

# Yermak-McFaul Working Group on Russian Sanctions

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

New sanctions imposed from  
1 February to 31 March 2023

Prepared by KSE Institute Sanctions Team

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## SUMMARY

### CORE UPDATES FROM 1 FEBRUARY TO 31 MARCH 2023

**#Oil/Energy** From 5 February 2023, the **Price Cap Coalition, Switzerland, Australia and Norway** to established caps on the price for seaborne refined petroleum products (CN code 2710) originating from Russia - the maximum price for "premium-to-crude" products is set at \$100 per barrel, for "discount-to-crude" products - \$45 per barrel. Also, US ban on export, re export, sale, or supply of services related to the maritime transport of Russian petroleum products and prohibition this for all US persons regardless of their location. The EU also prohibits providing gas storage capacity and impose additional restrictions on Russian goods inc. petroleum products. Russia's friendly countries are also taking the first steps to comply with price caps - Indian banks stopped clearing payments for Russian oil sold above the price cap. EU countries make lawsuits against Russians assets - the Engie (France energy company) filed a lawsuit against Gazprom over gas supply shortfalls. At the same time, the German court upheld the transfer of the German assets of the Russian oil company Rosneft to external management.

**#Transport** European countries neighboring Russia and Belarus introduce a limit on transit to Russia: Poland unilaterally limited the traffic for Belarusian freight vehicles at the Kukuryku-Kozłowicze border crossing, Lithuania imposed new restrictions on cargo transit to Kaliningrad and temporarily suspended the shipment of mail parcels containing goods to Russia. Russian friendly countries also joined this measure - Kazakhstan tightened regulations for foreign road carriers to avoid sanctions and transport goods to and from the EU. At the same time China refuses to allow more than half of the aircraft of Russian airlines into its airspace. Turkey, from 14 March 2023, closed airports to Russian airlines flying US-made aircraft and banned the refueling and maintenance servicing of certain aircraft operated by Russian and Belarusian airlines. In addition, Turkish customs officials have blocked the transit of some Western-sanctioned goods to Russia via Turkey. Bangladesh banned entry for 69 Russian ships into its maritime waters.

**#Financial** The **US** has imposed various sanctions on entities in Russia, China, Iran, Turkey, and Belarus, including full blocking sanctions and asset freezes. The **UK** has also implemented asset freezes on Russian entities, including banks and military institutions, as well as banning provision of trust services to individuals and entities subject to asset freeze sanctions. The **EU** has imposed restrictive financial measures on Russian entities in the military, defense, and banking sectors, as well as adding Russia to its list of non-cooperative jurisdictions for tax purposes. **Canada** has imposed sanctions on propagandist entities and entities in Russia's defense industry, while **Japan** has imposed asset freezes on PJSC Rosbank and entities in shipbuilding, aircraft, and machine building. **Australia** has imposed financial sanctions on entities in defense, shipbuilding, technology, aerospace, oil and gas, research, media, and banking sectors in Russia. **New Zealand** imposed sanctions on 4 Iranian entities for supplying drones to Russia, and on 40 entities operating in various sectors including defense, shipbuilding, technology, aerospace, oil and gas, research, media, and banking. They also imposed sanctions on 5 entities of strategic significance to Russia, including a private military company. **Switzerland** imposed sanctions on an Iranian company that manufactures military aircraft and UAVs, as well as 34 entities in accordance with the 10th EU package. **Germany** placed two German subsidiaries of Rosneft under fiduciary administration by the German Federal Network Agency. **Belgium** issued a license to a Russian individual to transfer frozen assets from NSD accounts to a non-sanctioned depository. **Kazakhstan** delisted 11 Russian issuers, including Aeroflot, Gazprom, Norilsk Nickel, LUKOIL, and Rostelecom, from its stock exchange. **Cyprus** froze bank and brokerage accounts of Russian citizens if the amount exceeded EUR 100,000 for any foreign brokers who have accounts of Russian clients in the Euroclear depository. **Kosovo** joined the US sanctions against Russian PMC "Wagner".

**#Trade** **USA** increased duty rates for Russia: from 35% to 70% on ~100 Russian metals, minerals, and chemical products), to 200% on Russian aluminum and derivative aluminum articles. Also imposed additional export restrictions on Russia, Belarus, and Iran, as well as entities in third countries, plus new export control measures to address Russia's use of Iranian UAVs. Sanctioned Russian entities (inc. military) and renewed the orders temporarily denying export privileges to Russian airlines Azur Air, UTair and Aeroflot. **EU** ban on goods, sensitive dual-use and advanced technologies, also sanctioned entities which can be or already used by Russia in the military sector. In addition, **EU** ban on import on additional goods which generate significant revenues for Russia. **Japan** introduced export bans against Russian entities on items that can be used for military purposes, dual-use goods and certain list of goods which contribute to Russia's industrial base. **Canada** prohibited import, purchase, or acquisition of any type of weapon, ammunition, military vehicle for Russia. Prohibited export, sale, supply or shipment of certain chemical elements and banned import, purchase or acquisition of various aluminum and steel products from Russia. In addition, Canada changed the NME methodology of calculating margins of dumping for Russia and Belarus cases. **Switzerland** imposed tighter export restrictions regarding dual-use goods and technology, technology which might contribute to technological enhancement of Russia for ~100 Russian entities. The **Turkish** government issued a list of foreign goods that are prohibited from being re-exported to Russia. From 1 April 2023, **Kazakhstan** will require exporters to submit additional documents when sending goods to Russia.

**#Terrorism** **Slovakia** adopted a resolution condemning the current Russian regime as terrorist and Russia as a state sponsor of terrorism. At the same time **Lithuania** went ahead and adopted a resolution "On limiting the influence of terrorist Russia" which proposes that the EU countries jointly create and expand the EU legal framework. Also, the country adopted a resolution stating that the Russian private military company Wagner is a terrorist organization.

**#Reconstruction** "The first victories" in the case of Russian assets confiscation - the **French** justice system has achieved its first criminal seizure of a villa belonging to a Russian oligarch. Also, **UK** seizure of Russian State Assets and Support for Ukraine Bill was presented at the House of Commons in the UK Government. At the same time **Netherlands** proposed to create an international register of damage caused by Russian aggression.

**#Individual** **USA** (full blocking), **UK** and **EU** (frozen assets), **Australia** and **Switzerland** (financial sanctions and travel bans), **Latvia** (travel ban), **Canada** and **New Zealand** imposed sanctions against Russian regional governors, government officials, the State Duma members, oligarchy, military and individuals connected with Russia's MIC and Iran officials or Iran military company. In addition, the **US** imposed sanctions on executives from Rosbank and Sberbank and individuals from China, Turkey, Iran and Belarussian for their supporting Russian military sector. **UK** sanctioned senior executives at Rosatom, Rostec, Almaz-Antey Corporation, Gazprom, Aeroflot. **The EU** sanctioned members of Wagner Group and announced plans to create a clearer legal framework for imposing sanctions against family members of Russian businessmen who have been subjected to EU restrictions. **Canada** sanctioned Russian propagandists. **Australia** sanctioned central election commission, military officials, inc. Patriarch Kirill. **Countries are actively changing legislation and restricting the entry of Russians under tourist visas** - such restrictions were introduced by **Kazakhstan** (Russians were required to have a foreign passport for long-term residence), the **Czech Republic** (banned long-term residence visas for foreigners with dual citizenship of Russia or Belarus), **Lithuania** (allowed the deprivation of citizenship of persons with dual citizenship), **Israel** (cancelled the accelerated program for Russians to obtain Israeli citizenship), India (reduced the continuous stay of Russians in India to 90 days).

**#Secondary** **US** already imposed secondary sanctions against Slovakian national A. Mkrtychev, for attempting to facilitate arms deals between Russia and North Korea and following the US and the EU warnings of secondary sanctions, exports from Turkey to Russia decreased 22% (from Dec 22 to Feb 23). In addition, the US threatened Chinese companies with sanctions over supplies of banned goods to Russia, besides the US is negotiating with close allies about the possibility of imposing new sanctions on China if Beijing provides military support to Russia for its war in Ukraine.

**#SOEs** European countries fight against Russian propaganda - **EU** and **Switzerland** suspended broadcasting licenses of 2 Russian media - RT Arabic and Sputnik Arabic, **Lithuania** obliged Internet providers to block IP addresses that provide access to Russian TV channels NTV, Channel One, Rossiya 1, Rossiya 24 and RTR Planet, to which the EU applied sanctions.

No progress in **#Transparency**.

**Other important updates:**













## #SanctionEnforcement
















The international community united in its efforts to combat illicit activities and promote transparency by imposing a series of sanctions on Russia and implementing measures to enforce them. The **Financial Action Task Force (FATF)** suspended Russia's membership, reinforcing the need for stricter control over beneficial ownership information and anonymous shell companies. The **G7** introduced the "Enforcement Coordination Mechanism" to enhance compliance and coordination in enforcing existing sanctions on Russia, aiming to ensure a unified front against illicit activities. The **US**, through the joint initiative called the Disruptive Technology Strike Force, focused on safeguarding critical technological assets from unauthorized acquisition and utilization by nation-state adversaries. This initiative sought to strengthen supply chains and combat illicit activities that threatened national security. The **EU** and **Switzerland** implemented comprehensive reporting requirements targeting the Central Bank of Russia's immobilized reserves and assets, along with economic resources owned by sanctioned individuals and entities. This move aimed to increase transparency and hinder attempts to circumvent the sanctions regime. The **UK** extended its measures against Russian-controlled areas, including Kherson and Zaporizhzhia oblasts, alongside existing restrictions on Crimea and non-government-controlled regions. These measures effectively restricted trade and financial access for these areas, aligning with the UK's commitment to sanction enforcement. Various departments of the **US** government issued a joint compliance note on the use of third-party intermediaries and transshipment points to evade Russian- and Belarussian-related sanctions and export controls. By addressing common evasion tactics, this note aimed to strengthen the effectiveness of sanctions and control mechanisms. The **UK** government launched the UK Integrated Security Fund (UKISF), which supported the Economic Deterrence Initiative (EDI) in its efforts to enforce UK sanctions. The initiative focused on tackling sanctions evasion across trade, transport, and financial sectors to maintain the integrity of the sanctions regime. Also, the **EU** established an ad hoc working group to explore the feasibility of using frozen Russian assets to aid in Ukraine's reconstruction. In addition, the **EU** extended its existing sanctions on business dealings with non-government-controlled areas of Ukraine, including Donetsk, Luhansk, Zaporizhzhia, and Kherson. These measures, which include import bans, export restrictions, and limitations on advisory services, aimed to maintain pressure on the sanctioned regions and encourage a peaceful resolution to the conflict.









## MONITORING TABLE

### Sanctions adopted since 1 February 2023











Type & Progress	Country & Details	
<b>1. Expand Oil and Gas Sanctions</b> #Oil/Energy  Progress: Yes, but incomplete scope	 <b>G7</b> After negotiations oil price cap was maintained at the level of 60\$/bbl The Price Cap Coalition established caps on the price for seaborne refined petroleum products (CN code 2710) originating from Russia from 5 February 2023 - the maximum price for "premium-to-crude" products is set at \$100 per barrel, for "discount-to-crude" products - \$45 per barrel.	
	 <b>USA</b> Ban on export, re export, sale, or supply of services related to the maritime transport of Russian petroleum products Price cap on Russian discount-to-crude petroleum products at \$45/bbl, for premium-to-crude petroleum products at \$100/bbl effective from 5 February 2023 Allowed Bank Zenit PJSC and Bank Saint-Petersburg PJSC certain energy-related transactions with US persons until 16 May 2023. Prohibition for any US person, regardless of their location, from exporting, re exporting, selling, or supplying services related to the maritime transport of Russian-origin petroleum products purchased above the price cap to any person located in Russia (inc. all services related to this operation).	
	 <b>UK</b> Price cap on Russian discount-to-crude petroleum products at \$45/bbl, for premium-to-crude petroleum products at \$100/bbl effective from 5 February 2023 Exempted from the price cap refined oil products that were loaded onto a ship at the port of loading before 5 Feb 23 and offloaded at the port of destination before 1 Apr 23	
	 <b>EU</b> Price cap on Russian discount-to-crude petroleum products at \$45/bbl, for premium-to-crude petroleum products at \$100/bbl effective from 5 February 2023, with a 55-day transitional period for vessels carrying Russian petroleum products, which were purchased and loaded onto the vessel prior to 5 Feb 2023 and unloaded prior to 1 Apr 2023. The EU's gas market correction mechanism entered into force on February 15. Prohibition to provide gas storage capacity in the EU to Russian nationals or legal persons Imposed additional restrictions on Russian goods, including a ban on the purchase and importation of certain petroleum products	
	 <b>Canada</b> Joined price cap on Russian oil products	
	 <b>Switzerland</b> Joined price cap on Russian oil products	
	 <b>Australia</b> Joined price cap on Russian oil products	
	 <b>Japan</b> Joined price cap on Russian oil products From 6 February 2023, Japan introduced pre-clearance procedures for the import of crude oil and petroleum products (excluding waste oil) originating from Russia	
	 <b>Norway</b> Joined price cap on Russian oil products	
	<b>France</b> The Engie (France energy company) filed a lawsuit against Gazprom over gas supply shortfalls	
	 <b>Germany</b> Germany plans to change its Energy Security Act to allow a quick sale of Russian energy group Rosneft's stake The E.ON (energy concern) has completely written off its 15.5% stake in Nord Stream AG The German court upheld the transfer of the German assets of the Russian oil company Rosneft to external management	
	 <b>India</b> The Baroda (2nd largest Indian bank) has stopped clearing payments for Russian oil sold above the price cap On 12 Mar 2023, Bloomberg reported that government authorities of India have instructed banks and traders to comply with the \$60 price cap imposed on purchases of oil from Russia	
	<b>2. Increase Transportation and Insurance-Related Sanctions</b> #Transport  Progress: Yes, but incomplete scope	 <b>EU</b> Obligated aircraft operators to provide all relevant information about non-scheduled private flights between the EU and Russia at least 48H in advance Introduced a new exemption for providing pilot services to vessels in innocent passage (inc. the transaction on a certain Russian SOE)
		 <b>Switzerland</b> Obligated aircraft operators to provide all relevant information about non-scheduled private flights between Switzerland and Russia at least 48H in advance Introduced a new exemption for providing pilot services to vessels in innocent passage (inc. the transaction on a certain Russian SOE)
 <b>Poland</b> Unilaterally limited the traffic for Belarusian freight vehicles at the Kukuryku-Kozłowicze border crossing		






		<b>Turkey</b> Country warned to close airports to Russian airlines flying US-made aircraft Turkish customs officials have blocked the transit of some Western-sanctioned goods to Russia via Turkey. From 14 March 2023, Turkey banned the refueling and maintenance servicing of certain aircraft operated by Russian and Belarusian airlines.
		<b>Lithuania</b> New restrictions on cargo transit to Kaliningrad Temporarily suspended the shipment of mail parcels containing goods to Russia due to new EU sanctions requiring additional information to be provided about the contents of the parcels
		<b>Bangladesh</b> According to media reports, banned entry for 69 Russian ships into its maritime waters
		<b>Kazakhstan</b> Kazakhstan tightened regulations for foreign road carriers to avoid sanctions and transport goods to and from the EU - from 20 Feb 2023 newly created carriers will be disqualified from international cargo transportations.
		<b>China</b> China refuses to allow more than half of the aircraft of Russian airlines into its airspace due to Western sanctions
<b>3. Impose New Financial Sanctions</b> #Financial  <b>Progress:</b> Yes		<b>USA</b> Full blocking sanctions on 12 entities across multiple countries for their supporting Russia's MIC OFAC had asked Raiffeisen for details of its exposure in Russia, the partially occupied Donbas, Ukraine and Syria OFAC authorized sanctions on any person operating in the Russian metals and mining sector Full blocking sanctions on 83 entities from various sectors in the Russian economy, inc. 11 banks Sanctions on 52 entities, inc. entities operating in Russia's financial services, defense and related materiel sector + subsidiaries of State Atomic Energy Corporation Rosatom's civil nuclear structure Removed a former Kazakh subsidiary of Sberbank from its sanctions list Designated a network of 5 companies in China for supporting Iran's UAV procurement efforts Designated 4 entities from Iran and Turkey for their involvement in in the procurement of equipment, such as European-origin engines for UAVs Designated 3 Belarusian entities, inc. Election Commission The US Attorney General authorized the first-ever transfer of assets confiscated from a sanctioned Russian oligarch Konstantin Malofeev, who was accused of evading sanctions, to be used in Ukraine
		<b>UK</b> Asset freeze on 7 entities, inc. 6 military entities and 1 entity from financial Kremlin networks Asset freeze on 12 Russian entities, inc. 4 banks (Bank Saint-Petersburg PJSC, Bank Uralsib PJSC, Bank Zenit PJSC, and MTS Bank PJSC), 6 entities in military, inc. aviation and navy and 2 Rosatom research institute Ban on provision of trust services to or for the benefit of all individuals and entities subject to asset freeze sanctions UK Treasury released a statement that the use of frozen funds for payment of legal professional fees for defamation cases is not appropriate in most cases
		<b>EU</b> Added Russia to its list of non-cooperative jurisdictions for tax purposes (EU "blacklist") Restrictive financial measures (asset freeze and prohibition to make funds and economic resources available) on 34 Russian entities, inc. Alfa-Bank, Rosbank, Tinkoff Bank, the National Wealth Fund of Russia and the Russian National Reinsurance Company and Russian military and defence sector Asset freeze, entry or transit ban against 7 entities linked to the Wagner Group Clarified that provision of crypto-asset wallet, account or custody services to Russian nationals or legal entities in Russia is also prohibited under previously adopted sanctions ECB is pressing Austria's Raiffeisen Bank International to unwind its highly profitable business in Russia Adopted the exemption for certain transactions extended until 31 December 2023 (instead of 30 June 2023). Allowed national competent authorities can authorize the release of certain frozen funds or economic resources for the limitation activities. More detail in block №3. Allowed operations with agricultural and food products, inc. wheat and fertilizers for Alfa-Bank JSC, Rosbank PJSC, and Tinkoff Bank JSC. <b>Prohibition on certain Russian banks from using SWIFT applies to the EU financial messaging service providers and not directly to the banks themselves. Also non-sanctioned alternative means such as paper, fax, or email to confirm payment orders for de-SWIRT banks (e.g. Rosselkhozbank)</b>
		<b>Canada</b> Sanctions on 16 propagandist entities Sanctions on 63 entities, inc. Russia's financial intelligence agency Federal Financial Monitoring Service, government institution, political party United Russia, entities in Russia's defense industry, Rosneftgaz company, along with the operating organization of the Zaporizhzhia NPP
		<b>Japan</b> Asset freeze on PJSC Rosbank and 73 entities in shipbuilding, aircraft and machine building
		<b>Australia</b> Sanctions on Safran Airport Services for their involvement in the production and supply of drones to Russia Imposed financial sanctions on 40 entities operating in defense, shipbuilding, technology, aerospace, oil and gas, research, media and banking sectors in Russia
		<b>New Zealand</b> Sanctions against 4 Iranian entities for the supply of drones to Russia Sanctions on 40 entities operating in defence, shipbuilding, technology, aerospace, oil and gas, research, media and banking sectors Sanctions against 5 entities of strategic significance to Russia, inc. private military company

	 <b>Switzerland</b> Sanctions on an Iranian company which manufacturing military aircraft and UAVs Sanctions against 34 entities in accordance with 10th EU package Adopted the exemption for certain transactions extended until 31 December 2023 (instead of 30 June 2023) Allowed national competent authorities can authorize the release of certain frozen funds or economic resources for the limitation activities. More detail in block №3 Allowed operations with agricultural and food products, inc. wheat and fertilizers for Alfa-Bank JSC, Rosbank PJSC, and Tinkoff Bank JSC
	 <b>Germany</b> Placed two German subsidiaries of Rosneft under fiduciary administration by the German Federal Network Agency
	 <b>Belgium</b> The Belgian Ministry of Finance issued a license to Russian individual to transfer frozen assets from the accounts of the NSD to a non-sanctioned depository
	 <b>Kazakhstan</b> The Kazakhstan Stock Exchange delisted 11 Russian issuers, inc. Aeroflot, Gazprom, Norilsk Nickel, LUKOIL and Rostelecom.
	 <b>Cyprus</b> Align with EU sanctions, country started to freeze bank and brokerage accounts of Russian citizens if the amount on them exceeds EUR 100,000 for any foreign brokers who have accounts of Russian clients in the Euroclear depository
	 <b>Kosovo</b> Joined the US sanctions sanctioned Russian PMC "Wagner"
<b>4. Designate the Russia as a Sponsor of State Terrorism</b> #Terrorism Progress: Yes	 <b>Lithuania</b> Adopted a resolution "On limiting the influence of terrorist Russia". The resolution proposes that the EU countries jointly create and expand the EU legal framework. Adopted a resolution stating that the Russian private military company Wagner is a terrorist organization
	 <b>Slovakia</b> Adopted a resolution condemning the current Russian regime as terrorist and Russia as a state sponsor of terrorism
<b>5. Strengthen Individual Sanctions against these Categories of Individuals</b> #Individual Progress: Yes	 <b>USA</b> Full blocking sanctions on 10 individuals across multiple countries, connected with Russia's MIC Sanctions on 8 senior executives of Paravar Pars Company (Iranian firm) for supply of UAVs to Russia Restrictive measures on 22 people, inc. executive from Rosbank and Sberbank Sanctions on 76 individuals, inc. several Russian regional governors and government officials Visa restrictions on 1219 members of the Russian military Visa restrictions on A. ZADACHIN and E. LENSKEYA and they family members for involvement in a gross violation of human rights Sanctions on Chinese individual for supporting Iran's UAVs procurement efforts Sanctions 3 individuals from Iran and Turkey which bought European-origin engines for Iran UAVs Sanctions on 9 Belarussian individuals Visa restrictions on 14 people from Belarus
	 <b>UK</b> Asset freeze on 8 individuals connected to Kremlin Asset freeze on 80 individuals, inc. Russian Deputy Finance Minister, Minister of Digital Development, senior executives at Rosatom, Rostec, Almaz-Antey Corporation, Gazprom (inc. Viktor Zubkov), Aeroflot Deleted from sanctions list Brian McDonald, head of RT (English edition)
	 <b>EU</b> De-listed D. Ovsyannikov, a former Governor of Sevastopol Asset freeze on 87 persons from Russian political and military elite Asset freeze and transit ban against 9 members of Wagner Group Asset freeze on 4 Russian police officers and members of the armed forces Annulled sanctions (asset freeze & travel ban is still in force) imposed on V. Prigozhina - mother of Wanger's head Deleted from the EU sanctions list 3 deceased persons Announced plans to create a clearer legal framework for imposing sanctions against family members of Russian businessmen who have been subjected to EU restrictions
	 <b>Canada</b> Sanctions on 38 propagandist Sanctions on 129 individuals, inc. senior officials in the Russian government, members of Russia's parliament, the State Duma, Russian military officials, a Russian oligarch (A.Mordashov) and 4 his relatives Sanctions on 3 senior Iran officials
	 <b>Japan</b> Asset freeze on 48 individuals
	 <b>Australia</b> Financial sanctions and travel bans on 90 individuals, inc. members of the Russian government, regional governors, central election commission, military officials and Patriarch Kirill Financial sanctions and travel bans on 13 people for involvement in production and supply of UAVs to Russia Financial sanctions and travel bans on 7 individuals
	 <b>New Zealand</b>

		Sanctions on 4 Iranian individuals for the supply of UAVs to Russia Sanctions on 87 individuals from Russian political and military elite Sanctions on 27 individuals from Russian and Belarusian elite, military actors
		<b>Switzerland</b> De-listed 2 individuals - D.Ovsyannikov, former "Governor of Sevastopol", S. Ivanov, member of Federation Council Financial sanctions and travel bans on 87 persons
		<b>Latvia</b> Added 35 individuals to the ban list on entering Latvia for an indefinite period
	<b>Tourist Visas Ban</b>	
		<b>Kazakhstan</b> New restriction required from Russians to have a foreign passport for long-term residency
		<b>Czech Republic</b> Prohibited issuance of Czech visas and long-term residency permits to foreign nationals who hold dual citizenship with Russia or Belarus
		<b>Lithuania</b> Allowed revocation of citizenship of persons with dual citizenship who pose a threat to the security of Lithuania. New law comes into force on 1 June 2023.
		<b>Israel</b> From April 15, 2023, Israel cancelled the emergency program "Aliyah", which provided an expedited path to Israeli citizenship for new arrivals from Russia and Belarus.
	<b>India</b> Introduced new rules for citizens of Russia on electronic tourist visas – now the period of continuous stay in India should not be > 90 days, and total duration of stay during 1 year should not be > 180 days.	
<b>6. Intensify Sanctions on State-Owned Enterprises</b> #SOE  <b>Progress:</b> Yes		<b>EU</b> Prohibited Russian nationals or residents from holding any posts in the governing bodies of the owners or operators of critical infrastructures in EU from March 27, 2023 - for more details look Block #6 Suspended broadcasting licenses of 2 Russian additional media - RT Arabic and Sputnik Arabic - from 10 Apr 2023
		<b>Switzerland</b> Prohibited the advertising of any product or service on NTV/NTV Mir, Rossiya 1, REN TV and Pervyi Kanal From 27 April 2023, come in force a prohibition for Russians from holding a function in the governing bodies of the owners or operators of critical infrastructure
		<b>Lithuania</b> Instructed internet service providers to block access to Russian propaganda TV channels ("NTV," "Pervyi Kanal," "Rossiya 1," "Rossiya 24," and "RTR Planeta") that have been sanctioned by EU
		<b>Japan</b> Institute of Space and Astronautical Science, belongs to Japan's space agency, set new standards for accepting foreign researchers and students that ban Chinese and Russian researchers, among others, from undergoing screening to enter ISAS
<b>7. Expand Export Controls and Ban Imports</b> #Trade  <b>Progress:</b> Yes		<b>G7 &amp; EU</b> G7 and the EU are discussing ways to track Russian diamonds across borders.
		<b>USA</b> Increased duty rates (from 35% to 70%) on a variety of goods from Russia (> 100 Russian metals, minerals, and chemical products) Increased tariffs on imports (to 200%) from Russia and other countries of aluminum and derivative aluminum articles Suspended export privileges of Radiotester OOO and I.Balakaev, for unauthorized export of controlled counterintelligence items to Russia and North Korea Additional export restrictions on Russia, Belarus, and Iran, as well as entities in third countries New export control measures on Iran, Russia, and Belarus to address Russia's use of Iranian UAVs Added 76 Russian entities to the Entity List, inc. 66 in the military sector Added 10 entities from Canada, China, France, Luxembourg, Netherlands, and Russia to Entity List for contributing significantly to Russia's military and defense industrial base Added 37 entities to Entity List, which will prohibit the listed companies from purchasing items, such as semiconductors and software made in the US or made abroad and containing US components Group of American senators proposed a bill to ban the import of Russian uranium into the US The US International Trade Commission maintained suspension agreement on imports of uranium Renewed the orders temporarily denying export privileges to Russian airlines Azur Air, UTair and Aeroflot. New license requirements for export of specified items used in Iran's UAV program to Russia and Belarus, including non-U.S. items that are the "direct product" of certain U.S. technology and software Imposing new license requirements for export or reexport of certain foreign-produced items (items made outside of the US) destined to Iran, regardless of U.S. person involvement, that may be used in Iranian unmanned aerial vehicles (UAVs). Extending restrictions on exports, reexports and in-country transfers for the oil and gas production industry items to Belarus Adding additional items to the lists of oil and gas production industry items controlled for export, reexport, and transfer to Russia and Belarus. Expanding the list of industrial items requiring a license for export or reexport to or transfer within Russia or Belarus Adding new items to the list of luxury goods subject to export restrictions. Announcing a favorable licensing policy to facilitate the disposition of items by companies curtailing or closing all operations in Russia or Belarus



	 <b>UK</b> Added derogation to the ban on business services related to transactions necessary for critical energy supply
	 <b>EU</b> Export bans on goods that can be easily redirected to be used to support the Russian war effort Export bans on sensitive dual-use and advanced technologies that contribute to Russia's military capabilities Extended list of restricted items that could contribute to Russia's military and technological enhancement Import bans on additional goods which generate significant revenues for Russia Listing additional 96 entities directly supporting Russia's MIC EC clarified that transit of dual-use goods and technology exported from the EU through the territory of Russia is prohibited Export ban on additional goods which could contribute to the enhancement of Russian industrial capacities Export ban on additional goods and technology which could contribute to Russia's military and technological enhancement or the development of the defense and security sector Export ban on additional airspace goods Export ban for 96 entities supporting Russia's military and industrial complex Import ban on additional Russia's revenues - generating goods Transit ban for dual-use goods and technology and firearms, their parts and essential components, and ammunition, exported from the EU to third countries Limited derogation from professional service ban exclusively for divestment of EU operators from Russia until 31 Dec 2023
	 <b>Japan</b> Introduced export bans against 21 Russian entities on items that can be used for military purposes, dual-use goods, certain commodities, and semiconductors Announced export bans on goods related to aerospace, construction, metallurgical industries, as well as a number of goods related to measuring equipment and communication that contribute to Russia's industrial base
	 <b>Canada</b> According to new amendments, from 14 Feb Canada is able to use a less stringent burden of proof to use a NME methodology for the purpose of calculating margins of dumping when investigating potential dumping cases involving Russia and Belarus Prohibited import, purchase, or acquisition of any type of weapon, ammunition, military vehicle or military or paramilitary equipment, or a spare part for any of those goods, from Russia or to any person in Russia Prohibited export, sale, supply or shipment of certain chemical elements for use in electronics wherever situated, to Russia or to any person in Russia Banned import, purchase or acquisition of various aluminum and steel products from Russia
	 <b>Switzerland</b> Added 96 entities to list of entities that fall under tighter export restrictions regarding dual-use goods and technology, technology which might contribute to technological enhancement of Russia Export ban on additional goods which could contribute to the enhancement of Russian industrial capacities Export ban on additional goods and technology which could contribute to Russia's military and technological enhancement or the development of the defense and security sector Export ban on additional airspace goods Export ban for 96 entities supporting Russia's military and industrial complex Import ban on additional Russia's revenues - generating goods Transit ban for dual-use goods and technology and firearms, their parts and essential components, and ammunition, exported from the EU to third countries Limited derogation from professional service ban exclusively for divestment of EU operators from Russia until 31 Dec 2023 Derogations from import/export bans until 30 Sep 2023 for divestment or winding down business in Russia
	 <b>Turkey</b> As of 1 Mar 2023, Turkish customs officials have blocked the transit of some Western-sanctioned goods to Russia via Turkey, without providing an official explanation. On 21 Mar 2023, the Turkish government issued a list of foreign goods that are prohibited from being re-exported to Russia (restrictions do not apply to goods produced in Turkey, even if they contain foreign components)
	 <b>Kazakhstan</b> From 1 April 2023, Kazakhstan will require exporters to submit additional documents when sending goods to Russia to reduce "underground" trade and prevent the circumvention of sanctions against Russia (online tracking system).
<b>8. Impose Secondary Sanctions</b> #Secondary  <b>Progress:</b> Yes, but slow	 <b>USA</b> US has warned Turkey about the negative consequences of exporting chemical reagents, semiconductors, and other products to Russia to circumvent sanctions The US threatened Chinese companies with sanctions over supplies of banned goods to Russia, besides the US is negotiating with close allies about the possibility of imposing new sanctions on China if Beijing provides military support to Russia for its war in Ukraine. Sanctioned Slovakian national, A. Mkrtych, for attempting to facilitate arms deals between Russia and North Korea.
	 <b>EU</b> EU plans to ask third countries that have increased their imports from the EU and exports to Russia to strengthen their oversight of external trade
	 <b>Turkey</b> Following the US and the EU warnings of secondary sanctions, exports from Turkey to Russia decreased 22% (from Dec 22 to Feb 23)
<b>9. Increase Transparency</b>	

<p>to Discourage Trade with and Investment in Russia #Transparency Progress: Yes, but slow</p>		
<p>10. Deepen Coordination of Sanctions &amp; Link Sanctions Relief to Peace &amp; Reconstruction #Coordinations #Reconstruction Progress: Yes</p>		<p><b>Council of Europe</b> Proposed creating a register to record evidence and claims for damage, loss or injury caused by Russia's crimes of aggression against Ukraine Proposed to set a special tribunal to prosecute those responsible for crimes against Ukraine</p>
		<p><b>UK</b> Seizure of Russian State Assets and Support for Ukraine Bill was presented at the House of Commons in the UK Government. The bill is currently at the first stages of adoption and discussions continue.</p>
		<p><b>Switzerland</b> The Federal Office of Justice has concluded that the confiscation of private assets frozen under Russian sanctions for use in the reconstruction of Ukraine is incompatible with Swiss law.</p>
		<p><b>France</b> The French justice system has achieved its first criminal seizure of a villa belonging to a Russian oligarch, Rashnikov. The villa, valued at €23 million, and the proceeds of the sale, estimated at €17 million, are now in the custody of the Ministry of Justice's Agency for the Management and Recovery of Seized and Confiscated Assets.</p>
		<p><b>Netherlands</b> Proposed to create an international register of damage caused by Russian aggression.</p>

## **SANCTION ENFORCEMENT**

### **Russian Elites, Proxies, and Oligarchs Task Force (REPO)**

On 24 February 2023, the Department of Finance Canada released a statement regarding the results of the Russian Elites, Proxies, and Oligarchs Task Force (REPO).

The REPO Task Force, which includes Canada, G7 partners, the European Commission, and Australia, has achieved significant results in the past year. They have blocked or frozen more than \$58 billion worth of sanctioned Russians' assets in financial accounts and economic resources; immobilized assets of the Russian Central Bank and National Wealth Fund; seized or frozen luxury real estate and other luxury assets owned, held, or controlled by sanctioned Russians, valued in the billions of dollars; seized, frozen, or detained yachts and other vessels owned, held, or controlled by sanctioned Russians. The REPO Task Force has conducted asset tracing activities to identify, locate, and seize yachts, aircraft, and other property located around the globe.

In addition to these actions, the REPO Task Force has worked to restrict sanctioned Russians' access to the global financial system and investigated and countered Russian sanctions evasion. They have updated or expanded and implemented their respective legal frameworks that enable the freezing, seizure, forfeiture, and/or disposal of assets.

Furthermore, the REPO Task Force has effected the first forfeiture of assets of a sanctioned Russian, paving the way for the transfer of \$5.4 million in funds as foreign assistance to Ukraine. The Task Force has worked collectively to investigate and counter Russian sanctions evasion, including attempts to hide or obfuscate assets, illicit cryptocurrency and money laundering schemes, illicit Russian defense procurement, and sanctioned Russians' use of financial facilitators.

On 9 March 2023, REPO's Global Advisory identified Russian sanctions evasion tactics, including:

- the use of family members and close associates to ensure continued control and access to wealth;
- the use of real estate as a vehicle to hold wealth and launder money;
- the use of complex ownership structures to disguise connections to assets or entities;
- the use of enablers to avoid direct participation in sanctions evasion involvement and leverage expertise; and
- the use of third-party jurisdictions and false trade information to facilitate the shipment of sensitive goods to Russia.

It also made recommendations for mitigating the risk of exposure to sanction evasion:

- ensure compliance with national rules incorporating FATF recommendations;
- ensure their compliance program implements relevant AML / CFT laws and regulations and is regularly reviewed;
- take part in existing public-private partnerships;
- leverage information sharing protocols; and
- update their risk assessments.

### **Financial Action Task Force (FATF)**

On 10 March 2023, FATF updated its guidance to help countries implement the revised Recommendation 24 on beneficial ownership standards. The revisions aim to prevent the use of anonymous shell companies and other businesses to hide illicit activities and dirty money. The guidance provides measures to ensure that beneficial ownership information is held by a public authority or body functioning as a beneficial ownership registry, or an alternative mechanism that enables efficient access to the information. The guidance also explains types and sources of relevant information and aims to assist policy makers and practitioners in national authorities and private sector stakeholders in implementing the necessary measures to prevent the misuse of legal persons for criminal purposes and ensuring transparency of beneficial ownership.

On 24 February 2023, FATF, an intergovernmental body that sets international standards for anti-money laundering, counter-terrorism financing, and countering the financing of proliferation of weapons of mass destruction suspended the membership of Russia due to its actions that go against FATF core principles aiming to promote security, safety, and the integrity of the global financial system.

While suspended, Russia will remain a member of the Global Network as an active member of the Eurasian Group on Combating Money Laundering and retain its rights as an EAG member, but the FATF will monitor the situation and consider lifting or modifying the suspension at future Plenary meetings.

On 24 February 2023, on the one-year anniversary of Russia's invasion of Ukraine the G7 announced the establishment of a new tool called the "Enforcement Coordination Mechanism" to improve compliance and coordination in enforcing existing sanctions on Russia. The instrument aims to improve information sharing and other actions directed at companies and countries suspected of aiding Russia's war in Ukraine through circumvention of sanctions.

The G7 has also pledged to strengthen their measures, such as transit and service restrictions, to prevent Russia from circumventing them.

On 2 March 2023, the G7 issued a statement at the one-year mark of Russia's invasion of Ukraine. The G7 partners reaffirmed their commitment to strengthening sanctions and imposing new coordinated economic actions against Russia in the days and weeks ahead. This includes the following new measures:

- Expanding current sanctions, including by preventing and responding to evasion through the establishment of an "Enforcement Coordination Mechanism";
- Calling on other international actors who seek to evade or undermine sanctions to cease providing material support to Russia, or face severe costs;
- Further aligning measures, such as transit or services bans, including to prevent Russian circumvention;
- Adopting further measures to prevent Russia from accessing inputs that support its military and manufacturing sectors, including industrial machinery, tools, construction equipment and other technologies used to build the war machine;
- Working collectively on further measures on Russian diamonds, including rough and polished ones, working closely to engage key partners;
- Taking additional measures in relation to Russia's financial sector; and
- Imposing targeted sanctions, including on those responsible for war crimes or human rights violations and abuses, exercising illegitimate authority in Ukraine, or who otherwise are profiting from the war.

The G7 also reaffirmed the need for an international mechanism to register the damages that Russia has inflicted and for Russia's sovereign assets to remain immobilised in G7 jurisdictions until there is a resolution to the conflict.

## US, EU, and UK

On 1 March 2023, Financial Times reported that the US, EU, and UK have been urging the United Arab Emirates (UAE) to stop exporting critical goods to Russia as part of their efforts to cut off supplies to Russia's military and pressure it to end the war in Ukraine. Concerns have been raised about the UAE becoming a hub for the shipment of electronics and other goods that can be repurposed to aid Russia's war effort, with the US government in particular worried about the practice of "re-exporting" through the UAE to sidestep sanctions. The UAE is a key exporter of electronic parts to Russia, with exports in this category jumping over seven-fold last year to almost \$283 million. It is also a popular destination for wealthy Russians seeking to shelter their assets. Western officials, including James O'Brien, head of the US office of sanctions coordination, EU sanctions envoy David O'Sullivan, and David Reed, director of the UK's sanctions directorate, visited the UAE to urge officials to clamp down on suspected sanctions busting.

## United States

On 7 February 2023, Russian national and US legal permanent resident Vladimir Voronchenko was charged in a US federal court for his involvement in a scheme to maintain and sell US properties owned by US-sanctioned "oligarch" Viktor Vekselberg. Vekselberg was designated by OFAC in April 2018 and again in March 2022. Voronchenko and a family member are alleged to have sent \$4 million in 25 wire transfers to an interest on lawyers' trust account used to make payments for the maintenance and service of Vekselberg's US properties. They are also accused of trying to sell Vekselberg's Park Avenue apartment and Southampton estate without obtaining OFAC licenses. The indictment states that the US government intends to forfeit the proceeds of his offenses, including the properties.

Voronchenko has been charged with violating the International Emergency Economic Powers Act (IEEPA), conspiring to commit international money laundering, and international money laundering, each of which carries a maximum sentence of 20 years in prison. Additionally, he is charged with contempt of court for his May 2022 flight from the US to Russia after being served with a Grand Jury subpoena. Voronchenko has not returned to the US since then.

On 14 February 2023, a federal jury in Boston found Russian businessman Vladislav Klyushin guilty of charges related to hacking U.S. computer networks to obtain secret, inside information about multiple companies which he and others used to make trades, making tens of millions of dollars in profits. Klyushin, the owner of Moscow-based information technology company M-13, was found guilty of conspiracy, wire fraud, and securities fraud. Of the five Russian nationals charged with the scheme, Klyushin was the only one arrested and to face trial. The other four, including Ivan Ermakov, a former Russian military intelligence officer, who worked at M-13 and is wanted by the U.S. government for his alleged involvement in hacking schemes to interfere in the 2016 presidential election and target anti-doping agencies, remain at large.

