maksut Igorevich SHADAYEV, Vladimir Nikolayevich SONGORKIN, 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 Oganovich KHUDAVERDYAN, Andrei Yurievich LIPOV, Vladimir Viktorovich LOGUNOV, Oleg Aleksandrovich TERLYAKOV, Vadim Alekseevich SUBBOTIN, Milosh Eduardovich VAGNER, Petr AKOPOV, Ekaterina Sergeevna ANDREEVA.

- 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 - 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),

**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 ISHCENKO (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), Dmitry 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 businessmen against whom sanctions were imposed earlier** - Stanislav Sergeyevich CHEMEZOV (son of Sergei Chemezov, a member of the Supreme Council of “United Russia” and chairman of the Rostec conglomerate), Maya Nikolaevna BOLOTOVA (born TOKAREVA) (daughter of Nikolay Tokarev, the CEO of Transneft), Pavel EZOUBOV (cousin of Oleg Deripaska, who owns the Russian Machines industrial conglomerate which includes the Military Industrial Company);
- **4 members of the nationalist motorcycle club Nightwolves MC** - Alexander Sergeyevich ZALDOSTANOV (the leader and founder), Andrey BOBROVSKIY, Jozef HAMBÁLEK (President of the Europe chapter of the club based in Slovakia), Alexei WEITZ;
- **1 businessperson** - Andrey Anatolyevich KOZITSYN (co-founder and CEO of Ural Mining Metallurgical Company);
- **2 actors** - Sergey 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 individuals<sup>27</sup> 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 Yanukovich and his son Oleksandr Yanukovich 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 Yanukovich has been involved in operations to replace Ukrainian President Zelensky with himself and Oleksandr Yanukovich 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 Ponomarev.

**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.

**UK.** On 21 April, added 16 individuals<sup>28</sup> 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 "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 individuals<sup>29</sup> with asset freezes and travel bans. Many of sanctioned individuals are actors from mainstream media organisations<sup>30</sup>.

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 Kabaeva<sup>31</sup>.

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.

<sup>27</sup> 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).

<sup>28</sup> Belozyorov, Oleg Valentinovich (Chief Executive Officer Of Russian Railways), Bogdanovsky, Nikolay Vasilevich (First Deputy Chief Of The General Staff Of The Armed Forces Of Russia), Chupriyan, Aleksandr Petrovich, Flyustikov, Valery (Commander Of The Special Operations Forces), Khan, Anzhelika (Wife Of German Borisovich Khan, A Prominent Russian Businessman), Kiva, Ilya (A Former Member Of The Ukrainian Parliament), Konashenkov, Igor Yevgenyevich, Korolyov, Sergei Borisovich, Korotchenko, Igor Yurievich ((1) Chairman Of The Public Council Under The Ministry Of Defence Of The Russian Federation (2) Editor-In Chief Of The National Defence Magazine (3) Director Of The Centre For Analysis Of The World Arms Trade (4) Military Rank - Reserve Colonel), Kuprin, Anton Valerevich (Captain Of The Frigate "Admiral Essen" Of The Russian Black Sea Fleet), Obnosov, Boris Viktorovich (Linked To: Tactical Missiles Corporation Jsc), Omurbekov, Azatbek (Commanding Officer Of The Russian 64th Separate Motorised Rifle Brigade), Pimanov, Aleksei Viktorovich ((1) Director General Of Managing Organisation Creative Association Red Star (2) Head Of The Krasnaya Zvezda Media Holding), Romanov, Arkadiy Yurevich, Serdyukov, Andrey Nikolayevich (Commander Airborne Forces Of The Russian Federation), Volozhinsky, Andrei Olgertovich )

<sup>29</sup> (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, Iliyus Umakhanov, Putin's aide Maxim Oreshkin).

<sup>30</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1073104/Notice\\_Russia\\_040522.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1073104/Notice_Russia_040522.pdf)

<sup>31</sup> 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).

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 Kirill<sup>32</sup>.

On 29 June, OFSI added 8 individuals to its RF sanctions list<sup>33</sup>.

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 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

<sup>32</sup> Vladimir Mikhailovich Gundyayev (aka Patriarch Kirill), head of the Russian Orthodox Church; Maria Alekseevna Lvova-Belova, Russian Children's Rights Commissioner; Alexey Ivanovich Isaykin, President and Board Member of Volga-Dnepr Group; Sergey Vladimirovich Savostyanov, deputy of the Moscow city Dum;a Serhiy Mikolayovich Cherevko, Tetiana Kuzmich, Volodymyr Vasilyovich Saldo and Kyrlo Sergiyovich Stremousov, Members of the 'Salvation Committee for Peace and Order' in Kherson; and Viacheslav Sergeevich Klobukov, Aleksandr Leonidovich Shershnev, Aleksandr Viktorovich Vins and Andrei Boevich Kurbanov, Military Colonels of the 64th Separate Motorised Rifle Brigade.

<sup>33</sup> 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), TSIVELEVA 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)

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 Ihorovych (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, Aleksandr Yuryevich (Head of Kherson Military-Civilian Administration), KOLTISOV, 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 Yuriovich (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; BARHUGOV, 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), ZLATKIS, Bella Ilyinichna (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 Georgievich, 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).

**Poland.** Poland-specific list of designated parties subject to measures not covered by EU Regulations 765/2014 and 269/2014 covered **15 individuals**<sup>34</sup>. These individuals are added to the list of foreigners whose stay in Poland is undesirable. For 7 of them<sup>35</sup> funds and economic resources are completely frozen, ban to provide, directly or indirectly, and funds or economic resources is imposed. In addition to the EU measures legislation related to freezing assets and suspension of transactions, the Act also foresees the entry on the list of foreigners whose residence in the territory of Poland is undesirable.

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

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

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 Yuri 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)), Tsvilev 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

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

<sup>35</sup> Bakalczuk Tatiana, Gucerjew Sait-Salam, Kaspierki Jewgienij, Melniczenko Aleksandra, Nuraliev Boris, Raszdow Timur, Vekselberg Victor.

Legislative Assembly of the Sverdlovsk Region and Deputy Secretary of the Sverdlovsk Regional Branch of "United Russia", Burlachko Yuri 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), Plokhov 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** - Balytskiy 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 Yurievych (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 businessmen against whom sanctions were imposed earlier** - 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 Sanction list: Zhirinovskiy Vladimir, Narzieva Saodat, Ayziman Olga. The measures come into force on 27 September 2022.

**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 Kabaeva<sup>36</sup>.

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.

**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 Belarus<sup>37</sup>.

On 23 August, New Zealand added 48 Russian officials operating in the so-called LDPR to its Russia sanctions list<sup>38</sup>.

On 27 September, Foreign Minister announced financial and travel sanctions imposed on **19 members of President Putin’s**

<sup>36</sup> 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 Klishin (Executive of Bank Rossiya, and a member of the Board of Directors at SOGAZ), Sergey Nikolayevich Gorkov (Banker, lawyer and Director-General of Rosegeologia), God Semenovich Nisanov (Property developer and chairman of Kievskaya Ploschad Group of Companies), Evgeny Grigorievich Novitsky (Former head of Sistema and Chairman of Radiotechnical and Information Systems Concern (RTI)), Grigory Viktorovich Berezkin (Chairman of the Board of Directors of ESN Group), Igor Albertovich Kesaev (Owner and President of Mercury Group), Irek Envarovich Faizullin (Minister for Construction, Housing and Utilities of Russia), Vitaly Gennadyevich Savelyev (Minister for Transport of Russia), Dmitry Nikolayevich Patrushev (Minister for Agriculture of Russian), And Maria Alekseevna Lvova-Beleva (Commissioner for Children’s Rights in Russia).

<sup>37</sup> 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 Anatolevich Miholap (Deputy Commander of the Air Force and Air Defense Forces), Anatoliy Anatolevich 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 Anatolevich 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).

<sup>38</sup> Galina Viktorovna 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 Zaporozhia 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), Alexander 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-civic 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), Anatoli 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 Anatolevich 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), Evgeny Anatolevich 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 (so-called ‘Minister of Income and Fees’ of the DPR), Svetlana Anatolevna 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 OPRISHHENKO (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), Dmitry 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 Vasilievich ZHELYTAKOV (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)

inner circle and other representatives of the Russian political elite. Those sanctioned include Federal Ministers, non-permanent members of Russia's Security Council, relatives of Putin, and Ramzan Kadyrov, the President of the Chechen Republic.

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

**Japan.** On 5 July, Japan imposed asset freeze sanctions on 57 Russian individuals<sup>39</sup> and 5 Russian-backed proxies in occupied Ukrainian territories<sup>40</sup>.

**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.

**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."

**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

<sup>39</sup> 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), Yuri Slyusar (President of United Aircraft Corporation), Andrei Gasilov (Solo shareholder of JSC Argument), God Nisanov (Board Chairman of Kievskaya Ploshchad Group), Evgeniy (Evgenii) Kochman (CEO of Imperial Yachts SARL), Evgeny (Evgeni) Novitskiy (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 Platonenkov (Lieutenant colonel), Vladimir Matafonov (Lieutenant colonel), Dmitrii Lvov (Lviv) (Lieutenant colonel), Evgenii Ladyzhenskii (Lieutenant colonel), Dmitrii Pakhrandir (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).

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

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.

**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 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.

**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.

**Poland.** Poland is currently working on a mechanism that will allow Russians to be denied visas - Deputy Minister of Foreign Affairs of Poland, Piotr Wawczyk. 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."

In Poland, from September 26, the entry ban for Russians with Schengen visas through air and sea checkpoints came into force. The relevant order was published on the official resource of legislative acts.

**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.

**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". On September 22, the Norwegian authorities officially suspended the agreement on a simplified visa regime with Russia.

**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.

## 6. Intensify Sanctions on State-Owned Enterprises

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

**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).

**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.

**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 Promtekhnologiya.

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:

- the Main Intelligence Directorate (GRU)<sup>41</sup> (military intelligence agency of the General Staff of the Russian Armed Forces);
- JSC Rossiyskiye Kosmicheskiye Sistemy (Russian Space Systems JSC) (Russian 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);
- Rzhzanov 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 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);
- 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);
- 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);

<sup>41</sup> 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 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).

**UK.** Added 4 state owned defense companies plus one with controlling stake 25+1 shares owned by RF<sup>42</sup> 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 ownership<sup>43</sup> (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 Initiativy, 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 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 Splay 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).

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

<sup>42</sup> 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.

<sup>43</sup> 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)

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 Ramenskiy 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 (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)
- **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).

**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 Ukraine<sup>44</sup>.

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

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



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.

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

**Australia.** On 17 May, sanctioned 3 SOE - the Private Military Company "Wagner" (PMC Wagner) and two Belarus defense enterprises (Industrial-Commercial Private Unitary Enterprise Minotor-Service and OJSC KB Radar-Managing Company of Radar Systems Holding). Both companies produce sophisticated equipment used by the Armed Forces of Belarus, who have in turn provided significant strategic support to Russian forces. And imposed sanctions on 12 entities for promoting Russian propaganda and disinformation<sup>45</sup>.

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

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

## PROPAGANDA

**EU.** 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).

<sup>45</sup> Internet Research Agency LLC, New Eastern Outlook, Oriental Review, Strategic Culture Foundation, SouthFront, NewsFront, OOO Inforos, United World International, Geopolitica, Odná Rodyna, Journal Kamerton, Analiticheski Tsentri Katekhon OOO (Part 2 of Schedule 2)

## 7. Expand Export Controls and Ban Imports

**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), **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 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. **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), **Taiwan** (strategic high-tech products in 57 categories to Belarus + ban on export of modern chips to Belarus and RF), **Canada** (ban on import – luxury goods; ban on export – luxury goods, goods for weapons manufacture and production + export ban on 28 services vital for the operation of the oil, gas and chemical industries, including technical, management, accounting and advertising services + ban on export for Belarus on products that could be used in the production and manufacturing of weapons, export and import ban on Belarus on luxury goods + expanded existing measures on the oil, gas and chemical sectors to include industrial manufacturing). **EU** (expansion of entities list with export restrictions for dual-use goods and technology + expansion of list of goods and technologies that can be used in defense and security sectors banned for export + ban of accounting, pr and consultancy services to RF + **exclusions to export ban on luxury goods, allowing for personal use of persons travelling from the EU** + reinforced export controls of dual use goods and advanced technology + 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**), **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).