On 16 February 2023, the US Department of Justice (DOJ) and the Department of Commerce announced the creation of a joint initiative called the Disruptive Technology Strike Force. The Strike Force will bring together experts from various government agencies, including the DOJ's National Security Division (NSD), Bureau of Industry and Security (BIS), the FBI, Homeland Security Investigations, and fourteen U.S. Attorneys' offices. Its main goal is to strengthen supply chains, combat illicit activities, and protect critical technological assets from being illegally acquired or used by nation-state adversaries. The Strike Force will particularly focus on advanced technologies, such as supercomputing and exascale computing, artificial intelligence, advanced manufacturing equipment and materials, quantum computing, and biosciences, which can be used to enhance military capabilities or support mass surveillance programs leading to human rights abuses. The announcement cited China, Iran, Russia, and North Korea as adversaries that could potentially employ these cutting-edge technologies in manners that jeopardize US security or result in oppression of their own citizens. The Strike Force will operate in 12 metropolitan regions in the US and will focus on investigating and prosecuting criminal violations of export laws, enhancing administrative enforcement of US export controls, and coordinating with international partners on law enforcement actions and disruption strategies. It will use advanced data analytics and intelligence information, as well as traditional investigative tools. The Strike Force will also collaborate with the private sector to strengthen supply chains and protect critical technological assets.

On 24 February 2023, Russian national Ilya Balakaev has been charged in a five-count indictment for smuggling devices commonly used in counterintelligence operations out of the US to Russia for the benefit of the Federal Security Service of Russia (FSB) and Democratic People's Republic of Korea (DPRK) in violation of US export control laws. Between 2017 and the present, Balakaev entered into multiple contracts through his company Radiotester LLC with the FSB, repairing spectrum analyzers and signal generators used as part of counterintelligence operations. Balakaev created a network of individuals in the US to assist him in purchasing the equipment in the US which he used to repair the FSB devices, in violation of US sanctions. Balakaev also provided US technology to a North Korean government official, in violation of US sanctions against North Korea.

On 24 February 2023, BIS implemented decisions made by Participating States of the Wassenaar Arrangement on Export Controls for Conventional Arms and Dual-Use Goods and Technologies (WA) during their December 2021 Plenary meeting. BIS has published a final rule that revises the Commerce Control List (CCL) and certain provisions of the Export Administration Regulations (EAR). The final rule adds four technologies to the CCL that meet the criteria for emerging or foundational technologies, revises the CCL, and certain EAR provisions, including License Exception Adjusted Peak Performance (APP). The final rule also corrects the scope of Significant Item (SI) license requirements and revises License Exception Strategic Trade Authorization (STA).

On 1 March 2023, the President sent a notice to Congress stating that the national emergency declared in Executive Order 13660 of March 6, 2014, which was expanded in scope in Executive Order 13661, Executive Order 13662, and Executive Order 14065, and under which additional steps were taken in Executive Order 13685 and Executive Order 13849 with respect to Ukraine is to continue beyond March 6, 2023. The actions and policies of persons that undermine democratic processes and institutions in Ukraine and threaten its peace, security, stability, sovereignty, and territorial integrity, as well as the actions and policies of the Russian Federation, including its purported annexation of Crimea and its use of force in Ukraine, continue to pose an unusual and extraordinary threat to the national security and foreign policy of the United States. Therefore, the President has determined that it is necessary to continue the national emergency.

On 2 March 2023, the Department of Commerce's Bureau of Industry and Security (BIS), the Department of the Treasury's Office of Foreign Asset Control (OFAC), and the Department of Justice issued a joint compliance note on the use of third-party intermediaries or transshipment points to evade Russian- and Belarussian-related sanctions and export controls. The Note highlights one of the most common evasion tactics used to hide the involvement of sanctioned persons or parties on the Entity List and obscure the true identifies of Russian end-users: the use of third-party intermediaries or transshipment points.

According to the note, the following common red flags can indicate that a third-party intermediary may be engaged in efforts to evade sanctions or export controls:

- Use of shell companies or other corporate vehicles to obscure ownership, source of funds, or countries involved, including claiming shell companies are intermediate consignees or end-users;
- A customer's reluctance to share information about a product's end-use or to complete an end-user form;
- Dividing an order of controlled items into multiple shipments;
- Use of shell companies to conduct international wire transfers, including financial institutions in jurisdictions distinct from company registration;
- Declining customary installation, training, or maintenance of the purchased items;
- IP addresses that do not correspond to a customer's reported location data;

- Last-minute changes to shipping instructions that are inconsistent with the customer's history or business practices;
- Payments coming from countries or businesses not listed on the End-User Statement;
- Use of personal, rather than business, email addresses;
- Operation of complex or international businesses using residential addresses or addresses common to multiple closely held corporate entities;
- Revisions to standard engagement letters that obscure the ultimate customer;
- Changes to transactions previously planned for shipment to or payment from Russia or Belarus;
- Using aliases for the identities of the intermediaries and end-users;
- Transactions involving entities with little or no physical presence (e.g., a company with no visible signage or a seemingly empty office in a strip mall);
- Entities with little or no web presence; or
- Routing purchases through China (including Hong Kong and Macau), Armenia, Turkey, and Uzbekistan, which are transshipment points commonly used to divert products to Russia or Belarus.

On 2 March 2023, the US Department of Justice (DOJ) announced increased efforts to prevent companies and other third parties from aiding Russia in bypassing U.S. sanctions. The DOJ will add 25 new prosecutors to its counterintelligence and export controls section who will work with companies to investigate and prosecute sanctions evasion, export control violations, and similar economic crimes, as well as advising on investigations involving corporations. In addition, the DOJ will create the first-ever Chief Counsel for Corporate Enforcement, a lawyer to advise on investigations involving corporations. The new hires are part of a broader restructuring of, and resource commitments to, the DOJ's National Security Division (NSD), increasing its capacity to investigate and prosecute sanctions violations. NSD will also issue joint advisories with the Commerce and Treasury Departments to inform the private sector about enforcement trends and highlight expectations as to national security-related compliance. The DOJ is also updating a program to encourage companies that may have been involved in misconduct that could have national security implications to voluntarily report those issues. The aim is to prevent companies and third parties from helping Russia evade U.S. sanctions and to raise awareness of potential risks and warning signs for evasion. The DOJ will also provide additional resources for the Bank Integrity Unit (BIU) in the Criminal Division's Money Laundering and Asset Recovery Section, prosecuting international financial institutions for violating sanctions. The new resources are intended to strengthen BIU's partnership with NSD in pursuing international financial institutions.

On 2 March 2023, US authorities arrested two men from Kansas, Cyril Gregory Buyanovsky and Douglas Robertson, on charges relating to the circumvention of US export laws, including conspiracy to commit offences against the US and unlawful export of US-origin controlled goods to Russia. The charges include conspiracy, exporting controlled goods without a license, falsifying and failing to file electronic export information, and smuggling goods. The two men are accused of owning and operating KanRus Trading Company, which supplied Western avionics equipment to Russian companies and provided repair services for equipment used in Russian-manufactured aircraft. They allegedly evaded US export laws by concealing and misstating the true end users, value and destinations of their exports and by submitting false export documents, exporting items to intermediary companies and transshipping items through third countries, such as Germany, the UAE, Cyprus and Armenia. They face up to 35 years in prison if convicted.

On 24 March 2023, the Financial Crimes Enforcement Network (FinCEN) released its first set of guidance materials to help corporate entities understand the reporting requirements under the Corporate Transparency Act (CTA), which was enacted by Congress on 1 January 2021. The CTA aims to prevent tax evasion, money laundering, sanctions evasion, and illicit finance by establishing uniform beneficial ownership information (BOI) reporting requirements for corporate entities in the United States. Under the new regulations, many corporations, limited liability companies, and other entities created in or registered to do business in the US must report information about their beneficial owners to FinCEN. FinCEN's guidance materials include information on who is considered a beneficial owner, which companies will be required to report BOI, exemptions to the reporting requirement, and what information must be reported. The reporting requirement will begin on 1 January 2024.

On 24 March 2023, Igor Panchernikov, a former member of the US military, pleaded guilty to conspiring to illegally export defense articles to Russia, including thermal imaging riflescopes and night vision goggles, without a license. Panchernikov conspired with others between December 2016 and May 2018 to export these items without obtaining the necessary approval from the State Department. His accomplices purchased the defense articles from online sellers in the U.S. and had them shipped to Panchernikov's residence in Corona, California. Panchernikov inspected the items and then mailed some to accomplices in Russia and others to Elena Shifrin in Illinois, who then forwarded them to Russia. To conceal the illegal activities, Panchernikov listed fictitious sender names, falsely described the items, and concealed them in other objects. Panchernikov faces a maximum sentence of 20 years in federal prison and is scheduled for sentencing on June

23. Shifrin has already pleaded guilty, and another defendant, Vladimir Pridacha, has pleaded not guilty and is awaiting trial. Two additional defendants are considered fugitives.

The US Treasury Department's Office of Foreign Assets Control (OFAC) has launched an inquiry into Raiffeisen Bank International's (RBI) business related to Russia, asking for details of its exposure in Russia, Ukraine, and Syria, including transactions and activity of certain clients. Raiffeisen has stated that it is cooperating fully with OFAC and that it has processes in place to ensure compliance with sanctions. The bank has negotiated an extension to provide answers in three tranches of information to be sent in April, May, and June. The inquiry is not believed to have been triggered by a specific transaction or business.

## United Kingdom

On 16 February 2023, the House of Commons Library published a research briefing "Post-conflict reconstruction assistance to Ukraine". The paper addresses the question of whether Russian sanctioned assets could be used for Ukraine's reconstruction and outlines the main legal issues with the proposal. In summary:

- the UK's current asset freezing regime prohibits those in possession of frozen economic resources to "deal" with them;
- seizing private assets risks falling foul of bilateral agreements protecting foreign investors from unlawful expropriation;
- seizing state-owned assets may also have international implications (e.g. conflict with the principle of non-intervention, or sovereign immunity in judicial proceedings);
- the proposal to seize Russian assets is likely to require a specific legal basis in international law (e.g. through the doctrine of countermeasures);
- from an international standpoint, there have also been developments in the US, the EU and Canada as to whether frozen Russian assets should be upgraded to seizure of assets and potentially redirected to the reconstruction of Ukraine.

On 24 February 2023, to mark the 1-year anniversary of Russia's actions in Ukraine, the UK announced the extension of existing measures against Crimea and the non-government-controlled areas of Donetsk and Luhansk to target Russian controlled areas of Kherson and Zaporizhzhia oblasts, restricting their access to UK trade and finance.

On 13 March 2023, as part of the 2023 Integrated Review Refresh, the UK government announced the launch of a new UK Integrated Security Fund (UKISF) that will fund projects both at home and overseas to tackle some of the most complex national security challenges facing the UK and its partners. The UKISF will have a budget of approximately £1 billion and will combine several other funds across the government.

The UKISF will also support the work of a £50 million Economic Deterrence Initiative (EDI) over 2 years to strengthen the implementation and enforcement of UK sanctions, including by tackling sanctions evasion across the UK's trade, transport and financial sanctions. The Initiative will also be used to enhance UK's preparedness for future scenarios where the UK may need to deter or respond to hostile acts and to expand upon the work already undertaken with the G7 in response to Russia's aggression against Ukraine, which includes deterrence and response efforts. The government will also work with the private sector to maximise the reach of sanctions against those who pose a threat to the UK.

The government has also said that it will augment the pool of security-cleared analysts, to enhance the precision and efficacy of future measures, minimising the impact on the UK economy.

On 30 March 2023, the UK government published its Economic Crime Plan for 2023-2026. As part of the Plan, the government has committed to combating kleptocracy and sanctions evasion, including by:

- expanding the capacity of the National Crime Agency's Combatting Kleptocracy Cell to target "corrupt elites" through assets hidden in the UK and to support cross-government work on criminal breaches of sanctions;
- publishing an assessment of sectoral threats and vulnerabilities relating to financial sanctions by Q4 2024;
- increasing engagement between the private and public sector, and reviewing and expanding on OFSI's enforcement guidance and licencing framework by Q4 2023;
- improving engagement and information sharing of suspected sanctions breach cases between domestic regulators by Q4 2023;
- enhancing cooperation with the US, EU and other jurisdictions to increase the effectiveness of financial sanctions;
- identifying and disrupting enablers of sanctions evasion, including a small number of "bad actors" in Trust or Company Service Providers (TCSPs) and the property, legal and accountancy sectors;
- considering all possible options for seizing assets in the UK that could be used to remedy harm to Ukraine.

## European Union

On 15 February 2023, the Swedish Presidency of the Council of the EU tweeted that the EU created an ad hoc working group to develop plans for the use of frozen and immobilized Russian assets to support the rebuilding of Ukraine. The working group was established in accordance with EU and international law and will conduct legal, financial, economic, and political analyses of the feasibility of using such assets. According to the Reuters news agency, the group will be led by Anders Ahnlid, the head of Sweden's National Board of Trade, and is expected to include assets from the Russian Central Bank amounting to tens of billions of dollars.

On 20 February 2023, the EU extended by one year until 24 February 2024, the sanctions imposed on business dealings with certain non-government controlled areas of Ukraine including Donetsk, Luhansk, Zaporizhzhia and Kherson, in response to the illegal recognition, occupation, or annexation by Russia. The restrictive measures include an import ban on goods from these areas, an export ban on certain goods and technologies, and a ban on certain advisory and consultancy services.

On 23 February 2023, the EU held its first Sanctions Coordinators Forum. The event gathered all EU Member States and the U.S, the UK, Japan, Canada, Australia, New Zealand, Norway, Switzerland and Ukraine to focus on ensuring that sanctions are implemented fully and effectively, while considering in particular circumvention patterns and routes and potential solutions.

On 24 February 2023, the European Council extended the existing sanctions against Belarus for another year (until 28 February 2024) due to the country's internal repression and support for Russia's actions in Ukraine. The decision was made based on the annual review and the continued seriousness of the situation in Belarus, as well as the country's involvement in Russia's military operation. The sanctions include travel bans and asset freezes for 195 individuals and 34 entities, including Belarusian President Alexander Lukashenko. The EU has also imposed targeted economic sanctions on Belarus in various sectors.

On 25 February 2023, as part of the 10th package of sanctions against Russia, the EU introduced broad reporting obligations concerning immobilized reserves and assets of the Russian Central Bank, as well as funds and economic resources belonging to listed individuals and entities. To allow time for adaptation, a deferred application of the new reporting requirements is provided.

### – Asset freeze

Starting from 26 April 2023, all natural and legal persons, entities, and bodies under EU jurisdiction must provide the following information to the competent authority of the Member State where they are resident or located within two weeks of acquiring this information:

- information about funds and economic resources belonging to, owned, held or controlled by listed natural or legal persons, entities or bodies, which have been frozen or should have been frozen;
- information about funds and economic resources within the EU belonging to, owned, held or controlled by listed natural or legal persons, entities or bodies, which were subject to any move, transfer, alteration, use of, access to, or dealing in the two weeks before their listing.

Such information must include at least (a) data identifying the natural or legal persons, entities or bodies owning, holding or controlling the frozen funds and economic resources (including their name, address, and VAT registration or tax identification number); (b) the amount or market value of such funds or economic resources at the date of reporting and freezing; (c) the types of funds or economic resources broken down according to the specific categories identified in the definition of "funds" and "economic resources", including crypto-assets; and where available the quantity, location or other relevant features.

The relevant EU Member States must transmit the information received within two weeks to the Commission. Such information may be transmitted in an anonymised form if an investigating or judicial authority has declared it to be confidential in the context of pending criminal investigations or criminal judicial proceedings.

Natural and legal persons must cooperate with their national competent authority and/or the European Commission in any verification of such information.

### – Central securities depositories

Central securities depositories (CSDs), due to their critical role in the functioning of securities markets, bear specific reporting responsibilities concerning frozen assets. Starting from 26 April 2023, CSDs are required to provide the aforementioned information, along with information regarding any extraordinary or unforeseen loss or damage related to the relevant funds and economic resources, to the competent authority of the EU Member State in which they are located within two weeks of acquiring such information. Concurrently, these reports should be transmitted to the European Commission as well. Following the initial report, subsequent reports should be submitted every three months. The information regarding extraordinary and unforeseen loss and damage pertains to events such as cyberattacks affecting the frozen assets, fraud, or circumvention of the freeze resulting in assets being moved without the knowledge of the CSD.



## – Immobilised assets of Central Bank of Russia

From 27 April 2023 onwards, it is required for natural and legal persons, entities, and bodies (including the European Central Bank, national central banks, financial sector entities, insurance and reinsurance undertakings, central securities depositories, and central counterparties) to report information concerning assets and reserves of the Central Bank of Russia, which they hold or control or are a counterparty to. This includes transactions involving any legal person, entity, or body acting on behalf of or under the direction of the Central Bank of Russia, such as the Russian National Wealth Fund.

These reports should be submitted to the competent authorities of the Member States where the reporting entities are resident or located. Simultaneously, the reports should also be submitted to the European Commission. Additionally, this information should be updated every three months.

Member States and the relevant natural and legal persons, entities and bodies must cooperate with the Commission in any verification of such information. The Commission may request any additional information, while informing the Member State concerned of such request.

Such information shall be updated every 3 months and shall at least cover the following:

- (a) information identifying the natural or legal persons, entities or bodies owning, holding or controlling such assets and reserves, including the name, address and VAT registration or tax identification number;
- (b) the amount or market value of such assets and reserves at the date of reporting and at the date of immobilisation;
- (c) types of the assets and reserves, broken down according to the categories as well as crypto-assets and other relevant categories, and an additional category corresponding to economic resources (assets of every kind, whether tangible or intangible, movable or immovable, which are not funds but may be used to obtain funds, goods or services).

For each of those categories and where available, relevant features, such as quantity, location, currency, maturity and contractual conditions between the reporting entity and the asset owner shall be indicated.

Any extraordinary and unforeseen loss or damage to those assets and reserves must be reported immediately to the competent authority of the relevant Member State and transmitted simultaneously to the Commission.

Specific categories identified in the definition of "funds" and "economic resources" cover:

- (i) cash, cheques, claims on money, drafts, money orders and other payment instruments;
- (ii) deposits with financial institutions or other entities, balances on accounts, debts and debt obligations;
- (iii) publicly- and privately-traded securities and debt instruments, including stocks and shares, certificates representing securities, bonds, notes, warrants, debentures and derivatives contracts;
- (iv) interest, dividends or other income on or value accruing from or generated by assets;
- (v) credit, right of set-off, guarantees, performance bonds or other financial commitments;
- (vi) letters of credit, bills of lading, bills of sale;
- (vii) documents showing evidence of an interest in funds or financial resources.

On 1 March 2023, the General Court of the EU suspended parts of EU targeted sanctions on Nikita Mazepin, who challenged his inclusion on the EU sanctions list. Mazepin has been designated on the EU's Russia sanctions list since September 2022. The Court granted interim measures permitting him to enter the EU to take steps strictly necessary to negotiate his recruitment as a formula 1 driver, provided that he undertook to race under a neutral flag. The Court said there was an arguable case that the measures were not taken on a sufficiently solid factual basis, and the measures would cause serious and irreparable harm to his career if not suspended.

On 7 March 2023, the EU and Canada in a joint press release announced their intention to increase coordination on sanctions, their enforcement, and export control restrictions. Canada has been designated as a Partner Country for EU's sanctions regulations against Russia, which will result in better exchange of information and best practices to more effectively enforce existing and future sanctions.

On 10 March 2023, the European Parliament published a briefing titled "*EU sanctions on Russia: Overview, impact and challenges*". The briefing includes a summary of the sanctions which have been imposed by the EU on Russia since the invasion. It also sets out a list of the European Parliament's demands, including:

- intensification of EU outreach to countries that have not yet introduced Russian sanctions. Parliament also criticised certain EU candidate countries' non-alignment with EU sanctions, and called for a clear plan of action towards non-EU countries facilitating sanctions evasion;
- active prevention, investigation and prosecution by Member States of any sanction circumvention and the setting-up of a legal regime for the confiscation of assets frozen by sanctions;
- development of an EU legal framework for the designation of states as sponsors of terrorism and states which use means of terrorism;

- extension of the scope of the EU Global Human Rights Sanctions Regime (EU Magnitsky Act) to include acts of corruption, to adopt targeted sanctions against individuals responsible for high-level corruption in Russia and Belarus, as well as their EU-based enablers and beneficiaries;
- action to hold the Russian and Belarusian political and military leadership accountable for the crime of aggression against Ukraine;
- strict enforcement of all sanctions; and an impact assessment on the sanctions' effects on Russia's war effort and on the circumvention of sanctions;
- sanction anyone associated with the 'Wagner group' and other Russian-funded armed groups, militias and proxies;
- creation of a secondary sanctions mechanism that would 'close any loopholes', and 'to complete the legal regime allowing for the confiscation of Russian assets frozen by the EU', and for their use to address reconstruction and compensation for the victims of Russia's aggression.

On 13 March 2023, the Council of the European Union extended for another 6 months, until 15 September 2023, the restrictive measures targeting individuals and entities responsible for undermining or threatening Ukraine's territorial integrity, sovereignty, and independence. These measures include travel restrictions, freezing of assets, and a ban on making funds or other economic resources available to listed individuals and entities. These sanctions apply to a total of 1473 individuals and 205 entities, many of which are targeted in response to Russia's ongoing military aggression against Ukraine.

On 15 March 2023, the Council of the European Union announced that certain third countries, including North Macedonia, Montenegro, Serbia, Albania, Ukraine, Moldova, Bosnia and Herzegovina, Iceland, Liechtenstein, and Norway, have aligned themselves with Council Decision (CFSP) 2023/4571. This decision prolongs restrictive measures until 6 March 2024 and updates information in the Annex to Decision 2014/119/CFSP regarding the rights of defence and the right to effective judicial protection. The aligned countries have committed to ensuring that their national policies conform to this decision.

On 15 March 2023, the Council of the European Union announced on 15 March 2023 that certain third countries, including North Macedonia, Montenegro, Albania, Ukraine and Bosnia and Herzegovina, Iceland, Liechtenstein and Norway, have aligned themselves with Council Decision that prolongs the restrictive measures against Belarus for one year, until 28 February 2024. The aligned countries have committed to ensuring that their national policies conform to this decision.

According to Bloomberg, Europe could not find €100 bn of assets of Russian elites. The EU encountered difficulties in finding and freezing the assets of sanctioned Russian elites. Having blacklisted nearly 1,500 Russians, inc. billionaires close to the Kremlin, the EU was able to find only €20.9 bn in assets from them. After 10 rounds of sanctions, officials expected significantly more: as of 2019, the portfolio of direct investments linked to Russia was estimated at €136 bn. Where the other €100 bn are, European officials still do not understand.

The EU is planning to launch a two-year project with nine member states to identify gaps in the sanctions regime against Russia and to improve coordination between national authorities when enforcing penalties. The partnership between the European Commission and national governments is viewed as a precursor to a new EU body to coordinate sanctions oversight. The Netherlands, supported by several other member states, has called for an EU-level mechanism to ensure that governments and companies are not evading the bloc's 10 rounds of sanctions against Russia. The project, which will run for two years starting in June, is the first time the bloc's executive arm is supporting member states on sanction enforcement with specific resources at this scale. The group will map the authorities in charge of asset freezes, exchange good practices, and improve their implementation.

On 24 March 2023, the head of the EU task force on seizing Russian assets, Anders Ahnliid, stated that the EU's plans to seize Russian assets following Russia's invasion of Ukraine are unprecedented and tricky. The EU is prioritising state assets of around \$350 billion, including from oligarchs' yachts to the Russian central bank's foreign reserves, but seizing them in a legal manner is easier said than done. Ahnliid stated that "nothing is simple" when it comes to finding the massive sums intended to be diverted to pay for Ukraine's reconstruction, and that it is a challenge to find legal means that are acceptable. The task force hopes to have made progress on identifying the Russian assets by May, but Ahnliid refrained from specifying a timeframe for the first payment to Kyiv made from the Russian funds.

## Germany

On 9 February 2023, the Cologne public prosecutor's office is reported to have searched the premises of 3 unnamed companies and 3 private homes in the Rhein-Erft-Kreis district as part of an investigation into possible violations of EU sanctions on Russia. It is said that the investigation concerns the supply of electronic components to Russia and that records, documents and IT equipment were seized.

On 23 February 2023, Germany's Deputy Chancellor, Robert Habeck, announced that Germany intends to strengthen regulations to prevent the export of EU-sanctioned goods to third countries. The aim is to ensure that the export of goods, which are crucial to the Russian war machine, to certain third countries is only allowed if end-use declarations are provided. In export declarations, companies will have to clearly state the end use of their goods, "indicating that they will not be further exported to Russia." The German Federal Minister of Economy is seeking to adjust both national and EU regulations to prevent circumvention activities more effectively, including criminalizing intentional violations of the obligation to submit truthful end-use certificates throughout Europe. Anyone who provides false information in the end-use statement will face criminal prosecution.

## Switzerland

On 14 March 2023, the Swiss State Secretariat for Economic Affairs (SECO) reported that it had identified around 100 cases of potential Russia sanctions violations related to the Russian aggression against Ukraine. The cases were reported by the Federal Office for Customs and Border Security (FOCBS) and mostly concern sanctions on goods, including luxury goods or goods of economic importance to Russia. According to the SECO:

- proceedings have been opened in 23 of these cases, with the 2 latest of which relate to Belarus;
- in 13 cases, criminal proceedings were dropped due to a lack of evidence; and
- 60 cases are still under investigation.

On 29 March 2023, Switzerland implemented comprehensive reporting requirements regarding the immobilized reserves and assets of the Central Bank of Russia, as well as funds and economic resources owned by sanctioned individuals and entities, in order to align with the EU's 10th package of sanctions against Russia. These measures included:

### – Asset freeze

All individuals and companies under Swiss jurisdiction that hold or manage funds or are aware of economic resources that are owned or controlled by sanctioned individuals or entities must notify SECO immediately of all transactions carried out by such individuals or entities in the two weeks prior to their listing.

### – Immobilised assets of Central Bank of Russia

Swiss individuals and businesses, including the Swiss National Bank, financial sector companies, insurance and reinsurance companies, central securities depositories, and central counterparties, that hold or control reserves and assets of the Central Bank of Russia or are counterparties to them, are required to report to SECO on such reserves and assets of the Central Bank of Russia, including transactions with any legal person, entity or body acting on its behalf or at its direction, such as the Russian National Wealth Fund, by 12 April 2023 and subsequently on a quarterly basis. In addition, they must immediately notify SECO of any extraordinary and unforeseen loss or damage suffered by the assets and reserves they control that belong to the Central Bank of Russia. The reports must contain the names of individuals and businesses and information on the type and value of the funds and economic resources concerned.

On 30 March 2023, four bankers were convicted in Switzerland for assisting Sergey Roldugin, a concert cellist and close friend of Russian President Vladimir Putin, in moving millions of francs through Swiss bank accounts. The bankers, who were employees of Gazprombank's Swiss subsidiary, including its chief executive Roman Abdulin, were found guilty of criminal negligence for allowing accounts to be opened in Switzerland without questioning the origin of the funds flowing through them. The sums involved in the case were around 30 million Swiss francs. The bankers were given fines totalling 741,000 Swiss francs, suspended for 2 years. The case was opened as a result of the 2016 Panama Papers leak.

## Netherlands

The Netherlands published a non-paper on strengthening EU sanctions capacity and countering sanctions circumvention. The proposals include the following:

- increase focus on alternative supply chains created through the use of front companies in countries surrounding Russia, notably on Western components that are crucial to the Russian military industry;
- strengthen the feedback loop between enforcement practice at national level and sanctions policy at EU-level (e.g. by enhancing cooperation between agencies such as customs, tax authorities and prosecutors the intelligence community, as well as research institutes and statistics agencies);
- strengthen the EU point of contact for sanctions circumvention (e.g. by setting up a "Sanctions HQ" in Brussels and creating a platform for common analysis on individual cases of circumvention and jurisdictions facilitating circumvention). The Netherlands also suggested leveraging the soon to be established EU Anti Money Laundering Authority (AMLA) for countering sanctions circumvention (background info regarding the AMLA [here](#));
- identify concrete steps for diplomatic outreach and potential further measures (e.g. by coordinating with G-7 plus partners to coordinate engagement with third states, notably with countries in the Global South);

- expand the EU-toolbox, for example:
  - issuing guidance by EU institutions for EU companies and tools to recognize and counter circumvention patterns;
  - issuing official warnings to certain persons/entities inside and outside the EU;
  - create a watch list of companies and/or sectors/trade flows of specific concern and explore possibilities of publishing 'suspicions' or warnings in case sufficiently solid evidence cannot be presented, enabling due diligence for companies;
  - encourage companies in circumvention-sensitive sectors to adopt contractual obligations regarding end-use;
  - consider using the EU's trade toolbox and possibly other instruments of external action in cases of widespread circumvention in a state which refuses to act upon these issues.
- expand listing capacities:
  - the EU needs to be able to act also on other cases where circumvention may be linked directly or indirectly to the use of products/components on the battlefield in Ukraine, thereby including a broader category of products/components required for weapons and military production.

## **Estonia**

On 22 March 2023, Estonian Minister of Finance Annely Akkermann spoke at the Baltic ACAMS (Association of Certified Anti-Money Laundering Specialists) symposium and emphasized the importance of implementing sanctions against Russia as strictly as possible to deter continued aggression. She also highlighted the need to strengthen measures against sanctions evasion, as Estonia has identified over 1500 cases of Russia-related sanctions violations. Akkermann noted an increase in the use of cryptocurrency to circumvent sanctions. In particular, virtual currency is used precisely to hide the origin of the asset and the counterparty of the transaction.

## **"Friendly countries"**

"Friendly countries" such as China, Turkey, the United Arab Emirates and post-Soviet republics, including Kazakhstan, Uzbekistan, Kyrgyzstan and Turkmenistan, refuse to work with Russian credit organizations that have come under the sanctions of the West - Rosbank Vice President Alexander Rakhmanin. For example, the largest state-owned banks of China - Bank of China, ICBC, China Construction Bank - refuse to accept payments from banks from the Russian Federation that have come under blocking sanctions. It is also not always possible to circumvent the restrictions by trading in RMB. If a Russian bank is disconnected from SWIFT, it ceases to have access to cross-border payments even in China. Turkish banks refuse to open lira checking accounts with blacklisted Russian banks. In the UAE, the local regulator has banned the complete replacement of, for example, US dollars with dirhams in trade with Russia.

## **China**

According to RBC, China refuses to allow more than half of the aircraft of Russian airlines into its airspace due to Western sanctions - Russian airlines cannot operate flights to China on aircraft that are not excluded from the Bermuda registry (over 480 aircraft) or are on the US Department of Commerce sanctions list (more 170).

## SANCTION CIRCUMVENTION

### Russia

Bloomberg reported that Russia has accumulated \$80 billion in "shadow reserves" over the course of a year of sanctions. These funds resulted from a record trade surplus and are distributed in cash, real estate, and investments in foreign companies, according to the agency. Russia was able to keep about a third of the \$227 billion received in 2022 from raw material exports abroad.

Russia is trying to circumvent the oil embargo. On March 20, Albanian police detained a tanker with 22,500 tons of Russian oil. The Liberian-flagged ship was transporting 22,500 tons of oil with forged documents, which was supposed to be smuggled to Albania. According to the first investigative actions, it is suspected that this batch of oil was exported from countries subject to an oil embargo, in particular from Russia. The vessel departed from Azerbaijan and is said to have been loaded with oil at the port of Kalamata, Greece, from another vessel in the amount of 22,500 tonnes of diesel fuel. All relevant materials for inspection were seized, the vessel with a crew of 22 people was blocked for further procedural actions.

Rostec bypasses sanctions and buys Western components for the war against Ukraine. The "daughter" of the company, the concern "Radio-Electronic Technologies" (KRET), through intermediaries, buys components for the production of electronic warfare equipment. KRET uses three chains of intermediary companies. They operate through shell companies registered to KRET's close relatives, as well as through shell companies in China, Hong Kong and Turkey owned by affiliated businessmen. More details [here](#).

A mysterious fleet is helping Russia ship oil around the world and it's growing - the size of that "shadow" fleet at roughly 600 vessels, or about 10% of the global number of large tankers. According to CNN, between 25 and 35 vessels enter the shadow fleet every month. The owners aren't determined - new, obscure players swooped in, with shell companies in Dubai or Hong Kong involved in some cases. Also unknown companies bought boats from Europeans or tapped old, creaking ships. In addition, there is often some evidence that they have been disguising their activities by turning off their AIS transponder. At the end of January, in the publication of the Economist, the number of tankers used for oil from Russia was estimated at 360 units.

Russia has sold millions of barrels of oil in circumvention of European sanctions - Bloomberg. Oil and its products are transferred from one tanker to another in neutral waters - for example, off the coast of Greece, as well as off North Africa. The Greek authorities have already stated that they can do nothing about this, since the trade takes place outside the territorial waters. Since the beginning of 2023, at least 23 million barrels of Russian oil and refined fuel have been pumped from one tanker to another in the Laconic Gulf, Bloomberg reports. It is alleged that this is done on tankers that belong to the "gray" tanker fleet, which then transports oil to Asian countries.

The Ministry of Industry and Trade has expanded the list of goods for deliveries to the country through parallel imports. The list is supplemented by a number of brands of motor oils (Shell Helix, Rimula), household appliances (Zanussi, Wahl), cosmetics and perfumery (Kerastase, Yves Saint Laurent), spare parts for agricultural and marine equipment (Caterpillar, Bauer Kompressoren), toys and children's goods (Hasbro, Logitech, Nintendo), as well as IKEA. In the future, the list may increase: the ministry intends to include not only individual trademarks, but also their parent companies, that is, copyright holders.

After the withdrawal of major oil traders from Russia, six little-known companies from Hong Kong and Dubai became the main sellers of Russian oil. Also, many of the buyers were large Chinese and Indian state-owned companies and divisions of Russian oil companies. Last December, they processed 1.4 million barrels worth more than \$2 billion from Russia, surpassing giants such as Trafigura Group and Vitol Group - Bloomberg, citing data from Russian customs.

From October 1, 2023, CBR will be require to use only Russian services and domestic financial infrastructure to transfer financial information when transferring funds in Russia (it will be prohibited to use SWIFT for transfers within Russia). Information on such transactions will now need to be transmitted through their own banking systems or services of third-party Russian companies, as well as the Financial Message Transmission System of CBR.

The government commission of the RF MinFin on control over foreign investments introduced a tax on the sale of business in Russia. "Unfriendly" companies were obliged to contribute to the budget in the amount of at least 10% of half the market value of the agreement. If the company sells the business at a discount of more than 90%, the contribution will increase to 10% of the total value of the deal.

## United Kingdom

According to Bloomberg, British law enforcement agencies have identified large numbers of sham companies incorporated in the UK by nationals from Russia and a range of countries in recent years, likely for the purposes of money laundering or tax evasion, the people said, asking not to be named discussing confidential matters. The British government is in the process of strengthening laws to reform Companies House and clamp down on financial crime. The Economic Crime and Corporate Transparency Bill was introduced to Parliament in September 2022 and seeks to give the companies registry more powers to uncover who is forming companies and investigate suspected fraud.

## European Union

The EU is investigating the surge in exports to Russia's neighboring countries. A report by the EBRD notes that Russia's neighboring countries, especially Kyrgyzstan and Armenia, have significantly increased their imports of goods from the EU, the UK, and the USA since the start of Russia's aggression against Ukraine. This indicates that they have taken on the role of trade intermediaries for Russia.

## Turkey

According to WSJ, Turkish companies exported tens of millions of dollars worth of machinery, electronics, spare parts and other goods Russia needs for its armed forces last year. At least 13 Turkish firms reportedly exported goods totaling \$18.5 million. According to the data analyzed by journalists, Turkish companies have sent at least 3 batches of American-made goods to Russia.

In 2022, 1,363 companies with Russian partners were registered in Turkey, according to a report by the Economic Policy Research Foundation of Turkey. Compared to only 177 of such companies registered. The increase equals 670%.

## Iran

Ships under the Russian flag transport ammunition from Iran to Russia. Iran secretly supplies Russia with ammunition, rockets and mortar shells by sea - Sky News, citing intelligence sources. Two cargo ships under the Russian flag - Musa Jalil and Begey - sent 200 containers of ammunition to Russia. They left the Iranian port in January and traveled to Russia via the Caspian Sea. The cargo consists of approximately 100 mln rounds of various calibers. The ships also carried a range of other munitions, including about 300,000 rounds, grenade launchers, anti-tank rockets and mortar shells of various sizes as well as artillery rockets and armored shells. Also on board were about 10,000 body armor and helmets. Russia pays for ammunition in cash to circumvent sanctions.

As reported by Reuters, Iran and Russia have connected their interbank communication and transfer systems to help boost trade and financial transactions. In 2015 the Islamic Republic was disconnected from the Belgium-based SWIFT financial messaging service. 10 large Russian banks are also disconnected from SWIFT.

## China

China is helping Russia circumvent sanctions by providing technology needed by Russian forces to continue waging war in Ukraine - research by WSJ in February. According to Russian customs data analyzed by research center C4ADS, China's state-owned defense companies ship navigation equipment, jamming technology and fighter jet parts to sanctioned Russian state-owned defense companies. Therefore, on August 31, 2022, China's state defense company Poly Technologies sent navigation equipment to the Russian state military export company Rosoboronexport JSC for M-17 military transport helicopters. Earlier that month, Chinese electronics company Fujian Nanan Baofeng Electronic supplied Rosoboronexport, via the Uzbek state-owned defense firm, with a telescopic antenna for the RB-531BE military vehicle, which is used to jam communications. On October 24, the Chinese state-owned aircraft construction company "AVIC International Holding Corp" sent spare parts for Su-35 fighters worth \$1.2 mln to the subsidiary of the state defense giant Rostec. Among the shipments from this firm were parts sent on October 4 to Russian state-sanctioned missile manufacturer Almaz Antey for use in the 96L6E mobile radar. The data also shows deliveries of Chinese DJI quadcopters to Russia following the introduction of sanctions and export controls. According to customs documents, some of these drones are shipped directly by the Chinese retailer to Russian distributors, but other DJI quadcopters go through the UAE.

Poly Technologies sent at least a dozen shipments - including helicopter parts and air-to-ground radio equipment - to a state-backed Russian firm Ulan Ude Aviation Plant (purveyor of military-grade helicopters). Company was sanctioned by the EU, US, Japan, Switzerland and Ukraine. Most of the helicopter parts were labeled for use in the multipurpose Mi-171E and Mi-171SH helicopters. This delivery was throughout 2022, through at least mid-November, according to the customer data - CNN.

According to Russian customs, China [exported](#) over \$12 mln worth of unmanned aerial vehicles, drones and their spare parts to Russia last year - NYT. About 70 Chinese exporters sold 26 different brands of drones to Russia after the start of the full-scale invasion of Ukraine by the Russian Federation. Chains of intermediary companies, which may contain more than a dozen firms, are used to circumvent sanctions. Moreover, the official sales are likely only part of a wider flow of technology being sold through unofficial channels and by other Russia-friendly countries such as Kazakhstan, Pakistan and Belarus. According to the NYT, hundreds of drones of various models are steadily delivered to Russia, which immediately go to the war zone in Ukraine. In addition, Chinese manufacturers plan to send components and technologies to Russia for the independent production of drones.

## Saudi Arabia

Russia began diesel [exports](#) to Saudi Arabia in February as it seeks to contend with an EU embargo on Russian supplies - traders Refinitiv data. At least three cargoes carrying 190,000 tonnes of diesel loaded in the Russian Baltic port of Primorsk in February were headed to Saudi Arabia. Also, Tanker Srin, with 66,000 tonnes of Russian diesel, is discharging in the Saudi Arabian port of Jeddah. Saudi Arabia could re-export Russian diesel to other destinations after some refining.

After the withdrawal of major oil traders from Russia, six little-known companies from Hong Kong and Dubai became the main [sellers](#) of Russian oil. Also, many of the buyers were large Chinese and Indian state-owned companies and divisions of Russian oil companies. Last December, they processed 1.4 million barrels worth more than \$2 billion from Russia, surpassing giants such as Trafigura Group and Vitol Group - Bloomberg, citing data from Russian customs.

## DETAILED ANALYSIS

### 1. Expand Oil and Gas Sanctions

#### G7

On 4 February 2023, the Price Cap Coalition, which consists of Australia, Canada, the EU, France, Germany, Italy, Japan, the UK, and the US, established caps on the price for seaborne refined petroleum products originating from Russia. The caps include two different pricing levels: one for "premium-to-crude" products and another for "discount-to-crude" products. The maximum price for "premium-to-crude" products is set at \$100 per barrel, while for "discount-to-crude" products it is set at \$45 per barrel. These caps will be implemented across jurisdictions starting from 5 February 2023, with some exceptions for transactions involving petroleum products loaded onto a vessel before that date. Service providers can still support the shipment of Russian-origin crude oil and petroleum products to other countries, as long as the prices do not exceed the established caps.

The Price Cap Coalition also has committed to undertake a review of the price cap on crude oil in March to ensure that it continues to meet its goals, to further diminish Russian revenues while supporting energy market stability.

On 20 March 2023, Bloomberg and The Wall Street Journal reported that the G7 nations are planning to maintain the current \$60 price cap on Russian oil, despite evidence that crude is selling well below this threshold. The European Commission has informed EU member states of the G7's position, and US President Joe Biden reportedly informed European Commission President Ursula von der Leyen during their meeting that his administration has no intention of adjusting the ceiling. Some countries, such as Poland, Lithuania, Latvia, and Estonia, have called for a reduction in the ceiling price by almost \$10, to \$51.45 per barrel, Estonia earlier in March called for the ceiling to be lowered to \$30 per barrel. But the US has argued that Russian fuel must continue to enter the global market, justifying the establishment of the ceiling at \$60 per barrel.