**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, the 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 goods<sup>46</sup> 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-process<sup>47</sup>) and the list of energy-related goods (oil and gas exploration data, hydraulic fracturing items) which are prohibited from exporting to Russia.

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

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

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

<sup>46</sup> 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.

<sup>47</sup> 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.

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

*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

			<i>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.</i>
3	27 May	1 June	<i>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</i>

**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 entities<sup>48</sup> 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 entities<sup>49</sup> 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.

<sup>48</sup> AO Rubin; Branch of AO Company Sukhoi Yuri Gagarin Komsomolsk on Amur Aircraft Plant; Branch of PAO II – Aviastar; Branch of RSK MiG Nizhny Novgorod Aircraft Construction Plant Sokol; Chkalov Novosibirsk Aviation Plant; entities of Concern Radio-Electronic Technologies (JSC Aeropribor Voskhod; JSC All Russian Scientific Research Institute Gradient; JSC Almatyevsk Radiopribor Plant; JSC Experimental Design Bureau Elektroavtomatika in the name of P.A. Efimov; JSC Industrial Controls Design Bureau; JSC Kazan Instrument Engineering and Design Bureau; JSC Microtechnology; JSC Phasotron Scientific Research Institute of Radio Engineering; JSC Radiopribor; JSC Ramensk Instrument Engineering Bureau; JSC Research and Production Center SAPSAN; JSC Rychag; JSC Scientific Production Enterprise Izmeritel; JSC Scientific Production Union for Radioelectronics named after V.I. Shimko; JSC Taganrog Communications Scientific Research Institute; JSC Urals Instrument Engineering Plant; JSC Vzlet Engineering Testing Support; JSC Zhiguli Radio Plant; PJSC Bryansk Special Design Bureau; PJSC Moscow Institute of Electro Mechanics and Automation; PJSC Stavropol Radio Plant Signal; PJSC Techpribor; Ramensky Instrument Engineering Plant; V.V. Tarasov Avia Avtomatika); Design Bureau of Chemical Machine Building KBKhM; Far Eastern Shipbuilding and Ship Repair Center; Ilyushin Aviation Complex Branch; Myasishcheva Experimental Mechanical Engineering Plant; Institute of Marine Technology Problems Far East Branch Russian Academy of Sciences; Irkutsk Aviation Plant; JSC Aerocomposit; JSC Avtomatika; JSC Bryansk Electromechanical Plant; JSC Eleron; JSC Experimental Design Bureau named after A.S. Yakovlev; JSC Federal Research and Production Center Altai; JSC Head Special Design Bureau Prozhektor; JSC Ilyushin Aviation Complex; JSC Lazurit Central Design Bureau; JSC Ramensky Instrument Engineering Plant; JSC Research and Development Enterprise Protek; JSC SPMDB Malachite; JSC Votkinsky Zavod; Kalyazinsky Machine Building Factory – Branch of RSK MiG; Main Directorate of Deep-Sea Research; NPP Start; DAO Radiofizika; P.A. Voronin Luchkovitsk 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; Voentelcom JSC.”

<sup>49</sup> 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



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 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 prohibiting the 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. This prohibition will take effect on October 15, 2022. This determination excludes the following: (1) any service to an entity located in the Russian Federation that is owned or controlled, directly or indirectly, by a US person; (2) any service in connection with the wind down or divestiture of an entity located in Russia that is not owned or controlled, directly or indirectly, 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.

**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 entities<sup>50</sup> and 24 Belarusian entities<sup>51</sup>. 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.

**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.

<sup>50</sup> 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, Dolgoprudnyi 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, Meteor Plant JSC, Moscow Communications Research Institute JSC, Moscow Order of the Red Banner of Labor Research Radio Engineering Institute JSC, NPO Elektromekhaniki JSC, Omsk Production Union Irtysh JSC, Omsk Scientific-Research Institute of Instrument Engineering JSC, Optron JSC, Pella Shipyard OJSC, Polyot Chelyabinsk Radio Plant JSC, Pskov Distance Communications Equipment Plant, Radiozavod JSC, Razryad JSC, Research Production Association Mars, Ryazan Radio-Plant, Scientific Production Center Vigstar JSC, Scientific Production Enterprise '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 'Vympef' By Name I.I. Toropov', Tactical Missile Company, JSC 'URALELEMENT', Tactical Missile Company, JSC 'Plant Daggiesel', Tactical Missile Company, JSC 'Scientific Research Institute of Marine Heat Engineering', Tactical Missile Company, JSC PA Strela, Tactical Missile Company, JSC Plant Kulakov, Tactical Missile Company, JSC Ravenstvo SSID: 175-55780 Name: Tactical Missile Company, JSC 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 Lighting, Tactical Missile Company, Petrovsky Electromechanical Plant 'Molot', Tactical Missile Company, PJSC 'MBDB 'ISKRA'', Tactical Missile Company, PJSC ANPP Temp Avia, Tactical Missile Company, Raduga Design Bureau, Tactical Missile Corporation, 'Central Design Bureau of Automation', Tactical Missile Corporation, 711 Aircraft Repair Plant, Tactical Missile Corporation, AO GNPP 'Region', Tactical Missile Corporation, AO TMKB 'Soyuz', Tactical Missile Corporation, Azov Optical and Mechanical Plant, Tactical Missile Corporation, Concern 'MPO - Gidropribor', Tactical Missile Corporation, JSC 'KRASNY GIDROPRESS', Tactical Missile Corporation, JSC Avangard, Tactical Missile Corporation, JSC Concern GranitElectron, Tactical Missile Corporation, JSC Elektrotyaga, Tactical Missile Corporation, JSC GosNIIMash, Tactical Missile Corporation, RKB Globus, Tactical Missile Corporation, Smolensk Aviation Plant, Tactical Missile Corporation, TRV Engineering, Tactical Missile Corporation, Ural Design Bureau 'Detal', Tactical Missile Corporation, Zvezda-Strela Limited Liability Company, Tambov Plant (TZ) 'October', United Shipbuilding Corporation 'Production Association Northern Machine Building Enterprise', United Shipbuilding Corporation '5th Shipyard'

<sup>51</sup> 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, 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, Minoror-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

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

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

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

On 10 June, the Federal Council decided to adopt new EU sanctions against Russia and Belarus and instructed the The Federal Department of Economic Affairs, Education and Research (EAER) to adapt the Ordinance on measures in connection with the situation in Ukraine. Switzerland extended the list of goods banned for export that could help to strengthen Russia in military and technological terms or to develop its defence and security sector, namely certain chemicals. Switzerland expanded the list of Russian persons and entities concerned by export restrictions regarding dual-use goods and technology by adding 91 Russian entities<sup>52</sup> and 24 Belarusian entities<sup>53</sup>.

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.

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 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.

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<sup>52</sup> 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, Dolgoprudnyi Design Bureau of Automatics (DDBA JSC), Electronic Computing Technology Scientific-Research Center JSC, Electrosignal JSC, Energiya JSC, Engineering Center Moselectronproekt, Etalon Scientific and Production Association, Foreign Trade Association Mashpriborintorg, Ineko LLC, Informakustika JSC, Institute of High Energy Physics, Institute of Theoretical and Experimental Physics, Inteltech PJSC, ISE SO RAN Institute of High-Current Electronics, Kaluga Scientific-Research Institute of Telemechanical Devices JSC, Kulon Scientific-Research Institute JSC, Lutch Design Office JSC, Meteor Plant JSC, Moscow Communications Research Institute JSC, Moscow Order of the Red Banner of Labor Research Radio Engineering Institute JSC, NPO Elektromekhaniki JSC, Omsk Production Union Irtysh JSC, Omsk Scientific-Research Institute of Instrument Engineering JSC, Optron JSC, Pella Shipyard OJSC, Polyot Chelyabinsk Radio Plant JSC, Pskov Distance Communications Equipment Plant, Radiozavod JSC, Razryad JSC, Research Production Association Mars, Ryazan Radio-Plant, Scientific Production Center Vigstar JSC, Scientific Production Enterprise 'Radiosviaz', Scientific Research Institute Ferrite-Domen, Scientific Research Institute of Communication Management Systems, Scientific-Production Association and Scientific-Research Institute of Radio-Components, Scientific-Production Enterprise 'Kant', Scientific-Production Enterprise 'Svyaz', Scientific-Production Enterprise Almaz JSC, Scientific-Production Enterprise Salyut JSC, Scientific-Production Enterprise Volna, Scientific-Production Enterprise Vostok JSC, Scientific-Research Institute 'Argon', Scientific-Research Institute and Factory Platan, Scientific-Research Institute of Automated Systems and Communications Complexes Neptune JSC, Special Design and Technical Bureau for Relay Technology, Special Design Bureau Salute JSC, Tactical Missile Company, JSC 'Salute', Tactical Missile Company, JSC 'State Machine Building Design Bureau 'Vympef' By Name I.I. Toropov', Tactical Missile Company, JSC 'URALELEMENT', Tactical Missile Company, JSC 'Plant Dagdiel', 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 GIDROPRESS', Tactical Missile Corporation, JSC Avangard, Tactical Missile Corporation, JSC Concern GranitElectron, Tactical Missile Corporation, JSC Elektrotvaga, Tactical Missile Corporation, JSC GosNIMash, 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'

<sup>53</sup> 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, 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

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 organizations<sup>54</sup> 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, etc<sup>55</sup>) destined for Russia. Based on this, the Cabinet Order to partially revise the Export Trade Control Ordinance was approved by the Cabinet, and it will implement the measures from May 20th. In addition, due to the amendment of the Ministry of Economy, Trade and Industry notification, service transactions related to the above export bans will also be subject to regulation.

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

<sup>54</sup> 5th Shipyard; Alagir Resistor Factory; All-Russian Scientific-Research Institute Etalon JSC; Almaz JSC; Dolgoprudny Design Bureau of Automatics; Electronic Computing Technology Scientific-Research Center; Electrosignal JSC; Inteltech PJSC; JSC NPO Elektromekhaniki; Kulon Scientific-Research Institute JSC; Lutch Design Office JSC; Meteor Plant JSC; Moscow Communications Research Institute JSC; Moscow Order of the Red Banner of Labor Research Radio Engineering Institute JSC; Omsk Production Union Irtys JSC; Omsk Scientific-Research Institute of Instrument Engineering JSC; Optron JSC; Polyot Chelyabinsk Radio Plant JSC; Pskov Distance Communications Equipment Plant; Radiozavod JSC; Razryad JSC; Research Production Association Mars; Ryazan Radio-Plant; Scientific-Production Association and Scientific-Research Institute of Radio-Components; Scientific-Production Enterprise Almaz JSC; Scientific-Production Enterprise "Kant"; Scientific Production Enterprise "Radiosviaz"; Scientific-Production Enterprise "Svyaz"; Scientific-Production Enterprise Volna; Scientific-Production Enterprise Vostok JSC; Scientific-Research Institute "Argon"; Scientific Research Institute Ferrite-Domen; Scientific-Research Institute of Automated Systems and Communications Complexes Neptune JSC; Scientific Research Institute of Communication Management Systems; Special Design and Technical Bureau for Relay Technology; Tactical Missile Corporation, 711 Aircraft Repair Plant (711 ARZ); Tactical Missile Corporation subsidiaries - AO GNPP "Region", AO TMKB "Soyuz", Azov Optical and Mechanical Plant, Central Design Bureau of Automation", Concern "MPO—Gidropribor", JSC Avangard, JSC Concern GranitElectron, JSC Elektrotyaga, JSC GosNIIMash, JSC PA Strela, JSC "Plant Daggiesel", JSC Plant Kulakov, JSC Ravenstvo, JSC Ravenstvo-service, JSC "Research Center for Automated Design", JSC "Salute", JSC Saratov Radio Instrument Plant, JSC "Scientific Research Institute of Marine Heat Engineering", JSC Severny Press, JSC "State Machine Building Design Bureau "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"