#### United States

On 3 February 2023, OFAC issued a Determination that prohibits any US person, regardless of their location, from exporting, reexporting, selling, or supplying services related to the maritime transport of Russian-origin petroleum products purchased above the price cap to any person located in Russia. The prohibition covers trading or brokering services, financing, shipping, insurance (including reinsurance and protection and indemnity), flagging, or customs brokering services related to the maritime transport of Russian-origin petroleum products and took effect on 5 February 2023.

The Determination excludes services with respect to Russian-origin petroleum products that are loaded onto a vessel at the port of loading prior to 5 February 2023, and unloaded at the port of destination prior to 1 April 2023. U.S. service providers can continue to provide services with respect to such products purchased at any price.

In addition, once the petroleum products are substantially transformed in a jurisdiction other than Russia, they are no longer considered to be of Russian origin, and thus the product caps no longer apply. OFAC clarified that blending is only considered substantial transformation when it results in a tariff shift of the petroleum product.

OFAC also issued a Determination, effective on 5 February 2023, setting the price cap for Russian origin petroleum products (articles defined under HTSUS heading 2710). Specifically, the determination set the price cap for Russian-origin discount-to-crude petroleum products at \$45 per barrel, and the price cap for Russian-origin premium-to-crude petroleum products at \$100 per barrel. Discount-to-crude products include naphtha, residual fuel oil, and waste oils; premium-to-crude products include gasoline, motor fuel blending stock, gasoil and diesel fuel, kerosene and kerosene-type jet fuel, and vacuum gas oil.

OFAC also updated its guidance on the implementation of the price cap policy for Russian-origin crude oil and petroleum products. Such updated guidance now includes, among other things, a listing of specific articles of petroleum products that qualify as either "premium-to-crude" or "discount-to-crude" petroleum products.

Articles defined at the following subheading/suffixes in the Harmonized Tariff Schedule of the United States are subject to the Premium to Crude price cap:

2710.12.15	2710.19.11.15	2710.19.11.06	2710.19.24	2710.20.10.07
2710.12.18	2710.19.11.25	2710.19.11.07	2710.19.25	2710.20.10.08
2710.19.06.05	2710.19.11.50	2710.19.11.08	2710.19.26	2710.20.10.11
2710.19.06.15	2710.19.11.02	2710.19.11.11	2710.20.10.02	2710.20.10.13
2710.19.06.25	2710.19.11.03	2710.19.11.13	2710.20.10.03	2710.20.10.14
2710.19.06.30	2710.19.11.04	2710.19.11.14	2710.20.10.04	



2710.19.06.35	2710.19.11.05	2710.19.16	2710.20.10.05	
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All other articles defined at 2710 are subject to the discount-to-crude price cap.

Finally, OFAC amended and reissued General Licenses 56A and 57A to include Russian petroleum products within their scope. General License 56A authorizes, subject to certain conditions, transactions related to the importation of Russian crude oil and petroleum products into Bulgaria, Croatia, or landlocked EU member states, while General License 57A, authorizes transactions that are ordinarily incident and necessary to addressing vessel emergencies related to the health or safety of the crew or environmental protection, including safe docking or anchoring, emergency repairs, or salvage operations, subject to conditions. Such General Licenses were previously issued with respect to Russian-origin crude products, but now have been expanded to cover petroleum products as well.

On 24 February 2023, OFAC also amended and reissued Russia-related General License No. 8F to include Bank Zenit PJSC and Bank Saint-Petersburg PJSC as authorized Russian financial institutions for certain energy-related transactions with US persons until 16 May 2023, after both institutions were designated as SDNs.

## United Kingdom

On 3 February 2023, the UK, in partnership with the G7 countries, the EU and Australia, announced price caps on Russian seaborne petroleum products, effective from 5 February 2023. The oil products falling within the scope of the ban are those goods falling within HS code 2710.

The UK's Office of Financial Sanctions Implementation (OFSI) implemented price caps for refined products from Russia through the General Licence INT/2022/2469656, which was amended to include 2710 oil and oil products under the definition of "Russian Oil" and "Price Cap". The amendment set two price caps for different categories of refined oil products: 'premium-to-crude' products and 'discount-to-crude' products. The price cap for 'premium-to-crude' products, which includes high-value exports often used for transport and electricity generation, such as kerosene-based jet fuel and diesel, is set at \$100 per barrel. The price cap for 'discount-to-crude' products, which pertains to products of a lesser value like fuel oil, is set at \$45 per barrel. These prices will be kept under review.

The General Licence allows the UK persons and entities to supply or deliver petroleum products by ship originating in Russia to a third country or between third countries as well as provide relevant services facilitating the maritime transport of refined oil products provided that the products are traded at or below the price cap levels. This licence takes effect from 5 February 2023.

OFSI uses HS codes to determine the applicability of the different price caps, as shown in the table below:

Per barrel for the below commodity codes ("Premium to Crude") – USD 100		
2710 12 31	2710 19 11	2710 19 46
2710 12 41	2710 19 15	2710 19 47
2710 12 45	2710 19 21	2710 19 48
2710 12 49	2710 19 29	2710 19 71
2710 12 50	2710 19 31	2710 20 11
2710 12 70	2710 19 35	2710 20 16
2710 12 90	2710 19 43	2710 20 19
Per barrel for all other 2710 commodity codes ("Discount to Crude") – USD 45		

To ensure market participants are able to transition to new sanctions, OFSI introduced a wind-down period by a General Licence NT/2023/2660772, exempting from the price cap refined oil products that was loaded onto a ship at the port of loading before 5 February 2023 and offloaded at the port of destination before 1 April 2023. It allows:

- any legal or natural person to supply or deliver such oil and oil products by ship from a place in Russia to a third country, or between third countries;
- a service provider to provide relevant services to any legal or natural person supplying or delivering Russian oil by ship from a place in Russia to a third country or between third countries;
- a financial institution to process payments in relation to these activities.

General Licence NT/2023/2660772 is in effect from 5 February 2023.

On 8 March 2023, OFSI released updated guidance on the Maritime Services Prohibition and the Oil Price Cap, which provides full detail of the implementation of the price caps, OFSI's approach to enforcement, and the requirements on involved persons. The OFSI Guidance clarifies that the oil products price caps will only cover the price of the oil product. Any ancillary costs such as transportation and legal fees will not fall within the scope of the price caps.

The price caps will be enforced from receipt of products on a ship until they are delivered and undergoes customs controls in a third country, or until they are substantially processed off the water. If the products pass through customs in a third

country and are later re-enter trade by maritime transportation without being substantially processed, the relevant price caps will still apply. To determine whether refined oil products have been significantly processed, OFSI regards blending operations as significant processing only if the HS code of the output refined oil product differs at the 8-digit level from that of the Russian-origin input products.

## European Union

On 4 February 2023, the EU Council, together with the other members of the Price Cap Coalition (the G7 and Australia), established two price caps for Russian petroleum products falling under CN code 2710, which vary depending on their types. The first price cap for petroleum products traded at a discount to crude oil, such as primarily residual fuel oils, naphthas, and waste oils, is set at \$45 per barrel, and the second price cap for petroleum products traded at a premium to crude oil, such as gasoline, motor spirits, aviation spirits, motor fuel blend stocks, gasoil and diesel fuel, kerosene and kerosene-type jet fuel, and vacuum gas oil, is set at \$100 per barrel. These are the price per barrel at or below which petroleum products from Russia are exempt from the prohibition on the maritime transport of these products from Russia to third countries, and the provision of related technical assistance, brokering services or financing or financial assistance. The caps will take effect on 5 February 2023, with a 55-day transitional period for vessels carrying Russian petroleum products, which were purchased and loaded onto the vessel at the port of loading prior to 5 February 2023 and unloaded at the final port of destination prior to 1 April 2023. The Council will review the price cap mechanism for crude oil regularly every two months, starting mid-March 2023.

The EU provided a categorisation of all the petroleum products in one of the two rates.

CN code	Description	Premium to crude oil / Discount to crude oil	Price per barrel (USD)
	Petroleum oils and oils obtained from bituminous minerals (other than crude) and preparations not elsewhere specified or included, containing by weight 70 % or more of petroleum oils or of oils obtained from bituminous minerals, these oils being the basic constituents of the preparations, other than those containing biodiesel and other than waste oils		
2710 12	Light oils and preparations		
2710 12 11	For undergoing a specific process	Discount to crude oil	45
2710 12 15	For undergoing chemical transformation by a process other than those specified in respect of subheading 2710 12 11		
	For other purposes Special spirits		
2710 12 21	White spirit	Discount to crude oil	45
2710 12 25	Other		
	Other Motor spirit		
2710 12 31	Aviation spirit	Premium to crude oil	100
	Other, with a lead content Not exceeding 0,013 g per litre		
2710 12 41	With an octane number (RON) of less than 95	Premium to crude oil	100
2710 12 45	With an octane number (RON) of 95 or more but less than 98		
2710 12 49	With an octane number (RON) of 98 or more		
2710 12 50	Exceeding 0,013 g per litre		
2710 12 70	Spirit type jet fuel		
2710 12 90	Other light oils		
2710 19	Other		
	Medium oils		
2710 19 11	For undergoing a specific process	Premium to crude oil	100
2710 19 15	For undergoing chemical transformation by a process other than those specified in respect of subheading 2710 19 11		

	For other purposes Kerosene		
2710 19 21	Jet fuel	Premium to crude oil	100
2710 19 25	Other		
2710 19 29	Other		
	Heavy oils Gas oils		
2710 19 31	For undergoing a specific process	Premium to crude oil	100
2710 19 35	For undergoing chemical transformation by a process other than those specified in respect of subheading 2710 19 31		
	For other purposes		
2710 19 43	With a sulphur content not exceeding 0,001 % by weight	Premium to crude oil	100
2710 19 46	With a sulphur content exceeding 0,001 % by weight but not exceeding 0,002 % by weight		
2710 19 47	With a sulphur content exceeding 0,002 % by weight but not exceeding 0,1 % by weight		
2710 19 48	With a sulphur content exceeding 0,1 % by weight		
	Fuel oils		
2710 19 51	For undergoing a specific process	Discount to crude oil	45
2710 19 55	For undergoing chemical transformation by a process other than those specified in respect of subheading 2710 19 51		
	For other purposes		
2710 19 62	With a sulphur content not exceeding 0,1 % by weight	Discount to crude oil	45
2710 19 66	With a sulphur content exceeding 0,1 % by weight but not exceeding 0,5 % by weight		
2710 19 67	With a sulphur content exceeding 0,5 % by weight		
	Lubricating oils; other oils		
2710 19 71	For undergoing a specific process	Premium to crude oil	100
2710 19 75	For undergoing chemical transformation by a process other than those specified in respect of subheading 2710 19 71	Discount to crude oil	45
	For other purposes		
2710 19 81	Motor oils, compressor lube oils, turbine lube oils	Discount to crude oil	45
2710 19 83	Hydraulic oils		
2710 19 85	White oils, liquid paraffin		
2710 19 87	Gear oils and reductor oils		
2710 19 91	Metal-working compounds, mould-release oils, anti-corrosion oils		
2710 19 93	Electrical insulating oils		
2710 19 99	Other lubricating oils and other oils		
2710 20	Petroleum oils and oils obtained from bituminous minerals (other than crude) and preparations not elsewhere specified or included, containing by weight 70 % or more of petroleum oils or of oils obtained from bituminous minerals, these oils being the basic constituents of the preparations, containing biodiesel, other than waste oils		
	Gas oils		
2710 20 11	With a sulphur content not exceeding 0,001 % by weight	Premium to crude oil	100
2710 20 16	With a sulphur content exceeding 0,001 % by weight but not exceeding 0,1 % by weight		
2710 20 19	With a sulphur content exceeding 0,1 % by weight		
	Fuel oils		
2710 20 32	With a sulphur content not exceeding 0,5 % by weight	Discount to crude oil	45
2710 20 38	With a sulphur content exceeding 0,5 % by weight		

2710 20 90	Other oils		
	Waste oils		
2710 91	Containing polychlorinated biphenyls (PCBs), polychlorinated terphenyls (PCTs) or polybrominated biphenyls (PBBs)	Discount to crude oil	45
2710 99	Other		

On 4 February 2023, the European Commission clarified that oil products derived from Russian crude oil in a third country other than Russia (where Russian crude has undergone substantial transformation and is classified under a different HS tariff heading) are exempted from sanctions and price limits as they are no longer considered of Russian origin.

Additionally, the price cap on Russian petroleum products will not apply if they are processed by being blended in a third country other than Russia with a product from another third country origin resulting in a different product, as it will no longer be considered of Russian origin. The different products will have a different customs code and will be allowed to be sold without the price limit, while European companies will be able to provide insurance and transportation services for them.

From 6 February 2023, the EU will impose additional restrictions on Russian goods, including a ban on the purchase and importation of certain petroleum products. This means that it will be prohibited to purchase and import certain Russian petroleum products into EU countries. However, EU residents will be allowed to purchase fuel in Russia if it is necessary to complete their journey and return to the EU. It should be noted that passengers are not allowed to import fuel in a canister purchased in Russia, and violations of the sanctions include draining fuel from a vehicle after crossing the border and transferring it to another container.

On 14 February 2023, the EU reported that a number of third countries have notified the EU that they will align themselves with the EU's decision to introduce two price caps for petroleum products falling under CN code 2710. These countries are the candidate countries North Macedonia, Montenegro, Albania, Ukraine, and Bosnia and Herzegovina, and the EFTA countries Iceland, Liechtenstein and Norway, members of the European Economic Area.

On 15 February 2023, the EU's gas market correction mechanism entered into force (agreed back in December). The market correction will be triggered automatically if two conditions are met simultaneously: (1) if the price of the monthly futures on the European hub TTF remains above 180 euros per MWh for 3 business days (2) if this price is 35 EUR higher than the indicative price of LNG on world markets. In this case no transactions in the relevant gas futures will be allowed at a price higher than the dynamic limit. It will be valid for at least 20 business days from the date of activation. If the limit falls below €180 per MWh for three consecutive days, the mechanism will automatically turn off.

On 25 February 2023, the EU introduced a prohibition on providing storage capacity (which refers to any combination of space, injectability, and deliverability) in a storage facility in the EU to Russian nationals, residents, or legal persons, entities or bodies established in Russia, as well as to legal persons, entities or bodies whose ownership is over 50% controlled by Russian nationals, residents, or legal persons, entities or bodies established in Russia, and to individuals, legal persons, entities or bodies acting on behalf or under the direction of such individuals, entities or bodies. A storage facility refers to a facility used for stocking natural gas, owned and/or operated by a natural gas undertaking, including the part of LNG facilities used for storage. However, it excludes the portion used for production operations and facilities reserved exclusively for transmission system operators in carrying out their functions. This measure aims to safeguard the security of gas supply in the EU, counteract Russia's weaponization of its gas supply and prevent the possibility of market manipulation by Russian operators. This prohibition does not apply to the section of LNG facilities used for storage.

On 28 March 2023, Reuters reported that EU countries have agreed to seek a legal option to stop Russian companies from sending liquefied natural gas (LNG) to EU nations by preventing Russian firms from booking infrastructure capacity. The proposal was made by EU countries' energy ministers and seeks to include the option for governments to temporarily stop Russian and Belarusian gas exporters from bidding upfront for capacity on the infrastructure needed to deliver LNG into Europe.

The proposal is part of the countries' negotiating position on new EU gas market rules and will need to be negotiated with the European Parliament, a process that can take months. If approved, the proposal would offer member states a route to stop Russian LNG imports without using sanctions, which need unanimous approval from all 27 EU member states.

## Japan

On 6 February 2023, the Ministry of Foreign Affairs of Japan issued a notice regarding the establishment of a maximum price for petroleum products originating from Russia. The notification includes both crude oil and petroleum products and

sets the maximum price for high-value petroleum products at \$100 per barrel and for low-value petroleum products at \$45 per barrel.

On 6 February 2023, the Japanese government prohibited the importation of Russian-origin petroleum products traded above the price cap referenced in the Ministry of Foreign Affairs notice dated 6 February 2023. The importation of petroleum products originating in Russia that are traded at a price exceeding the ceiling price shall be subject to obtaining permission from the Ministry of Economy, Trade and Industry, and prior confirmation by the Minister of Economy, Trade and Industry shall be required for the importation of such petroleum products below the ceiling price.

The measures apply to imports of relevant petroleum products made on or after 6 February 2023. However, it does not apply if the import is based on a contract concluded prior to that date, and the goods were loaded before 6 February 2023 and unloaded in Japan before 1 April 2023.

On 6 February 2023, the Japanese government prohibited the provision of certain services related to the purchase of petroleum products transported by sea originating in Russia that are traded at prices exceeding the price cap referenced in the Ministry of Foreign Affairs notice dated 6 February 2023.

A license must be obtained for the provision of loan agreements, debt guarantee contracts, debts offsets, and other designated services related to the purchase of such petroleum products, including brokerage transactions. This measure applies when the implementation of debts or provision of labor or services happens on or after 6 February 2023, unless the transactions are based on a contract concluded prior to that date and are related to the purchase of oil products of Russian origin loaded prior to 6 February 2023 and unloaded in Japan prior to 1 April 2023.

Japan also implemented pre-clearance procedures for the import of crude oil and petroleum products (excluding waste oil) originating from Russia. Goods shipped before 6 February 2023 based on contracts concluded before that date are not subject to pre-clearance, but those imported after 6 February 2023 must obtain confirmation from the Minister of Economy, Trade and Industry.

## Canada

On 2 February 2023, the government of Canada implemented a maximum price for seaborne petroleum products of Russian origin. As of 5 February 2023, the maximum price for premium-to-crude petroleum products is set at US\$100 per barrel, while the maximum price for discount-to-crude petroleum products is set at US\$45 per barrel. The new rules do not apply to goods loaded onto a ship before 5 February 2023 and unloaded at the port of destination before 1 April 2023.

## Australia

On 15 February 2023, Australian Ministry for Foreign Affairs amended the operations prohibitions regarding refined petroleum products to implement G7 agreed price caps. The ministry issued two general permits that each implement different elements of the price caps of \$100 per barrel for high value and \$45 per barrel for low value Russian-origin refined petroleum products:

- one permit authorizes the provision of relevant services if they assist with, or are provided in relation to, the import, purchase or transport of Russian refined petroleum products and those products were purchased at or below the relevant price caps;
- the other permit authorizes the shipping of Russian refined petroleum products to countries other than Australia if those products were purchased at or below the relevant price caps.

High Value Russian refined petroleum products, subject to the price cap of \$100 per barrel, include gasoline; crudes, topped or enriched (including vacuum gas oil); diesel; kerosene for use as fuel in aircraft; heating oil; kerosene; and biodiesel.

The permits define a Low Value Russian refined petroleum product, subject to the price cap of \$45 per barrel, as a Russian refined petroleum product that is not a High Value Russian refined petroleum product.

These permits pertain only to the provision of relevant services relating to Russian refined petroleum products and the transportation by ship of Russian refined petroleum products to countries other than Australia, where those products were purchased at or under the relevant price caps.

## Switzerland

On 15 February 2023, the Swiss Federal Council adjusted its sanctions regime on crude oil and petroleum products from Russia to be consistent with the latest EU sanctions package. The adjustments included setting price limits for petroleum products from Russia. The price cap for heating oil from or originating in Russia is set at \$45 per barrel, and the cap for petrol, diesel, or kerosene is set at \$100 per barrel. Services involved in the trade, brokering, and transportation of such products are only permitted if the price is below the established price caps. However, there is a wind-down period for products purchased above the price cap and loaded prior to 15 February, provided they are unloaded before 11 April 2023.

## Norway

On 7 February 2023, Norway set a price cap on Russian petroleum products falling under the CN code 2710 and originating from Russia or exported from Russia which will take effect from 5 February 2023. The price cap is \$45 per barrel for refined petroleum products that trade at a discount to crude oil and \$100 per barrel for those that trade at a premium to crude oil, aligning with the EU and G7 countries. Petroleum products will be subject to restrictions if their purchase price exceeds the designated price cap. There is also a transitional period for petroleum products that were loaded onto a vessel in a loading port before 5 February 2023 but unloaded at a destination port before 1 April 2023.

## Estonia

On 3 February 2023, the Tax and Customs Board of Estonia announced that additional sanctions on Russian goods will be enforced starting from 6 February 2023, as the transitional period of the EU's sanctions on oil products from Russia comes to an end. The new measures prohibit the purchase, import, or transfer of petroleum products, including fuel used for consumption in motor vehicles, originating in Russia. The ban applies to all Baltic countries and Finland.

However, EU residents are allowed to purchase fuel from Russia if it is necessary for completing the trip and returning to the territory of the EU. In this case, the passenger can import fuel that is already in the vehicle's standard fuel tank free of tax on the first entry into Estonia. Subsequent border crossings in the same calendar month will be taxed, unless the passenger informs the customs authorities when travelling from Estonia to Russia that there is fuel in the tank of the vehicle which the passenger wishes to bring back.

Importing fuel in containers purchased in Russia is also prohibited under these new sanctions. Pumping fuel out of the vehicle after crossing the border and handing it over for a fee or free of charge is considered a breach of the sanction and is permitted only for the purpose of repairing the vehicle if it is subsequently pumped back into the vehicle.

On 6 March 2023, Estonian Foreign Minister proposed that the EU develop a new package of sanctions against Russia that includes lowering the ceiling on crude oil prices to \$30 per barrel and taking steps to reduce Russia's ability to export crude oil by sea. It also proposed to ban the sale of Russian tankers and not allow oil reloading through EU territorial waters. If the price ceiling or oil transportation rules are violated, sanctions would be imposed on tankers or violator companies, including not allowing them into EU space. This proposal follows calls from Poland, Latvia, and Lithuania to lower the ceiling on the price of Russian oil to \$51.45 per barrel.

## Poland, Latvia, and Lithuania

On 14 March 2023, Bloomberg reported that authorities in Poland, Latvia, and Lithuania called for a reduction in the price cap for oil from Russia from \$60 per barrel, which was set in December 2021, to \$51.45 per barrel.

## Netherlands

Dutch Minister of Climate and Energy Rob Jetten announced that the Netherlands is no longer dependent on Russian coal, oil products, and crude oil, fulfilling the sanctions against Russia imposed after their invasion of Ukraine. Although gas is not covered by these sanctions, the government's aim was to become less dependent on Russia. Jetten says this has been achieved by importing LNG, with a floating installation built in Eemshaven in recent months, while the full operation of coal-fired power plants has reduced the demand for Russian gas.

## Italy

According to an Italian minister for business and made in Italy, Adolfo Urso, the country will achieve energy independence from Russia by the end of 2023 and will become the hub of European gas soon. Italy plans to diversify its energy sources, including renewable energy, and invest in green and digital technologies, from batteries to semiconductors, to attain energy production and full sovereignty. The government's aim is to produce more energy, expand renewable energy and digitize the industry.

## Finland

As [Reuters](#) reported on November 22, Finland refuses to buy Russian nuclear fuel. The Finnish energy company Fortum has announced that it plans to replace Russian nuclear fuel with American fuel and is preparing to purchase it from Westinghouse Electric.

## France

According to Reuters, following Germany's Uniper and RWE, France's largest energy company Engie has filed a lawsuit against Gazprom over gas supply shortfalls. Engie has initiated arbitration proceedings against Gazprom Export and demands to recognize the Russian company's obligations under long-term gas contracts as unfulfilled. Engie also wants to obtain fines and compensation from Gazprom's export subsidiary for losses incurred since the transportation of gas to France was halted in July 2022. BCS analyst Ronald Smith estimates the amount of Engie's claims, which have not been officially disclosed, at \$1.3 bn, while the total amount of claims against Gazprom has reached about \$15 bn.

## Germany

As Reuters reported on February 16, Germany plans to change its Energy Security Act to allow a quick sale of Russian energy group Rosneft's stake in the Schwedt refinery without the need for prior nationalization. Berlin strives to stabilize a key energy supplier.

According to its annual report, German energy concern E.ON has completely written off its 15.5% stake in Nord Stream AG, the operator of the Nord Stream gas pipeline.

As reported on March 14, the court upheld the transfer of the German assets of the Russian oil company Rosneft to external management. According to the court, such a measure would help to avoid the risk of stopping oil supplies from Russia.

## India

According to Reuters, India's Bank of Baroda (2nd largest) has stopped clearing payments for Russian oil sold above the price cap set by the West from April, a move that could expedite transition to a rupee trade mechanism, at least for barrels that exceed the price cap. Some Indian refiners were paying in the United Arab Emirates dirham currency for Russian low-sulfur crude priced above the \$60 a barrel cap using Bank of Baroda, mainly to Dubai-based traders. Officially India does not recognise the Western price cap on Russian oil, but in March the state-run lender told refiners that it would not settle payment from Russian barrels bought above the price cap.

On 12 March 2023, Bloomberg reported that government authorities of India have instructed banks and traders to comply with the \$60 price cap imposed on purchases of oil from Russia. The Indian government has not issued an official statement on the matter.

## 2. Increase Transportation and Insurance-Related Sanctions

### United States

According to The New York Times, US airlines are urging the White House and Congress to address the issue of foreign airlines having an advantage on routes to and from the United States due to their access to Russian airspace. Currently, US carriers are not permitted to fly through Russian airspace due to the war in Ukraine, forcing them to take longer and less fuel-efficient routes. This has resulted in changes to the schedule of Pacific flights, reduced the maximum number of passengers and cargo volume. Meanwhile, foreign airlines are still able to use the shorter, more efficient routes, giving them an unfair advantage to attract more passengers on flights to and from the US. US airlines estimate that this is resulting in a collective annual loss of \$2 billion. To address this issue, US airlines are calling for restrictions on flying in Russian airspace for foreign carriers. In response, the US Department of Transportation has drafted an order that would ban Chinese carriers from flying passengers to the US through Russian airspace.

### European Union

On 25 February 2023, the EU imposed an obligation on aircraft operators of non-scheduled flights between Russia and the EU, whether operated directly or via third countries, to notify all relevant information concerning the flight to their competent authorities. The notification must be at least 48 hours prior to their operation. This measure is put in place in order to prevent circumvention and ensure compliance with the prohibition on any non-Russian-registered aircraft that is owned, chartered, or otherwise controlled by any Russian natural or legal person, entity, or body from landing in, taking off from, or overflying EU territory. If a Member State does not clear such a flight, it should immediately inform other Member States, the Network Manager, and the Commission.

For reasons of maritime safety, the EU introduced a new exemption from the prohibition on the provision of technical assistance under any EU export or import bans to allow EU operators to provide pilot services to vessels in innocent passage. In addition, an exemption from the transaction ban on certain Russian state-owned entities also applies in respect of the provision of pilot services to such vessels in innocent passage.

### Switzerland

On 29 March 2023, Switzerland adopted new measures to align its approach with the EU's 10th package of sanctions against Russia. These measures included:

- An obligation on aircraft operators of non-scheduled flights between Russia and Switzerland, whether operated directly or via third countries, to notify all relevant flight information to the Federal Office of Civil Aviation (FOCA). The notification must be made at least 48 hours prior to their operation;
- A new exemption from the prohibition on the provision of technical assistance under any Swiss export or import bans for the provision of pilot services to vessels in innocent passage, as part of efforts to enhance maritime safety. In addition, an exemption from the transaction ban on certain Russian state-owned entities also applies in respect of the provision of pilot services to such vessels in innocent passage.

### Lithuania

Lithuania's postal service, Lietuvos paštas, has temporarily suspended the shipment of mail parcels containing goods to Russia due to new EU sanctions requiring additional information to be provided about the contents of the parcels. However, written correspondence, such as letters and postcards, will continue to be sent to Russia. Previously, Lithuania's postal service had sent parcels to Russia via Latvia's postal service. However, Latvia's postal service has informed Lithuania that it will no longer accept mail parcels containing goods without the additional required information. Lithuania's postal service is currently unable to find a solution for how to provide the required information to Latvia and thus cannot comply with this requirement. It is worth mentioning that commercial shipments to Russia have already been suspended for a year by Lithuania Post. Additionally, from last year's March, money transfers to and from Russia and Belarus were also suspended at Lithuania's post offices.

### Poland

On 20 February 2023, Poland unilaterally decided to limit the traffic for Belarusian freight vehicles at the Kukuryki-Kozłowicze border crossing, the only one for cargo traffic on the Belarus-Poland border, because of restrictions introduced by the Belarusian authorities on Polish carriers regarding the possibility of crossing the border at the Belarusian-Lithuanian and Belarusian-Latvian border crossings. The restriction does not apply to passenger traffic at the border crossing in Terespol. The suspension of traffic will apply from 19:00 on 21 February 2023 until the Belarusian



authorities lift restrictions on Polish carriers. At the same time, Belarusian carriers can go to Belarus via Lithuania and Latvia.

## Turkey

The Turkish Ministry of Customs and Trade banned the refueling and maintenance servicing of certain aircraft operated by Russian and Belarusian airlines, effective from 14 March 2023. The ban was based on a letter from the US Commerce Department's Bureau of Industry and Security regarding export controls. It applies to all US-produced aircraft, including private, cargo, commercial, and charter aircraft, as well as those manufactured in any foreign country if they contain more than 25% US-origin raw materials that are heading to Russia and Belarus. This ban affected the operations of 170 aircraft belonging to nine airlines, including Aeroflot, Rossiya, S7 Airlines, Utair Airlines, Red Wings, Nordwind, and Yamal, as well as Belarusian airline Belavia. However, the ban does not mean that Russian and Belarusian airlines will stop flying to Turkey, as they can use Russian- or foreign-made airliners with no more than 25% American components. But smaller companies still provide services to Russian aircraft, and there is no blanket ban on Russian planes as each ground service and maintenance company decides on which aircraft to serve.

## Kazakhstan

The Kazakhstani authorities tightened regulations for foreign road carriers, including Russian companies, who previously used Kazakhstani registration to avoid sanctions and transport goods to and from Europe. Starting from 20 February 2023, new rules will prevent this practice and disqualify new carriers from international cargo transportation. The main goal is to halt illegal schemes for permit distribution and protect Kazakhstani carriers from unfair competition.

To conduct international transportation, transport companies must obtain tachograph cards exclusively in Kazakhstan, and the number of drivers must correspond to the number of cars. Violators of the new rules will be punished, including blacklisting. The amendments include a permit card's validity period for motor vehicles, the admission procedure to obtain foreign permits, and the prohibition of foreign permit forms transfer to third parties. Using foreign permits for vehicles not listed in the carrier's authorization card is forbidden, except for transported vehicles. If a foreign permit is no longer valid, domestic carriers must return the permit to the territorial authority where it was issued within 30 days of the suspension or termination of admission.

## Bangladesh

According to [media reports](#), in mid February the Bangladesh government imposed restrictions that prevent 69 Russian ships from entering its maritime waters, in line with US and EU sanctions related to the war in Ukraine. The ban covers a range of ships, including oil tankers and cargo vessels operated by 7 companies. As a result, Russian ships will be unable to bring in imports, refuel, anchor in the area, or use sea routes. The government has sent notices to relevant ministries, agencies, ports, shipping services, and international organizations regarding the new restrictions.

## China

According to RBC, China [refuses](#) to allow more than half of the aircraft of Russian airlines into its airspace due to Western sanctions - Russian airlines cannot operate flights to China on aircraft that are not excluded from the Bermuda registry (over 480 aircraft) or are on the US Department of Commerce sanctions list (more 170).

### 3. Impose New Financial Sanctions

#### United States

On 1 February 2023, OFAC imposed full blocking sanctions on 12 entities across multiple countries, which are connected to a sanctions evasion network, led by a Russia- and Cyprus-based arms dealer Igor Zimenkov, supporting Russia's military-industrial complex and Russian sanctioned state-owned defense entities Rosoboroneksport OAO and State Corporation Rostec.

According to Reuters, OFAC in January launched an inquiry into Raiffeisen Bank International over its business related to Russia, increasing scrutiny of the Austrian lender that plays a critical role in the Russian economy. OFAC had asked Raiffeisen for details of its exposure in Russia, the partially occupied Donbas, Ukraine and Syria, including about the transactions and activity of certain clients.

On 15 February 2023, the US District Court for the Southern District of New York granted a Department of Justice (DOJ) forfeiture request for almost \$5.4 million owned by Russian businessman Konstantin Malofeyev, who was sanctioned by OFAC in December 2014. The funds were the result of a conversion of Malofeyev's shares in a Texas-based bank for cash by its successor, Sunflower Bank. The DOJ alleges that Malofeyev violated US sanctions by signing a Sale and Purchase Agreement in June 2015 that purported to transfer the ownership of a shell company to a Greek business associate without an OFAC license, and in violation of US sanctions, and his attorney made false representations to the Texas bank. These allegations form part of an indictment charging Malofeyev with conspiracy to violate US sanctions and violations of US sanctions, which was unsealed in April 2022.

The US Attorney General, Merrick Garland, has announced that he had authorized the first-ever transfer of assets confiscated from a sanctioned Russian oligarch Konstantin Malofeev, who was accused of evading sanctions, to be used in Ukraine. The money will be transferred to the State Department to support Ukraine.

On 24 February 2023, OFAC, in consultation with the State Department, issued a sectoral determination that authorizes the imposition of economic sanctions on any person operating in the metals and mining sector of the Russian economy. This determination highlights the potential sanctions risk for individuals or entities operating or having operated in a specified sector, but it does not automatically impose sanctions on all parties in that sector. Only those individuals or entities who have been found to operate or have operated in the identified sector are subject to sanctions.

FAQ 1115 explains that OFAC plans to define the term "metals and mining sector of the Russian Federation economy" in forthcoming regulations. This definition will encompass any industry or process related to extracting, procuring, processing, manufacturing, refining, or transporting ores, coal, precious stones, or any other minerals or geological materials within or to/from Russia.

FAQ 1116 clarifies that operating in the Russian metals and mining sector does not automatically result in sanctions under EO 14024 and the Metals and mining determination, as a determination must first be made. However, parties operating in the sector are exposed to potential sanctions. The FAQ also notes that additional sanctions may be imposed on those operating in the sector through new investment bans under EO 14071 and through the prohibition on importing certain Russian goods produced by the metals and mining sector under EO 14068.

FAQ 1117 notes that non-US persons, transacting with mining sector parties designated under EO 14024 may also be exposed to sanctions, though not if US persons would otherwise be authorized to engage in such transactions (for example, newly expanded General License (GL) 8F authorizes certain transactions related to energy and General License (GL) 6C authorizes certain transactions related to the production, manufacturing, sale, transport, or provision of medicine or medical devices, including certain industrial isotopes used in nuclear medicine, among other things). These FAQs also advised that OFAC will not target persons for sanctions designations pursuant to this new Directive when those persons' supply of goods and services to the metals and mining sector of the Russian economy is solely for the safety and care of personnel, protection of human life, prevention of accidents or injuries, maintenance or repair necessary to avoid environmental or other significant damage, or activities related to environmental mitigation or remediation. Examples of goods include personal protective equipment, safety devices, ventilation systems, and alarm systems; examples of such services include rescue and accident response services, cleaning, safety inspections, and services necessary for use of the goods described above.

On 24 February 2023, OFAC imposed full blocking sanctions on 83 entities from various sectors in the Russian economy, which included 11 banks, several wealth management-related entities, 4 entities operating in the Russian metals and mining sector, numerous third-country companies involved in evading U.S. sanctions and export controls, dozens of entities

supporting Russia's military supply chain (including suppliers of carbon fiber and aerospace materiel, electronics and software companies, and entities operating in the defense and related materiel sector), a Russian mercenary force operating in Ukraine, as well as entities owned by newly sanctioned persons.

On 24 February 2023, the Department of State imposed full blocking sanctions on 52 entities, including entities operating in Russia's financial services, defense and related materiel sector, numerous entities in advanced technology sector, including entities associated with the manufacturing of hardware and development of software for Russia's System for Operational-Search Measures (SORM) capabilities, key enterprises that develop and operate Russia's nuclear weapons, subsidiaries of State Atomic Energy Corporation Rosatom's civil nuclear structure, entities involved in Russia's future energy production and export capacity and 3 entities owned or controlled by newly sanctioned persons.

On 24 February 2023, OFAC issued renewed General License 13D which allows US persons or entities owned or controlled by US persons to pay taxes, fees or import duties, and to purchase or receive permits, licenses, registrations, or certificates in Russia until 6 June 2023, provided such transactions are ordinarily incident and necessary to their day-to-day operations in Russia.

However, OFAC clarified that the payment of "exit taxes" are not authorized under GL 13D because such payments are not considered ordinarily incidental and necessary to day-to-day operations in Russia. Therefore, US persons whose divestment of assets in Russia will involve the payment of such an "exit tax" should consider seeking a specific license from OFAC. License applications related to these payments should include information regarding the amount of the exit tax, the amount of ongoing taxes that would otherwise be paid to the Government of Russia should divestment not occur, the impact that failure to pay the tax could have on the employees of the existing company, the specific economic activity in Russia of the existing company, and the impact on Russia of the divestment. OFAC will expedite its review of such requests, which are evaluated on a case-by-case basis.

On 8 March 2023, OFAC removed a former Kazakh subsidiary of Sberbank from its sanctions list. The subsidiary was previously known as Subsidiary Bank Sberbank of Russia JSC and was designated on 6 April 2022. It has since been sold to National Managing Holding Co. Baiterek, which is owned by the Kazakh government, and has been renamed Bereke Bank Joint Stock Co.

On 9 March 2023, OFAC imposed full blocking sanctions on a network of 5 companies in China for supporting Iran's unmanned aerial vehicle (UAV) procurement efforts. This network sold and shipped thousands of aerospace components, including those used in Shahed-series UAVs, to the Iran Aircraft Manufacturing Industrial Company (HESA), which has been involved in the production of the Shahed-136 UAV model that Iran has used to attack oil tankers and exported to Russia. HESA was previously designated for being owned or controlled by Iran's Ministry of Defense and Armed Forces Logistics (MODAFL) and for providing support to Iran's Islamic Revolutionary Guard Corps (IRGC).

On 21 March 2023, OFAC, in collaboration with the Federal Bureau of Investigation (FBI), imposed full blocking sanctions on 4 entities from Iran and Turkey for their involvement in the procurement of equipment, such as European-origin engines for unmanned aerial vehicles (UAVs), in support of Iran's UAV and weapons programs. The procurement network is said to be working on behalf of Iran's Ministry of Defence and Armed Forces Logistics (MODAFL). These designations were made under Executive Order 13382, which targets weapons of mass destruction proliferators and their supporters.

On 24 March 2023, OFAC imposed full blocking sanctions on 3 entities in Belarus, including revenue generating state-owned enterprises OJSC Belarusian Automobile Plant (BelAZ) and OJSC Minsk Automobile Plant (MAZ), as well as the Central Election Commission of the Republic of Belarus (CEC). The designations were made in response to the Lukashenka regime's efforts to suppress democracy by cracking down on pro-democracy movements and civil society following the 2020 presidential election and to support Russia's ongoing war against Ukraine.

## United Kingdom

On 8 February 2023, the UK imposed asset freeze sanctions on 7 entities, including 6 military entities providing warfare equipment such as drones in support of Russia's actions in Ukraine and 1 entity connected to nefarious financial networks that help maintain wealth and power amongst Kremlin elites.

On 24 February 2023, marking the one-year anniversary of Russia's invasion of Ukraine, the UK imposed asset freeze measures against 12 Russian entities, including 4 banks (Bank Saint-Petersburg PJSC, Bank Uralsib PJSC, Bank Zenit PJSC, and MTS Bank PJSC), 6 entities involved in the manufacture or repair of military equipment for Russia's armed forces, including aviation and navy and 2 research institute that are subsidiaries of nuclear power company Rosatom.

On 17 March 2023, the UK deleted a duplicate entry for the Minsk Wheel Tractor Plant introduced under Russia sanction regime on 24 March 2022. This entity remains listed on the Belarus sanctions list from 18 December 2020.

On 21 March 2023, the Foreign, Commonwealth and Development Office imposed a ban on the provision of trust services to or for the benefit of all individuals and entities (1730 entries) subject to asset freeze sanctions under the Russia financial sanctions regime.

On 30 March 2023, Baroness Penn, the UK Treasury Lords Minister, released a statement that the use of frozen funds for payment of legal professional fees for defamation cases is not appropriate in most cases. While still reviewing each individual application on a case-by-case basis, the UK Office of Financial Sanctions Implementation (OFSI) will take a presumption that legal fees relating to defamation and similar cases will be rejected. The Russian and Belarusian Legal Services General Licence will be amended to prevent legal fees for defamation and similar cases. The Government will also bring forward legislation to tackle Strategic Lawsuits Against Public Participation (SLAPPs), which will include a statutory definition, an early dismissal process and costs protection for SLAPPs cases.

This move follows reports that Yevgeny Prigozhin, the founder of the Wagner private military company, filed a lawsuit in a UK court against a journalist who accused him of links to Russian intelligence. The aim of the move is to close a loophole in UK legislation that allowed Prigozhin to file the lawsuit.

## European Union

On 14 February 2023, the Economic and Financial Affairs Council (ECOFIN) added Russia to its list of non-cooperative jurisdictions for tax purposes (EU "blacklist"). Russia is listed after the Code of Conduct Group screened Russia's new legislation adopted in 2022 against the good tax governance criteria and found that Russia had not fulfilled its commitment to address the harmful aspects of a special regime for international holding companies. In addition, dialogue with Russia on matters related to taxation came to a standstill following the Russian aggression against Ukraine.