<sup>55</sup> Target items: Catalyst for oil refining; Quantum computers and other devices that utilize the characteristics of quantum, their accessories, and their components; Electron microscopes, atomic force microscopes and other microscopes and devices designed for use with these microscopes; Equipment for laminated modeling (3D printer) and powdered metals and metal alloys used for this; Equipment for manufacturing organic light emitting diodes, organic field effect transistors, and organic solar cells; Equipment for manufacturing minute electromechanical systems; A device for manufacturing fuels made from hydrogen (limited to those manufactured using solar power, wind power, and other renewable energies) and solar cells with high conversion efficiency; Vacuum pumps and vacuum gauges (quantum technology related); Cooling equipment designed for extremely low temperatures, their accessories, and their components (quantum technology related); A device for removing lids and encapsulants from integrated circuits; Photodetector with high quantum yield (quantum technology related); Numerical control device for machine tools and their parts and machine tools; Materials that improve the function of making detection by electromagnetic waves (metamaterials), alloys composed of multiple elements in almost equal proportions (high entropy alloys) and other advanced materials (some are related to quantum technology); Conductive polymers, semi-conductive polymers and polymers with electroluminescence properties.

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, Japan prohibited the exports to 21 organizations designated as special organizations in Russia by the MFA notice - 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 Telemechanical 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",

Japan also introduced a ban on the export of goods related to chemical weapons to Russia.

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

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

## 8. Impose Secondary Sanctions

**USA** plans to include secondary sanctions in its financial crime strategy. They are also considering sanctions against unscrupulous banks that help circumvent sanctions. USA sanctioned 7 RF entities and 6 non-RF entities for evading newly imposed export controls on Russia, these companies provided support to Russia's military and/or defence industrial base. **The US passed a legislative amendment which allows India to buy a missile defence system from Russia.** 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. As a result of the US Turkish bank İşbank and Denizbank officially suspending work with the Russian payment system "Mir", Russians started to declare difficulties in withdrawing cash from Mir cards in Turkey. According to Russian media three more countries have already stopped working with Mir – Kazakhstan, Vietnam and Armenia. USA warned non-US financial institutions for risk being sanctioned due to work with Russian Mir. **EU a discussion on sanctioning Turkey for assisting RF trade is being born. 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.

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. 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.

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.

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. 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.

**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.

**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.

## 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).

**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."

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

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

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

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

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

**Canada.** On 02.05, Canada proposed new power to seek forfeiture of sanctioned persons' assets. Currently, the Special Economic Measures Act ("SEMA") and the Justice for Victims of Corrupt Foreign Officials Act (Sergei Magnitsky Law)



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

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

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

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

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

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

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

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

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

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

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

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

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

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



# MONITORING TABLE

Total cumulative progress: ~70% (29 sanction-measures) out of 42 in the Action Plan (10 blocks).

10 sanction-measures (24%) with status No progress, 29 sanction-measures (70%) with status Yes, 3 sanction-measures (7%) with status Slow Progress.

		UPD 26.09 (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><b>EU banned purchase, import or transfer seaborne crude oil or petroleum products originated in RF</b> (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. <b>Switzerland</b> (ban on RF crude oil and petroleum products). <b>Poland</b> refused from RF gas in response to RF cut off. Poland terminated the agreement on the supply of Russian gas.</p> <p><b>Lithuania.</b> 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). <b>Ban on transit of RF gas to Kaliningrad region).</b></p> <p><b>Latvia</b> ban on natural gas supplies from RF from Jan 1, 2023, <b>Latvijas Gaze resumed purchase of Russian gas via an unnamed intermediate entity.</b></p> <p><b>UK</b> ban on import of RF oil and oil products from 31 Dec, ban on import of RF coal came into force on August 10).</p> <p><b>Bulgaria, Finland, Netherland and Denmark</b> (RF cut off supplies due to refusal to pay in rubles). <b>Norway</b> (ban on purchase, import or transfer of oil transported by sea and supporting services).</p>
1.2.	Commit to ending all EU trade with Russia and Belarus in petroleum products	Yes	<b>EU 6<sup>th</sup> package envisions the elimination of around 90% of RF oil from the European market by the end of 2022.</b>
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><b>EU.</b> According to <u>Euractiv</u>, the EU is considering two scenations – 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. <b>European Commission proposed to limit the price of Russian gas by setting it at 50 euros/MWh. 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 on Sept 9.</b></p> <p><b>India.</b> 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><b>G7</b> 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.</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	<b>Shell.</b> Company announced it would no longer accept refined products with any Russian content, including blended fuels. <b>BP.</b> 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><b>USA.</b> 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><b>Norway.</b> 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</p>

			<p>framework of the ICAO.</p> <p><b>UK.</b> Aeroflot, Ural Airlines and Rossiya Airlines unable to sell their landing slots in UK airports. <b>Lithuania</b> (applied transit restrictions on goods subject to EU sanctions between Russia and Kaliningrad region).</p> <p><b>EU + Lithuania.</b> 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><b>EU.</b> Extended existing port access ban, allowed the exchange of information within the framework of the ICAO.</p> <p><b>UK.</b> allowed necessary technical assistance for temporarily detained aircraft.</p> <p><b>Switzerland.</b> Allowed the exchange of information within the framework of the ICAO.</p>
2.2.	Blocking sanctions on the state shipping companies	Yes	<p><b>USA.</b> 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><b>UK.</b> Zvezda PJSC (manufacture, sales, and service of diesel engines)</p> <p><b>Canada.</b> 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&amp;I, UK Club, Norway's Gard,</p> <p><b>EU.</b> 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><b>Switzerland.</b> Ban on services, including insurance or reinsurance, for transportation of RF oil and certain petroleum products to any destination.</p> <p><b>EU &amp; UK</b> 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><b>UK.</b> 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><b>USA.</b> 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. <b>USA did not to renew the provisions of General License 9C</b> (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 + <b>ban on import of gold from RF</b> + 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 &amp; 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.</p> <p><b>UK.</b> Announced ban on trusts services + extended existing restrictions on Belarus on dealing with financial instruments and providing loans to a</p>