When a country is listed in the EU "blacklist", it can have several consequences. EU member countries can apply tax and non-tax "protective measures" in operations with jurisdictions on the list. Tax "protective measures" include: non-deductibility of costs incurred in a listed jurisdiction; controlled foreign company (CFC) rules to limit artificial deferral of tax to offshore, low-taxed entities; withholding tax measures (WHT) to tackle improper tax exemption or refunds; and limitation of the participation exemption on shareholder dividends. In non-tax areas, EU institutions and member states are encouraged to consider the list when it comes to foreign policy, development cooperation, and economic relations with third countries. The list is also being taken into account in the implementation of EU financing and investment operations, with certain funding rules referring explicitly to the list and prohibiting the channeling of funds through entities located in listed countries. This includes funds from the European Fund for Sustainable Development (EFSD), European Fund for Strategic Investments (EFSI), External Lending Mandate (ELM), and General framework for securitisation.

The implementation of these measures is left to the competence of the Member States and should be compatible with their national tax systems.

On 25 February 2023, as part of the 10th package of sanctions measures, the EU imposed restrictive financial measures (asset freeze and the prohibition to make funds and economic resources available) on 34 Russian entities, including: economic actors that provide a substantial source of revenue or financial support to the Russian government, such as Alfa-Bank, Rosbank, Tinkoff Bank, the National Wealth Fund of Russia and the Russian National Reinsurance Company, entities operating in the Russian military and defence sector, in particular companies manufacturing missiles, drones, aircrafts, military vehicles, warships or control systems, and supplying the Russian Armed Forces, entities operating in shipbuilding, maritime transport and aerospace sector, media organizations and entities responsible for spreading disinformation and propaganda.

The EU also imposed asset freeze sanctions and entry or transit ban under the EU Global Human Rights Sanctions Regime against 7 entities linked to the Wagner Group and involved in serious human rights abuses in the Central African Republic and Sudan.

The EU also adopted new and extended existing exceptions and derogations from the asset freeze restrictions for the following activities:

- extended until 31 December 2023 (instead of 30 June 2023) the exemption from the prohibition on entering into any transactions with certain Russian state-owned entities, if such a transaction is strictly necessary for the wind-down of a joint venture or similar legal arrangement concluded before 16 March 2022;

- extended until 31 December 2023 (instead of 30 June 2023) the duration of the period in which the competent authorities of the Member States may authorize transactions with certain Russian state-owned entities subject to a transaction ban or their subsidiaries in the EU if such transactions are necessary for the divestment and withdrawal by such Russian entities from companies established in the EU;
- adopted new derogations under which national competent authorities can authorize the release of certain frozen funds or economic resources held by certain listed entities or allow the making available of certain funds or economic resources to those entities for the following activities:
  - transactions related to Alfa-Bank JSC, Rosbank PJSC, Tinkoff Bank JSC, and "Commercial Vehicles – GAZ Group" LLC (Russia's top supplier of commercial vehicles) if necessary for the termination by 26 August 2023 of operations, contracts, or other agreements, including correspondent banking relations, concluded with the same entities before 25 February 2023;
  - transactions related to Alfa-Bank JSC for the disbursement of funds by the Jewish Claims Conference to beneficiaries in Russia by 26 November 2023, irrespective of when the operations, contracts or other agreements were concluded;
  - transactions related to the National Settlement Depository (Russia's central securities depository), if necessary for the disposal or the transfer of securities by an EU entity which is currently or was previously controlled by VTB Bank, if such disposal or transfer is completed by 24 July 2023 in connection with operations/agreements etc concluded with the National Settlement Depository before 3 June 2022.
- extended by 3 months until 31 May 2023 (instead of 28 February 2023) the deadline for the derogation for the sale and transfer by a listed natural or legal person, entity or body of its proprietary rights in a legal person, entity or body established in the EU;
- extended to Alfa-Bank JSC, Rosbank PJSC, and Tinkoff Bank JSC the existing derogation from the asset freeze restrictions on certain designated Russian banks in relation to the purchase, import or transport of agricultural and food products, including wheat and fertilizers.

On 28 February 2023, the EU clarified that the prohibition on certain Russian banks from using specialized financial messaging services provided by EU operators, including SWIFT, applies to the EU financial messaging service providers and not directly to the banks themselves. However, transactions for non-sanctioned trade are still allowed with banks disconnected from the SWIFT network and not subject to asset freezes, if they use alternative means such as paper, fax, or email to confirm payment orders. This clarification may concern Rosselkhozbank, which is disconnected from SWIFT but is not subject to EU blocking sanctions.

On 8 March 2023, the European Commission added a new FAQ clarifying that exemption to its Russian sanctions on state-owned enterprises permits transactions with the Russian Maritime Register of Shipping necessary for the purchase, import or transport of agricultural and food products, including wheat and fertilisers, provided they are allowed under Council Regulation (EU) 833/2014. Accordingly, EU operators such as EU insurance providers can provide services to the Russian Maritime Register of Shipping, directly or indirectly, if they are necessary for the purchase, import or transport of such products, without requesting authorisation from an EU member state.

Non-EU operators and vessels can also transact with the Russian Maritime Register of Shipping outside of the EU for the purchase, import, or transport of agricultural and food products without violating EU sanctions as these sanctions do not apply extraterritorially.

On 21 March 2023, the European Commission provided clarification on the applicability of EU sanctions regulations to crypto-assets, specifically cryptocurrencies. These regulations prohibit the provision of crypto-asset wallet, account or custody services to Russian nationals or legal entities in Russia. The Commission explained that the definition of "funds" in Council Regulation (EU) No 269/2014 includes crypto-assets and the definition of "economic resources" may also encompass certain crypto-assets. Consequently, the provisions on the asset freeze and prohibition of funds or economic resources to listed persons also apply to crypto-assets. Council Regulation (EU) No 833/2014 clarifies that crypto-assets are considered transferable securities, except for instruments of payment. Therefore, all transactions prohibited in the regulations are also prohibited when carried out using crypto-assets, and all transactions allowed in the regulations remain allowed when using crypto-assets. It is also emphasized that crypto-assets should not be used to circumvent EU sanctions.

Furthermore, the provision does not involve freezing of assets. Instead, no new financial services or accounts related to Russia are permitted, and existing services/accounts must be closed. If assets are held in these accounts/services, they should be returned to the Russian customer or converted into fiat currency or other asset categories not subject to sanctions. The provision also allows for the conversion of crypto-assets into fiat deposits up to the amount allowed for deposits.

According to Reuters, the European Central Bank is pressing Austria's Raiffeisen Bank International to unwind its highly profitable business in Russia - Reuters.

## Canada

On 2 February 2023, Canada imposed sanctions against 16 entities that are complicit in peddling Russian disinformation and propaganda.

On 23 February 2023, Canada imposed sanctions against 63 entities. The listed entities included Russian federal institutions involved in Russia's violation of Ukraine's sovereignty and territorial integrity (such as both houses of Russian parliament – the State Duma and the Federation Council, the Chief Directorate for Special Programmes of the Russian President, Federal Security Service of Russia (FSB), Federal Guard Service, and the Main Directorate of the General Staff of the Armed Forces), as well as Russia's financial intelligence agency Federal Financial Monitoring Service. The sanctions also targeted President Putin's political party United Russia, as well as private and state-owned enterprises in Russia's defense industry with specializations in areas such as digital and cyber capabilities for military purposes, radar and reconnaissance, rocket and missile systems, armaments and machinery, including the production of battle tanks. Additionally, the largest state scientific aviation center of Russia and a Russian holding company managing assets in the oil and gas industry (Rosneftgaz) were included in the sanctions, along with the Russian entity created to operate Ukraine's Zaporizhzhia Nuclear Power Plant, which Russia controls illegally.

## Japan

On 28 February 2023, Japan imposed asset freeze measures against 73 Russian entities operating in shipbuilding, aircraft building, machine building, electronics, and the military industrial complex. The measures include restrictions on payment and capital transactions. Additionally, PJSC Rosbank was included in the list of entities subject to asset freeze measures, which will come into force from 30 March 2023.

## Australia

On 23 February 2023, the Australian government imposed targeted financial sanctions on 40 entities operating in defence, shipbuilding, technology, aerospace, oil and gas, research, media and banking sectors due to their economic or strategic significance to Russia, as well as armed separatist group involved in the fighting in eastern Ukraine.

On 17 March 2023, Australia imposed targeted financial sanctions on Safiran Airport Services for their involvement in the production and supply of drones to Russia, which were used in the ongoing war against Ukraine.

## New Zealand

On 16 February 2023, the New Zealand Government imposed sanctions against 4 Iranian entities for the supply of drones to Russia for use in its unjustified and illegal invasion of Ukraine.

On 27 March 2023, the New Zealand government imposed broad sanctions, effective as of 31 March 2023, against 5 entities of strategic significance to Russia, including a paramilitary organization, a financial intelligence unit, the internal armed forces of Russia, a private military company, and a technology sector company.

## Switzerland

On 15 February 2023, the Federal Department of Economic Affairs (EAER) imposed financial sanctions on an Iranian company which specializes in manufacturing military and civilian aircraft, and unmanned aerial vehicles (UAVs).

On 1 March 2023, the Federal Council decided to implement financial sanctions against 34 entities, effective from 2 March 2023. These sanctions were adopted in accordance with the latest measures introduced by the EU under the 10th package of sanctions.

On 29 March 2023, Switzerland introduced new exceptions and extended existing derogations from the asset freeze restrictions against Russia in order to align its measures with the EU's 10th sanctions package, allowing for certain activities such as:

- extended until 31 December 2023, instead of the previous deadline of 30 June 2023, the exemption from the prohibition on entering into any transactions with certain Russian state-owned entities, if such a transaction, including sales, is strictly necessary for the wind-down of a joint venture or similar legal arrangement concluded before 26 March 2022;

- extended until 31 December 2023, instead of the previous deadline of 30 June 2023, the duration of the period during which SECO may authorize transactions with Russian state-owned enterprises subject to a transaction ban and their branches in Switzerland or EEA member states if such transactions are necessary for the deduction of investments and withdrawal of such Russian companies from companies established in Switzerland or EEA member states;
- adopted new derogations under which national competent authorities can authorize the release of certain frozen funds or economic resources held by certain listed entities or allow the making available of certain funds or economic resources to those entities for the following activities:
  - transactions related to Alfa-Bank JSC, Rosbank PJSC, Tinkoff Bank JSC, and "Commercial Vehicles – GAZ Group" LLC (Russia's top supplier of commercial vehicles) if necessary for the termination by 26 August 2023 of operations, contracts, or other agreements, including correspondent banking relations, concluded with the same entities before 29 March 2023;
  - transactions related to Alfa-Bank JSC for the disbursement of funds by the Jewish Claims Conference to beneficiaries in Russia by 26 November 2023, regardless of when the transactions, contracts or other agreements contracts have been concluded;
  - transactions related to the National Settlement Depository (NSD) (Russia's central securities depository), if necessary for the disposal or the transfer of securities by an EU entity which is currently or was previously controlled by VTB Bank, if such disposal or transfer is completed by 24 July 2023 in connection with operations/agreements etc. concluded with the National Settlement Depository before 3 June 2022.
- extended by 3 months until 30 June 2023 (instead of 8 March 2023) the deadline for the derogation for the sale and transfer by a listed natural or legal person, entity or body of its proprietary rights in legal entities established in Switzerland or in the EEA Member States;
- extended to Alfa-Bank JSC, Rosbank PJSC, and Tinkoff Bank JSC the existing derogation from the asset freeze restrictions on certain designated Russian banks in relation to the purchase, import or transport of agricultural and food products, including wheat and fertilisers.
- introduced a provision that allows SECO to authorise the release of blocked funds or economic resources, or the provision of such funds or resources to a sanctioned individual, entity, or organization in exceptional circumstances, if it is deemed necessary to safeguard the interests of Switzerland. The Federal Department of Economic Affairs, Education and Research stated that the introduction of this new exception was driven by the need to prevent two sanctioned Russian banks from acquiring shares in two Swiss companies, Sulzer and medmix AG. The US had imposed sanctions on Viktor Vekselberg in 2018, and Switzerland had also sanctioned the two Russian banks. Consequently, Tiwel Holding AG, which holds shares in Sulzer and medmix as collateral for a loan with the Russian banks, was unable to service its loan, prompting the need for the new exception.

## Germany

On 14 March 2023, the German Federal Administrative Court (Bundesverwaltungsgericht - BVerwG) upheld the legality of the German Government's decision to place two German subsidiaries of Rosneft under fiduciary administration by the German Federal Network Agency (Bundesnetzagentur – BNetzA). This decision, which was initially made in September 2022 during an energy crisis, means that while Rosneft remains the legal owner of the shares in these companies, it has lost its voting rights and control over the management of the companies as well as access to their resources and potential profits. Rosneft had appealed the decision, but the court rejected the appeal, making the decision final.

## Cyprus

In response to EU sanctions, at the end of March, Cyprus began to freeze bank and brokerage accounts of Russian citizens if the amount on them exceeds 100,000 euros. The new restrictions apply to any foreign brokers who have accounts of Russian clients in the Euroclear depository. Under the new rules, the entire amount or the equivalent in another currency will be blocked. Limits apply only to fund balances, the value of securities held at Euroclear will not be taken into account. The restrictions will affect citizens of Russia and Belarus, individuals temporarily residing in Russia or companies registered in Russia, companies registered outside the EU if 50% or more is owned by citizens of Russia or individuals residing in Russia.

## Belgium

It is reported, that on 15 March 2023, the Belgian Ministry of Finance for the first time issued a license to an individual with Russian citizenship and a residence permit abroad the license to transfer frozen assets from the accounts of the National Settlement Depository (NSD) to a non-sanctioned depository. This license has been granted to an individual, rather than a broker. The reporter suggested that the fact that the individual had Russian citizenship but a residence permit abroad may

have played a role in the granting of the license to transfer frozen assets. Additionally, she speculated that the individual may have had existing accounts in foreign banks, which could have also been a factor in the decision.

## France

On 3 March 2022, French customs officers arrested the super yacht "Amore Vero," allegedly belonging to the head of "Rosneft," Igor Sechin, according to a tweet from French Finance Minister Bruno Le Maire. The 85-meter yacht was previously named "St. Princess Olga" and was estimated to be worth \$100 million when it was first revealed in 2016. The detention and arrest of the yacht were due to Sechin's inclusion in the EU's sanctions list following the start of the Ukrainian war. The press release from the minister stated that the yacht had been in La-Sotte until 1 April but urgently set sail after Sechin's inclusion in the sanctions list.

## Kazakhstan

The Kazakhstan Stock Exchange (KASE) has excluded shares of some Russian companies from its listing due to the difficulty of conducting settlements and trading securities between Russia and Kazakhstan, as well as the current sanctions regime. KASE delisted 11 Russian issuers, including Aeroflot, Gazprom, Norilsk Nickel, LUKOIL, Magnit, and Rostelecom, on March 15, 2023. Yandex N.V.'s common shares will be excluded from the KASE list from March 15, 2023, due to "certain sanction nuances" related to the company and its stakeholders, according to Alina Aldambergen, Chairman of the KASE Board.

## Kosovo

On 22 March 2023, Kosovo followed the US and imposed sanctions against the Russian private military company "Wagner" and designated it a significant transnational criminal organization. Kosovo's Deputy Prime Minister stated that the country's alignment with the US decision is aimed at decreasing Russia's ability to wage war on Ukraine. However, the decision may also be influenced by Wagner's reported activities in the Western Balkans, such as recruiting through links to right-wing organizations and having murals supporting the group appearing in Belgrade since the war in Ukraine broke out.



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

##### Canada

On 31 January 2023, the lower house of the Parliament of Canada unanimously supported a resolution to send the government a proposal regarding the official recognition of the Wagner PMC as a terrorist organization, but this resolution is only of a recommendatory nature.

##### Czech Republic

The Czech Senate once again condemned Russian aggression against Ukraine in Ukraine. It supported the need to prosecute those responsible for war crimes and those who support them. The upper house of parliament emphasized this in a resolution it adopted 15 February 2023 after discussing the results of an extraordinary meeting of the European Council.

##### Lithuania

On 14 March 2023, the Seimas (Lithuanian Parliament) adopted a resolution stating that the Russian private military company Wagner is a terrorist organization, and its members and hires pose a threat to national and public security. The Seimas also strongly condemned the use of any hired groups, such as Wagner, set up with the support of the Russian government, in carrying out aggression crimes in Ukraine. The resolution highlights that the private military company Wagner, founded by a Russian businessman close to Russian President Vladimir Putin, is a shadow tool of Russian power. The group receives free military equipment from the Russian government, such as rocket systems, tanks, armored vehicles, and uses the Russian military infrastructure, with the fighters of the company being trained by the Russian military intelligence service (GRU).

On 21 March 2023, the Seimas (Lithuanian Parliament) unanimously adopted a resolution "On limiting the influence of terrorist Russia". The resolution invites the EU and its member states to jointly create and expand the EU legal framework to recognize states that support terrorism and use terrorist means. The resolution specifically calls for adding Russia to the list of states supporting terrorism and proposes the establishment of a Special International Criminal Tribunal to investigate Russian aggression.

##### Slovakia

On 16 February 2023, the National Council of the Slovak Republic adopted a resolution condemning the current Russian regime as terrorist and Russia as a state sponsor of terrorism. The resolution also expresses support for efforts to establish a special tribunal to prosecute crimes of aggression and to prosecute crimes against humanity and war crimes.

##### Slovenia

Slovenia's proposal for a resolution that would recognise Russia as a state sponsor of terrorism was voted down by parliament's Foreign Policy Committee. The committee instead unanimously supported coalition-sponsored conclusions condemning Russia's war in Ukraine and called on the government to provide aid and assistance to Kyiv. The ruling coalition had rejected the proposal as soon as it was tabled, and Foreign Minister Tanja Fajon said that putting Russia on a list of countries sponsoring terrorism would be equivalent to punishing the entire Russian nation.

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

### United States

On 1 February 2023, OFAC imposed full blocking sanctions on 10 individuals across multiple countries, who are connected to a sanctions evasion network led by Russia- and Cyprus-based gray arms dealer Igor Zimenkov, supporting Russia's military-industrial complex and Russian sanctioned state-owned defense entities Rosoboroneksport OAO and State Corporation Rostec, including supplying a Russian company with high-technology devices.

On 3 February 2023, in response to Iran's supply of drones to Russia for the war against Ukraine, OFAC imposed sanctions on 8 senior executives of Paravar Pars Company, an Iranian firm that had previously been sanctioned by the US and the EU for manufacturing Shahed-series unmanned aerial vehicles (UAVs) for the Islamic Revolutionary Guard Corps Aerospace Force (IRGC ASF). The sanctions were imposed under the authority of Executive Order 13382, which aims to block the assets of weapons of mass destruction proliferators and their supporters.

On 9 February 2023, the US, in coordination with the UK, designated 7 Russian individuals for their involvement in the Trickbot cybercrime group, which has been linked to the deployment of various ransomware strains targeting critical infrastructure, including hospitals and medical facilities in both the US and the UK during the pandemic. Members of the group are associated with Russian Intelligence Services, and their activities in 2020 were aligned with Russian state objectives, including targeting the US government and companies.

On 24 February 2023, OFAC imposed full blocking sanctions on 22 Russian and non-Russian individuals, including finance professionals such as private bankers, wealth managers and investment advisers that play key roles in Russia's financial services sector, third-country individuals connected to Russia's sanctions evasion efforts, businesspeople related to arms trafficking and illicit finance and individuals operating in Russia's technology and electronics sectors involved in Russia's military supply chains.

On 24 February 2023, the Department of State imposed sanctions on 76 individuals, including several Russian regional governors and government officials, high-ranking officials, as well as individuals operating in Russia's financial services, defense and related materiel, and technology sectors. The sanctions also targeted individuals facilitating grain theft and governing on behalf of Russia in parts of Ukraine that are currently occupied by Russia, persons involved in Russia's illegitimate control of Ukraine's Zaporizhzhya Nuclear Power Plant and family members of previously sanctioned persons.

The State Department has also imposed visa restrictions on 1219 members of the Russian military for actions that threaten or violate the sovereignty, territorial integrity, or political independence of Ukraine and imposed visa sanctions on 3 Russian military officials for their involvement in gross violations of human rights perpetrated against Ukrainian civilians and prisoners of war (extrajudicial killings, torture and/or cruel, inhuman, or degrading treatment or punishment).

On 3 March 2023, OFAC added 3 Russian nationals to its sanctions list under the Russian Harmful Foreign Activities sanctions program in response to the arbitrary detention of Vladimir Kara-Murza, a well-known Russian human rights defender, prominent opposition leader, author, and historian. Kara-Murza was arrested in Moscow in April 2022 after exercising his right to freedom of expression by speaking out against the Kremlin's war of aggression in Ukraine. The sanctioned individuals include Elena Anatolievna LENSKAYA, a judge of the Basmannyy District Court in Moscow; Andrei Andreevich ZADACHIN, a special investigator with the Chief Investigative Directorate of the Russian Investigative Committee; and Danila Yurievich MIKHEEV, who acted as an expert witness for the Russian government in the case against Vladimir Kara-Murza. These individuals were listed due to their involvement in serious human rights abuses against Vladimir Kara-Murza.

The Department of State also imposed visa restrictions on Andrei Andreevich ZADACHIN and Elena Anatolievna LENSKAYA for their involvement in a gross violation of human rights. Their immediate family members are also ineligible for entry into the United States

Additionally, the Department of State imposed full blocking sanctions on 3 Russian government officials who are perpetrators of serious human rights abuse. These officials include Oleg Mikhailovich SVIRIDENKO, the Russian Deputy Minister of Justice who oversees the prosecution of criminal cases, including the criminal case to which Kara-Murza is subject, Diana Igorevna MISHCHENKO, a judge who authorized Kara-Murza's arrest and sentenced him to 15 days in jail, and Ilya Pavlovich KOZLOV, a judge who denied Kara-Murza's appeal of Mishchenko's administrative arrest ruling.

On 9 March 2023, OFAC imposed full blocking sanctions on 1 individual in China, Yun Xia Yuan, employee of S&C Trade PTY Co., Ltd., for supporting Iran's unmanned aerial vehicle (UAV) procurement efforts.

On 21 March 2023, OFAC, in collaboration with the Federal Bureau of Investigation (FBI), imposed full blocking sanctions on 3 individuals from Iran and Turkey for their involvement in the procurement of equipment, such as European-origin engines for unmanned aerial vehicles (UAVs), in support of Iran's UAV and weapons programs. The procurement network is said to be working on behalf of Iran's Ministry of Defence and Armed Forces Logistics (MODAFL). These designations were made under Executive Order 13382, which targets weapons of mass destruction proliferators and their supporters.

24 March 2023, OFAC imposed full blocking sanctions on 9 Belarusian individuals who are executives of the newly designated entities and members of the Central Election Commission of Belarus. The designations were made in response to the Lukashenka regime's efforts to suppress democracy by cracking down on pro-democracy movements and civil society following the 2020 presidential election and to support Russia's ongoing war against Ukraine.

On 24 March 2023, the State Department imposed visa restrictions on 14 individuals, including regime officials, who were involved in implementing policies that posed a threat to and intimidated the Belarusian people. These restrictions were imposed under Presidential Proclamation 8015, in response to their actions undermining democracy in Belarus.

## United Kingdom

On 8 February 2023, the UK imposed asset freeze sanctions on 8 individuals connected to Kremlin nefarious financial networks that help maintain wealth and power amongst Kremlin elites.

On 9 February 2023, the UK government through coordinated actions with the US government sanctioned 7 Russian cyber criminals associated with the development or deployment of a range of ransomware strains which have targeted the UK and US, and who are believed to be part of the Trickbot cybercrime gang associated with Russian Intelligence Services.

On 24 February 2023, marking the one-year anniversary of Russia's invasion of Ukraine, the UK imposed asset freeze sanctions against 80 individuals, including senior executives at Russian state-owned nuclear power enterprise **Rosatom**, senior executives from Russia's defence enterprises **Rostec and Almaz-Antey Corporation**, senior executives of Gazprom, including Gazprom Chairman and former Russian Prime Minister Viktor Zubkov, senior executives of Aeroflot, including Russian Deputy Finance Minister and Minister of Digital Development, Communications and Mass Media, senior executives in Iranian company Qods Aviation Industry manufacturing the drones used in Ukraine, as well as Russian elites with close ties to Vladimir Putin.

On 17 March 2023, the UK deleted Brian McDonald, head of Russia desk for the English language edition of RT (formerly Russia Today), from its Russia sanctions list.

## European Union

On 6 February 2023, the EU removed Dmitry Ovsyannikov, a former Governor of Sevastopol, from the EU's Russia sanctions list after the September 2020 to March 2022 acts maintaining his designation were annulled by the General Court in October 2022.

On 25 February 2023, as part of the 10th package of sanctions measures, the EU imposed asset freeze sanctions against 87 persons responsible for actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine. These include key Russian decision-makers, such as new members of the Federation Council of Russia since 20 December 2022, including the representative of the illegally annexed so-called 'Luhansk People's Republic' and deputy secretary of the general council of the 'United Russia' party, members of the State Duma, senior government officials, heads of federal agencies, military leaders and officials, persons involved in the Russian abduction of Ukrainian children, proxy authorities installed by Russia in the occupied territories in Ukraine, such as prosecutors, individuals responsible for spreading disinformation, including individuals related to the 'All-Russia People's Front', members of Russia's Presidential Council Civil Society and Human Rights, and Iranian individuals associated with the supply of drones to Russia.

The EU also imposed asset freeze sanctions and entry or transit bans on 9 individuals connected to Russia's Wagner Group, a mercenary organization engaged in various activities in multiple countries. This action includes targeting 8 individuals associated with severe human rights violations in the Central African Republic and Sudan under the EU Global Human Rights Sanctions Regime. Additionally, a Russian national leading the Wagner Group in Mali has been targeted under the Mali sanctions regime, aimed at actions that pose a threat to Mali's peace, security, or stability.

On 25 February 2023, as part of the 10th package of sanctions measures, the EU implemented a prohibition effective from 27 March 2023, disallowing Russian nationals or residents (excluding Russian nationals and residents who also hold EU,

EEA or Swiss citizenship) from holding any post in the governing bodies of the owners or operators of critical infrastructures, European critical infrastructures and critical entities.

As per the current legal framework, the ban on holding positions in governing bodies is limited to European critical infrastructures and critical infrastructures identified under national law, but from 18 October 2024 the ban will extend to critical entities and critical infrastructures defined in Directive (EU) 2022/2557, which mandates Member States to identify critical entities for various sectors and subsectors in their national law by 17 July 2026, making the prohibition applicable to all critical entities designated or identified by Member States.

The concepts "critical infrastructure" and "critical entities" cover various sectors including energy, transport, banking, financial market infrastructure and public administration.

"Critical infrastructure" means an asset, system or part thereof located in Member States which is essential for the maintenance of vital societal functions, health, safety, security, economic or social well-being of people, and the disruption or destruction of which would have a significant impact in a Member State as a result of the failure to maintain those functions, as well as an asset, a facility, equipment, a network or a system, or a part of an asset, a facility, equipment, a network or a system, which is necessary for the provision of an essential service.

This definition of "European critical infrastructure" refers to infrastructure that is located within the European Union Member States and whose disruption or destruction would have a significant impact on at least two of those Member States. The impact of such disruption or destruction is assessed based on cross-cutting criteria, including effects that may result from cross-sector dependencies on other types of infrastructure. It covers various sectors including energy (infrastructures and facilities for generation and transmission of electricity in respect of supply electricity; oil and gas production, refining, treatment, storage and transmission by pipelines; LNG terminals), transport (road transport, rail transport, air transport, inland waterways transport, ocean and short-sea shipping and ports).

A "critical entity" is a private or public organization that a Member State has identified as belonging to certain specified categories, including energy, transport, banking, financial market infrastructure, health, drinking or waste water, digital infrastructure, public administration, space, and production, processing and distribution of food, listed in the table.

#### SECTORS, SUBSECTORS AND CATEGORIES OF ENTITIES

Sectors / subsectors	Categories of entities
<i>1. Energy</i>	
(a) Electricity	Electricity undertakings, which carry out the function of 'supply' Distribution system operators Transmission system operators Producers Nominated electricity market operators Market participants providing aggregation, demand response or energy storage services
(b) District heating and cooling	Operators of district heating or district cooling
(c) Oil	Operators of oil transmission pipelines Operators of oil production, refining and treatment facilities, storage and transmission Central stockholding entities
(d) Gas	Supply undertakings Distribution system operators Transmission system operators Storage system operators LNG system operators Natural gas undertakings Operators of natural gas refining and treatment facilities
(e) Hydrogen	Operators of hydrogen production, storage and transmission
<i>2. Transport</i>	
(a) Air	Air carriers used for commercial purposes Airport managing bodies, airports, including the listed core airports, and entities operating ancillary installations contained within airports Traffic management control operators providing air traffic control (ATC) services
(b) Rail	Infrastructure managers Railway undertakings and operators of service facilities
(c) Water	Inland, sea and coastal passenger and freight water transport companies, not including the individual vessels operated by those companies Managing bodies of ports, including their port facilities, and entities operating works and equipment contained within ports Operators of vessel traffic services (VTS)
(d) Road	Road authorities responsible for traffic management control, excluding public entities for whom traffic-management or the operation of intelligent transport systems is a non-essential part of their general activity Operators of Intelligent Transport Systems

(e) public transport	Public service operators
3. Banking	Credit institutions
4. Financial market infrastructure	Operators of trading venues Central counterparties (CCPs)
5. Health	(1) Healthcare providers, (2) EU reference laboratories, Entities carrying out research and development activities of medicinal product, (3) Entities manufacturing basic pharmaceutical products and pharmaceutical preparations, (4) Entities manufacturing medical devices considered as critical during a public health emergency ('public health emergency critical devices list'), (5) Entities holding a distribution authorisation
6. Drinking water	Suppliers and distributors of water intended for human consumption, excluding distributors for which distribution of water for human consumption is a non-essential part of their general activity of distributing other commodities and goods
7. Waste water	Undertakings collecting, disposing of or treating urban waste water, domestic waste water or industrial waste water, excluding undertakings for which collecting, disposing of or treating urban waste water, domestic waste water or industrial waste water is a non-essential part of their general activity
8. Digital infrastructure	Providers of internet exchange points DNS service providers, excluding operators of root name servers Top-level-domain name registries Providers of cloud computing services Providers of data centre services Providers of content delivery networks Trust service providers Providers of public electronic communications networks Providers of electronic communications services insofar as their services are publicly available
9. Public administration	Public administration entities of central governments
10. Space	Operators of ground-based infrastructure, owned, managed and operated by Member States or by private parties, that support the provision of space-based services, excluding providers of public electronic communications networks
11. Production, processing and distribution of food	Food businesses which are engaged exclusively in logistics and wholesale distribution and large scale industrial production and processing

On 7 March 2023, the European Commission imposed asset freeze sanctions against 4 Russian police officers and members of the armed forces for their involvement in serious human rights violations in Ukraine or against anti-war protesters in Russia.

On 8 March 2023, the EU General Court ruled to annul the EU sanctions imposed on Violetta Prigozhina, the mother of Yevgeny Prigozhin, the head of the Wagner Group. Violetta Prigozhina was included in the EU's sanctions list in 2022 due to her alleged "association" with her son, based on their family and economic ties. However, the court determined that the Council had not established a sufficient association between Ms. Prigozhina and her son to warrant the restrictive measures. EU's general court noting that the link between her & her son is based solely on their family relationship. The Council has a two-month window to appeal the decision to the Court of Justice, but this appeal would be restricted to points of law.

It is to be noted that the recent judgement of the General Court only concerns the decision of 23 February 2022. Consequently, asset freeze & travel ban measures vis-a-vis Prigozhina still apply as the decision adopted on 14 September 2022 to renew her designation is still in force.

On 13 March 2023, the EU deleted the entries for 3 deceased persons from the EU sanctions list – Nikolay PETRUNIN, Vladimir SUNGORKIN, Kyrlyo STREMOUSOV.

On 16 March 2023, the EU announced plans to create a clearer legal framework for imposing sanctions against family members of Russian businessmen who have been subjected to EU restrictions. The European External Action Service (EEAS), responsible for sanctions lists in the EU, has notified member states of its plan to submit a draft legislation that will provide clear eligibility criteria for sanctions against relatives of Russians on the blacklist. Estonia and other countries had suggested the idea due to concerns that sanctioned individuals could evade restrictions imposed since Russia's invasion of Ukraine. The initiative follows an EU court decision to revoke penalties imposed on Violetta Prigozhina, the mother of Yevgeny Prigozhin, head of the Russian Wagner mercenary group fighting in Ukraine, who was included in the EU sanctions list on 3 March 2022. Despite the court annulling the decision, the EEAS initiative aims to use evidence to show that some family members of sanctioned businessmen benefit from undue kinship benefits and can help them circumvent sanctions.

On 2 February 2023, Canada imposed sanctions against 38 individuals that are complicit in peddling Russian disinformation and propaganda.

On 23 February 2023, Canada implemented sanctions against 129 individuals, which included senior officials in the Russian government who were involved in facilitating Russia's invasion of Ukraine (Russian deputy prime ministers and ministers), members of the State Duma (the lower house of Russia's parliament) who had voted in favor of legislation related to the invasion and attempted annexation of four regions of Ukraine, the chairman of the Constitutional Court of Russia, officials of the Administration of the President of Russia, businesspersons, and senior managers in Russia's leading defense companies, Russian military officials, as well as a Russian oligarch (A. Mordashov) and four of his relatives, along with family members of previously sanctioned individuals.

On 27 March 2023, Canada imposed sanctions against a dozen of individuals and entities, including 3 senior officials involved in unmanned aerial vehicle and ballistic missile production in Iran.

## Japan

On 28 February 2023, Japan imposed asset freeze measures, in particular restrictions on payment and restriction on capital transactions, against 48 individuals, including 39 Russian individuals and 9 individuals who are directly involved in the purported "incorporations" of eastern and southern regions of Ukraine by Russia.

## Australia

On 23 February 2023, the Australian government imposed targeted financial sanctions and travel bans on 90 individuals, including members of the Russian government (ministers with responsibilities spanning energy, natural resources, industry, education, labour, migration and health), regional governors, members of the Russian Central Election Commission, military leaders, officials from the border service and federal penitentiary service, individuals engaged in disinformation and propaganda actions, religious leader (Patriarch Kirill), and businesspeople.

On 17 March 2023, Australia imposed targeted financial sanctions and travel bans on 13 Iranian individuals for their involvement in the production and supply of drones to Russia, which were used in the ongoing war against Ukraine. Among those targeted were senior executives of Paravar Pars Company and Qods Aviation Industries (QAI), as well as the Commander of the IRGC Navy.

On 30 March 2023, the Australian government imposed targeted financial sanctions and travel bans on 7 individuals for a new three-year period, following the expiration of previous sanctions imposed on 31 January 2020. These persons are responsible for, or complicit in, the threat to the sovereignty and territorial integrity of Ukraine.

## New Zealand

On 16 February 2023, the New Zealand Government imposed sanctions against 4 Iranian individuals for the supply of drones to Russia for use in its unjustified and illegal invasion of Ukraine.

On 20 February 2023, the New Zealand Government imposed sanctions, effective as 24 February 2023, against 87 individuals from the Russian political and military elite for their material or strategic support for Russia's illegal invasion of Ukraine. The list includes members of the Government of Russia, members of the State Council of Russia, Russia's governors of regions, members of the Central Election Commission, military officials, Russian filtration actors, and Federal Penitentiary Service officials that work closely with Wagner.

On 27 March 2023, the New Zealand government imposed broad sanctions, effective as 31 March 2023, against 27 individuals of the Russian and Belarusian elite, as well as military actors.

## Switzerland

On 15 February 2023, Switzerland de-listed 2 individuals – Dmitry Vladimirovich OVSYANNIKOV, former "Governor of Sevastopol" (until Jul 2019), former Deputy Minister for Industry and Trade of Russia (until Apr 2020); Sergey Pavlovich IVANOV, member of the Federation Council who on 4 October 2022 ratified the four treaties between Russia and the Donetsk People's Republic, the Luhansk People's Republic, the Zaporizhzhia region, and the Kherson region, and their admission to Russia.

On 1 March 2023, the Federal Council decided to implement financial sanctions and travel bans on 87 persons, effective from 2 March 2023. These sanctions were adopted in accordance with the latest measures introduced by the EU under the 10th package of sanctions.

On 29 March 2023, Switzerland implemented a prohibition, effective from 27 April 2023, on Russian nationals and residents (excluding those who hold EEA, UK, or Swiss citizenship) from holding a function in the governing bodies of the owners or operators of critical infrastructure. This measure was taken to align with the EU's 10th sanctions package against Russia. The concept of "critical infrastructure" is defined in the Federal Information Security Act, which will enter into full force in September 2023, as encompassing "the supply of drinking water and energy, information, communication and transport infrastructure, as well as other processes, systems and facilities that are essential to the functioning of the economy and the well-being of the population."

## Latvia

On 17 March 2023, the Latvian Foreign Ministry added 35 individuals who have supported Russian aggression in Ukraine to the list of undesirable persons in Latvia. The decision provides for a ban on these individuals entering Latvia for an indefinite period. The stop list includes artists, journalists, bloggers, and public figures.

### **Tourist visa ban for ordinary Russians**

## Portugal

Portugal plans to terminate its golden visa scheme that has become popular with Russians after ten years. In a legislation project, all applications for new golden visas lodged after 16 February 2023 are no longer valid, while existing residence permits for investment will remain effective. Golden visas granted under the scheme will be converted into regular residence permits, similar to those of foreign citizens. However, golden visas for entrepreneurship will remain available for foreign entrepreneurs who want to develop a project in this field in Portugal.

## Kazakhstan

On 8 February 2023, Kazakhstan made changes to the rules for obtaining permanent residency permits for foreigners. Foreign citizens with whom Kazakhstan has corresponding migration agreements can enter, exit, transit, move, and temporarily stay in the country using internal documents. However, a foreign passport is now required to obtain a permanent residency permit in Kazakhstan, which must be valid for at least 180 calendar days on the day of application. Personal presence of the property owner or a person acting on his behalf by power of attorney, or a notarized consent of the owner is necessary to obtain a temporary residence permit. Additionally, the address specified when applying for a residence permit must have a registration code. These measures were taken to prevent foreigners from registering at non-existent or unrelated addresses.

## Czech Republic

On 30 March 2023, the Czech Republic government extended the ban on the issuance of new visas and residence permits to Russian and Belarusian nationals submitted at diplomatic missions for one year, until 31 March 2024. This ban has been in place since March 2022. Some Russian and Belarusian nationals, such as family members of EU nationals who reside in the Czech Republic, are exempt from the ban, and those with long-term visas or residence permits can still renew these documents.

In response to a request from the Ministry of the Interior, the Czech Republic government also approved a new amendment, which suspends the issuance of Czech visas and long-term residence permits to foreign nationals who hold dual citizenship with Russia or Belarus. This aims to prevent dual citizenship from being used to circumvent the existing ban on residency permits for citizens of Russia and Belarus.

## Lithuania

On 23 March 2023, the Seimas (Lithuanian Parliament) approved the amendments to the Law on Citizenship allowing the revocation of citizenship of persons with dual citizenship who pose a threat to the security of the Lithuanian state. The law states that a person who acquired Lithuanian citizenship as an exception, while also being a citizen of another state, may lose their citizenship if they publicly express support for a state that poses a threat to Lithuania or if their actions threaten Lithuania's security interests or those of its EU member state allies. The law also enshrines new functions for the

Citizenship Affairs Commission, which will examine appeals from the Minister of Internal Affairs and submit proposals to the President of the Republic on matters related to loss of citizenship. a new law will come into effect on 1 June 2023.

## **Moldova**

Moldova will gradually join the sanctions imposed by the EU against Russia and will introduce sanctions against Russian citizens involved in the aggression against Ukraine, according to Foreign Minister Nicu Popescu in an interview with Europa Liberă on 17 March 2023. The decision has already been made, and it will include travel bans and the freezing of bank accounts or assets of those individuals who are involved in the aggression against Ukraine. The list will include around 25 people, about half of whom are Russian citizens. The EU had requested Moldova to join the package of individual sanctions aimed at punishing individuals for human rights violations in Ukraine. Popescu also suggested that Moldova is not considering joining the economic sanctions against Russia at the moment, but it is effectively applying financial sanctions since their introduction in 2022.

## **India**

On 13 March 2023, the Bureau of Immigration of the Ministry of Home Affairs of India presented official clarifications of the new rules on the validity of electronic visas. The maximum period of continuous stay in India for Russian tourists with e-tourist visas must not exceed 90 days, and the total duration of stay within one calendar year must not exceed 180 days. The previous limit was more than 180 days per year, but not more than 90 consecutive days. The changes apply to already issued e-visas.