			<p>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, <b>gold exported from RF before 21 July 2022 is not in scope</b> + 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. <b>The UK sanctioned 3 entities in response to the "sham referendums"</b>.</p> <p><b>New Zealand.</b> 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 (<b>SOE</b>), Black Sea Bank for Development and Reconstruction, Credit Bank of Moscow, Gazprombank (<b>SOE, 50+1</b>), GenBank, Industrial Savings Bank, Novikombank (<b>SOE</b>), Russia Agricultural Bank (<b>SOE</b>), Russian National Commercial Bank (<b>SOE</b>), Sberbank (<b>SOE, 50+1</b>), Sovcombank, SMP Bank, Vnesheconombank SOE, VTB (<b>SOE, 60+1</b>), +61 entities that support the Russian military (inc. 42 SOEs) + 1 collaborationist authority in Kherson.</p> <p><b>Canada.</b> Asset freeze and dealing prohibition on 4 RF financial institutions and banks + <b>import ban on RF gold after Aug 6</b> + 17 entities in the defence sector directly or indirectly supporting the Russian military (inc. 10 SOEs) + 1 defence sector entity.</p> <p><b>Japan.</b> 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.</p> <p><b>EU. de-SWIFT 3 RF banks + 1 Belarus</b> + <b>consider gold as a new sanction target</b> + 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).</p> <p><b>Switzerland.</b> 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 + <b>suspended the exchange of tax information with Russia</b>.</p> <p><b>Norway.</b> De-SWIFT 3 RF banks; restrictive measures for 18 entities that 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.</p> <p><b>Australia</b> (again announced ban import of Russian gold on Aug 15, previously such ban was announced on Jul 4).</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	<b>No</b>	-
3.3.	Discourage European banks such as Raiffeisen Bank and Unicredit, from operating in Russia	<b>No</b>	-
<b>4. Designate the Russian Federation as a sponsor of terrorism.</b>			
4.1.	Designate the Russian Federation as a sponsor of terrorism	<b>Yes</b>	<p><b>Lithuania</b> officially recognized RF as a state sponsor and perpetrator of terrorism.</p> <p><b>USA</b> 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 + <b>Blinken said that he is not ready to make such a decision</b> + 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><b>NATO</b> recognised RF as "the most significant and direct threat".</p> <p><b>Latvia</b> recognized Russia as a sponsor of terrorism.</p>
4.2.	Designate the Armed Forces of the Russian Federation as a Foreign Terrorist Organization	<b>No</b>	-
4.3.	Place Russia on the FATF's blacklist	<b>No</b>	-

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><b>USA.</b> 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 + <b>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.</b></p> <p><b>Canada.</b> 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. <b>Deputy PM of Canada proposed G7 to allow Russian "oligarchs" to pay for leaving the sanctions lists.</b> 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.</p> <p><b>UK.</b> 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 + <b>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).</b></p> <p><b>Poland.</b> +15 with entrance ban, 7 of them with assets freeze)</p> <p><b>Australia.</b> 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, <b>incl. Kabaeva.</b></p> <p><b>New Zealand.</b> 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) + <b>sanctioned 19 members of President Putin's inner circle and other representatives of the Russian political elite.</b> <b>Japan.</b> 8 RF officials + 133 individuals from self-proclaimed "DPR/LPR" + 62</p> <p><b>EU. Switzerland. Liechtenstein</b> 2 oligarchs (Kurchenko, Prigozhin) + V.Yanukovich and his son O.Yanukovich.</p> <p><b>EU.</b> + 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) + <b>47 individuals, inc. Sobyenin (the mayor of Moscow) + decided to suspend visa facilitation agreement + 3 politicians.</b></p> <p><b>Switzerland.</b> 65 RF +12 Belarus + 54 + 3-3.</p> <p><b>Norway.</b> 65 + 54 RF individuals.</p> <p><b>Lithuania.</b> Ban on entering country for P.Kirill.</p>
5.2.	Family members	Yes	<p><b>Yet, no US sanctions against Kabaeva. UK sanctioned Kabaeva.</b> She avoided sanctions due to a last-minute decision of the National Security Council.</p> <p><b>EU. Sanctioned Kabayeva, excluded Patriarch Kirill.</b></p> <p><b>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.</b></p> <p><b>Canada.</b> The GoV has introduced a Bill to allow for the imposition of travel bans on family members of sanctioned people + A.Kabaeva</p> <p><b>USA. Sanctioned Kabayeva.</b></p>