## **Israel**

As of 15 April 2023, the Aliyah and Integration Ministry in Israel has cancelled its emergency program called Aliyah, which provided an expedited path to Israeli citizenship for new arrivals from Russia and Belarus. The program will still be available for Ukrainian immigrants. The decision was reportedly made due to a decrease in the number of applicants and concerns over human rights violations in Russia. The cancellation was not published until after the concessions had expired, leaving new immigrants from Russia and Belarus without legal residency status and significant limitations on their ability to earn a living, rent an apartment, and receive medical care. They will now have to go through a standard immigration process, which could take several months to a year. However, citizens from Russia and Belarus who signed up for Aliyah before 15 April 2023 will still be eligible for the expedited process. The Population and Immigration Authority has also cancelled other concessions that eased the Aliyah process for new immigrants arriving from Russia and Belarus. Previously, the candidates were exempted from presenting apostilled documents from their home country's foreign ministry and providing a certificate indicating law-abiding conduct. But now, these exemptions no longer apply. New immigrants arriving from Ukraine, on the other hand, are still eligible for these concessions. New immigrants arriving from Ukraine, on the other hand, are still eligible for these concessions.



## 6. Intensify Sanctions on State-Owned Enterprises

### European Union

On 25 February 2023, the EU suspended the broadcasting licences in the EU of two additional media outlets under the permanent control of the Russian leadership and prohibited against broadcasting their content. The media outlets concerned are RT Arabic and Sputnik Arabic. The prohibition will apply as from 10 April 2023 provided that the Council, having examined the respective cases, so decides by implementing act. However, such prohibition will not prevent them and their staff from carrying out activities other than broadcasting, such as research and interviews.

On 31 March 2023, the European Council, having examined the respective cases, concluded that the restrictive measures in respect of RT Arabic and Sputnik Arabic should apply from 10 April 2023.

The measures mean:

- it is prohibited for operators to broadcast, or to enable, facilitate or otherwise contribute to broadcast, any content by these outlets, including through transmission or distribution by any means such as cable, satellite, IP-TV, internet service providers, internet video-sharing platforms or applications;
- any broadcasting licence or authorisation, transmission and distribution arrangement with these outlets shall be suspended; and
- it is prohibited to advertise products or services in any content produced or broadcast by these outlets.

### Japan

On 24 March 2023, the Institute of Space and Astronautical Science (ISAS), a scientific institute belonging to Japan's space agency, set new standards for accepting foreign researchers and students that bar Chinese and Russian researchers, among others, from undergoing screening to enter ISAS. The move comes as part of efforts to prevent sensitive technological information from being accessed by foreign agencies developing weapons of mass destruction. The institute will consider whether foreign institutes employ Japanese nationals or foreigners who have lived in Japan for more than half a year and whether they are receiving scholarships or other financial benefits from overseas governments in making their decision.

### Propaganda

#### Switzerland

On 15 February 2023, Switzerland prohibited the commissioning or arranging of advertising of any product or service to be transmitted or distributed in any radio or television program or other electronic content created or broadcast by NTV/NTV Mir, Rossiya 1, REN TV and Pervyi Kanal. This applies regardless of the type of transmission or distribution of the content.

#### Lithuania

On 8 March 2023, the Lithuanian Radio and Television Commission (LRTK) obliged Internet providers to block IP addresses that provide access to Russian TV channels NTV, Channel One, Rossiya 1, Rossiya 24 and RTR Planet, to which the EU applied sanctions.

## 7. Expand Export Controls and Ban Imports

### G7 and European Union

According to Bloomberg, G7 and the EU are discussing ways to track Russian diamonds across borders, a move that could pave the way for restrictions on their trade in future. A diamond's origin is clear at the start of the supply chain when it is issued a certificate under the Kimberley Process, which was designed to end the sale of so-called blood diamonds that financed wars. But after that they can become difficult to track.

### European Union and United States

On 6 March 2023, the EU and US held a meeting with key players in the diamond industry to discuss ways to disrupt Russia's diamond revenue stream in response to their actions in Ukraine. The meeting aimed to find effective ways to reduce Russia's involvement in the global diamond trade and prevent their access to retail markets in G7 and EU member states for non-industrial diamonds mined in Russia. The attendees included European Commission Deputy Director-General and Chief Trade Enforcement Officer Denis Redonnet and US Sanctions Coordinator James O'Brien, who emphasized the importance of the diamond industry's engagement on future Russia-related import measures, including on polished diamonds, as noted in the recent G7 Leaders' Statement.

### United States

On 24 February 2023, President Biden issued Proclamation 10523 to increase import tariffs on a broad range of Russian-origin products, effective from 1 April 2023. The tariffs will affect more than 100 Russian-origin metals, minerals, and chemical products valued at around \$2.8 billion. This is the second time that the US has acted under the authority of the Suspending Normal Trade Relations with Russia and Belarus Act, which was enacted on 8 April 2022. The previous action increased duty rates for certain products to 35%, while the new tariffs cover a broader range of products, including some that were not previously subject to tariffs. However, this Proclamation does not apply to products of Belarus.

This includes:

- imposing the 35 % ad valorem tariff covering certain Russian-origin mineral ores (iron ores, zirconium ores and concentrates), chemicals (carbon, selenium, and calcium products, hydroxide and peroxide of magnesium, calcium nitrates, rare-earth oxides or chlorides), industrial diamonds, precious metals (platinum, palladium, rhodium, iridium, osmium and ruthenium), nickel, and bumpers made of aluminum and steel for motor vehicles;
- imposing the 70% ad valorem tariff for a broad range of products made of aluminum, copper, iron, lead, steel, and other base metals (certain of which previously had been increased to 35% as a result of the 27 June 2022 action). They cover, among others, a large number of primary iron and steel materials (pig iron, ferroalloys, ferrous products, ferrous waste and scrap), certain manufactured or processed steel and iron products (semifinished products, flat-rolled products, wire, bars and rods, tubes, pipes and hollow profiles, structures and parts of structures, tanks, casks, drums, cans, boxes and similar containers, containers for compressed or liquefied gas, casings, tube and pipe fittings, grill, netting and fencing, screws, bolts, nuts, and washers), refined copper and copper wire, foil, unwrought aluminum and articles of aluminum (bars, rods and profiles, wire, plates, sheets and strip, foil, containers for compressed or liquefied gas), unwrought lead, unwrought titanium, waste and scrap of titanium articles, other base metal materials such as hafnium, rhenium, gallium, indium, niobium (columbium).

The products subject to the newly increased 70% ad valorem tariff also include certain Russian-origin aluminum products such as unwrought aluminum (under heading 7601) and aluminum plates, sheets, and strips (under heading 7606) that are already subject to a 200% ad valorem tariff under Proclamation 10522. Therefore, these products could be subject to a total import duty of 270%.

The products subject to the ad valorem duty increase from 35 to 70% include items such as iron ores, chemicals, certain iron or steel wire, iron or steel containers for compressed or liquefied gas, certain waste and scrap. The products subject to the duty increase from 35 to 70% ad valorem, include but are not limited to: wire of iron or nonalloy steel under heading 7217; containers for compressed or liquefied gas, of iron or steel under heading 7311; aluminum wires under heading 7605; aluminum containers for compressed or liquefied gas under subheading 7613.00.00; and waste and scrap of titanium articles under heading 8108.

Additionally, Presidential Proclamation 10523 increased tariffs on additional Russian products, including, but not limited to, certain iron ores and chemicals under chapter 26 and 28 and bumpers for motor vehicles under subheading 8708.10.30, to 35% ad valorem.

The products subject to the newly increased 70% ad valorem tariff also include certain Russian-origin aluminum products such as unwrought aluminum (under heading 7601) and aluminum plates, sheets, and strips (under heading 7606) that are already subject to a 200% ad valorem tariff under Proclamation 10522. Therefore, these products could be subject to a total import duty of 270%.

Additionally, on 24 February 2023, President Biden issued a proclamation to increase tariffs on imports of aluminum and derivative aluminum articles from Russia and other countries. The new 200% ad valorem tariff, that applies in addition to the duties already imposed on products of Russia pursuant to the Suspending Normal Trade Relations with Russia and Belarus Act, will be imposed in two stages:

- 1) starting 10 March 2023, on aluminum and derivative articles produced in Russia, or where any amount of primary aluminum used in the manufacture of the aluminum articles is smelted in Russia, or the aluminum articles are cast in Russia;
- 2) beginning 10 April 2023, on aluminum and derivative articles, regardless of origin, where any amount of primary aluminum used in the manufacture of such articles is smelted in Russia or such articles are cast in Russia. However, countries that impose tariffs of 200% or more on their imports of aluminum articles that are products of Russia may be exempt from these tariffs.

For purposes of these new tariffs, the Proclamation defines “primary aluminum” as new aluminum metal produced from alumina (or aluminum oxide) using the electrolytic Hall-Heroult process.

Importers will be required to provide U.S. Customs and Border Protection with the information necessary to identify the countries where (1) the primary aluminum used in the manufacture of the articles is smelted and (2) the articles are cast.

Additionally, under the proclamation, the aluminum articles and derivative aluminum articles mentioned earlier will no longer be eligible for in-quota treatment for any quota or tariff-rate quota under Section 232 duties, and they will not be eligible for General Approved Exclusions. Furthermore, subject aluminum products that are imported into a foreign trade zone (FTZ) under privileged foreign status will be subject to a 200% ad valorem duty rate upon subsequent importation into the customs territory of the United States.

On 24 February 2023, BIS issued a Temporary Denial Order (TDO) suspending the export privileges of Russian company Radiotester OOO (Radiotester LLC) and Russian individual Ilya Balakaev, for unauthorized export of controlled counterintelligence items to Russia and North Korea. Since at least January 2017, Ilya Balakaev and others allegedly conspired to export electronic devices subject to the Export Administration Regulations (EAR) to Russia, and he unlawfully purchased sensitive electronic devices including spectrum analyzers, signal generators, and gas detection equipment. He used the devices to repair equipment for the FSB and sold gas detection equipment to North Korea, in violation of United States law.

On 24 February 2023, on the one-year mark of Russia's invasion in Ukraine, BIS issued 4 separate final rules imposing additional export restrictions on Russia, Belarus, and Iran, as well as entities in third countries.

The first rule imposed new export control measures on Iran to prevent the use of U.S.-origin components in Iranian drones that Russia has been using in its ongoing war against Ukraine, as well as to limit Iran's ability to support Russia's military aggression in Ukraine by:

- Establishing a new list (Supplement no. 7 to Part 746 of the EAR) identifying specific generally low-tech EAR99 items by HTS-6 code, which can be used in Iranian UAVs. This will allow BIS and other relevant U.S. government agencies to track and quantify these exports.

The supplement includes 12 items used in UAVs, such as aircraft internal combustion piston engines, parts for such engines, processing units, certain switching and routing apparatus, radio navigational aid apparatus, capacitors, processors and controllers, memories, amplifiers, and other electronic integrated circuits, which could be used to manufacture UAV in Iran and disseminate additional UAV technology to Russia. The supplement covers not only the original items but also any modified or designed components, parts, accessories, and attachments related to those items, regardless of their HTS Code or HTS Description. However, certain minor components such as fasteners, washers, spacers, insulators, grommets, bushings, springs, wires, and solder are excluded from this definition.

- Expanding the product scope of the existing Russia/Belarus FDP rule to include foreign-produced EAR99 items that can be used in UAVs identified in new supplement no. 7 to part 746 subjecting them to export license requirements. These items cover "parts" and "components" used in UAVs that have been found on the battlefield in Ukraine, which include items branded as US or US-origin. This expansion will help ensure that such products will be similarly controlled to Russia and Belarus when they are also the “direct product” of certain U.S.-origin “technology” or “software,” or are produced by a plant or a “major component” of a plant which is itself the “direct product” of certain U.S.-origin “technology” or “software.” Together, with a separate rule adding export controls for Russia and Belarus, these changes impose license requirements on additional exports from abroad and reexports to Iran, Russia, and Belarus, with the purpose of substantially degrading the Iranian UAV program and Russia's use of such UAVs against Ukraine. Thus, expanding the foreign direct product rule to cover these items will help ensure that such products are not available for shipment to Iran for use in the manufacture of UAVs that are being used by Russia in Ukraine.

- Establishing an Iran Foreign Direct Product (FDP) rule, that imposes additional licensing requirements on the export, re-export, and transfer of certain items that can be used in UAVs items to or in Iran, regardless of the involvement of a U.S. person in the transaction. The product scope of the rule is limited to foreign-produced items identified by HTS-6 codes in newly added Supplement No. 7 to Part 746 of the EAR, including items designated EAR99, and to items classified under any Export Control Classification Number (ECCN) in Categories 3 through 5 and 7 of the Commerce Control List (CCL). The Iran FDP rule establishes EAR jurisdiction over foreign-produced items that are the direct product of U.S.-origin software or technology classified in Categories 3 through 5 and 7 of the CCL or are produced by a plant or major component of a plant which itself is the “direct product” of such software or technology. Consequently, items made outside of the US may require a license to export, reexport, or transfer to Iran. The measures are intended to address Russia’s use of UAVs in Ukraine. This rule is similar to the Russia/Belarus FDP rule, but with some differences to target Iran’s UAV activities more specifically.
- Exempting countries identified in supplement no. 3 to part 746 of the EAR (27 EU member states, Australia, Canada, Iceland, Japan, Liechtenstein, New Zealand, Norway, South Korea, Switzerland, Taiwan, and UK) from the license requirements for items subject to this new Iran FDP rule. Items that are designated as EAR99 and listed in supplement no. 7 to part 746 of the EAR are not considered as U.S.-origin controlled content when they are incorporated into a foreign-made item that is being exported or reexported from a country listed in supplement no. 3 to part 746 of the EAR.

These new controls do not apply to transactions abroad involving Iran that would otherwise meet the terms and conditions of an OFAC general license if the transactions had been subject to OFAC jurisdiction. BIS specifies that separate authorization from BIS is not required for transactions authorized by OFAC. The exemption is added because the Iran FDP rule has the potential to cover items that may be used in applications other than to develop or produce Iran UAVs, such as medical devices or communications devices authorized for export or reexport to Iran under the Iranian Transactions Sanctions Regulations. In such cases, BIS will treat transactions involving foreign-produced items consistently with transactions eligible for OFAC general licenses if they were conducted by U.S. persons or involved reexports of items exported from the US. This means that reexports and exports from abroad of foreign-produced items that meet the terms and conditions of an OFAC general license are exempt from BIS license requirements.

The second rule imposed new and strengthened the existing export controls measures to further restrict the export of U.S.-origin and certain foreign-made goods to Russia and Belarus. These actions were made to enhance the effectiveness of its controls on both countries and to better align EAR’s controls more closely with sanctions imposed by U.S. allies and partners.

- Revising and expanding the scope of industry sector sanctions that have been implemented on Russia and Belarus under the Export Administration Regulations (EAR) by:
  - expanding the reach of export restrictions for the oil and gas production industry items (e.g., mobile drilling derricks, liquid elevators, aluminum containers for liquefied natural gas, line pipe for oil and gas pipelines) to include Belarus (amending the heading for Supplement No. 2 to Part 746). That is, such items require a license for export, reexport to or transfer within Russia or Belarus;
  - using the HTS-6 Code and HTS Description to identify the items subject to licensing requirements in Supplement No. 2, replacing the Schedule B number and Schedule B description previously used;
  - clarifying that the license requirements extend to HTS Codes at the 8- and 10-digit level as long as those codes begin with the HTS-6 Codes as their first 6 numbers. This means that exporters cannot try to evade control by identifying an item at the 8- or 10-digit level if it matches one of the HTS-6 codes specified. If the item is subject to the EAR, it will require a license unless an exclusion applies;
  - extending the scope of Supplement No. 2 to Part 746 (oil and gas production items) to cover any modified or designed "parts," "components," "accessories," and "attachments" of items identified in the supplement, even if not specifically identified by HTS Code or HTS Description. Thus, controls may apply to other items, even if not listed, and in many cases, such items are not specifically identified by HTS Code or HTS Description. However, BIS does make clear that such controls do not include minor components, such as fasteners (e.g., screw, bolt, nut, nut plate, stud, insert, clip, rivet, pin), washers, spacers, insulators, grommets, bushings, springs, wires, or solders are excluded from the expanded coverage. This revision enhances the strength and effectiveness of the sanctions by ensuring that items subject to the sanctions cannot be easily circumvented by exporting or reexporting these types of items separately;
  - adding 322 new industrial items to Supplement No. 4 to Part 746 that lists commercial and industrial items requiring a license for export or reexport to or transfer within Russia or Belarus. The items added include a variety of electronics, industrial machinery, and equipment related to oil and gas production (items in HTS Chapters 72, 73, 76, 84, 85, 87, and 90). The controlled items in Supplement No. 4 are now exclusively identified using HTS-6 Codes and HTS Descriptions, instead of Schedule B classifications, which is consistent with the controls implemented by other US allies and partners;

- amending and expanding chemical sector-related export and reexport controls applicable to Russia and Belarus for items that require a license. BIS expanded the list of EAR99 items related to chemical and biological weapons (chemical and biological precursors) that require a license to Russia and Belarus by adding new items and certain components, parts, and accessories to previously listed items. Among other items, BIS added thiafentanil, reagents and materials for oligonucleotide synthesis, and resins, reagents, and materials for peptide synthesis. BIS also added controls for: “microarrays”; “ultracentrifuges”, including for biological sample separation capabilities; “microreactors, n.e.s.”; “solid and liquid aerosol generating equipment, n.e.s.”; “laboratory milling equipment, “components,” “parts,” and “accessories, n.e.s.”; and “peptide synthesizers, “components,” “parts,” and “accessories”.
- Including Taiwan on the list of partner countries that are exempt from the expanded de minimis and foreign direct product rules that apply to licenses for exports, re-exports and transfers (in-country) to Belarus, Iran and Russia, as those countries have adopted substantially similar export control rules on Russia and Belarus under their domestic laws.
- Expanding the scope of controls applicable to “luxury goods” by adding 276 items to Supplement No. 5 to Part 746 that require a license for export, re-export or transfer within Russia or Belarus or for designated Russian and Belarusian oligarchs and malign actors worldwide. Newly added items fall under a wide variety of product areas, including many common consumer and household items such as electrical fans, air conditioners, refrigerator-freezers, cooking appliances, restaurant equipment, dishwashers, toasters and various other kitchen appliances, microwaves, vacuum cleaners, hair dryers, smartphones and other types of telephones, modems, turntables and record players, radio/TV and related items, smoke detectors, alarms, personal weighing machines, lifting equipment, office and other types of printers, photocopiers, typewriters, washing machines, dryers, sewing machines, electronic calculators, ADP machines, keyboards, scanners, card key and magnetic media entry devices, magnetic disk drives/floppy disks, storage units, ATMs, musical instruments, as well as certain types of spark ignition and compression ignition piston engines, various turbojet and other aircraft parts and turbines, certain gas turbines and parts, household bearings, gears and pulleys, items relating to nuclear reactors, boilers, machinery, mechanical appliances, electronics and related equipment and parts, amongst others.
- Various other corrections and clarifications to existing controls on Russia and Belarus:
  - Clarification that the license requirements for exports and reexport of certain items to and for the use of certain Russian and Belarusian vessels or aircraft also apply to transfers (in-country);
  - Clarification that the exception from the license requirement for items controlled under ECCN 5A992 or 5D992 (mass-market encryption commodities and software) that applies to certain U.S. and Country Group A:5 or A:6 entities in Russia or Belarus also applies to the luxury goods sanctions, so that no separate license requirement is imposed on the excluded goods when they include these mass market items;
  - Modification of licensing policy for applications related to the disposition of items by companies that are curtailing or closing all operations in Russia or Belarus. Under the new policy, BIS will review such license applications on case-by-case basis, instead of under a policy of denial, to determine whether the disposition of these items will benefit the Russian or Belarusian government or military, provided that the companies are not headquartered in countries subject to national security, arms embargo, unilateral embargo, or terrorist-supporting country controls. The policy is intended to encourage companies to exit Russia and Belarus in an orderly manner while taking into account US national security and foreign policy interests.

The third rule added 76 Russian entities that support Russia's military or filtration operations in occupied areas of Ukraine to the Entity List. Of these entities, 5 provided biometric technology to support Russia's operations in Ukraine's occupied areas, another 5 attempted to acquire US-origin items in support of activities contrary to US national security and foreign policy interests, and the remaining 66 were involved in acquiring or attempting to acquire US-origin items in support of Russia's military. As a result of this decision, the listed entities will be prohibited from purchasing items such as semiconductors and software made in the US or abroad containing US components. License requirements will be imposed for all items subject to the Export Administration Regulations (EAR), introduced limitations on most license exceptions for transactions involving the listed entities, and license applications will be reviewed under a presumption or policy of denial for these entities.

The fourth rule added 10 entities in third countries, including Canada, China, France, Luxembourg, Netherlands, and Russia to the Entity List for contributing to Russia's military and defense industrial base. Some of these entities in Canada, France, Luxembourg, and the Netherlands are subsidiaries of companies based in China and Russia. The entities have been determined to be Russian or Belarusian "military end users". As a result, they are given a footnote 3 designation and are subject to the Russia/Belarus-Military End User Foreign Direct Product (FDP) rule, which mandates a license requirement for all items subject to the Export Administration Regulations (EAR) for these entities. All license applications from these entities will be reviewed under a policy of denial, except for food and medicine items designated as EAR99, which will be reviewed on a case-by-case basis.

On 2 March 2023, BIS added 37 entities to the Entity List, which restricts these companies from buying items, such as semiconductors and software made in the US or made abroad and containing US components. Three of these entities, DMT Electronics in Russia, DMT Trading LLC in Belarus, and Neotec Semiconductor Ltd. in Taiwan, were added for significantly contributing to Russia's military and/or defense industrial complex. These entities have been designated as 'military end users' under footnote 3 and are subject to the Russia/Belarus-Military End User Foreign Direct Product (FDP) rule. As per this rule, these entities are now subject to a license requirement for all items subject to the Export Administration Regulations (EAR) and license applications for these entities will be reviewed under a policy of denial for all items subject to the EAR, except for food and medicine designated as EAR99, which will be reviewed on a case-by-case basis.

On 3 March 2023, BIS added 2 aircraft operated by Russian airlines Red Wings to its list of commercial and private aircraft that are allegedly in violation of U.S. export controls for entering Russia and/or Belarus without required authorization.

On 6 March 2022, the US State Department and European Commission officials held a meeting with the heads of companies in the diamond industry to discuss potential import measures related to Russian diamonds, including on polished diamonds. The discussion focused on disrupting the revenue stream that Russia earns from the diamond trade, which continues to generate billions of dollars for the country. The meeting was held in response to the recent G7 Leaders' Statement, which called for economic consequences to be imposed on Russia for its actions in Ukraine.

A group of American senators from both the Republican and Democratic parties have proposed a bill to ban the import of Russian uranium into the US, according to a statement from the US Senate Committee on Energy and Natural Resources. The senators argue that the US nuclear industry is ready to stop using Russian uranium and that there are sufficient resources within the country to increase domestic uranium production. The bill, if approved, would help US nuclear energy companies to reduce their dependence on imported Russian uranium fuel.

On 22 March 2023, mass media reported that G7 countries may require diamond importers to declare that their imported polished diamonds are not of Russian origin, according to Ambassador James O'Brien, who heads the US Office of Sanctions Coordination. The leaders of the bloc are planning to develop a declaration on this matter before their summit in mid-May. The aim is to prevent Alrosa, a diamond mining company in which the Kremlin holds a stake, from profiting from diamond sales abroad using profits to fund the war in Ukraine. Due to sanctions against ALROSA, there have been increased deliveries of Russian diamonds to India, but payment issues arise when dealing with buyers from that country. The G7 leaders will meet in mid-May to discuss a plan, with the US government hoping to have a framework in place by then. O'Brien also stated that the US wants to ensure that Burma does not provide assistance to Russia.

On 23 March 2023, The U.S. International Trade Commission (USITC) determined that termination of the suspended investigation on uranium from Russia would likely lead to the continuation or recurrence of material injury to the U.S. uranium industry within a reasonably foreseeable time. Therefore, the suspension agreement on imports of uranium from Russia will remain in effect. The Commission's affirmative determination came as a result of a five-year (sunset) review process required by the Uruguay Round Agreements Act.

On 28 March 2023, BIS added 11 entities from Burma, China, Nicaragua, and Russia to the Entity List due to their involvement in human rights abuses worldwide. As a result, the listed companies are prohibited from purchasing items such as semiconductors and software made in the US or manufactured abroad with US components. Aviatech Supply Ltd. and Aviazapchast PLC, two entities from Russia, were included on the list for their actions in supporting the sale, procurement, and service of military equipment used by Burma's military regime to carry out human rights abuses and brutal aerial attacks resulting in the killing and injury of civilians. BIS has therefore imposed a license requirement for all items subject to the Export Administration Regulations (EAR) and will review license applications for export, reexport, or transfer (in-country) of these items under a presumption of denial for these entities.

On 29 March 2023, BIS renewed the orders temporarily denying export privileges to Russian airlines Azur Air JSC, UTair Aviation JSC and PJSC Aeroflot. The TDOs were originally issued on 7 April 2022 because the airlines were operating controlled aircraft on flights into and out of Russia and within Russia, without the necessary licences. They were renewed in October 2022. They have been renewed again because BIS has evidence that the airlines have continued to operate aircraft subject to the Export Administration Regulations (EAR) and classified under ECCN 9A991.b, on flights into and within Russia, in violation of the October TDO and / or the EAR.

On 24 February 2023, to mark the 1-year anniversary of Russia's actions in Ukraine, the UK announced new trade sanctions against Russia, including:

- (1) export bans on every item Russia has been found using on the battlefield in Ukraine, including aircraft parts, radio equipment, and electronic components that can be used by the Russian military industrial complex, including in the production of UAVs;
- (2) import ban of 140 goods of Russian origin, including iron and steel products processed in third countries.

On 20 March 2023, the UK government amended its Statutory Guidance on Russia sanctions as regards licences that can be granted to permit conduct that would otherwise be prohibited by Russia Sanctions Regulations regarding business services (i.e. accounting, advertising, architectural, auditing, business and management consulting, engineering, IT consultancy and design and public relations services to a person connected with Russia). The guidance now says a licence may be granted "if it is necessary for ensuring critical energy supply to any country".

On 10 March 2023, the UK amended the control lists in the Export Control Order 2008, which sets out rules for controlling the export of military and dual-use goods, software, and technology, and retained Council Regulation (EC) No 428/2009, which sets up a Community regime for the control of exports, transfer, brokering and transit of dual-use items, to reflect changes to the Wassenaar Arrangement munitions list and dual-use list, an international export control regime, as well as changes to other multilateral export control regime lists, including those of the Australia Group and the Missile Technology Control Regime. The changes also align with control list amendments introduced by Commission Delegated Regulation (EU) 2023/66. The new list comes into effect on 31 March 2023.

## European Union

On 25 February 2023, as part of the 10th package of sanctions, the EU adopted new trade sanctions against Russia, including:

- ❖ Export restrictions:
  - extended the list of restricted goods which could contribute to the enhancement of Russian industrial capacities and are prohibited for sale, supply, transfer, or export to any natural or legal person, entity or body in Russia, or for use in Russia (the new Part C of Annex XXIII). The list of restricted goods now covers among others: certain pumps, industrial robots, ball bearings, certain flat-rolled products of iron or non-alloy steel, bridges, structures for buildings tower-like, electronics, certain machines and machine parts (e.g., earth moving machinery, boring machines for metals, machining centers), heavy trucks and fork-lifts, cranes, bulldozers, trailers, semi-trailers, rail locomotives, special vehicles such as snowmobiles, oil or petrol-filters for internal combustion engines, steam and vapour turbines, electric generators, optical fibers, binoculars, direction finding compasses, and rangefinders, complete industrial plants (except plants for the production of food and drinks, pharmaceuticals, medicines and medical devices) and various other equipment;
  - narrowed down the scope of the previously introduced derogation from the ban on the sale, supply, transfer, or export of goods that could contribute to the enhancement of Russian industrial capacities, with the exemption now applying only to household bakery ovens, including biscuit ovens, and the exclusion of other machinery used for making hot drinks, cooking or heating food (those intended for civil aircraft and other), and bakery machinery necessary for personal household use by individuals;
  - extended the list of goods and technology subject to export restriction that could contribute to Russia's military and technological enhancement or the development of the defense and security sector. Now the list includes rare-earth metals and compounds (such as scandium, yttrium, lanthanum, cerium, praseodymium, neodymium, promethium, samarium, europium, gadolinium, terbium, dysprosium, holmium, erbium, thulium, ytterbium, and lutetium; minerals containing rare-earth metals are excluded), electronic integrated circuits (such as boards, panels, consoles, desks, cabinets, and other bases) used in Russian weapons systems (including drones, missiles, helicopters and other vehicles), certain thermographic cameras, and other electrical and magnetic components (such as aerials and aerial reflectors of all kinds and other fixed tantalum capacitors);
  - extended the list of goods and technology suited for the aviation or the space industry, the sale, supply, transfer or export of which to any natural or legal person, entity or body in Russia or for use in Russia are restricted, to include turbojets (CN 8411.11 and 8411.12), turbopropellers (CN 8411.21 and 8411.22), and their parts (CN 8411.91) (new Part D of Annex XI);
  - added 96 entities to the list of entities directly supporting Russia's military and industrial complex, on whom tighter export restrictions regarding dual-use goods and technology as well as goods and technology which might contribute to the technological enhancement of Russia's defence and security sector are imposed. This includes 7 Iranian entities that have been using EU components and providing Russia with military "Shahed" drones to attack civilian infrastructure in Ukraine;
- ❖ Import restrictions:

- extended the list of goods generating significant revenues for Russia, whose purchase, import, or transfer is prohibited to include various petroleum products, including petroleum jelly (CN 2712), petroleum coke and petroleum bitumen (CN 2713), bitumen and asphalt (CN 2714), bituminous mastics (CN 2715), carbon (CN 2803), and synthetic rubber (CN 4002) (new Part C of Annex XXI). For the newly listed products, there is a 3-month wind-down period until 27 May 2023 for the execution of contracts concluded before 26 February 2023 or of ancillary contracts, except with respect to carbon and synthetic rubber for which import quotas are envisaged until 30 June 2024 – 752 475 metric tonnes for carbon and 562 973 metric tonnes for synthetic rubber;
- ❖ Transit restrictions:
  - introduced a ban on the transit of dual-use goods and technology exported from the EU through the territory of Russia, with limited exceptions. The ban aims to minimize the risk of circumventing restrictive measures, with exceptions including the sale, supply, transfer, or export of those dual-use goods intended for humanitarian purposes, health emergencies, software updates, or for the personal use of individuals travelling to Russia;
  - introduced a prohibition on the transit via the territory of Russia of firearms, their parts and essential components, and ammunition, exported from the EU to minimize the risk of circumventing the restrictive measures.

The EU also established rules that allow national customs authorities to release goods that were physically located in the EU and had already been presented to customs, but not yet released for free circulation at the time when they became subject to import ban. These rules also apply to goods that were imported during a wind-down period, when their import was still allowed despite the impending import ban. This rule applies regardless of the procedures under which the goods were placed after presentation to customs (transit, inward processing, release for free circulation, etc.). However, if customs authorities refuse to release the goods due to reasonable suspicions of circumvention, the goods cannot be re-exported to Russia, and payment related to the import of the goods is still subject to applicable regulations. These rules also authorize Member States to release goods already brought into the EU in the past and which were stopped because of the imposition of sanctions.

The EU also added Australia, Canada, New Zealand, and Norway to the list of partner countries that have applied a set of export control measures substantially equivalent to those set out in the EU. This list is relevant for certain exemptions and derogations from the EU ban on professional services and the EU export bans. The implication of this is that EU businesses and individuals are permitted to provide professional services that are otherwise restricted, such as IT consultancy and engineering services, to Russian companies that are solely owned or controlled by a parent company established in these newly added Partner Countries.

EU also introduced a possibility for temporary and limited in scope derogation (subject to prior authorisation) from the earlier EU ban on providing certain types of professional services, aiming at facilitating an expeditious exit from the Russian market by EU operators. More specifically, this derogation allows national competent authorities to grant authorization for EU operators to continue providing restricted professional and business services (e.g., accounting, auditing, bookkeeping, tax consulting, architectural and engineering services, legal advisory, IT consultancy services) until 31 December 2023, when such services are strictly necessary for the divestment from Russia or the wind-down of business activities in Russia. However, such restricted services must be provided for the exclusive benefit of legal persons, entities, or bodies resulting from the divestment. Additionally, the competent authorities of the Member States should ensure that the services are not directly or indirectly provided to the Government of Russia or benefit military end-users or have a military end-use in Russia.

The EU is considering imposing trade restrictions on countries assisting Russia in acquiring consumer goods like washing machines, second-hand cars, and cameras which are being used to repair its damaged tanks and drones, according to The Telegraph. The increased trade in these items is being used by Russia to circumvent Western sanctions, and many contain dual-use technologies that are on the list of items prohibited for export to Russia. The EU is discussing plans to impose trade restrictions that could prevent any country, business, or individual from accessing the single market. Before widening sanctions on Russia's allies, the EU may first seek diplomatic talks with central Asian countries to warn them of the consequences.

On 10 March 2023, Bloomberg reported that the EU is planning to ask third countries to enhance trade monitoring of advanced technologies and other goods that could be used for military purposes by Russia in Ukraine. The request, which would involve ramping up tracking and information gathering on trade flows, would apply to hundreds of sanctioned goods and technologies that could be used for military purposes. The purpose of the enhanced monitoring is to determine whether the sanctioned goods end up in Russia.

On 31 March 2023, the European Commission amended its Russia sanctions FAQs regarding export-related restrictions for dual-use goods and advanced technologies. The updates include clarification that the transit of dual-use goods and technology exported from the EU through the territory of Russia is prohibited.



## Japan

On 25 February 2023, the Government of Japan introduced export bans, effective from 28 February 2023, against 21 Russian military-related entities, including entities operating in technology, electronics sectors, Russian government-related research institutes connected with the Russian military and industrial complex, as well as a Russian private military company the Wagner Group.

On 31 March 2023, Japan announced export bans on goods related to the aerospace, construction, metallurgical industries, as well as a number of goods related to measuring equipment and communication that contribute to Russia's industrial base. The ban applies to supplies of 418 items designated by HS code:

- iron and steel;
- iron and steel products;
- aluminum and aluminum products;
- boilers, machinery, and parts and accessories thereof (e.g., construction machinery such as hydraulic shovels, bulldozers and excavators, etc.; engines for aircraft and ship propulsion, forging machines, etc.);
- electrical equipment and parts thereof (e.g., electronic devices such as electric circuits, etc.; radio equipment for navigation, generators, etc.);
- some transportation machinery and their parts (e.g., cargo trucks with a total vehicle weight exceeding 20 tons, concrete mixer trucks, etc.);
- aircraft and spacecraft, and parts and accessories thereof (e.g., unmanned aerial vehicles (drones), etc.);
- optical equipment, photographic equipment, measuring equipment, inspection equipment, precision equipment, and parts and accessories thereof (e.g., optical fibers cables, binoculars, cameras specially designed for aerial surveying, etc.);
- toys and scale models, etc.

These measures will come into effect on 7 April 2023.

On 31 March 2023, the Reuters reported that Japan has announced plans to restrict the exports of 23 types of semiconductor manufacturing equipment in alignment with US efforts to curb China's ability to make advanced chips. The move is seen as a significant diplomatic win for the US administration and is likely to affect at least a dozen Japanese companies, including Nikon, Tokyo Electron, Screen Holdings, and Advantest Corp. The restrictions are expected to come into effect from July and will apply to equipment used in chip manufacturing, including cleaning, deposition, lithography, and etching. Japan has not specified China as the target of the measures, saying that equipment makers would need to seek export permission for all regions.

On 31 March 2023, Japan's Ministry of Economy, Trade and Industry (METI) started a public comment procedure for a draft amendment to the Ministerial Ordinance and a draft amendment to the Circular to impose new export control requirements on certain semiconductor manufacturing equipment from Japan. The newly controlled items include semiconductor manufacturing equipment, test equipment, masks, or reticles used for the manufacture of integrated circuits, or components or accessories thereof, and programs designed to use those items. Pellicle specifically designed for equipment for manufacturing integrated circuits using extreme ultraviolet (EUV) will also be controlled. The proposed amendment to the circular further identifies specifications of some of the newly controlled items and clarifies that companies may apply for a special bulk license to export the newly controlled items to "non-white list" countries, including China. However, the bulk license cannot be used to export the newly controlled items to certain countries, including Afghanistan, Iraq, Iran, North Korea, Congo, Sudan, Somalia, Central Africa, Belarus, South Sudan, Libya, Lebanon, or Russia. The public comment period is from 31 March to 29 April 2023.

## Canada

On 14 February 2023, the Canadian government made changes to their import regulations in order to address concerns about unfairly traded imports from Russia and Belarus. Previously, it was required to demonstrate that these countries had a monopoly or substantial monopoly over their export trade in a particular sector in order to use a non-market economy methodology for calculating margins of dumping. However, with the new amendments, this requirement has been eliminated. This means that Canada will be able to use a less stringent burden of proof to use a NME methodology for the purpose of calculating margins of dumping when investigating potential dumping cases involving Russia and Belarus.

On 23 February 2023, the Canadian government imposed a ban on importing, purchasing or acquiring from Russia or from any person in Russia any type of weapon, ammunition, military vehicle or military or paramilitary equipment, or a spare part for any of those goods.

On 23 February 2023, the Canadian government imposed an export on certain chemicals primed for use in electronic devices that could be used in weapons (HS code 3818.00), wherever situated, to Russia or to any person in Russia.

On 10 March 2023, Canada banned the importation, purchase or acquisition of various aluminum and steel products from Russia or from any person in Russia. This ban includes all Russian aluminum products (HS code 76), such as unwrought aluminum, aluminum sheets, and finished products like containers and household items made from aluminum. Additionally, primary Russian steel products, including iron and non-alloy steel (HS code 72), as well as semi-finished and finished products such as sheet piling of iron or steel (HS code 7301), railway or tramway track construction material (HS code 7302), tubes, pipes and hollow profiles (HS codes 7303-7306), are also prohibited.

## Switzerland

On 29 March 2023, Switzerland decided to implement additional trade sanctions against Russia, bringing the country in line with the EU's 10th package of sanctions, including:

- ❖ Export restrictions:
  - extended the list of restricted goods which could contribute to the enhancement of Russian industrial capacities and are prohibited for sale, supply, transfer, or export to any natural or legal person, entity or body in Russia, or for use in Russia (the new Part C of Annex XXIII). The list of restricted goods now covers among others: certain pumps, industrial robots, ball bearings, certain flat-rolled products of iron or non-alloy steel, bridges, structures for buildings tower-like, electronics, certain machines and machine parts (e.g., earth moving machinery, boring machines for metals, machining centers), heavy trucks and fork-lifts, cranes, bulldozers, trailers, semi-trailers, rail locomotives, special vehicles such as snowmobiles, oil or petrol-filters for internal combustion engines, steam and vapour turbines, electric generators, optical fibers, binoculars, direction finding compasses, and rangefinders, complete industrial plants (except plants for the production of food and drinks, pharmaceuticals, medicines and medical devices) and various other equipment;
  - narrowed down the scope of the previously introduced derogation from the ban on the sale, supply, transfer, or export of goods that could contribute to the enhancement of Russian industrial capacities, with the exemption now applying only to household bakery ovens, including biscuit ovens, and the exclusion of other machinery used for making hot drinks, cooking or heating food (those intended for civil aircraft and other), and bakery machinery necessary for personal household use by individuals;
  - extended the list of goods and technology subject to export restriction that could contribute to Russia's military and technological enhancement or the development of the defense and security sector. Now the list includes rare-earth metals and compounds (such as scandium, yttrium, lanthanum, cerium, praseodymium, neodymium, promethium, samarium, europium, gadolinium, terbium, dysprosium, holmium, erbium, thulium, ytterbium, and lutetium; minerals containing rare-earth metals are excluded), electronic integrated circuits (such as boards, panels, consoles, desks, cabinets, and other bases) used in Russian weapons systems (including drones, missiles, helicopters and other vehicles), certain thermographic cameras, and other electrical and magnetic components (such as aerials and aerial reflectors of all kinds and other fixed tantalum capacitors);
  - extended the list of goods and technology suited for the aviation or the space industry, the sale, supply, transfer or export of which to any natural or legal person, entity or body in Russia or for use in Russia are restricted, to include turbojets (CN 8411.11 and 8411.12), turbopropellers (CN 8411.21 and 8411.22), and their parts (CN 8411.91) (new Part 4 of Annex 3);
  - added 96 entities to the list of entities directly supporting Russia's military and industrial complex, on whom tighter export restrictions regarding dual-use goods and technology as well as goods and technology which might contribute to the technological enhancement of Russia's defence and security sector are imposed.
- ❖ Import restrictions:
  - extended the list of goods generating significant revenues for Russia, whose purchase, import, or transfer is prohibited to include various petroleum products, including petroleum jelly (CN 2712), petroleum coke and petroleum bitumen (CN 2713), bitumen and asphalt (CN 2714), bituminous mastics (CN 2715), carbon (CN 2803), and synthetic rubber (CN 4002) (new Part C of Annex XXI). For the newly listed products, there is a 3-month wind-down period until 27 June 2023 for the execution of contracts agreed before 29 March 2023, except with respect to carbon and synthetic rubber for which import quotas are envisaged until 24 June 2024 – 42 metric tonnes for carbon and 4072 metric tonnes for synthetic rubber.
- ❖ Transit restrictions:
  - introduced a ban on transit of armaments of all kinds, including weapons and ammunition, military vehicles and equipment, paramilitary equipment as well as components, accessories and spare parts for them through the territory of Russia or Ukraine;
  - introduced a ban on the transit of dual-use goods and technology exported from the EU through the territory of Russia until 28 March 2027, with limited exceptions.

The Swiss government also added Australia, Canada, Japan, New Zealand, Norway, South Korea, the UK and the US to the list of "Partner countries", which are countries that are exempt from certain restrictions on professional services and exports to Russia. This means that Swiss businesses and individuals can provide restricted services, such as IT consultancy and engineering services, to Russian companies owned or controlled by a parent company established in one of these partner countries.

Switzerland also implemented new derogations to earlier imposed trade sanctions:

- derogation from ban on providing certain types of professional and business services, aiming at facilitating an expeditious exit from the Russian market by Swiss operators. More specifically, this derogation allows SECO to grant authorization for Swiss operators to continue providing restricted services (e.g., accounting, auditing, bookkeeping, tax consulting, architectural and engineering services, legal advisory, IT consultancy services) until 31 December 2023, when such services are strictly necessary for withdrawing investments from Russia or the winding-down of business activities in Russia. However, such restricted services must be provided exclusively for the benefit of legal persons, entities, or bodies resulting from the divestment. Additionally, if SECO has reasonable grounds to believe that the services requested could be intended directly or indirectly for the Government of Russia, military end-users, or military end-use in Russia, it must reject the request for an exception.
- derogation allowing SECO to grant exceptions from the import and export prohibitions until 30 September 2023, strictly for the purpose of withdrawing investments from Russia or winding down business activities in Russia. This derogation allows for the sale, supply, or transfer of restricted goods, or import of such goods into the EU, but only for those goods that were already physically located in Russia when the relevant restrictions came into effect and owned or controlled by Swiss or EEA nationals, legal persons incorporated under Swiss or EEA laws, or legal persons established in Russia that are owned or controlled by legal persons incorporated under Swiss or EEA laws. However, SECO may reject applications for exceptions from the ban on the sale, delivery, transit, or transport of restricted goods if there are reasonable grounds to assume that goods remaining in Russia could be intended for military end users or a military end use in Russia.

Switzerland also established rules that allow the Federal Office of Customs and Border Security (BAZG) to release goods that were physically located in Switzerland and had already been presented to customs, but not yet released for free circulation at the time when they became subject to import ban. However, if BAZG refuses to place goods under a customs procedure due to reasonable suspicions of circumvention of sanctions, the goods cannot be re-exported to Russia, and payment related to the import of the goods is still subject to applicable regulations. These rules also authorize Member States to release goods already brought into Switzerland before 29 March 2023 and which were stopped because of the imposition of sanctions.

## Turkey

As of 1 March 2023, Turkish customs officials have blocked the transit of some Western-sanctioned goods to Russia via Turkey, without providing an official explanation. The reason for the blockade is believed to be mounting US and EU pressure, with some analysts suggesting it may be related to an update of the e-customs system. Others believe that the suspension of transit of sanctioned cargo relates to the visit of US Secretary of State Anthony Blinken to Turkey in February, with Washington warning Ankara that it could impose secondary sanctions against Turkish companies for violating the restrictive measures regime against Russia. Turkish trade ministry officials declined to comment, but an EU official stated that Ankara had given the European Commission verbal assurance that goods covered by EU, US or UK sanctions and export controls would not transit to Russia from 1 March 2023.

The halt does not affect the export of goods from Turkey to Russia or importation from Russia to Turkey. Goods produced in Turkey with components from other countries can still be shipped to Russia without restrictions. Despite the situation, there has been no change in Turkey's approach to sanctions against Russia, and no laws or presidential decrees aimed at imposing sanctions against Russia have been passed since the beginning of the war.

On 21 March 2023, the Turkish government issued a list of foreign goods that are prohibited from being re-exported to Russia, according to the head of the Istanbul Association of Exporters of Ferrous and Non-Ferrous Metals. The restrictions apply to any goods from this list, regardless of the country they originated from. However, these restrictions do not apply to goods produced in Turkey, even if they contain foreign components. The Turkish Ministry of Trade has declined to comment on this matter. In addition, the European Union representative stated that Turkey provided an "oral assurance" to the European Commission that the transit of goods subject to sanctions or export restrictions by the EU, US, and UK to Russia would be terminated from 1 March 2023. This decision was made after "serious warnings" from Western countries to avoid confrontation with the EU, which accounts for half of Turkey's exports.

## Kazakhstan

According to recent reports, Kazakhstan introduced a new measure to monitor goods imported into the country for re-export, tracking them until they reach their final destination. New rules, effective from 1 April 2023, require exporters to submit additional documents when sending goods to Russia to reduce "underground" trade and prevent the circumvention of sanctions against Russia. The new rules are aimed at preventing companies and individuals from using Kazakhstan to bypass Western sanctions. Country announced the introduction of an online tracking system for all goods entering and leaving the country, allowing real-time tracking of the entire chain of movement of goods from border to border. These rules apply to exports within the Russia-led Eurasian Economic Union. While there is no specific legislation implementing the new online tracking tool, it is intended to monitor trade with Russia in the context of secondary sanctions risks. Kazakhstan has also stated that while it remains committed to upholding the sanctions, it will not allow the country to be used as a platform for their circumvention.

## 8. Impose Secondary Sanctions

### Action of countries in fear of the US secondary sanctions

The U.S, the EU and the UK have begun to put pressure on the UAE to stop exporting critical electronic components to Russia that Moscow could use to create weapons, the [Financial Times](#) reported.

#### United States

On 4 February 2023, the media reported that the United States has warned Turkey about the negative consequences of exporting chemical reagents, semiconductors, and other products to Russia that could potentially be used in the war against Ukraine in violation of sanctions. Brian Nelson, Deputy Minister of Finance for Counterterrorism and Financial Intelligence, the US Treasury Department's top sanctions official, visited Ankara and Istanbul on 2-3 February and urged Turkish government officials, businesses, and banking institutions to cooperate in disrupting the flow of such goods to Russia. During the meetings, Nelson emphasized that the sharp increase in exports from Turkey to Russia last year raised concerns and warned that Turkish companies are particularly vulnerable to reputational and sanctions risks. He also called on Turkish companies to take extra precautions to avoid transactions related to potential dual-use technology transfers that could be used by the Russian military-industrial complex.

On 21 February 2023, the US Treasury Department's Deputy Secretary, Wally Adeyemo, [warned companies](#) around the world that they will face punishment if they continue to do business with Russia in violation of US sanctions. The US will also put new pressure on countries that help Russia evade sanctions. Adeyemo stated that the US is in contact with banks and companies to inform them that they risk being cut off from the US and its financial partners' financial systems. He also underscored that the US is willing to sanction Chinese companies that support Russia's invasion of Ukraine.

On 1 March 2023, [Reuters](#) reported that the United States is negotiating with close allies about the possibility of imposing new sanctions on China if Beijing provides military support to Russia in its war with Ukraine. The conversations are intended to coordinate support for any possible restrictions, but it is not yet clear what specific sanctions the US will propose. Washington and its allies have said that China is considering providing weapons to Russia, which Beijing denies. The Biden administration's initial steps to counter Chinese support for Russia have included informal outreach at the staff and diplomatic levels, including the Treasury Department. The consultations, which are still at a preliminary stage, are intended to drum up support from a range of countries, especially in G7, to coordinate support for any possible restrictions.

On 30 March 2023, OFAC imposed sanctions on a Slovakian national Ashot Mkrtychev for attempting to facilitate arms deals between Russia and the Democratic People's Republic of Korea (DPRK). Mkrtychev is accused of negotiating the exchange of over two dozen kinds of weapons and munitions for Russia in exchange for materials to be sent to the DPRK, including commercial aircraft, raw materials, and commodities. It is alleged that, between the end of 2022 and early 2023, Mkrtychev worked with North Korean officials to obtain weapons and munitions for Russia, in exchange for materials ranging from commercial aircraft, raw materials and commodities to be sent to North Korea. He is also said to have provided DPRK officials with information from Russian officials related to his attempts to obtain military equipment for Russia. The sanctions are being imposed under Executive Order 13551, which prohibits the import, export, or reexport of arms or related material to the DPRK.

#### EU

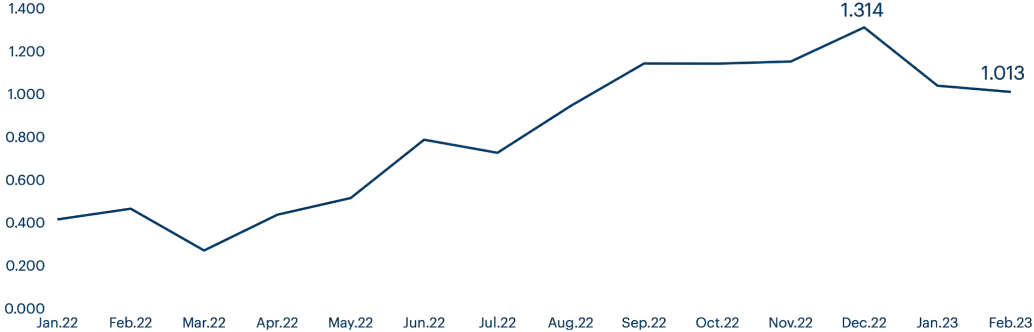
On 13 March 2023, Forbes and Bloomberg reported that the EU plans to ask third countries that have increased their imports from the EU and exports to Russia to strengthen their oversight of external trade. According to these sources, this concerns countries that have started to import more advanced technologies and goods from the EU, which Russia could use for military purposes. The EU aims to determine whether sanction goods are ultimately ending up in Russia through these third countries. The request will involve hundreds of types of sanctioned goods and technologies. The EU, as well as the US and other countries, are tightening control over compliance with the sanctions imposed against Russia, focusing on closing loopholes in the sanctions and preventing their circumvention. The increased supervision will involve more active tracking of goods and collecting information on trade flows.

#### Turkey

The boom in mutual trade between Russia and Turkey, which began amid the war in Ukraine, stalled after the US and the EU threatened retaliatory measures against countries that violate the sanctions regime. By February 2023 exports from Turkey to Russia decreased by 22% - from \$1.3 bn in Dec 22 to \$1.01 bn in Feb 23. The transit shutdown is related to sanctions, a senior Turkish official explained to [Bloomberg](#). The Turkish authorities were warned about these risks by U.S.

officials, who visited Ankara at least three times in the past year to discuss sanctions policy. The last such visit, involving U.S. Treasury Undersecretary Brian Nelson, took place in February. The U.S. demanded an end to shipments of sanctioned goods to Russia.

**Graph. Monthly exports from Turkey to Russia, in \$bn**



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

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

### Council of Europe

On 8 February 2023, the Council of Europe proposed creating a register to record evidence and claims for damage, loss or injury caused by Russia's crimes of aggression against Ukraine. The register will be part of the EU's initiative to hold Russia accountable for its actions. The Council will use the experiences of the United Nations Compensation Commission (UNCC) and the United Nations Register of Damage (UNRoD) to design the compensation mechanism.

The Council of Europe is also considering setting up a special tribunal to prosecute those responsible for crimes against Ukraine. This initiative is supported by the European Parliament. The options include a multilateral agreement between Ukraine and other states, an agreement between Ukraine and an international organization, or a hybrid tribunal based on Ukrainian law and endorsed by the UN.

### – United States

On 24 February 2023, the US Attorney for the Southern District of New York filed a civil forfeiture complaint against 6 luxury properties worth approximately \$75 million owned by Russian oligarch Viktor Vekselberg. The properties, which are located in New York, Southampton and Fisher Island, Florida, are believed to be the proceeds of sanctions violations and money laundering that was committed by Vekselberg's associate, Vladimir Voronchenko, who was indicted on 7 February 2023.

On 8 March 2023, in a coordinated enforcement action through the Justice Department's Task Force KleptoCapture, the DOJ, FBI, and BIS jointly announced that the United States obtained a warrant for the seizure of a Boeing 737-7JU aircraft valued at over \$25 million and owned by PJSC Rosneft Oil Company, a Russian integrated energy company. The U.S. District Court for the Eastern District of New York authorized the seizure based on violations of the Export Control Reform Act (ECRA) and recent sanctions issued against Russia. It is alleged that the US-built aircraft violated export controls and license requirements imposed by BIS in 2022, which prohibit the export, reexport, or in-country transfer of U.S.-manufactured aircraft to or within Russia without a valid license. The aircraft is said to have left and returned to Russia at least 7 times without obtaining the required licenses.

### – United Kingdom

On 7 February 2023, Sir Chris Bryant MP presented the Seizure of Russian State Assets and Support for Ukraine Bill to the House of Commons under the '10 minute rule' which allows a backbench MP to make their case for a new bill and the House decides whether or not to introduce it. The Bill would require the Secretary of State to lay before Parliament proposals for the seizure of Russian state assets to provide support for Ukraine. Under the Bill, the government should make proposals for a Bill to provide for the seizure of Russian state assets to support Ukraine, including as to the type of Russian state assets to be seized, who determines which assets should be seized, for what purposes the seized assets could be applied, who should hold and manage the application of seized assets. The next stage for this Bill, Second reading, is scheduled to take place on Friday 3 March.

On 24 February 2023, the UK government objected to the Seizure of Russian State Assets and Support for Ukraine Bill introduced by Sir Chris Bryant MP as a Private Member's Bill in the House of Commons, which aims to provide proposals for the seizure of Russian state assets to support Ukraine. It is not yet clear whether the Bill will progress further; there is a second reading on 3 March 2023.

### – Switzerland

On 15 February 2023, the Swiss government announced that a working group led by the Federal Office of Justice has concluded that the confiscation of private assets frozen under Russian sanctions for use in the reconstruction of Ukraine is incompatible with Swiss law. The working group representing the State Secretariat for Economic Affairs, the State Secretariat for International Finance, and the Directorate of International Law concluded that the expropriation of private assets of lawful origin without compensation is not permissible under Swiss law, and the confiscation of frozen private assets is inconsistent with the Federal Constitution and the prevailing legal order.

### – France

On 1 March 2023, French newspaper Le Monde reported that the French justice system has achieved its first criminal seizure of a villa belonging to a Russian oligarch, Rashnikov, who was placed under sanctions on 15 March 2022. Rashnikov's villa, which was not initially detected, was sold to a Swiss company registered in Panama shortly after Russia's



invasion of Ukraine in February 2021. France's financial intelligence unit, TRACFIN, blocked the money from the sale and notified the courts, leading to the villa's seizure in Saint-Jean-Cap-Ferrat. The villa, valued at €23 million, and the proceeds of the sale, estimated at €17 million, are now in the custody of the Ministry of Justice's Agency for the Management and Recovery of Seized and Confiscated Assets. If the courts find that Rashnikov tried to conceal the true ownership of the property, it could be permanently confiscated by the French government.

#### **– Netherland**

On February 17, the Dutch government supported Ukraine's proposal to create an international register of damage caused by Russian aggression.

# FULL MONITORING TABLE (Since 19 Apr, 22)

Total cumulative progress: ~85% (36 sanction-measures) out of 42 in the Action Plan (10 blocks).

8 sanction-measures (19%) with status No progress, 29 sanction-measures (70%) with status Yes, 5 sanction-measures (11%) with status Slow Progress.

		Progress compared to 19.04.2022 - reporting period (1 Feb 23 to 31 Mar 23)	Details
1. Expand Oil and Gas Sanctions			
1.1.	Complete import and export ban and embargo of crude oil, oil products, gas, and coal	Yes but incomplete scope	<p><b>EU. Banned purchase, import or transfer seaborne crude oil or petroleum products originated in RF</b> (on 3 Aug, the EC 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 + EU is considering a plan to cap the price of Russian diesel at \$100 a barrel while a lower \$45 threshold would be set for discounted products like fuel oil. The EU's gas market correction mechanism entered into force on February 15. Prohibition to provide gas storage capacity in the EU to Russian nationals or legal persons.</p> <p><b>Switzerland. Banned RF crude oil and petroleum products.</b></p> <p><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). Ban on transit of RF gas to Kaliningrad region.</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) + ban on import of LNG from Russia from 1 Jan, 23.</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> <p><b>Estonia.</b> Banned import and purchase of natural gas from Russia as well as providing associated transmission services from 31 Dec 2022 + also plans to stop oil business with Russia from December 5 (earlier than EU embargo) + ban on the purchase, import and transfer of petroleum oils from Russia from Dec 5 (comes into force prior EU ban).</p> <p><b>New Zealand.</b> Prohibition of import of energy products of Russian origin (coal, oil, or gas products); ban of the export of oil exploration and oil production products to Russia) - comes into force 4 Nov.</p>
1.2.	Commit to ending all EU trade with Russia and Belarus in petroleum products	Yes	<p><b>G7.</b> The Price Cap Coalition established caps on the price for seaborne refined petroleum products (CN code 2710) originating from Russia from 5 February 2023 - the maximum price for "premium-to-crude" products is set at \$100 per barrel, for "discount-to-crude" products - \$45 per barrel.</p> <p><b>EU.</b> The 6th package envisions the elimination of around 90% of RF oil from the European market by the end of 2022. Price cap on Russian discount-to-crude petroleum products at \$45/bbl, for premium-to-crude petroleum products at \$100/bbl effective from 5 February 2023, with a 55-day transitional period for vessels carrying Russian petroleum products, which were purchased and loaded onto the vessel prior to 5 Feb 2023 and unloaded prior to 1 Apr 2023. Imposed additional restrictions on Russian goods, including a ban on the purchase and importation of certain petroleum products.</p> <p><b>USA.</b> Ban on export, re export, sale, or supply of services related to the maritime transport of Russian petroleum products. Price cap on Russian discount-to-crude petroleum products at \$45/bbl, for premium-to-crude petroleum products at \$100/bbl effective from 5 February 2023. Prohibition for any US person, regardless of their location, from exporting, re exporting, selling, or supplying services related to the maritime transport of Russian-origin petroleum products purchased above the price cap to any person located in Russia (inc. all services related to this operation).</p> <p><b>UK.</b> Price cap on Russian discount-to-crude petroleum products at \$45/bbl, for</p>

			<p>premium-to-crude petroleum products at \$100/bbl effective from 5 February 2023.</p> <p><b>Canada.</b> Joined price cap on Russian oil products.</p> <p><b>Switzerland.</b> Joined price cap on Russian oil products.</p> <p><b>Australia.</b> Joined price cap on Russian oil products.</p> <p><b>Japan.</b> Joined price cap on Russian oil products.</p>
1.3.	Set a special and significant import duty, tariff, or tax for Russian crude oil	<b>Yes, but incomplete scope</b>	<p><b>Poland.</b> The country <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>USA.</b> <b>Adopted Price Cap for Russian oil at the level \$60 per barrel starting on 5 December 2022</b> (prohibits maritime transport, inc. through ship-to-ship transfers, and technical assistance, brokering services or financing or financial assistance for Russia-origin crude oil exported to 3rd countries if purchased above the adopted level).</p> <p><b>EU.</b> <b>EC proposed to limit the price of Russian gas by setting it at 50 euros/MWh. Under the 8th package EU laid the basis for the required legal framework to implement the oil price cap).</b> Adopted price cap for Russian oil at the level \$60 per barrel starting on 5 December 2022 (prohibits maritime transport, inc. through ship-to-ship transfers, and technical assistance, brokering services or financing or financial assistance for Russia-origin crude oil exported to 3rd countries if purchased above the adopted level). EU energy ministers agreed to introduce the price of gas if prices at DTF exceed €180 per MWh in a row. Cap may be adopted from 15 February 2023.</p> <p><b>UK.</b> <b>Adopted G-7 price cap and introduced new trade restrictions relating to certain oil and oil products.</b> Exempted from the price cap refined oil products that were loaded onto a ship at the port of loading before 5 Feb 23 and offloaded at the port of destination before 1 Apr 23.</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. As Reuters, the US and Western officials are finalising the details on price cap for Russian oil – the cap might be determined at the historical avg of \$63-64 a barrel. After negotiations the oil price cap was maintained at the level of 60\$/bbl.</p> <p><b>Canada.</b> Adopted G-7 price cap.</p> <p><b>Japan.</b> <b>Adopted G-7 price cap.</b> Ban on the import of crude oil and petroleum products from Russia that are traded above a certain price ceiling ("Sakhalin 2" project is excluded from these measures). Ban on the provision of services related to the purchase of crude oil transported by sea originating in Russia that is traded at a price exceeding the ceiling price.</p> <p><b>Norway.</b> Adopted a legal basis for the future price cap on Russian oil. <b>Joined G-7 price cap.</b> Joined price cap on Russian oil products.</p> <p><b>Australia.</b> <b>Joined G-7 price cap.</b></p> <p><b>Switzerland.</b> <b>Joined the price cap of \$60 per barrel for Russian crude petroleum oils or oils from bituminous minerals.</b></p> <p><b>India.</b> The Baroda (2nd largest Indian bank) has stopped clearing payments for Russian oil sold above the price cap. On 12 Mar 2023, Bloomberg reported that government authorities of India have instructed banks and traders to comply with the \$60 price cap imposed on purchases of oil from Russia.</p>
1.4.	Make payments into escrow accounts	<b>No</b>	-
1.5.	Decreasing imports of Russian petroleum	<b>Yes, but incomplete scope</b>	<p>REPowerEU plan adopted on May 18, stipulates steps to rapidly reduce dependence on Russian fossil fuels and fast forward the green transition.</p> <p><b>USA.</b> Issued preliminary guidance on the implementation of the price cap policy for petroleum products of Russian origin, which will take effect on 5 February 2023.</p>
1.6.	Apply these embargos and limits to all blends	<b>No</b>	<p><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.</p>
<b>2. Increase Transportation and Insurance-Related Sanctions</b>			
2.1.	Prohibition of shipping, land, and rail transport from Russia to the democratic world	<b>Yes</b>	<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 framework of the ICAO. <b>Tightened</b></p>

			<p>restrictions on Russian fishing vessels (allowed access to only 3 Norwegian ports of were vessels will be inspected by customs officers to avoid illegal transport of goods to Russia) + extended the port ban to apply to vessels certified by the Russian Maritime Ship Register).</p> <p><b>UK.</b> Aeroflot, Ural Airlines and Rossiya Airlines unable to sell their landing slots in UK airports. <b>Allowed necessary technical assistance for temporarily detained aircraft.</b></p> <p><b>Lithuania.</b> Applied transit restrictions on goods subject to EU sanctions between Russia and Kaliningrad region). <b>New restrictions on cargo transit to Kaliningrad.</b></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. <b>prohibition on provision of maritime transport, inc. through ship-to-ship transfers, technical assistance, brokering services or financing or financial assistance, related to the maritime transport to 3rd countries of crude oil (as of 5 Dec 2022) or petroleum products (as of 5 Feb 2023) which originate /exported from RF, or which have been exported from RF to 3rd countries (purchases at or below a pre-established price cap were allowed) + ban on Russian-flagged vessels accessing EU ports and locks now also applies to vessels certified by the Russian Maritime Register of Shipping).</b></p> <p>Obligated aircraft operators to provide all relevant information about non-scheduled private flights between the EU and Russia at least 48H in advance. <b>Introduced a new exemption for providing pilot services to vessels in innocent passage (inc. the transaction on a certain Russian SOE).</b></p> <p><b>Switzerland.</b> Allowed the exchange of information within the framework of the ICAO. Obligated aircraft operators to provide all relevant information about non-scheduled private flights between the EU and Russia at least 48H in advance. <b>Introduced a new exemption for providing pilot services to vessels in innocent passage (inc. the transaction on a certain Russian SOE).</b></p> <p><b>Poland.</b> Unilaterally limited the traffic for Belarusian freight vehicles at the Kukuryku-Kozłowicze border crossing.</p> <p><b>Turkey.</b> Banned the flight of aircrafts (registered in Russia and Bermuda) with dual registration from 1 November 2022 + oil tankers without insurance documents from passing through the Black Sea straits. The country warned to close airports to Russian airlines flying US-made aircraft. Turkish customs officials have blocked the transit of some Western-sanctioned goods to Russia via Turkey. From 14 March 2023, Turkey banned the refueling and maintenance servicing of certain aircraft operated by Russian and Belarusian airlines.</p> <p><b>Estonia.</b> Banned own state railway company, Operail, from transporting Russian and Belarusian goods from 1 January 2023.</p> <p><b>Kazakhstan.</b> Kazakhstan tightened regulations for foreign road carriers to avoid sanctions and transport goods to and from the EU - from 20 Feb 2023 newly created carriers will be disqualified from international cargo transportations.</p> <p><b>Jordan.</b> Restricted use of Jordan's airspace for Russian airlines with dual registration starting from 15 December 2022, Imposed a requirement for Russian carriers to provide 3rd-party aviation insurance with reinsurance certificates issued in London.</p> <p><b>Laos.</b> Banned Russian airlines from flying through the country's airspace.</p> <p><b>Bangladesh.</b> According to media reports, banned entry for 69 Russian ships into its maritime waters.</p> <p><b>China.</b> China refuses to allow more than half of the aircraft of Russian airlines into its airspace due to Western sanctions.</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.</p> <p>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 <b>are terminating cover</b> 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. The 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.</b></p> <p><b>Switzerland.</b> Ban on services, including insurance or reinsurance, for</p>

			<p>transportation of RF oil and certain petroleum products to any destination.</p> <p><b>EU &amp; UK a plan to shut Moscow out of the vital Lloyd's of London maritime insurance market is delayed in the EU, UK has not adopted agreed restrictions.</b></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 + ship insurers announced that they will be canceling war-risk coverage across Russia, Ukraine, and Belarus, starting from 1 January 2023.</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. JSC Moscow Industrial Bank (MIB) (SOE) and 10 of its subsidiaries. USA did not to renew the provisions of General License 9C (transactions in debt or equity of Bank Otkritie, Sovcombank, Sberbank, VTBBank, Alfa-Bank, Alrosa, CBR, NWF and MinFin of RF) that expire on 25 May, which could bring Moscow closer to default + ban on purchasing Russian securities on the secondary market + extended until 5 Dec 2022 licence allowing for energy financing transactions via RF banks) + asset freeze on Heritage Trust + ban on import of gold from RF + 2 Kazakh subsidiaries of Alfa-Bank excluded from SDN-list, since were bought by Kazakhstan bank + issued General Licence authorising transactions through Dec 16, 2022 involving Gazprom Germania GmbH + 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 + 10 Russian entities, inc. Federation Council of the Federal Assembly of Russia and 1 Belarusian entities + ban on the exchange of SDRs of Russia and Belarus + designated 2 entities that procured military and sensitive dual-use technologies from U.S. manufacturers and supplied them to Russian end-users (Nord-Deutsche Industrieanlagenbau GmbH (NDA GmbH) and Opus Energy Trading LLC (Opus Energy Trading) + sanctioned 27 entities, inc. transnational network procuring technology that supports the Russian military-industrial complex + PKK Milandr (Russian microelectronics company) + 9 Iranian and Russian entities, inc. PMC "Wagner" for production &amp; delivery of Iranian UAVs + Russian Central Election Commission for holding referendums + 18 entities related to Russia's financial services sector, inc. PJSC Rosbank &amp; 17 subsidiaries of VTB Bank PJSC (Russia's 2nd largest bank) + designated 3 entities as SDN, inc. INTERROS, owned by Potanin + adopted legislation which directly sanctions any U.S. entities that transact with or transport gold from Russia's central bank reserves + imposed sanction on 10 Russian naval entities, which operate in defense and marine sectors + designated 7 entities for providing material support to the Wagner Group or for being owned or controlled by the Wagner Group + 14 entities linked to Wagner Group and producers of Russia's weapons + 19 entities, inc. 5 linked to Wagner Group, 4 associated with V.Potanin, 9 linked to Russia's military industrial complex. Full blocking sanctions on 12 entities across multiple countries for their supporting Russia's MIC. OFAC had asked Raiffeisen for details of its exposure in Russia, the partially occupied Donbas, Ukraine and Syria. OFAC authorized sanctions on any person operating in the Russian metals and mining sector. Full blocking sanctions on 83 entities from various sectors in the Russian economy, inc. 11 banks. Sanctions on 52 entities, inc. entities operating in Russia's financial services, defense and related materiel sector + subsidiaries of State Atomic Energy Corporation Rosatom's civil nuclear structure. Removed a former Kazakh subsidiary of Sberbank from its sanctions list. Designated a network of 5 companies in China for supporting Iran's UAV procurement efforts. Designated 4 entities from Iran and Turkey for their involvement in the procurement of equipment, such as European-origin engines for UAVs. Designated 3 Belarusian entities, inc. Election Commission. The US Attorney General authorized the first-ever transfer of assets confiscated from a sanctioned Russian oligarch Konstantin Malofeev, who was accused of evading sanctions, to be used in Ukraine.</p>

**UK. Announced ban on trusts services** + extended existing restrictions on Belarus on dealing with financial instruments and providing loans to a broader range of transferable securities, money market instruments, loans and credit + prohibited transactions related to the management of reserves as well as of assets of CB Belarus and Belarus MinFin + introduced new financial sanctions in the form of reporting obligations + ban on RF gold and ancillary services, exported from RF after Jul 21, **gold exported from RF before 21 July 2022 is not in scope** + prohibited investment activities in respect of land located in RF, persons connected with RF, relevant entities, joint ventures, opening a representative office or establishing a branch or subsidiary located in RF. The UK sanctioned 3 entities in response to the "sham referendums" + asset freeze Shahed Aviation Industries (Iran) + prohibition on making loans or credits with a maturity of more than 30 days to persons, other than an individual, connected with Russia or persons owned, directly or indirectly, by a person connected with Russia + designated Iranian Company which provided military components and engines for UAVs + prohibition on providing services related to trusts or similar arrangements + additional restrictions on loans and credit arrangements to a person connected with Russia + prohibited to deal with transferable security or money-market instrument issued on or after 16 December 2022 by Russians. Asset freeze on 7 entities, inc. 6 military entities and 1 entity from financial Kremlin networks. Asset freeze on 12 Russian entities, inc. 4 banks (Bank Saint-Petersburg PJSC, Bank Uralsib PJSC, Bank Zenit PJSC, and MTS Bank PJSC), 6 entities in military, inc. aviation and navy and 2 Rosatom research institutes. Ban on provision of trust services to or for the benefit of all individuals and entities subject to asset freeze sanctions. UK Treasury released a statement that the use of frozen funds for payment of legal professional fees for defamation cases is not appropriate in most cases.

**New Zealand.** Assets freeze and dealing with securities ban against the CBR, the Russian Direct Investment Fund, 8 largest and 8 other banks linked to oligarchs (8 SOEs). The sanctioned entities are: Alfa-Bank, Bank Rossiya, Bank Otkritie (SOE), Black Sea Bank for Development and Reconstruction, Credit Bank of Moscow, Gazprombank (SOE\_50+1), GenBank, Industrial Savings Bank, Novikombank (SOE), Russia Agricultural Bank (SOE), Russian National Commercial Bank (SOE), Sberbank (SOE\_50+1), Sovcombank, SMP Bank, Vnesheconombank SOE, VTB (SOE\_60+1) + sanctioned all associates of 3 defence entities (already sanctioned): Russian Helicopters, Tactical Missiles Corporation, United Shipbuilding Corporation + 61 entities that support the Russian military (inc. 42 SOEs) + 1 collaborationist authority in Kherson + sanctions on Evraz and its subsidiaries, Goznak and 1 more entity) + 7 entities (inc. 3 disinformation outlets)).

**Canada.** Asset freeze and dealing prohibition on 4 RF financial institutions and banks + import ban on RF gold after Aug 6 + 17 entities in the defence sector directly or indirectly supporting the Russian military (inc. 10 SOEs) + 1 defence sector entity + sanctions Salvation Committee for Peace and Order (so-called government body in Kherson) + 1 Russian propaganda channel + 6 entities in energy sector + 16 Belarusian entities (military manufacturing, technology, engineering, banking and railway transportation) + 6 Russian federal institutions involved in investigation, prosecution and detention of Russian citizens who oppose the regime + 4 Iranian entities for their military support to Russia and UAVs delivery. Sanctions on 16 propagandist entities. Sanctions on 63 entities, inc. Russia's financial intelligence agency Federal Financial Monitoring Service, government institution, political party United Russia, entities in Russia's defense industry, Rosneftegaz company, along with the operating organization of the Zaporizhzhia NPP.

**Japan.** Asset freeze 2 RF and 1 Belarus banks + Japan MinFin imposed an embargo on the purchase of Russian gold, ban comes into force on 1 August, 2022 + 9 entities, inc. Rostec and Kalashnikov Concern + asset freeze measures JSC Irkut Corporation, MMZ Avangard and KAMAZ Publicly Traded Company. Asset freeze on PJSC Rosbank and 73 entities in shipbuilding, aircraft and machine building.

**EU. De-SWIFT 3 RF banks + 1 Belarus + consider gold as a new sanction target** + ban on RF gold and jewelries, exported from RF after July 22 + expanded the scope of the prohibition on accepting deposits + 9 entities (inc. 7 SOEs) + 7 entities, inc. Central Election Commission of Russia and Goznak + asset freeze Shahed Aviation Industries (Iran) + full ban of the provision of crypto-asset wallet, account or custody services to Russians + transaction ban for Russian Maritime Shipping Register) + 6 Iranian entities involved in development & delivery of UAVs to Russia + sanctioned 49 entities (asset freeze targets) inc. Credit Bank of Moscow and Dalnevostochny Bank; transaction ban on Russian Regional Development Bank (SOE); prohibited of new investments in the Russian mining sector, with the exception of certain critical raw materials; extended the prohibition regarding transferable securities of any legal person, entity or body established in Russia and with over 50% public ownership; prohibited the admission to trading of these securities on such trading venues as of 29 January 2023. Added Russia to its list of non-cooperative jurisdictions for tax purposes (EU "blacklist"). Restrictive financial measures (asset freeze and prohibition to make funds and economic

resources available) on 34 Russian entities, inc. Alfa-Bank, Rosbank, Tinkoff Bank, the National Wealth Fund of Russia and the Russian National Reinsurance Company and Russian military and defence sector. Asset freeze, entry or transit ban against 7 entities linked to the Wagner Group. Clarified that provision of crypto-asset wallet, account or custody services to Russian nationals or legal entities in Russia is also prohibited under previously adopted sanctions. Adopted the exemption for certain transactions extended until 31 December 2023 (instead of 30 June 2023). Allowed national competent authorities can authorize the release of certain frozen funds or economic resources for the limitation activities. More detail here. Allowed operations with agricultural and food products, inc. wheat and fertilizers for Alfa-Bank JSC, Rosbank PJSC, and Tinkoff Bank JSC.

**Switzerland.** Ban on trusts registered by Russians + de-SWIFT 3 RF and 1 Belarus banks + asset freeze for 9 entities, inc. 5 SOEs + asset freeze on Sberbank + ban on import of Russian gold, including jewellery, after Aug 4 + ban on services of any kind, including financial services, brokering and technical assistance + extended the scope of the ban on accepting deposits + suspended the exchange of tax information with Russia + 7 entities, inc. Central Election Commission of Russia and Goznak) + asset freeze Shahed Aviation Industries (Iran) + 2 Iranian entities for development and supply of Iranian UAVs + 4 Iran organizations for their military support to Russia and UAVs delivery + full ban on provision of services in connection with crypto wallets, crypto accounts or the custody of crypto-based assets + clarified that prohibition on accepting deposits from Russians and entities, Russian banks, if the deposit > 100K francs, does not apply to citizens of Russia who have dual citizenship in the UK, Andorra, or Monaco, or who have a residence permit in these countries + sanctioned 49 companies involved in attacks on civilian population, illegal annexation of Ukraine's regions, companies responsible for propaganda. In line with 9th EU sanction package: full transaction ban for Russian Regional Development Bank (SOE); prohibited new investments in Russian mining sector, with the exception of certain critical raw materials; prohibited trading, recording, and related services for securities of banks, companies, or organizations established in Russia controlled by a state body starting March 17, 2023. Sanctions on an Iranian company which manufactures military aircraft and UAVs. Sanctions against 34 entities in accordance with 10th EU package. Adopted the exemption for certain transactions extended until 31 December 2023 (instead of 30 June 2023). Allowed national competent authorities can authorize the release of certain frozen funds or economic resources for the limitation activities. More detail in block №3. Allowed operations with agricultural and food products, inc. wheat and fertilizers for Alfa-Bank JSC, Rosbank PJSC, and Tinkoff Bank JSC.

**Norway.** 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 + 7 entities + additional restrictions on providing services for crypto assets to Russian citizens and entities).

**Australia.** Again announced ban import of Russian gold on Aug 15, previously such ban was announced on Jul 4 + ban on import of gold from Russia after 30 Sep + Shahed Aviation Industries (Iran) for the supply of drones to Russia for use in its invasion of Ukraine. Sanctions on Safiran Airport Services for their involvement in the production and supply of drones to Russia. Imposed financial sanctions on 40 entities operating in defense, shipbuilding, technology, aerospace, oil and gas, research, media and banking sectors in Russia.

**Poland.** Added 37 entities on top of EU lists. The UK sanctioned 3 entities in response to the "sham referendums" + asset freeze and ban on access to financial funds and economic assets for Gazprom Export + entities that operate in the field of cashless settlements and payments in the fuel industry + one of the largest wholesale suppliers of automotive batteries on the Russian market.

**New Zealand.** Sanctioned 4 entities for providing material or strategic support for Russia's illegal invasion of Ukraine + Shahed Aviation Industries (Iran) for the supply of drones to Russia for use in its invasion of Ukraine. Sanctions against 4 Iranian entities for the supply of drones to Russia. Sanctions on 40 entities operating in defence, shipbuilding, technology, aerospace, oil and gas, research, media and banking sectors. Sanctions against 5 entities of strategic significance to Russia, inc. private military company.

**Germany.** Placed two German subsidiaries of Rosneft under fiduciary administration by the German Federal Network Agency.

**Belgium.** The Belgian Ministry of Finance issued a license to Russian individual to transfer frozen assets from the accounts of the NSD to a non-sanctioned depository

**Kazakhstan.** The Kazakhstan Stock Exchange delisted 11 Russian issuers, inc. Aeroflot, Gazprom, Norilsk Nickel, LUKOIL and Rostelecom.