			<b>Switzerland.</b> Sanctioned Kabayeva.
5.3.	Members of governing bodies of Russian state-owned and state-controlled enterprises	Yes	<b>UK.</b> Mikhail KLISHIN (an Executive in Bank Rossiya, and a member of the Board of Directors at SOGAZ). <b>EU.</b> Gerhard Schroeder, Matthias Waring and Karin Kneissl left the BoD of Rosneft threatened by sanctions
5.4.	Key executives and board members of companies that are subject to US or EU sanctions	Yes	<b>USA.</b> 8 members of the Executive Board of Sberbank and 27 members of Gazprombank Board of Directors. <b>UK.</b> + 2 top-managers of Rosneft were re-listed in sanction lists - Olga Ayziman has been de-listed.
5.5.	Propagandists	Yes	<b>New Zealand.</b> 5 persons in media and propaganda sphere. <b>Australia.</b> 11 individuals in the Russian media industry who promote the Russian Government's false narratives. <b>Canada.</b> 30 disinformation and propaganda figures.
5.6.	Senior members of the governing bodies of Russian political parties and every member of Putin's political party, United Russia	Yes	
6. Intensify Sanctions on State-Owned Enterprises			
6.1.	Key state-owned enterprises in the energy industry	No	-
6.2.	Key channels of Russian propaganda	Yes	<b>UK.</b> 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 <b>USA.</b> JSC Channel One Russia, Television Station Russia-1, and JSC NTV Broadcasting Company. <b>New Zealand.</b> 85th Main Special Service Centre (GTsSS) (SOE), Internet Research Agency, Main Centre for Special Technologies (GTsST). <b>Australia.</b> 12 RF (Internet Research Agency LLC, New Eastern Outlook, Oriental Review, Strategic Culture Foundation, SouthFront, NewsFront, OOO Inforos, United World International, Geopolitica, Odna Rodyna, Journal Kamerton, Analiticheskiv Tsentri Katekhon OOO) <b>EU</b> (3 SOE media + extended prohibition of broadcasting for 3 RF SOE media) <b>Latvia</b> (ban on distribution of 80 audio and audiovisual programs registered in RF). <b>Switzerland</b> (prohibition of advertisement of content produced or broadcast by certain RF SOE media). <b>Canada.</b> 15 entities involved in disinformation activities (inc. 12 SOEs).
6.3.	Key state infrastructure and industrial companies	Yes	<b>UK.</b> + 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) <b>New Zealand.</b> + 42 SOEs. <u>Defense:</u> Makeyev Rocket Design Bureau, Minsk Wheel Tractor Plant (MZKT), State authority for military industry of the Republic Of Belarus (SAMI), OKB TSP Scientific Production LLC (OKB TSP), Oboronnye Initiativy, LLC Synesis. <u>Shipbuilding:</u> United Shipbuilding Corporation. <b>USA.</b> 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. <b>Canada.</b> Zelenodolsk Shipyard JSC, Military Industrial Company LLC, Rosgvardia, UEC Klimov JSC, KAMAZ PTC + 28 defence SOEs + 10 SOEs in defence + 1 defence sector entity. <b>Australia:</b> PMC Wagner, Industrial-Commercial Private Unitary Enterprise Minotor-Service and OJSC KB Radar-Managing Company of Radar Systems Holding <b>New Zealand.</b> Sanctions on 44 entities that are funding or fuelling the war, including 32 RF SOEs and 3 Belarus SOEs) <b>EU, Switzerland</b> (6 SOEs + 4 owned by SOE on 27% and 3 Belarus SOEs). <b>Norway</b> (6 RF SOE + 4 owned by SOE on 27%). <b>EU.</b> 7 SOEs. <b>Switzerland:</b> + 5 SOEs + Sberbank.



6.4.	Sanctions on any new project of RosAtom	No	<b>Finland.</b> Finland's Fennovoima has terminated its contract with Rosatom to build a nuclear power plant due to significant delays by RAOS (a subsidiary of Rosatom) and its inability to complete the project. Finnish MinEcon approves the decision.
7. Expand Export Controls and Ban Imports			
7.1.	Ban on exports to Russia of all strategically important high-technology products	Yes	<p><b>UK.</b> 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&amp;technology and related services. Extended the list of oil refining goods&amp;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). Ban on export of goods and items of significant importance to the Russian (such as chemicals, materials, machinery goods and electrical appliances with the exception of licensed humanitarian goods) + expanded the scope of existing energy-related goods and services prohibitions + ban on export of accounting, business and management consulting, and public relations services.</p> <p><b>USA.</b> 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. 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><b>Japan.</b> 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.</p> <p><b>EU.</b> Ban of accounting, pr and consultancy to RF. Exclusions to export ban on luxury goods, allowing for personal use of persons travelling from the EU.</p> <p><b>Canada.</b> Imposed an export ban on 28 services vital for the operation of the oil, gas and chemical industries, including technical, management, accounting and advertising services. Luxury goods (incl. alcohol, tobacco, luxury clothing and accessories, jewelry, kitchenware, and art), export ban on Belarus on luxury goods. Expanded existing measures on the oil, gas and chemical sectors to include industrial manufacturing.</p> <p><b>Norway.</b> 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&amp;technology for use in oil refining.</p> <p><b>Switzerland:</b> 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><b>Japan.</b> Ban on trust, accounting / audit, and management consulting services + ban on export of goods to 65 RF and 25 Belarus entities in defence.</p>
7.2.	Ban on the export and supply to Russia of catalysts used for oil production, the telecom industry, and agriculture	Slow progress	<b>UK.</b> Internet services and online media services

7.3.	Tighten the sanctions on technologies and equipment (microchips, semiconductors)	Yes	<p><b>Switzerland.</b> Industrial robots</p> <p><b>USA.</b> 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><b>Japan.</b> Export ban of cutting-edge goods (quantum computers, 3D printers, etc).</p> <p><b>UK.</b> Export bans targeted on Russia's manufacturing and heavy machinery sectors announced.</p> <p><b>Taiwan.</b> Imposed controls on exports of strategic high-tech products in 57 categories to Belarus + <b>ban on export of modern chips to Belarus and RF.</b></p>
7.4.	Enhance export controls on critical technology systems, components, and materials with potential military dual-use	Yes	<p><b>UK.</b> <del>Announced</del> 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&amp;technology that could be used to repress people, Export ban on goods and technology relating to chemical and biological weapons. Export ban on jet fuel and fuel additives.</p> <p><b>Canada.</b> 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><b>EU.</b> Expansion of export restrictions for dual-use goods and technology, goods &amp; 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&amp;technology.</p> <p><b>USA.</b> Export control for 70 entities in RF and 1 in Belarus</p> <p><b>Switzerland:</b> extended the list of <b>dual-use goods banned for export</b> by 91 RF entities and 24 Belarus entities.</p> <p><b>Norway:</b> added 4 Russian entities to the export ban list regarding dual-use goods&amp;technology.</p>
7.5.	Prohibit the export of metals, minerals, and ores	Slow progress	<p><b>Switzerland.</b> Certain chemical products.</p> <p><b>UK.</b> 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><b>UK</b> (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). <b>Switzerland</b> (lignite and coal, timber, cement, seafood, caviar + extended the list of prohibited for import from RF goods). <b>Canada</b> (luxury goods, incl. alcoholic beverages, seafood, fish and non-industrial diamonds + import ban on Belarus on luxury goods). <b>USA</b> (35% import tariff for 570 categories of RF products worth approximately \$2.3 bn).</p> <p><b>EU</b> (extended the exemption from the prohibition to engage in transactions with certain SOEs as regards transactions for agro products and the transport of oil to 3rd countries).</p> <p><b>Japan.</b> banned exports to 21 scientific organisations on Russia, banned export of goods related to chemical weapons to Russia</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><b>USA.</b> 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 <b>Pressure Gain Combustion (PGC) technology</b> 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><b>USA.</b> 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</p>