**Cyprus.** Aligned with EU sanctions, the country started to freeze bank and

			<p>brokerage accounts of Russian citizens if the amount on them exceeds EUR 100,000 for any foreign brokers who have accounts of Russian clients in the Euroclear depository.</p> <p><b>Kosovo.</b> Joined the US sanctions sanctioned Russian PMC "Wagner".</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>Yes, but incomplete scope</b>	<p>Among 30 largest Russian banks, coverage with sanctions is not full among countries of Sanctions Coalitions.</p> <p><b>EU.</b> Prohibition on certain Russian banks from using SWIFT applies to the EU financial messaging service providers and not directly to the banks themselves. Also non-sanctioned alternative means such as paper, fax, or email to confirm payment orders for de-SWIFT banks (e.g. Rosselkhozbank).</p>
3.3.	Discourage European banks such as Raiffeisen Bank and Unicredit, from operating in Russia	<b>Slow progress</b>	<b>EU.</b> ECB is pressing Austria's Raiffeisen Bank International to unwind its highly profitable business in Russia. However, the final decision was not achieved.
<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, but incomplete scope</b>	<p><b>Lithuania.</b> Officially recognized RF as a state sponsor and perpetrator of terrorism. Adopted a resolution "On limiting the influence of terrorist Russia". The resolution proposes that the EU countries jointly create and expand the EU legal framework.</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 + Blinken said that he is not ready to make such a decision + US State Department called RF a "human trafficking" state, a draft Resolution on recognizing Russia's actions in Ukraine as a genocide was registered in the US Senate. On Sep 14, the US senators Richard Blumenthal (Democratic) and Lindsey Graham (Republican) introduced a law according to which Russia can be recognized as a SST.</p> <p><b>NATO.</b> The block recognised RF as "the most significant and direct threat". Recognised Russia as a terrorist state, called for creation of a special international tribunal.</p> <p><b>Latvia.</b> Recognized Russia as a sponsor of terrorism.</p> <p><b>Estonia.</b> Estonian Parliament declared Russia a "state sponsor of terrorism, condemned the annexation of the occupied regions of Ukraine and qualified Russia as "the main threat to peace in Europe".</p> <p><b>Poland.</b> The Polish Senate recognized the authorities of the Russian Federation as a terrorist regime). Recognised Russia as a terrorist regime.</p> <p><b>EU.</b> PACE adopted a resolution calling RF a terrorist regime. The European Parliament recognized the Russian Federation as a state sponsor of terrorism.</p> <p><b>Netherlands.</b> Recognized Russia as a state sponsor of terrorism.</p> <p><b>Czech Republic.</b> Recognized the Russian regime as terrorist in accordance with the resolution of the Parliamentary Assembly of the Council of Europe.</p> <p><b>Slovakia.</b> Adopted a resolution condemning the current Russian regime as terrorist and Russia as a state sponsor of terrorism.</p>
4.2.	Designate the Armed Forces of the Russian Federation as a Foreign Terrorist Organization	<b>No</b>	<p><b>USA.</b> Designated PMC Wagner as a significant Transnational Criminal Organisation.</p> <p><b>Lithuania.</b> Adopted a resolution stating that the Russian private military company Wagner is a terrorist organization.</p>
4.3.	Place Russia on the FATF's blacklist	<b>Slow progress</b>	Russia was banned from participating in current and future FATF projects + from participation in meetings of FATF regional bodies.
4.4.	Recognize political parties as terrorist-supporting organizations	<b>No</b>	-
<b>5. Strengthen Individual Sanctions against these Categories of Individuals</b>			
5.1.	Individuals who hold senior governmental positions	<b>Yes</b>	<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</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> + 303 individuals, inc. E.Nabiullina, O.Skorobogatova, A.Novak + visa restrictions for 910 persons, inc. members of</p>



the Russian military, Belarusian military officials and Russian proxies in Ukraine + designation for Ochur-Suge Mongush for his alleged involvement & 2 daughters of S.Sobyanin + 1 Russian national and procurement agent (Y. Orekhov) + an indictment charging 5 Russian nationals in connection with a sanctions evasion and money laundering scheme was unsealed in US federal court on 19 October + 14 individuals, inc. persons related to entities from the Russian military procurement network + 2 individuals for facilitating PMC Wagner's acquisition of Iranian UAVs. + designated 21 Russian nationals for their alleged involvement in human rights abuses + 19 Russian officials and proxies + 2 Russian nationals which were reportedly implicated in human rights abuses against civilians in Ukraine + 46 individuals, inc. V. Potanin and 3 members of his family, 5 Members of Board of Directors of Russian Railways, 2 Deputy PMs A. Belousov and D. Chernyshenko, 29 Russian heads of regions and governors connected to mobilization efforts + 6 executives and board members of Qods Aviation Industries (Iranian defense manufacturer of UAVs) & director of Iran's Aerospace Industries Organization (key organization responsible for overseeing Iran's ballistic missile programs) + visa restrictions on 25 individuals who are involved in undermining democracy in Belarus and on 531 members of the Russian military + sanctioned on 8 individuals, inc. 3 persons that support Russian defense-related entities, 2 officials of the Putin's Administration administering Russian-occupied areas of Ukraine, 2 individuals who supported the Wagner Group's military operations + 10 individuals, inc. an individual linked to the Wagner Group, 3 individuals for their roles as heads of the Russian Federal Penitentiary Service, which facilitated the recruitment of Russian prisoners into the Wagner Group, a Deputy Prime Minister, the Chairman of the Election Commission of the Rostov Region, an individual associated with Russian oligarch Vladimir Potanin. Full blocking sanctions on 10 individuals across multiple countries, connected with Russia's MIC. Sanctions on 8 senior executives of Paravar Pars Company (Iranian firm) for supply of UAVs to Russia. Restrictive measures on 22 people, inc. executive from Rosbank and Sberbank. Sanctions on 76 individuals, inc. several Russian regional governors and government officials. Visa restrictions on 1219 members of the Russian military. Sanctions on Chinese individual for supporting Iran's UAVs procurement efforts. Sanctions 3 individuals from Iran and Turkey which bought European-origin engines for Iran UAVs. Sanctions on 9 Belarussian individuals. Visa restrictions on 14 people from Belarus.

**Canada.** 14 oligarchs, close associates of the Russian regime, and members of their families. 203 senior officials or current or former members of the People's Councils of DPR and LPR. 21 oligarchs + 19 senior defense officials + 14 oligarchs and their family and close associates + 22. **Deputy PM of Canada proposed G7 to allow Russian "oligarchs" to pay for leaving the sanctions lists.** In response, the G7 countries are considering whether to allow Russia's sanctions oligarchs to pay for the release of sanctions: it is expected that the funds will go to rebuild Ukraine. Neither the Russian oligarchs themselves nor the Ukrainian authorities seem to oppose such an idea, which was proposed after a conversation with the oligarchs + 21 + 13 Belarus MinDefence officials + 43 military staff + 62 Russian officials and their family members + 78 individuals + 23 individuals, who are members of the Russian justice and security sector + 22 senior Belarusian officials + 33 current or former senior Russian officials. Sanctions on 129 individuals, inc. senior officials in the Russian government, members of Russia's parliament, the State Duma, Russian military officials, a Russian oligarch (A.Mordashov) and 4 his relatives. Sanctions on 3 senior Iran officials.

**UK.** 16 notable individuals, including family members Additionally sanctioned 31 individuals with asset freezes and travel bans. Many of the sanctioned individuals are actors and propagandists, senior executive officers or members of the board of directors of banks, members of the Federation Council. The British National Crime Agency (NCA) has created a special unit whose goal is to "create difficulties" for the Russians under the sanctions. The NCA has already carried out three searches in the homes of people who are relatives or close associates of Russian businessmen who have been sanctioned + **12 incl. Patriarch Kirill** + 8 individuals + 7 propagandists + 41 + removed **M.Razvozhayev (Governor of Sevastopol)** + 1 + in response to the "sham referendums", UK sanctioned 89 individuals (inc. 26 Russian "officials and collaborators" involved in the organization of the referendums, 4 "oligarchs", 55 board members of Russian state-linked organizations) + freeze & travel ban on E.Nabiullina + asset freeze 3 Iranian military nationals which key persons to supply Iranian kamikaze drones + 4 oligarchs (subject to a travel ban, asset freeze and transport sanctions) + 22 Russian who have promoted and enforced mobilization & organized referendums + 5 individuals as alleged rights viators + 15 individuals (12 seniors of Russian military forces, & 3 Iranians for production and / or supply of UAVs). Asset freeze on 8 individuals connected to the Kremlin.

**Poland.** Added 15 individuals with entrance ban, 7 of them with assets freeze) + asset freeze sanctions and entry ban against 4 Russian individuals + has complicated employment for Russians - from now entrepreneurs will not be able to

			<p>employ Russian citizens on simplified terms + 18 individuals (6 Russian and 12 Belarussian) to the list of foreigners whose stay on the territory of Poland is undesirable + Russian individual who violated Polish and international laws regulating trade.</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.</p> <p>4 individuals for supporting the invasion - Aleksandr Chupriyan, Sergei Korolyov, Nikolay Bogdanovsky and Illia Kyva +16, <b>incl. Kabaeva</b> + 28 individuals + 3 Iranian military officials involved in supply of UAVs to Russia. Financial sanctions and travel bans on 90 individuals, inc. members of the Russian government, regional governors, central election commission, military officials and Patriarch Kirill. Financial sanctions and travel bans on 13 people involved in production and supply of UAVs to Russia. Financial sanctions and travel bans on 7 individuals.</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> + broad economic sanctions and travel ban against 74 individuals, 24 so-called 'officials' in illegally annexed regions of Ukraine) and extended further sanctions on 15 individuals with strategic or economic relevance who were previously only travel banned + travel ban against A.Abramov (Former Chair and significant shareholder of Evraz plc) and 4 his family members + 15 (inc. 12 military officials) + 22 individuals of the Russian and Belarussian elite + 3 Iranian military officials involved in supply of UAVs to Russia. Sanctions on 4 Iranian individuals for the supply of UAVs to Russia. Sanctions on 87 individuals from the Russian political and military elite. Sanctions on 27 individuals from Russian and Belarussian elite, military actors.</p> <p><b>Japan.</b> 8 RF officials + 133 individuals from self-proclaimed "DPR/LPR" + 62 + 58 individuals + 23 individuals directly responsible for the unilateral annexation of Donet, sk, Luhansk, Kherson and Zaporizhzhia + asset freeze measures on 22 Russian individuals, as well as 14 individuals directly involved in the annexation of Crimea or the destabilization of the Eastern Part of Ukraine, and those directly involved in the purported "incorporation" of Eastern and Southern regions of Ukraine by Russia. Asset freeze on 48 individuals.</p> <p><b>EU. Switzerland. Liechtenstein.</b> 2 oligarchs (Kurchenko, Prigozhin) + V.Yanukovich and his son O.Yanukovich.</p> <p><b>EU.</b> Added 2 Individuals + 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 + 30 individuals + financial sanctions, inc. freeze of funds and economic resources against 3 Iranian individuals + approved decision not to accept Russian passports issued in temporarily occupied territories of Ukraine and Georgia + 6 Iranian individuals for involvement in development &amp; delivery of UAVs to Russia + asset freeze for 141 individuals. De-listed D. Ovsyannikov, a former Governor of Sevastopol.</b> Asset freeze on 87 persons from Russian political and military elite. Asset freeze and transit freeze against 9 members of Wagner Group. Asset freeze on 4 Russian police officers and members of the armed forces. Deleted from the EU sanctions list 3 deceased persons</p> <p><b>Switzerland.</b> 65 RF +12 Belarus + 54 + 3 - 3 + assets freeze and travel ban 30 individuals + financial sanctions and entry and transit ban on 3 Iranian military officials) + financial sanctions and travel restrictions on 2 Iranian military officials + 4 Iran military individuals + 141 individuals, including members of the State Duma, ministers, persons responsible for propaganda, members of the military + stopped accepting travel documents issued in Russian-occupied regions of Ukraine or in breakaway territories of Georgia for obtaining a visa or crossing the outer border of the Schengen area. De-listed 2 individuals - D.Ovsyannikov, former "Governor of Sevastopol", S. Ivanov, member of Federation Council</p> <p>Financial sanctions and travel bans on 87 persons.</p> <p><b>Norway.</b> 65 + 54 RF individuals + 30 (inc. actors involved in the so-called referendums).</p> <p><b>Lithuania.</b> Ban on entering the country for P.Kirill.</p> <p><b>Latvia.</b> Added 35 individuals to the ban list on entering Latvia for an indefinite period.</p>
5.2.	Family members	Yes	<p><b>EU.</b> Sanctioned Kabayeva, <b>excluded Patriarch Kirill.</b> <b>Annulled sanctions (asset freeze &amp; travel ban is still in force) imposed on V. Prigozhina</b> - mother of Wanger's head. Announced plans to create a clearer legal framework for imposing sanctions against family members of Russian businessmen who have been subjected to EU restrictions.</p> <p><b>UK.</b> Alina KABAEVA, Viktor KHMARIN, Vladimir KOLBIN, Lyudmila OCHERETNAYA (ex-wife of Putin), Aleksandr Grigorevich PLEKHOV, PUTIN Igor</p>

			Alexandrovich, PUTIN Mikhail Evgenievich, PUTIN Roman Igorevich, SHAMALOV Yuri Nikolayevich, SHELOMOV Mikhail Lvovich, ZATSEPILINA Anna Yakovlena. <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. <b>USA.</b> Sanctioned Kabayeva. Visa restrictions on A. ZADACHIN and E. LENSKAYA and their family members for involvement in a gross violation of human rights. <b>Switzerland.</b> Sanctioned Kabayeva. <b>Australia.</b> Sanctioned Patriarch Kirill.
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). Asset freeze on 80 individuals, inc. Russian Deputy Finance Minister, Minister of Digital Development, senior executives at Rosatom, Rostec, Almaz-Antey Corporation, Gazprom (inc. Viktor Zubkov), Aeroflot. <b>EU.</b> Gerhard Schroeder, Matthias Waring and Karin Kneissl left the BoD of Rosneft threatened by sanctions <b>Canada.</b> 35 individuals - senior executives of energy entities (inc. Gazprom) and government officials.
5.4.	Key executives and board members of companies that are subject to US or EU sanctions	Yes	<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 + 4 individuals (inc. 2 ex-top officials of Evraz).
5.5.	Propagandists	Yes	<b>New Zealand.</b> 5 persons in media and propaganda sphere + 23 individuals, who are responsible for disinformation campaigns in support of the Russian war effort. <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 + 34 agents of Russian propaganda and their family members, and influential individuals spreading disinformation. Sanctions on 38 propagandist. <b>UK.</b> Deleted from sanctions list Brian McDonald, head of RT (English edition).
5.6.	Senior members of the governing bodies of Russian political parties and every member of Putin's political party, United Russia	Yes	
6. Intensify Sanctions on State-Owned Enterprises			
6.1.	Key state-owned enterprises in the energy industry	Slow progress	<b>Poland.</b> sanctioned Gazprom Export. <b>Canada.</b> sanctioned 3 entities in the energy sector.
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, Odná Rodyna, Journal Kamerton, Analiticheskiv Tsentri Katekhon OOO). <b>EU.</b> 3 SOE media + extended prohibition of broadcasting for 3 RF SOE media + suspended broadcasting licenses for 4 Russian media outlets - NTV/NTV Mir, Rossiya 1, REN TV and Perviy Kanal - and prohibited broadcasting their content + prohibited from 16 January 2023 for EU nationals to hold any posts on the governing bodies of all Russian SOEs or controlled legal persons, entities and bodies located in Russia. Suspended broadcasting licenses of 2 Russian additional media - RT Arabic and Sputnik Arabic - from 10 Apr 2023. Suspended broadcasting licenses of 2 Russian additional media - RT Arabic and Sputnik Arabic - from 10 Apr 2023. <b>Latvia.</b> Ban on distribution of 80 audio and audiovisual programs registered in RF. <b>Lithuania.</b> Instructed internet service providers to block access to Russian propaganda TV channels ("NTV," "Perviy Kanal," "Rossiya 1," "Rossiya 24," and "RTR Planeta") that have been sanctioned by EU. <b>Estonia.</b> Banned 5 TV channels ("RTR Planet," "NTV Mir" (also "NTV Mir Baltic"), "Belarus 24," "Russia 24," and TV Centre International (TVCI)) from being rebroadcasted. <b>Switzerland.</b> Prohibition of advertisement of content produced or broadcast by certain RF SOE media + prohibited for Swiss nationals to hold any posts on the

			governing bodies of all Russian SOEs or controlled legal persons, entities and bodies located in Russia. Prohibited the advertising of any product or service on NTV/NTV Mir, Rossiya 1, REN TV and Pervyi Kanal. <b>Canada.</b> 15 entities involved in disinformation activities (inc. 12 SOEs). + 1 channel of Russian propaganda - Zvezda. <b>Moldova.</b> Adopted a decision to suspend the broadcasting licenses of 6 TV channels for their pro-Russian propaganda in Moldova.
6.3.	Key state infrastructure and industrial companies	Yes	<b>UK.</b> Added 13 SOEs & 4 subsidiaries. <b>Machine building:</b> KAMAZ. <b>Defense:</b> Avangard JS, JSC Kalashnikov concern (SOE 25+1), Rocket and space center progress JSC. <b>Shipbuilding:</b> The Dalzavod ship repair centre JSC. <b>Electronics:</b> CROCUS NANO ELECTRONICS (14,32% SOE), JSC MIKRON (6.5% SOE). <b>Leasing:</b> JSC GTLK. <b>Science:</b> 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. <b>Logistics:</b> RF Railways Evraz plc (steel manufacturing and mining company) <b>New Zealand.</b> Added 42 SOEs. <b>Defence:</b> Makeyev Rocket Design Bureau, Minsk Wheel Tractor Plant (MZKT), State authority for military industry of the Republic of Belarus (SAMI), OKB TSP Scientific Production LLC (OKB TSP), Oboronnye Initsiativy, LLC Synesis. <b>Shipbuilding:</b> 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 + Federation Council of the Federal Assembly of Russia) and 1 Belarusian entitiy <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 + sanctions Salvation Committee for Peace and Order (so-called government body in Kherson) <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) + JSC Goznak + 2 entities that operate in the Russian defense and related material sector. <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% + ban on holding managerial positions in certain companies that are owned or controlled by the Russian state. <b>EU.</b> 7 SOEs + 7 entities, inc. Central Election Commission of Russia and Goznak + ban on EU nationals to hold any posts on the governing bodies of certain Russian state-owned or controlled legal persons, entities or bodies. Prohibited Russian nationals or residents from holding any posts in the governing bodies of the owners or operators of critical infrastructures in the EU from March 27, 2023. <b>Switzerland.</b> Added 5 SOEs + Sberbank + 7 entities, inc. Central Election Commission of Russia and Goznak + the Russian Maritime Register of Shipping are included to the list of SOEs that are subject to a full ban on transactions. Prohibited Russian nationals or residents from holding any posts in the governing bodies of the owners or operators of critical infrastructures in the EU from March 27, 2023. <b>Japan.</b> Added 9 entities, inc. Rostec and Kalashnikov Concern.
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. <b>Bulgaria.</b> Rejected Russian fuel for its nuclear power plants from 2025 - agreements with Framatome (France) & Westinghouse (USA) for supplies were signed. <b>Czech Republic.</b> Withdrew from United Institute of Nuclear Research (JINR), international organization based in Russia which focuses on nuclear and particle physics research, on 31 December 2022.
7. Expand Export Controls and Ban Imports			
7.1.	Ban on exports to Russia of all strategically important high-technology products	Yes	<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&technology and related services. Extended the list of oil refining goods&technology and the list of energy-related goods banned to export. Export

restrictions for Belarus on goods and technology relating to critical industry, quantum computing, oil refining, luxury goods including dual-use good and technology (will block trade of ~£60 mln of goods with Belarus).

Ban on export of goods and items of significant importance to the Russian (such as chemicals, materials, machinery goods and electrical appliances with the exception of licensed humanitarian goods) + expanded the scope of existing energy-related goods and services prohibitions + ban on export of accounting, business and management consulting, and public relations services + prohibition of export, supply and delivery, and making available of goods, critical to the functioning of Russia's economy, in par. manufacturing sector + expansion of list of G7 Dependency and Further Goods subject to certain export controls + minor expansion of list of revenue generating goods subject to certain import/purchasing restrictions + prohibition of import and acquisition of gold jewellery (inc. related technical assistance, financial services and funds, and brokering services) + extended the list of critical-industry goods subject to export ban + extended list of chemicals - added 5 new to subject to export ban + ban on the direct and indirect provision of the additional professional and business services to a person connected with Russia.

**USA.** Export ban on accounting, trust and corporate formation, and management consulting services (will take effect on June 7, 2022).

The U.S. Nuclear Regulatory Commission will suspend general licenses that previously permitted export of source material, special nuclear material, byproduct material, and deuterium to Russia.

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 + BIS renewed orders denying export privileges for 180 days to Pobeda Airlines, Nordwind Airlines, Siberian Airlines, Belavia Belarusian Airlines, Rossiya Airlines + BIS introduced export control measures against 9 Russian entities + BIS issued an order temporarily denying export privileges for a period of 180 days for 4 Russian nationals and 2 entities. Additional export restrictions on Russia, Belarus, and Iran, as well as entities in third countries. Suspended export privileges of Radiotester OOO and I.Balakaev, for unauthorized export of controlled counterintelligence items to Russia and North Korea. New export control measures on Iran to address the use of Iranian UAVs by Russia. Renewed the orders temporarily denying export privileges to Russian airlines Azur Air, UTair and Aeroflot. Extending restrictions on exports, reexports and in-country transfers for the oil and gas production industry items to Belarus. Adding additional items to the lists of oil and gas production industry items controlled for export, reexport, and transfer to Russia and Belarus.

**Japan.** Bans on exports to 71 specific organizations + ban on export goods that strengthen the industrial base of RF (wood products, steel storage tanks and other similar containers, machinery and electrical equipment components) + prohibited exportation, reexportation, sale, or supply, directly or indirectly, from the United States, or by a US person, wherever located, of quantum computing services to any person located in Russia, and issued a Final Rule imposing additional export controls on Russia and Belarus on industrial and commercial items that could support Russian and Belarusian military aggression + added 4 Iranian cargo aircraft to US BIS list + renewed Temporary Denial Orders (TDOs) issued against Russian airlines Aeroflot, Azur Air and UTair for a further 180 days + issued an order denying the export privileges of Russian airline Ural Airlines + renewed the export denial order against Russian cargo airlines Aviastar-TU for another 180 days) + ban on exports to 49 Russian entities (aerospace, military and shipbuilding industries) from Feb 3, 2023. Announced export bans on goods related to aerospace, construction, metallurgical industries, as well as a number of goods related to measuring equipment and communication that contribute to Russia's industrial base. Expanding the list of industrial items requiring a license for export or reexport to or transfer within Russia or Belarus. Adding new items to the list of luxury goods subject to export restrictions. Announcing a favorable licensing policy to facilitate the disposition of items by companies curtailing or closing all operations in Russia or Belarus.

**EU. Ban of accounting, pr and consultancy to RF. Exclusions to export ban on luxury goods, allowing for personal use of persons travelling from the EU** + prohibition to provide Architectural & engineering, IT consultancy, Legal advisory services to the Government of Russia + extension of the list of goods and technology suited for use in aviation or the space industry + EU included ability for EU Member States authorise the sale, supply, transfer or export of the goods and technology which could contribute in particular to the enhancement of Russian industrial capacities + extension of the list of goods that generate significant revenues for Russia and are subject to the import ban + ban on sell, supply, transfer or export goods which could contribute to the enhancement of Russian

			<p>industrial capacities + export ban on certain coal, lignite, peat and coke products + extended list of goods which are subject to export bans and could contribute to the enhancement of Russian industrial capacities + banned provision of advertising, market research and public opinion polling services, as well as technical testing and analysis services to Russia and to legal persons, entities or bodies established in Russia + extended export ban covering goods and technology suited for use in aviation and the space industry. Export bans on goods that can be easily redirected to be used to support the Russian war effort. Export ban on additional goods which could contribute to the enhancement of Russian industrial capacities. Export ban on additional airspace goods. Import ban on additional Russia's revenues - generating goods. Limited derogation from professional service ban exclusively for divestment of EU operators from Russia until 31 Dec 2023.</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 + withdrew MFN for Russia - a 35% tariff applicable to virtually all goods. Prohibited export, sale, supply or shipment of certain chemical elements for use in electronics wherever situated, to Russia or to any person in Russia.</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 + export restrictions relating to coal, electronic components, technical items in the aviation sector, certain chemicals and firearms + restriction on architectural and engineering services, legal advisory services and IT consultancy services.</p> <p><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 + ban on Architectural &amp; engineering, legal and IT consulting services + extended list of goods which are subject to export bans and could contribute to the enhancement of Russian industrial capacities + banned provision of advertising, market research and public opinion polling services, as well as technical testing and analysis services to Russia and to legal persons, entities or bodies established in Russia + extended export ban covering goods and technology suited for use in aviation and the space industry. Export ban on additional goods which could contribute to the enhancement of Russian industrial capacities. Derogations from import/export bans until 30 Sep 2023 for divestment or winding down business in Russia. Export ban on additional airspace goods. Import ban on additional Russia's revenues - generating goods. Limited derogation from professional service ban exclusively for divestment of EU operators from Russia until 31 Dec 2023.</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 defense + ban on exports to 21 Russian organizations designated as specific organizations + export ban on chemical weapons-related goods to Russia (came into force on the 7 Oct).</p> <p><b>New Zealand.</b> Extension of the 35% tariff on Russian imports till Mar 2025 + significant expansion of the list of prohibited exports to Russia and Belarus + ban of the export of luxury goods (inc. gold) to Russia (for example, wine, seafood) + ban of the export of oil exploration and oil production products to Russia (came into force on 4 Nov) + added perfumes and toilet waters and cosmetics, including beauty and make-up products, into the list of luxury goods subject to the export ban.</p> <p><b>Taiwan.</b> Expanded the scope of export control on goods exported to Russia and Belarus which includes 52 items such as nuclear energy materials, law enforcement restraint tools, materials, chemicals and machine tools.</p> <p><b>Turkey.</b> As of 1 Mar 2023, Turkish customs officials have blocked the transit of some Western-sanctioned goods to Russia via Turkey, without providing an official explanation. On 21 Mar 2023, the Turkish government issued a list of foreign goods that are prohibited from being re-exported to Russia (restrictions do not apply to goods produced in Turkey, even if they contain foreign components).</p> <p><b>Kazakhstan.</b> Implement new rules requiring exporters to submit additional</p>
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			documents when sending goods to Russia to reduce "underground" trade and prevent the circumvention of sanctions. From 1 April 2023, Kazakhstan will require exporters to submit additional documents when sending goods to Russia to reduce "underground" trade and prevent the circumvention of sanctions against Russia (online tracking system).
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	<b>Switzerland.</b> Industrial robots. <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. <b>Japan.</b> Export ban of cutting-edge goods (quantum computers, 3D printers, etc). <b>UK.</b> Export bans targeted on Russia's manufacturing and heavy machinery sectors announced. <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> <b>China.</b> According to media reports China government banned export of Loongson processors to Russia (were used in defence as a substitution to Intel and AMD processors).
7.4.	Enhance export controls on critical technology systems, components, and materials with potential military dual-use	Yes	<b>UK.</b> <u>Announced</u> an export ban on products used to repress the Ukrainian people (announced but not yet implemented). Products targeted could include interception and monitoring equipment (dual-use products). Export ban on products&technology that could be used to repress people, Export ban on goods and technology relating to chemical and biological weapons. Export ban on jet fuel and fuel additives + 57 entities which acquired (or tried) U.S.-origin items for Russia's military or involvement in the development of quantum computing technologies. <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. <b>EU.</b> Expansion of export restrictions for dual-use goods and technology, goods & technologies that can be used in defense and security. Reinforced export controls of dual use goods and advanced technology + added 4 Russian entities to the list of entities subject to export restrictions regarding dual-use goods&technology + extension of the list of restricted goods and technology which might contribute to Russia's military and technological enhancement or to the development of its defence and security sector, including in that list + extended list of restricted items sensitive dual-use and advanced technologies which might contribute to Russia's military and technological enhancement or the development of its defence and security sector + imposed tighter export restrictions regarding dual-use goods or which might contribute to the technological enhancement of Russia's defence and security sector on 168 additional Russian entities closely connected to the Russian military industrial complex. Export bans on sensitive dual-use and advanced technologies that contribute to Russia's military capabilities.Extended list of restricted items that could contribute to Russia's military and technological enhancement. EC clarified that transit of dual-use goods and technology exported from the EU through the territory of Russia is prohibited. Export ban on additional goods and technology which could contribute to Russia's military and technological Enhancement or the development of the defense and security sector. Transit ban for dual-use goods and technology and firearms, their parts and essential components, and ammunition, exported from the EU to third countries. Export ban for 96 entities supporting Russia's military and industrial complex. <b>USA.</b> Export control for 70 entities in RF and 1 in Belarus + BIS added 24 technological companies located in several countries to the Entity List (12 due to their contributions to Russia's military and/or defense industrial base). New export control measures on Iran, Russia, and Belarus to address Russia's use of Iranian UAVs. Added 76 Russian entities to the Entity List, inc. 66 in the military sector. Added 10 entities from Canada, China, France, Luxembourg, Netherlands, and Russia to Entity List for contributing significantly to Russia's military and defense industrial base. Added 37 entities to Entity List, which will prohibit the listed companies from purchasing items, such as semiconductors and software made in the US or made abroad and containing US components. Group of American senators proposed a bill to ban the import of Russian uranium into the US. The US International Trade Commission maintained a suspension agreement on imports of uranium. Listing additional 96 entities directly supporting Russia's MIC. New license requirements for export of specified items used in Iran's UAV program to

			<p>Russia and Belarus, including non-U.S. items that are the “direct product” of certain U.S. technology and software. Imposing new license requirements for export or reexport of certain foreign-produced items (items made outside of the US) destined to Iran, regardless of U.S. person involvement, that may be used in Iranian unmanned aerial vehicles (UAVs).</p> <p><b>Switzerland.</b> Extended the list of <b>dual-use goods banned for export by 91 RF entities and 24 Belarus entities</b> + extended lists (of goods which may contribute to Russia’s military and technological enhancement, of goods for use in the aerospace industry, iron and steel products, economically important goods, goods which can strengthen Russian industry) subject to export ban + extended list of restricted items sensitive dual-use and advanced technologies which might contribute to Russia’s military and technological enhancement or the development of its defence and security sector + imposed tighter export restrictions regarding dual-use goods or which might contribute to the technological enhancement of Russia’s defence and security sector on 168 additional Russian entities closely connected to the Russian military industrial complex. Added 96 entities to the list of entities that fall under tighter export restrictions regarding dual-use goods and technology, technology which might contribute to technological enhancement of Russia. Export ban on additional goods and technology which could contribute to Russia’s military and technological Enhancement or the development of the defense and security sector. Transit ban for dual-use goods and technology and firearms, their parts and essential components, and ammunition, exported from the EU to third countries. Export ban for 96 entities supporting Russia’s military and industrial complex.</p> <p><b>Norway.</b> Added 4 Russian entities to the export ban list regarding dual-use goods&amp;technology.</p> <p><b>Japan.</b> Prohibited exports of dual-use goods to Russia that could strengthen its military potential, effective from 3 February 2023. Introduced export bans against 21 Russian entities on items that can be used for military purposes, dual-use goods, certain commodities, and semiconductors.</p>
7.5.	Prohibit the export of metals, minerals, and ores	<b>Slow progress</b>	<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	<b>No</b>	-
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	<b>Yes</b>	<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.</p> <p><b>Switzerland.</b> Lignite and coal, timber, cement, seafood, caviar + extended the list of prohibited for import from RF goods.</p> <p><b>Canada.</b> Luxury goods, incl. alcoholic beverages, seafood, fish and non-industrial diamonds + import ban on Belarus on luxury goods. According to new amendments, from 14 Feb Canada is able to use a less stringent burden of proof to use a NME methodology for the purpose of calculating margins of dumping when investigating potential dumping cases involving Russia and Belarus. Prohibited import, purchase, or acquisition of any type of weapon, ammunition, military vehicle or military or paramilitary equipment, or a spare part for any of those goods, from Russia or to any person in Russia. Banned import, purchase or acquisition of various aluminum and steel products from Russia.</p> <p><b>USA.</b> 35% import tariff for 570 categories of RF products worth approximately \$2.3 bn). Increased tariffs on imports (to 200%) from Russia and other countries of aluminum and derivative aluminum articles. Increased duty rates (from 35% to 70%) on a variety of goods from Russia (&gt; 100 Russian metals, minerals, and chemical products).</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 + introduced the ability for EU Member States to authorise the operation with titanium goods required in the aeronautic industry, for which no alternative supply is available + ban to import into the EU of iron and steel products processed in third countries inc. from Russia (from September 30, 2023) + extension of the ban to import into the EU of iron and steel products processed in third countries inc. from Russia (from September 30, 2023) + introduction of the prohibition on importing or purchasing, as from 30 September 2023, the listed iron and steel products when processed in a third country incorporating listed iron and steel products originating in Russia + ban on the import of Russian finished and semi-finished steel products (come into force due three months). Under 9th package extended existing prohibitions on the import or purchase of certain iron and steel products processed in a third country incorporating iron and steel products originating in Russia. Import bans on additional goods which generate</p>



			<p>significant revenues for Russia.</p> <p><b>Japan.</b> Banned exports to 21 scientific organizations in Russia, banned export of goods related to chemical weapons to Russia.</p> <p><b>New Zealand.</b> Ban of the import of luxury goods of Russian origin into New Zealand (vodka and caviar) + prohibition of the import of energy products of Russian origin (coal, oil, or gas products) into New Zealand.</p> <p><b>Norway.</b> Import restrictions relating to steel products, machinery and appliances, plastics, vehicles, textiles, footwear, leather, ceramics, certain chemical products and jewelry that are not made of gold.</p> <p><b>Switzerland.</b> Implemented a complete armaments embargo on Russia, lifting previous restrictions on the import of firearms, ammunition, explosives, pyrotechnic articles, and gunpowder as well as lifting restrictions on the sale, supply, export, transit, and transport of special military items. This embargo was partially extended to Ukraine in order to comply with Switzerland's neutrality under public international law + prohibited import, transport and purchase of iron &amp; steel products from Russia + from 3rd country from Russian iron and steel products (includes ban on supportive services). Derogations from import/export bans until 30 Sep 2023 for divestment or winding down business in 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 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,</p>

			<p>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.</b></p> <p>After the US warning, banks in Turkey, Kazakhstan, Vietnam, Armenia, Kyrgyz Republic, Sri Lanka started to suspend work with the Russian payment system "Mir". According to Russian media, Mir coverage area in friendly countries collapsed by 90%. Also, Russians face problems with UnionPay (Tourists in Spain, the Czech Republic and Cyprus have encountered problems, Nosto ATMs (Finland) stopped servicing UnionPay cards). BIS warned third-country companies and governments that they could find themselves subject to export controls imposed in response to Russia's war against Ukraine. OFAC confirmed that non-US individuals and legal entities risk exposure to sanctions for providing ammunition and other military goods to Russia or for supporting Russia's military-industrial complex, as well as PMCs or paramilitary groups participating in or otherwise supporting Russia's attack on Ukraine.</p> <p>On Sep 18, Biden warned Chinese leader Xi Jinping about the risk of stopping "American and other" investments in China if Beijing violates sanctions against Russia.</p> <p>On Sep 19, Turkish Airlines refused to train Russian pilots.</p> <p>The U.S. government is exerting pressure on Turkey to stop Russian airlines from flying American-made airplanes to and from the country.</p> <p>The US threatened Chinese companies with sanctions over supplies of banned goods to Russia, besides the US is negotiating with close allies about the possibility of imposing new sanctions on China if Beijing provides military support to Russia for its war in Ukraine.</p> <p>Sanctioned Slovakian national, A. Mkrtychev, for attempting to facilitate arms deals between Russia and North Korea.</p> <p>US has warned Turkey about the negative consequences of exporting chemical reagents, semiconductors, and other products to Russia to circumvent sanctions</p> <p><b>EU. Discussion on sanctioning Turkey for assisting RF trade is being born.</b> EU plans to ask third countries that have increased their imports from the EU and exports to Russia to strengthen their oversight of external trade.</p> <p><b>EU. Norway.</b> The EU broadened the listing criteria on which specific designations can be based – Sanctions could now be imposed on natural or legal persons who facilitate the circumvention of EU sanctions.</p> <p><b>China.</b> Chinese UnionPay has limited the ability of Russians to withdraw cash abroad.</p> <p><b>Kyrgyzstan.</b> Banks stopped servicing Russian payment cards "Mir".</p> <p><b>Kazakhstan.</b> OFAC allows the use of bank cards of the "MIR" system by private individuals, namely citizens who migrated from Russia to Kazakhstan, to carry out operations that ensure their livelihoods. It is up to the individual banks to decide to connect to the "MIR" system.</p> <p><b>UAE.</b> Sberbank is closing its subsidiary in the United Arab Emirates because of sanctions.</p> <p><b>Turkey.</b> Following the US and the EU warnings of secondary sanctions, exports from Turkey to Russia decreased 22% (from Dec 22 to Feb 23).</p>
<p>9. Increase Transparency to Discourage Trade with and Investment in Russia</p>			
<p>9.1.</p>	<p>A registry of all international companies still operating in Russia and Belarus</p>	<p><b>Slow progress</b></p>	<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>The EU created</b> 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 <a href="#">sample comment letter</a> 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> <p><b>Switzerland.</b> Federal Council instructed to draft a bill on increased transparency and easier identification of the beneficial owners of legal entities which will include a register for identifying beneficial owners and new obligations the risk-based updating of information on effective ownership.</p>
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> <p><b>USA-UK.</b> OFSI and OFAC announced enhanced co-operation on sanctions.</p> <p><b>REPO</b> is going to accelerate oligarch asset forfeiture efforts in response to Russia's illegal war in Ukraine.</p> <p><b>Czech Republic.</b> Approved a legislative proposal to freeze foreign assets in case of human rights violations, support of terrorism or participation in cyber-attacks (needs to pass Senate and then office of the President).</p>
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>Council of Europe.</b> Proposed creating a register to record evidence and claims for damage, loss or injury caused by Russia's crimes of aggression against Ukraine. Proposed to set a special tribunal to prosecute those responsible for crimes against Ukraine.</p> <p><b>USA and Canada.</b> The countries are preparing legislative acts to use sanctioned assets for compensation to Ukraine. <b>USA. The USA doesn't have legal authority to seize CBR assets frozen due to its invasion of Ukraine,</b> but 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.</b></p> <p><b>USA.</b> Adopted amendment to the US government funding bill that would allow the confiscation and sale of frozen assets of Russian oligarchs for the benefit of Ukraine.</p> <p><b>Canada.</b> Passed a law for the freezing and confiscation of Russian-sanctioned assets). Announced that it will seize and pursue the forfeiture of \$26 mln from Granite Capital Holdings (owned by Abramovich) – the first time Canada is using</p>

			<p>its new authority to pursue the seizure of assets belonging to sanctioned individuals.</p> <p><b>UK.</b> Adopted a resolution on the payment of reparations from the Russian Federation for damages. Seizure of Russian State Assets and Support for Ukraine Bill was presented at the House of Commons in the UK Government. The bill is currently at the first stages of adoption and discussions continue.</p> <p><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. The EU is ready to create an international platform for the restoration of Ukraine. The 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.</p> <p><b>Germany.</b> Consider the possibility. The Finance Minister does not support the idea of confiscating the personal assets of Russians for Ukraine.</p> <p><b>Estonia.</b> Takes initiative to transfer frozen Russian assets to Ukraine and plans to develop a legal framework for this process. The European Commission supported Estonia's plan to start seizing Russian financial assets without waiting for other EU countries and criminalize the evasion of sanctions.</p> <p><b>Switzerland.</b> The Federal Office of Justice has concluded that the confiscation of private assets frozen under Russian sanctions for use in the reconstruction of Ukraine is incompatible with Swiss law.</p> <p><b>France.</b> The French justice system has achieved its first criminal seizure of a villa belonging to a Russian oligarch, Rashnikov. The villa, valued at €23 million, and the proceeds of the sale, estimated at €17 million, are now in the custody of the Ministry of Justice's Agency for the Management and Recovery of Seized and Confiscated Assets.</p> <p><b>Netherland.</b> Proposed to create an international register of damage caused by Russian aggression.</p>
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**APPENDIX**

**SANCTIONS TARGETED AGAINST INDIVIDUALS**

<b>United States</b>			
Date	Target country		Description
1 Feb 2023	Russia	OFAC	<i>10 individuals across multiple countries associated with a network involved in evading sanctions and providing support to Russia's military-industrial complex and Russian sanctioned state-owned defense entities</i> – Igor Vladimirovich ZIMENKOV, Russia- and Cyprus-based arms dealer; Jonatan ZIMENKOV, son of Igor Zimenkov, Russian-Italian-Israeli national, maintained Powers of Attorney for companies in the Zimenkov network on behalf of his father, Igor Zimenkov; Alexander VOLFOVICH, Cyprus-based arms broker, owner and director of GBD Limited, registered owner of the following six companies: Mateas Limited, Kliosa Limited, VFC Solutions LTD, U-Stone Limited EOOD, GMI Global Manufacturing & Integration LTD, D.E.S. Defense Engineering Solutions LTD; Ariel VOLFOVICH, son of Alexander Volfovich, Cyprus national, Director of VFC Solutions LTD, limited company registered in Cyprus; Stanislav Volfovich, son of Alexander Volfovich, Director and Secretary of VFC Solutions LTD, limited company registered in Cyprus; Maks Borisovich PIFLAKS, Uzbekistan-based director of Mateas Limited, associate of D.E.S. Defense Engineering Solutions LTD; Serena Bee Lin NG, director of Asia Trading & Construction PTE LTD; Gilad PIFLAKS, son of Maks Piflaks, Uzbekistan-Israel national, associate of D.E.S. Defense Engineering Solutions LTD; Marks BLATS, Latvian national, CEO of Texel F.C.G. Technology 2100 Limited, owner of Latvia-based Elektrooptika SIA; Igor PALNYCHENKO, Cyprus-based owner of Pitaron Limited and Terra-Az Limited, director of GMI Global Manufacturing & Integration Limited.
3 Feb 2023	Iran	OFAC	<i>8 senior executives of Iranian entities involved in the elaboration, production and supply of drones to Russia</i> – Mohsen ASADI, members of Board of Directors of Paravar Pars Company; Mohammad Reza MOHAMMADI, members of Board of Directors of Paravar Pars Company; Mohammad Sadegh Heidari MOUSA, members of Board of Directors of Paravar Pars Company, IRGC Navy official; Abulfazl NAZERI, members of Board of Directors of Paravar Pars Company, Vice Chairman; Abulfazl SALEHNEJAD, members of Board of Directors of Paravar Pars Company; Hossein SHAMSABADI, members of Board of Directors of Paravar Pars Company, Managing Director and CEO; Abulghasem VALAGOHAR, members of Board of Directors of Paravar Pars Company; Ali Reza TANGSIRI, members of Board of Directors of Paravar Pars Company, Chairman, Commander of the IRGC Navy.
9 Feb 2023	Russia	OFAC	<i>7 Russian cyber criminals</i> associated with the development or deployment of a range of ransomware strains which have targeted the UK and US – Mikhail ISKRITSKIY, Valentin Olegovich KARYAGIN, Vitaliy Nikolayevich KOVALEV, Maksim Sergeevich MIKHAILOV, Dmitry PLESHEVSKIY, Valery Veniaminovich SEDLETSKI, Ivan Vasilyevich VAKHROMEYEV.
24 Feb 2023	Russia	OFAC	22 Russian and non-Russian individuals: – <i>7 finance professionals such as private bankers, wealth managers and investment advisers</i> – Olga Borisovna RAYKES, Russian Federation-Israel national, founder of CONFIDERI Pte Ltd, private banker, wealth manager, and investment adviser; Marat Maratovich SAVELOV, Russian Federation-Israel national, founder of CONFIDERI Pte Ltd, private banker, wealth manager, and investment adviser; Dmitry Vitaleyevich BUGAYENKO, Russian-Cyprus national, owner of Moscow-based investment and wealth management firm IC Veles Capital LLC; Aleksei Dmitrievich GNEDOVSKII, Russian-Cyprus national, owner of Moscow-based investment and wealth management firm IC Veles Capital LLC; Ulan Vladimirovich ILISHKIN, Deputy Chairman of the Management Board of U.S.-sanctioned PJSC Rosbank, leader of the Rosbank's L'Hermitage Private Banking