			<p>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 '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. <b>BIS will review license applications under a policy of denial, and no license exceptions are available for these entities being added.</b> 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.	Introduce secondary sanctions against all foreign individuals and entities that facilitate significant transactions or investments for the designees to prevent any potential transactions facilitated with Russian-related shell entities and offshore jurisdictions.	Yes	<p><b>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.</b></p> <p><b>China.</b> 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. <b>Due to the potential consequences of financial sanctions, fewer shipowners are willing to let their tankers load in RF.</b> Supply of Russian oil to China becomes more and more congested at sea, despite the short distance between countries, Bloomberg.</p> <p><b>UK.</b> 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><b>Western lawyers start to refuse working with Russians, while RF itself closes its market for them.</b> According to FT, British lawyers began to refuse to work with the Russians against the background of sanctions.</p> <p><b>Germany.</b> 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><b>USA.</b> Plans to include secondary sanctions in its financial crime strategy. They are also considering sanctions against unscrupulous banks that help circumvent sanctions. <b>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. As a result of the US Turkish bank İşbank and Denizbank officially suspending work with the Russian payment system "Mir", Russians started to declare difficulties in withdrawing cash from Mir cards in Turkey. According to Russian media three more countries have already stopped working with Mir – Kazakhstan, Vietnam and Armenia.</b> 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. Also, the US OFAC warned non-US financial institutions for risk being sanctioned due to work with russian Mir.</p> <p><b>EU discussion on sanctioning Turkey for assisting RF trade is being born.</b></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	<p><u>Here</u> can be found a registry of both companies still operating and ones who have already left Russia. The registry is created and administered by Yale School of Management.</p> <p><b>EU</b> created a special online mechanism through which whistleblowers can report violations of anti-Russian sanction.</p>

9.2.	Obligate legal entities and organizations to disclose information regarding existing business relations with enterprises and their subsidiaries inside and outside of Russia and Belarus	Yes	<p><b>USA.</b> 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, <b>draft has not passed either house of Congress yet.</b></p> <p><b>Germany.</b> The Bundestag obliged those who fell under anti-Russian sanctions to report assets in Germany under the threat of imprisonment, DPA reports + <b>is to create a national registry of assets that are subject to sanctions.</b></p> <p><b>EU.</b> The European Council has requested the European Parliament's consent to add the violation of sanctions to the list of 'EU crimes'. The European Parliament gave its consent to the draft of the European Council Decision which identifies the violation of EU sanctions as an EU crime. Strengthened reporting requirements - sanctioned people and entities were obliged to declare assets in EU before 1 Sep 2022 or within 6 weeks from the date of listing. Share of information on property of sanctioned persons, entities and bodies between EU Member States and the European Commission.</p> <p><b>UK.</b> 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.</p>
10. Deepen Coordination of Sanctions and Link Sanctions Relief to Peace and Reconstruction			
10.1	Continue to coordinate sanctions across the EU, United States, and other allied countries and partners to ensure that, if an individual or entity is sanctioned in one jurisdiction, then they should be sanctioned in all jurisdictions.	Yes	<p><b>UK.</b> <b>Fast-tracked on 19 individuals and entities</b> in alignment with G7 and the EU to target Russia's military and defense capabilities.</p> <p><b>UK and EU</b> reached an agreement to enact a co-ordinated ban on insuring ships carrying Russian oil.</p> <p><b>UK.</b> Introduced an urgent procedure for designations of a person/entity on the basis that they have been sanctioned by the US, the EU, Australia or Canada.</p> <p><b>Switzerland</b> adopts new EU sanctions and replicates the EU lists of sanctioned individuals and entities. <b>Norway</b> adopted the 6th EU sanction package.</p>
10.2	Maintain all sanctions until Russia has ended its invasion of Ukraine.	Yes	<p><b>So far such consensus exists.</b></p> <p><b>USA.</b> Merely stopping the invasion of Ukraine may not be enough for RF to gain relief from Western economic sanctions. The U.S. also wants an assurance that there will never be another such invasion. USA won't lift sanctions on Russia until the special operation is stopped, State Department spokesman Ned Price.</p> <p><b>Germany.</b> The lifting of anti-Russian sanctions is possible only if the withdrawal of Russian troops from the territory of Ukraine.</p> <p><b>UK.</b> Sanctions against Russia will be lifted only after "complete ceasefire and withdrawal of troops"</p>
10.3	After the war has ended, coordinate closely any lifting of sanctions with the Ukrainian government and its assessment of (1) progress in peace talks and negotiations, (2) Russia's recognition of Ukraine's sovereignty and territorial integrity, and (3) Russian cooperation in contributing substantially to a Ukraine reconstruction fund as compensation for all the material and human damage inflicted as a result of its invasion.	Yes (3)	<p><b>USA</b> and <b>Canada</b> are preparing legislative acts to use sanctioned assets for compensation to Ukraine. <b>USA.</b> <b>The USA doesn't have legal authority to seize CBR assets frozen due to its invasion of Ukraine,</b> but continues talks with partners over ways to make Russia foot the bill for Ukraine's post-war reconstruction are starting. <b>The Baltic countries and Slovakia called on the EU to transfer Russian assets to Ukraine. Canada</b> passed a law for the freezing and confiscation of Russian-sanctioned assets). <b>EU.</b> 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. <b>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.</b> Consider the possibility. <b>The Finance Minister does not support the idea of confiscating the personal assets of Russians for Ukraine.</b></p>