			<p>unit; Alina Olegovna NAZAROVA, head of A-Club, the private banking department of U.S.-sanctioned JSC Alfa-Bank; Evgeniya Sergeevna TYURIKOVA, head of the private banking department of U.S.-sanctioned PJSC Sberbank of Russia;</p> <p>– 7 non-Russian individuals connected to Russia’s sanctions evasion efforts, including those related to arms trafficking and illicit finance: Walter MORETTI, Swiss businessman who leads a network of associates and companies that covertly procured sensitive Western technologies and equipment for Russian intelligence services and the Russian military, including hydraulic presses, armament packages, and armor plating, as well as procured equipment for Russia’s nuclear weapons laboratories; Markus Gerhard MUELLER, German national who assisted Walter Moretti in the procurement of sensitive Western technologies and equipment for Russian intelligence services and the Russian military; Ronald Eric COSMAN, Swiss national who assisted Walter Moretti in the procurement of sensitive Western technologies and equipment for Russian intelligence services and the Russian military; Bruno KOLLER, Swiss national who assisted Walter Moretti in the procurement of sensitive Western technologies and equipment for Russian intelligence services and the Russian military; Frederic Pierre VILLA, Swiss-Italian national who along with Walter Moretti are on the board of directors of Stratton Investment Group LTD; Hans-Peter BOMATTER, Swiss national, senior managers of Tamyna AG; Lutwin SCHOMMER, Swiss national, senior managers of Tamyna AG;</p> <p>– 2 businesspersons – Nurmurad KURBANOV, Russian-Turkmen arms dealer who has represented Russian and Belarusian defense firms abroad, including the U.S.-sanctioned Belarusian firm OKB TSP Scientific Production LLC, involved in the production of a short-range air defense system, and facilitated military and technical cooperation efforts between Russia and foreign countries, he also owns Cyprus-based firm Stella Leone Limited; Aleksandr Yevgenyevich UDODOV, Russian elite-linked businessman tied to illicit financial activity, the former brother-in-law of Russian Prime Minister Mikhail Mishustin, linked to business dealings with both Mishustin himself and Mishustin’s sister, he has also been investigated for manipulating value-added tax revenues and money laundering;</p> <p>– 6 individuals operating in Russia’s technology and electronics sectors involved in Russia’s military supply chains, including persons who produce or import specialized or high-tech equipment used by Russia’s defense entities – Anastasiya Olegovna ESHSTRUT, co-owner and general director of Maxtech; Maksim Valeryevich SAFONOV, co-owner of Maxtech; Sergei Valentinovich PETROV, owner of PSV; Svetlana Alekseyevna MORETTI, owner and CEO of the technology company Tamimed; Andrey Igorevich MASALOVICH, head of Lavina Puls OOO and Inforus AO, who worked to sell the internet monitoring and influence technology he designed for the GRU internationally Inforus; Andrey Aleksandrovich UGLOV, General Director of OJSC Ilyenko Elara Research and Production Complex, a former Government of Russia official.</p>
24 Feb 2023	Russia	Department of State	<p>76 individuals:</p> <p>– 47 governors and heads of Russian regions who have among their duties the conscription of citizens to fight in Ukraine – Igor Yuryevich BABUSHKIN, Governor of the Astrakhan region; Yuriy Vasilyevich BEZDUDNIY, Governor of the Nenets Autonomous Area; Aleksandr Vladimirovich BRECHALOV, Head of the Republic of Udmurtia; Aleksandr Leonidovich BURKOV, Governor of the Omsk Region; Roman Viktorovich BUSARGIN, Governor of the Saratov Region; Andrey Vladimirovich CHIBIS, Governor of the Murmansk Region; Mikhail Vladimirovich DEGTYAREV, Governor of the Khabarovsk Territory; Mikhail Yakovlevich EVRAEV, Governor of the Yaroslavl Region; Makhmud-ali Maksharipovich KALIMATOV, Head of the Ingushetia Republic; Batu Sergeevich KHASIKOV, Head of the Republic of Kalmykia; Oleg Leonidovich KHOROKHORDIN, Head of the Altai Republic; Vladislav Tovarishchayovich KHOVALYG, Head of the Tuva Republic; Andrey Evgenyevich KLYCHKOV, Governor of the Orel Region; Igor Ivanovich KOBZEV, Governor of the Irkutsk region; Kazbek Valeryevich KOKOV, Head of the Kabardino-Balkaria Republic; Natalya Vladimirovna KOMAROVA, Governor of the Khanty-Mansi Autonomous Area – Yugra; Veniamin Ivanovich KONDRATYEV, Governor of the Krasnodar Territory; Valentin Olegovich KONOVALOV, Head of the Republic of Khakassia; Roman Valentinovich KOPIN, Governor of the Chukotka Autonomous Area; Oleg Nikolayevich KOZHEMYAKO, Governor of the Primorye Territory; Murat Karalbiyevich KUMPILOV, Head of the Republic of Adygea; Valeriy Igorevich LIMARENKO, Governor of the Sakhalin Region; Dmitriy Nikolayevich MAKHONIN, Governor of the Perm Territory; Pavel Viktorovich MALKOV, Governor of the Ryazan Region; Vladimir Vladimirovich MAZUR, Governor of the Tomsk Region; Sergey Alimovich MELIKOV, Head of the Dagestan Republic; Oleg Vladimirovich MELNICHENKO, Governor of the Penza Region; Gleb Sergeevich NIKITIN, Governor</p>

of the Nizhniy Novgorod Region; Sergey Konstantinovich NOSOV, Governor of the Magadan Region; Vasilii Aleksandrovich ORLOV, Head of the Amur region; Aleksandr Mikhaylovich OSIPOV, Governor of the Trans-Baikal Territory; Artur Olegovich PARFENCHIKOV, Head of the Karelia Republic; Igor Mikhaylovich RUDENYA, Governor of the Tver Region; Aleksey Yurevich RUSSKIKH, Governor of the Ulyanovsk Region; Vladislav Valeryevich SHAPSHA, Governor of the Kaluga region; Vadim Mikhailovich SHUMKOV, Governor of the Kurgan Region; Sergey Konstantinovich SITNIKOV, Governor of the Kostroma Region; Aleksandr Valentinovich SOKOLOV, Governor of the Kirov Region; Vladimir Viktorovich SOLODOV, Governor of the Kamchatka Territory; Rashid Borispievich TEMREZOV, Head of the Karachayevo-Circassia Republic; Sergey Evgenyevich TSIVILEV, Governor of the Kemerovo Region – Kuzbass; Aleksandr Vitalevich TSYBULSKIY, Head of the Arkhangelsk region; Aleksey Sambuyevich TSYDENOV, Head of the Republic of Buryatia; Mikhail Yuryevich VEDERNIKOV, Governor of the Pskov Region; Stanislav Sergeyevech VOSKRESENSKIY, Governor of the Ivanovo region; Yuriy Viktorovich ZAYTSEV, Head of the Mari El Republic; Artem Alekseyevich ZDUNOV, Head of The Republic of Mordovia;

- *10 members of the Government of Russia* – Tatyana Alekseyevna GOLIKOVA, Deputy Prime Minister of Russia; Aleksey Olegovich CHEKUNKOV, Minister of Far East and Arctic Development; Valeriy Nikolayevich FALKOV, Minister of Science and Higher Education; Anton Olegovich KOTYAKOV, Minister of Labor and Social Protection; Aleksandr Aleksandrovich KOZLOV, Minister of Natural Resources and Ecology; Aleksandr Vyacheslavovich KURENKOV, Minister of Civil Defense, Emergency Situations, and Elimination of Consequences of Natural Disasters; Olga Borisovna LYUBIMOVA, Minister of Culture; Oleg Vasilyevich MATYTSIN, Minister of Sport; Maksut Igorevich SHADAYEV, Minister of Digital Development, Communications, and Mass Media; Nikolay Grigorevich SHULGINOV, Minister of Energy;
- *1 official of the Government of Russia* – Valentina Lvovna KAZAKOVA, Head of the Main Directorate for Migration Affairs of the Ministry of Internal Affairs of Russia, which oversees the issuance of Russian passports to individuals in temporarily Russia-occupied territory of Ukraine;
- *1 official of the Administration of the President of Russia* – Magomedislam Magomedaliyevich MAGOMEDOV, Deputy Head of the Presidential Executive Office, which provides support for the President of Russia and monitors the implementation of the President's decisions;
- *1 official of the Security Council of Russia* – Yuriy Timofeyevich AVERYANOV, First Deputy Secretary of the Security Council of Russia;
- *1 official of the prosecutorial system* – Anatoliy Vyacheslavovich RAZINKIN, First Deputy Prosecutor General of Russia;
- *1 individual operating in Russia's financial services sector* – Anna Borisovna SUROVIKINA, owner of JSC Argus Holding, the wife of General Sergey Surovkin who previously oversaw Russia's illegal war against Ukraine;
- *6 individuals operating in Russia's advanced technology or technology sectors* – Alexander Aleksandrovich MOSKOVSKY, owner of CJSC RSK Technologies; Alexey Borisovich SHMELEV, cofounder and COO of CJSC RSK Technologies; Anton Andreevich CHEREPENNIKOV, the ultimate beneficial owner and head of LLC Citadel; Sergei Anatolyevich OVCHINNIKOV, majority owner and head of CJSC Norski Trans; Igor Vladimirovich Borisov, developer of Strelok and Strelok Pro, mobile phone applications used for ballistics calculations; Yuriy Mikhailovich MILEKHIN, Director General of the Federal State Unitary Enterprise Federal Center of Dual Technologies Soyuz.
- *2 family members of previously sanctioned persons* – Viktor Borisovich KHRISTENKO, husband of Tatyana Golikova, Deputy Prime Minister of Russia; Olga Vladimirovna SKABEYEVA, wife of Yevgeny Popov, a Duma member, who host a Russian talk show where they predominately disseminate pro-Russia propaganda for the war against Ukraine;
- *4 so-called officials in areas of Ukraine illegally occupied by Russian forces or controlled by Russian-backed proxies*, including individuals facilitating grain theft – Nikita Petrovich BUSEL, director general of State Unitary Enterprise State Grain Operator; Leonid Ivanovich PASECHNIK, Putin-appointed interim head of the former so-called Luhansk People's Republic; Natalya Leonidivna DESYATOVA, the Russia-appointed director of the Kherson Arts Museum and oversaw the theft of approximately 10,000 items from the museum's collection; Aleksey Aleksandrovich KOSTRUBITSKY, the Minister of the Ministry of Emergency Situations of the formerly so-called Donetsk People's Republic;

			<ul style="list-style-type: none"> <li>– 1 representative of illegal military entity waging war on behalf of Russia – Artem Volodymyrovich ZHOGA, commander of the Sparta Battalion, a military unit that was part of the armed forces of the former so-called Donetsk People’s Republic;</li> <li>– 1 person involved in Russia’s illegitimate control of Ukraine’s Zaporizhzhya Nuclear Power Plant – Oleg Evgenievich ROMANENKO, Russia-appointed general director of JSC Operating Organization of Zaporizhzhya NPP.</li> </ul>
24 Feb 2023	Russia	Department of State	Visa restrictions on 1219 members of the Russian military for actions that threaten or violate the sovereignty, territorial integrity, or political independence of Ukraine and 3 Russian military officials involved in gross violations of human rights perpetrated against Ukrainian civilians and prisoners of war.
3 Mar 2023	Russia	OFAC	3 individuals involved in serious human rights abuses against Vladimir Kara-Murza – Elena Anatolievna LENSKAYA, judge of the Basmannyy District Court in Moscow; Andrei Andreevich ZADACHIN, special investigator with the Chief Investigative Directorate of the Russian Investigative Committee; and Danila Yurievich MIKHEEV, who acted as an expert witness for the Russian government in the case against Vladimir Kara-Murza.
3 Mar 2023	Russia	Department of State	Visa restrictions on Andrei Andreevich ZADACHIN and Elena Anatolievna LENSKAYA for their involvement in a gross violation of human rights. Their immediate family members are also ineligible for entry into the United States.
3 Mar 2023	Russia	Department of State	3 individuals who are perpetrators of serious human rights abuse – Oleg Mikhailovich SVIRIDENKO, the Russian Deputy Minister of Justice who oversees the prosecution of criminal cases, including the criminal case to which Kara-Murza is subject; Diana Igorevna MISHCHENKO, judge who authorized Kara-Murza’s arrest and sentenced him to 15 days in jail; Ilya Pavlovich KOZLOV, judge who denied Kara-Murza’s appeal of Mishchenko’s administrative arrest ruling.
9 Mar 2023	China	OFAC	1 individual supporting Iran’s unmanned aerial vehicle (UAV) procurement efforts – Yun Xia Yuan, employee of S&C Trade PTY Co., Ltd. (China)
21 Mar 2023	Iran / Turkey	OFAC	3 individuals from Iran and Turkey involved in the procurement of equipment in support of Iran’s UAV and weapons programs – Amanallah PAIDAR, commercial manager and procurement agent for the Defence Technology and Science Research Centre (DTSRC), which procured items with UAV applications such as inertial measurement units and attitude and heading reference systems; Murat BUKEY, Turkey national, procurement agent who supported Amanallah Paidar and his DTSRC-related procurement, utilizing his ownership in Ozone Havacilik Ve Savunma Sanayi Ticaret Anonim Sirketi (Ozone Aviation) and his dormant company Ozon Spor Ve Hobi Urunleri to facilitate the procurement of defense-related goods, including chemical and biological detection devices, as well as attempted to supply European-origin engines with UAV and surface-to-air missile applications to Amanallah Paidar and Farazan Industrial Engineering, Inc., while also selling numerous European-origin UAV engines and related accessories to companies likely involved in transshipping the items to Iran; Asghar MAHMOUDI, Iranian national who facilitated the supply of items, including marine electronics, to Amanallah Paidar and the Defence Technology and Science Research Centre (DTSRC), and separately provided various equipment to MODAFL UAV developers Qods Aviation Industries (QAI) and Iran Aircraft Manufacturing Industrial Company (HESA).
24 Mar 2023	Belarus	OFAC	<p>9 Belarussian individuals involved in the Lukashenka regime’s efforts to suppress democracy by cracking down on pro-democracy movements and civil society following the 2020 presidential election and to support Russia’s ongoing war against Ukraine:</p> <ul style="list-style-type: none"> <li>– 2 senior executives of Belarusian state-owned enterprises – Sergei Olegovich NIKIFOROVICH, Director of OJSC Belarusian Automobile Plant (BelAZ); Valery Valerievich IVANKOVICH, Director of OJSC Minsk Automobile Plant (MAZ);</li> <li>– 7 members of Central Election Commission of the Republic of Belarus (CEC) – Ihar Vasilyevich KARPENKA, Alena Anatolievna BALDOUSKAYA, Dzyanis Uladzimiravich DUK, Alena Kanstantsinauna KUNTSEVICH, Alyaksandr Henadzievich TKACHOU, Katsyaryna Alyaksandrauna FEDASENKA, and Alyaksandr Uladzimiravich YUZHYK.</li> </ul>



24 Mar 2023	Belarus	Department of State	Visa restrictions on 14 individuals, including regime officials, who were involved in implementing policies that posed a threat to and intimidated the Belarusian people.
30 Mar 2023	Russia	OFAC	Ashot MKRTYCHEV, Slovakian national, President of Versor S.R.O., the founder and owner of LLC Verus, and the sole director of Defense Engineering Limited Liability Partnership. who attempted to facilitate arms deals between Russia and the Democratic People's Republic of Korea (DPRK).

### United Kingdom

Date	Target country	Description
8 Feb 2023	Russia	8 individuals connected to Kremlin nefarious financial networks that help maintain wealth and power amongst Kremlin elites: – 6 <i>businesspeople</i> – Nikolai Dmitrievich EGOROV, Deputy Chairman of Antipinsky Oil Refinery JSC, the largest privately owned oil refinery in Russia, owner of Russian energy company Energetika Sodruzhestvo Uspekhn LLC; Svetlana Alexandrovna KRIVONOGIKH, shareholder in Bank Rossiya that, in turn, is a significant stakeholder in National Media Group; Viktor Evgenyevich MYACHIN, owner of Russian aircraft maintenance and repair company Aerostart; Alexander Evgenyevich REPIK, Chairman of the Board of Russian pharmaceutical company R-Pharm, Chairman of Delovaya Rossiya; Evgeny Mikhailovich SHKOLOV, former presidential aide and Deputy Chairman of the Board of Directors for JSC System Operator of the Unified Energy System (SO UES); Pavel Borisovich TITOV, the son of Boris Titov, Chairman of the Board of Directors of Abrau-Durso and President of Delovaya Rossiya (Business Russia), an association that represents entrepreneurial interests; – 1 <i>individual involved in Russia's disinformation and propaganda actions</i> – Sergei Olegovich RUDNOV, owner of pro-Kremlin Regnum News Agency; – 1 <i>official of federal executive bodies, government agencies</i> – Boris Yuryevich TITOV, Presidential Commissioner for Entrepreneurs' Rights.
9 Feb 2023	Russia	7 <i>Russian cyber criminals</i> associated with the development or deployment of a range of ransomware strains which have targeted the UK and US – Mikhail ISKRITSKIY, Valentin Olegovich KARYAGIN, Vitaliy Nikolayevich KOVALEV, Maksim Sergeevich MIKHAILOV, Dmitry PLESHEVSKIY, Valery Veniaminovich SEDLETSKI, Ivan Vasilyevich VAKHROMEYEV.
24 Feb 2023	Russia / Iran	80 individuals: – 17 <i>senior executives of Russian state-owned nuclear power enterprise Rosatom</i> – Larissa Igorevna BRYCHYOVA, Member of ROSATOM's Supervisory Board; Konstantin DENISOV, Member of ROSATOM's Management Board; Kirill Borisovich KOMAROV, Member of ROSATOM's Management Board; Sergey Borisovich KOROLEV, Member of ROSATOM's Supervisory Board; Oleg Vasilyevich KRYUKOV, Member of ROSATOM's Management Board; Aleksey Evgenyevich LIKHACHEV, Director General and Member of ROSATOM's Management Board; Alexander Markovich LOKSHIN, Member of ROSATOM's Management Board; Andrey Vladimirovich NIKIPELOV, Member of ROSATOM's Management Board; Alexander Valentinovich NOVAK, Member of ROSATOM's Supervisory Board; Sergey NOVIKOV, Member of ROSATOM's Management Board; Sergey Alexandrovich OBOZOV, Member of ROSATOM's Management Board; Yuri Alexandrovich OLENIN, Member of ROSATOM's Management Board; Andrei Yuvenalyevich PETROV, Member of ROSATOM's Management Board; Ilya Vasilevich REBROV, Member of ROSATOM's Management Board; Vyascheslav Vladimirovich RUKSHA, Member of ROSATOM's Management Board; Nikolai SPASSKIY, Member of ROSATOM's Management Board; Yuri Vladimirovich YAKOVLEV, Member of ROSATOM's Management Board; – 19 <i>senior executives of Russia's state-owned defence conglomerate Rostec</i> – Nikolay Valentinovich ANDRIANOV, Director for Special Assignments at Rostec; Vladimir Vladimirovich ARTYAKOV, First Deputy General Director of Rostec and member of the Management Board; Natalya Vladimirovna BORISOVA, Chief Accountant at Rostec and member of the Management Board; Vasily Yuryevich BROVKO, Director-at-Large and Deputy Head of the Committee for the Implementation of National Projects – Rostec; Oleg Nikolaevich EVTUSHENKO, Executive Director and member of Rostec's Management Board; Victor Nikolayevich KIRYANOV, Managing Director for Infrastructure Projects at Rostec and member of Rostec's Management Board; Yury Nikolayevich KOPTEV, Chairman of the Scientific and Technical Council at Rostec and member of Rostec's Management Board; Dmitry Yuryevich LELIKOV, Deputy General Director at Rostec and member of Rostec's Management Board; Vladimir Zalmanovich LITVIN, Organisational Managing Director at Rostec and member of Rostec's Management Board; Aleksandr Yuryevich NAZAROV, Deputy General Director at Rostec and member of Rostec's Management

Board; Pavel Mikhaylovich OSIN, Director for Legal Support at Rostec; Aleksandr Nikolaevich POPOV, Director for Special Assignments at Rostec; Anatoliy Eduardovich SERDYUKOV, Industrial Director of Aviation Complex at Rostec and a member of Rostec's Management Board; Elena Oduliovna SIERRA, Managing Director for Construction Control at Rostec and a member of Rostec's Management Board; Natalya Ivanova SMIRNOVA, Director of Internal Audit at Rostec; Sergey Anatolyevich TSYB, Secretary of State at Rostec and member of Rostec's Management Board; Nikolai Anatolevich VOLOBUEV, Deputy General Director at Rostec and member of Rostec's Management Board; Maksim Vladimirovich VYBORNYYKH, Deputy General Director at Rostec and member of Rostec's Management Board; Igor Nikolaevich ZAVYALOV, Deputy General Director at Rostec and member of Rostec's Management Board;

– *15 senior executives of Russian state-owned enterprise Almaz-Antey Corporation*, specialising in producing surface to air missiles and firearms for aircrafts – Boris Mikhailovich BELOTSEKOVSK, Deputy General Director for Economics and Production Cost Management; Sergey Valentinovich DRUZIN, Deputy General Director for Scientific and Technical Development; Viacheslav Karlovich DZIRKALN, Deputy General Director for Foreign Economic Affairs; Vitaly Ivanovich KNYAZEV, Deputy General Director for General Issues; Vladimir Anatolievich KONOVALOV, Deputy General Director for Legal Affairs; Alexander Georgievich KOVAL, Deputy General Director for Strategic Development; Vitaly Vladimirovich NESKORODOV, Deputy General Director for Orders and Supply of Military Products; Yan Valentinovich NOVIKOV, CEO, Chairman of the Management Board, General Director; Mikhail PODVYAZNIKOV, Deputy General Director – Director of SZRTs; Dmitry Vladimirovich SAVITSKY, Deputy General Director for Air Navigation System Products and Dual-Use Products; Pavel Alekseevich SOZINOV, Deputy General Director - General Designer; Rustam Faridovich ULUMBKOV, Deputy General Director – Financial Director; Oleg Vitalievich VAVILOV, Deputy General Director for Capital Construction; Alexander Anatolievich VEDROV, Deputy General Director for Production and Technological Policy; Nikolay Yuryevich ZAKHRYAPIN, Deputy General Director for Regime and Security;

– *11 senior executives of Gazprom* – Elena Viktorovna BURMISTROVA, Deputy Chairman of the Gazprom Management Committee, Director General of Gazprom Export; Sergey Fedorovich KHOMYAKOV, Deputy Chairman of the Management Committee, Director General of the Corporate Security Service of Gazprom; Sergey Ivanovich KUZNETS, Member of the Management Committee of Gazprom; Vitaly Anatolyevich MARKELOV, Deputy-Chairman of the Management Board of Gazprom, Executive Director Gazprom; Vladimir Konstantinovich MARKOV, Member of the Management Committee of Gazprom; Viktor Georgievich MARTYNOV, Independent Director at Gazprom, Rector of the Gubkin Russian State University of Oil and Gas; Sergey Nikolaevich MENSHIKOV, Member of the Management Committee of Gazprom; Vyacheslav Alexandrovich MIHALENKO, Member of the Management Committee of Gazprom; Elena Vladimirovna MIHAYLOVA, Member of the Management Committee of Gazprom; Gennady Nikolaevich SUKHOV, Member of the Management Committee of Gazprom; Viktor Alexeevich ZUBKOV, Former Deputy Prime Minister, Chairman of the Board of Directors at Gazprom;

– *9 senior executives of Aeroflot* – Sergey Vladimirovich ALEKSANDROVSKY, CEO of Aeroflot-Russian Airlines PJSC; Andrey Yurevich CHIKHANCHIN, Member of Aeroflot-Russian Airlines PJSC Management Board; Igor KAMENSKOY, Member of the Board of Directors Aeroflot-Russian Airlines PJSC; Maksim LIKSUTOV, Member of the Board of Directors of Aeroflot-Russian Airlines PJSC, Deputy Mayor of the Government of Moscow; Timur MAKSIMOV, Member of the Board of Directors of Aeroflot-Russian Airlines PJSC, Deputy Finance Minister of Russia; Georgiy Nikolaevich MATVEEV, Member of Aeroflot Russian Airlines PJSC Management Board; Roman PAKHOMOV, Member of the Board of Directors Aeroflot-Russian Airlines PJSC; Dmitry PESKOV, Member of the Board of Directors of Aeroflot-Russian Airlines PJSC; Maksut SHADAYEV, Non-Executive Director of Aeroflot-Russian Airlines PJSC, Minister of Digital Development, Communications and Mass Media of Russia;

– *5 senior executives of Iranian entities involved in the elaboration, production and supply of drones to Russia* – Vali ARLANIZADEH, Board member of Qods Aviation Industry (QAI); Ghassem DAMAVANDIAN, Managing Director of Qods Aviation Industry (QAI); Reza KHAKI, Board Member of Qods Aviation Industry (QAI); Majid Reza NIYAZI-ANGILI, Board Member of Qods Aviation Industry (QAI); Hamidreza SHARIFI-TEHRANI, Board Member of Qods Aviation Industry (QAI);

– *4 Putin's closest allies* – Mattias Artur WARNIG, CEO of Nord Stream 2, and previously a member of the boards of Russian energy companies Transneft and Rosneft, Lyubov Mikhailovna KABAEVA, mother of former Russian gymnast and Duma Deputy, Chair of National Media Group (NMG) Alina Kabaeva; Alexei Nikolaevich KOZAK, son of the former Deputy Prime Minister and Putin ally Dmitry Kozak, member of ROSATOM's Management Board; Alexei Gennadyevich DYUMIN, governor of Tula Oblast, former chief security guard to President Putin who has been actively involved in supporting the Russian military in Ukraine, including launching and facilitating a drone training school for Russian troops.

17 Mar 2023	Russia	Removal of Brian McDonald, head of Russia desk for the English language edition of RT (formerly Russia Today), from the UK Russia sanctions list.
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### European Union

Date	Target country	Description
6 Feb 2023	Russia	Removal of Dmitry Vladimirovich OVSYANNIKOV, a former Governor of Sevastopol, from the EU's Russia sanctions list after the September 2020 to March 2022 acts maintaining his designation were annulled by the General Court in October 2022.
25 Feb 2023	Russia, Iran	<p>87 individuals:</p> <ul style="list-style-type: none"> <li>– <i>4 members of the Federation Council of Russia</i> – Olga Yevgenyevna BAS, Member of the Federation Council of Russia since 20 December 2022, as the representative of the illegally annexed so-called “Luhansk People’s Republic”; Konstantin Vladimirovich BASYUK, Member of the Federation Council of Russia since 20 December 2022, as the representative of the illegally annexed Kherson region; Dmitry Nikolayevich VORONA, Member of the Federation Council of the Russian Federation since 20 December 2022, as the representative of the illegally annexed Zaporizhzhia region, Former CEO of the Crimea Development Corporation; Dariya Sergeevna LANTRATOVA, Deputy Secretary of the General Council of the “United Russia” Party, Member of the Federation Council of Russia since 20 December 2022, as the representative of the illegally annexed so-called “Luhansk People’s Republic”;</li> <li>– <i>4 members of the State Duma of Russia</i> – Tatiana Petrovna LARIONOVA; Oleg Alexeyevich MIKHAILOV; Zelimkhan Alikoevich MUTSOEV; Vladimir Viktorovich PAVLOV;</li> <li>– <i>20 members of the Government of Russia</i> – Vasiliy Sergeevich OSMAKOV, Deputy Minister of the Ministry of Industry and Trade; Oleg Evgenievich BOCHAROV, Deputy Minister of Industry and Trade; Kirill Alekseevich LYSOGORSKY, Deputy Minister of Industry and Trade; Vasily Viktorovich SHPAK, Deputy Minister of Industry and Trade; Alexey Sergeevich BESPROZVANNYKH, Deputy Minister of Industry and Trade; Ekaterina Gennadiyevna PRIEZZHEVA, Deputy Minister of Industry and Trade; Albert Anvarovich KARIMOV, Deputy Minister of Industry and Trade; Viktor Leonidovich YEVTUKHOV, Deputy Minister of Industry and Trade, and State Secretary of Ministry of Industry and Trade; Aleksey Aleksandrovich UCHENOV, Deputy Minister of Industry and Trade; Mikhail Igorevich IVANOV, Deputy Minister of the Ministry of Industry and Trade; Tatyana Alexandrovna ILYUSHNIKOVA, Deputy Minister of the Russian Ministry of Economic Development; Polina Viktorovna KRYUCHKOVA, Deputy Minister of the Russian Ministry of Economic Development; Vladimir Evgenievich ILYICHEV, Deputy Minister of the Russian Ministry of Economic Development; Ilya Eduardovich TOROSOV, Deputy Minister of the Russian Ministry of Economic Development; Aleksey Igorevich KHERSONTSEV, Deputy Minister of the Russian Ministry of Economic Development; Sergey Makarovich NAZAROV, Deputy Minister of the Russian Ministry of Economic Development; Dmitriy Valer'yevich VOLVACH, Deputy Minister of the Russian Ministry of Economic Development; Dmitriy Sergeevich VAKHRUKOV, Deputy Minister of the Russian Ministry of Economic Development; Murat Anatolyevich KEREFOV, Deputy Minister of the Russian Ministry of Economic Development; Maxim Andreevich KOLESNIKOV, Deputy Minister of the Russian Ministry of Economic Development;</li> <li>– <i>1 official of the Administration of the President of Russia</i> – Vyacheslav Nikolaevich SMIRNOV, Advisor to the Deputy Head of the State Council of the Presidential Administration;</li> <li>– <i>2 senior officials of federal executive bodies, government agencies</i> – Vladimir Ivanovich BULAVIN, Head of the Federal Customs Service of Russia; Tatiana Nikolaevna MOSKALKOVA, Commissioner for Human Rights of Russia;</li> <li>– <i>25 individuals involved in Russia’s disinformation and propaganda actions</i> – Yevgeny Alexandrovich PRIMAKOV, Head of the Federal Agency for the Commonwealth of Independent States, Compatriots Living Abroad and International Humanitarian Cooperation (Rossotrudnichestvo); Alexey Gennadyevich KOMISSAROV, Co-Chairman of the Central Headquarters of the All-Russia People’s Front; Leonid Mikhailovich ROSHAL, Co-Chairman of the Central Headquarters of the All-Russia People’s Front; Elena Vladimirovna SHMELEVA, Co-Chairman of the Central Headquarters of the All-Russia People’s Front, Head of the educational fund “Talent and Success”, Chairman of the Sirius Federal Territory Council; Mikhail Mikhailovich KUZNETSOV, Head of the Executive Committee of the All-Russia People’s Front; Sergei Olegovich GORBUNOV, Deputy Head of the Executive Committee of the All-Russia People’s Front; Yulia Alexandrovna BELEKHOVA, Member of the Presidential Council for Civil Society and Human Rights, Head of the Moscow regional branch of the pro-Putin political coalition, the All-Russia People’s Front; Oleg Aleksandrovich TERLIAKOV, Deputy Head of the Russian Federal Service for</li> </ul>

Supervision of Communications Information Technology and Mass Media (Roskomnadzor); Vadim Alekseevich SUBOTIN, Deputy Head of the Russian Federal Service for Supervision of Communications Information Technology and Mass Media (Roskomnadzor); Alexandr Semenovich BROD, Member of the Presidential Council for the Development of Civil Society and Human Rights, Chairman of the coordinating council of the All-Russian public organisation “Lawyers for the rights and worthy life of a person”; Valery Aleksandrovich FADEYEV, journalist, former secretary of the Civic Chamber of the Russian Federation and incumbent Chairman of the Presidential Council for Civil Society and Human Rights; Igor Stanislavovich ASHMANOV, Member of the Presidential Council for Civil Society and Human Rights, Information Technology expert, CEO of Ashmanov & Partners and President of Kribrum; Kirill Valeryevich VYSHINSKY, Member of the Presidential Council for Civil Society and Human Rights, Executive Director of the Rossiya Segodnya Media Group; Alexandr Igorevich KOTS, Member of the Presidential Council for Civil Society and Human Rights, Special correspondent of Komsomolskaya Pravda; Marina Magomednebiyevna AKHMEDOVA, writer and journalist, editor of the online edition of Regnum, Vice editor-in-chief of the Russkiy Reporter magazine; Maxim Adolfovich ZAMSHEV, Member of the Presidential Council for Civil Society and Human Rights, Editor-in-Chief of Literaturnaya Gazeta; Nikolai Fyodorovich IVANOV, Member of the Presidential Council for Civil Society and Human Rights, Chairman of the Board of the All-Russian public organisation “Union of Writers of Russia”; Kirill Alekseevich KLEIMENOV, Deputy Director General, Director of the Information Programmes Directorate, Member of the Board of Directors of Channel One (Pervyi Kanal); Alexander Zavenovich AKOPOV, Deputy CEO of “National Media Group”; Evgeniy Vladimirovich BEKASOV, Editor-in-chief of Rossiya 24 TV Channel; Milosh Eduardovich WAGNER, Deputy Head of the Russian Federal Service for Supervision of Communications Information Technology and Mass Media (Roskomnadzor); Vladimir Viktorovich LOGUNOV, Deputy Head of the Russian Federal Service for Supervision of Communications Information Technology and Mass Media (Roskomnadzor); Yakov Iosifovich KAZAKOV, former politician and diplomat who is a regular participant on State TV and pro-Kremlin talk shows; Sergey Yervandovich KURGINYAN, Russian politician and founder and leader of a Russian movement “Essence of Time”; Vitaliy Tovievich TRETYAKOV, Russian journalist and political scientist, the Dean of Higher School of Television at M.V. Lomonosov Moscow State University;

– *3 individuals responsible for the illegal transfer, deportation and forced adoption of Ukrainian children* – Lenara Khakimovna IVANOVA, Deputy prime minister of the government of the Republic of Bashkortostan and minister of family, labour and social protection of the Republic of Bashkortostan; Vyacheslav Vyacheslavovich DUKHIN, Deputy Head of the Moscow Oblast Duma; Viktoria Vyacheslavovna YAKIMOVA, Chair of the Board of the Gulfstream Foundation and contributor to Russia’s so-called “charitable” action “Into the Hands of Children”;

– *8 so-called officials in areas of Ukraine illegally occupied by Russian forces or controlled by Russian-backed proxies* – Gleb Leonidovich MIKHAILOV, Prosecutor of the so-called “Luhansk People’s Republic” appointed by the President of Russia; Kirill Nikolaevich OSIPCHUK, Prosecutor of the illegally annexed Zaporizhzhia region appointed by the President of Russia; Andrey Yuryevich PETROV: Prosecutor of the Kherson region appointed by the President of Russia; Andrey SPIVAK, Prosecutor of the illegally annexed “Donetsk People’s Republic” appointed by the President of Russia; Alexey Nikolaevich PARIKIN, “First Deputy Governor” of the illegally annexed City of Sevastopol, previously “Deputy Governor” of the illegally annexed City of Sevastopol; Sergey Yurievich TOLMACHEV, “Deputy Governor” of the illegally annexed “Zaporizhzhia region”; Andriy Yuriovich TROFIMOV, so-called deputy head of the Russian temporary controlled military-civilian administration in the Zaporizhzhia region and Head of the Crimean Union of Journalists; Pavlo Igorovich FILIPCHUK, so-called Head of the seized city of Kakhovka;

– *3 military officials* – Alexander Vladimirovich NOVIKOV, Major-General, Head of the Directorate for construction and development of unmanned aerial vehicles; Nikolay Mikhailovich PARSHIN, Lieutenant-General, Head of the Main Rocket and Artillery Directorate of the Ministry of Defense of Russia; Vladimir Viktorovich SELIN, Director of the Federal Service for Technical and Export Control;

– *10 military leaders* – Alexander Semyonovich SANCHIK, Lieutenant General, Commander of the 35th Combined Arms Army; Alexey Vyacheslavovich AVDEEV, Major-General, Commander of the 3rd Vislenskaya Red Banner Order of Suvorov and Kutuzov Motor Rifle Division; Evgeny Nikolaevich ZHURAVLEV, Major-General, Commander of the Guards 4th (Kantemirovskaya) Tank Division of the Tank Army of the Western Military District; Georgy Ivanovich SHUVAEV, Colonel, Head of Missile Troops and Artillery of the 1st Tank Army of the Western Military District of the Russian Armed Forces; Mikhail Mikhailovich MATVEEVSKY, Lieutenant General, Head of Missile Troops and Artillery of the Ground Forces of Russia; Mikhail Stepanovich ZUSKO, Lieutenant-General, Chief of staff of the “West” grouping and Former Commander of the 58th Combined Arms Army of the Southern Military District; Mikhail Yuryevich TEPLINSKIY, Colonel-General, Commander of Airborne Forces of the Armed Forces of Russia; Oleg Yurievich TSOKOV, Major-General, Commander of the 144th Motor

		Rifle Division of the 20th Combined Arms Army of the Armed Forces of Russia; Ramil Rakhmatulovich IBATULLIN, Major-General, Commander of the 90th Guards Tank Division; Sergey Viktorovich KARAKAEV, Colonel-General, Commander of the Strategic Missile Forces; – <i>2 representatives of illegal military entity waging war on behalf of Russia</i> – Hayk Arsenovich GASPARYAN, Commander of the assault forces of the Wagner group during the battle of Soledar in Ukraine; Anton Olegovich ELIZAROV, military commander of the <i>Wagner</i> Group; – <i>4 senior executives of Iranian entities involved in the elaboration of drones and components supporting Russia's military</i> – Abualfazi NAZERI, Vice Chairman of the Board of Paravar Pars Company; Abulghasem VALAGOHAR, Member of the Board of Paravar Pars Company; Hossein SHAMSABADI, Managing Director and CEO of Paravar Pars Company; Ghassem DAMAVANDIAN, Member of the Board of Directors of Qods Aviation Industries; – <i>1 Ukrainian collaborator businessperson</i> – Vyacheslav Oleksandrovykh BOGUSLAYEV, General director of JSC MOTOR SICH, former member of the Ukrainian parliament.
25 Feb 2023	Russia	9 persons who are members and supporters of Russia's mercenary Wagner Group and its activities in other countries, – <i>8 individuals involved in serious human rights abuses in the Central African Republic and Sudan</i> – Maxim SHUGALEY, Head of Foundation for the Defence of National Values (FDNV) who works directly under the supervision of Yevgeny Prigozhin; Aleksandr Grigorievitch MALOLETKO, close collaborator of Yevgeny Prigozhin, Head of the “Veteran’s Interests Defenders League”, an instructor for the Wagner Group in the Central African Republic (CAR); Konstantin Alexandrovich PIKALOV, one of the PMC Wagner Group Commanders in Africa, notably in the Central African Republic (CAR); Dimitri SYTII, Director of the Russian house of Bangui, which is the cultural arm of the Russian foreign ministry, leading figure in the Wagner Group's operations in the Central African Republic (CAR) responsible for conducting the group's influence policy in the country; Mikhail Sergeyeovich POTEPKIN, director of Meroe Gold, a cover entity for the Wagner Group's operations in Sudan, where he secured the exploiting and exporting of gold to Russia through affiliation with the Sudanese military; Alexander Alexandrovich IVANOV, Representative of the Wagner Group instructors in the Central African Republic; Vitalii Viktorovitch PERFILEV, security advisor to the President of the Central African Republic (CAR), a key figure within the Wagner Group in CAR; Andrei Sergeevich MANDEL, head of M-Invest, a cover entity for the Wagner Group's operations in Sudan; – <i>1 person involved in actions that threaten the peace, security, or stability of Mali</i> – Ivan Aleksandrovitch MASLOV, head of the Wagner Group in Mali.
7 Mar 2023	Russia	<i>4 Russian police officers and members of the armed forces involved in serious human rights violations in Ukraine or against anti-war protesters in Russia</i> – Alexander Georgievich FEDORINOV, Lieutenant Colonel, commanding officer of Moscow Police Station; Ivan RYABOV, police officer of Moscow Police Station; Nikolay Anatolevich KUZNETSOV, Major-General, commander of the Dzerzhinsky division special forces unit of Rosgvardia (Federal Service of National Guard Troops of the Russian Federation); Ramil Rakhmatulovich IBATULLIN, Colonel, former commander of the 90th guards tank division.
13 Mar 2023	Russia / Ukraine n TOT	Removal of 3 deceased persons from the EU sanctions list – Nikolay Yurevich PETRUNIN, Vladimir Nikolayevich SUNGORKIN, Kyrilo Sergiyovitch STREMOUSOV.

#### Canada

Date	Target country	Description
2 Feb 2023	Russia	<i>38 individuals involved in Russia's disinformation and propaganda actions</i> – Sergey Borisovich BRILEV, Russian journalist and TV presenter, public figure, head of the studio "Sergei Brilev's Author's Program" (since September 2022), deputy general director of the state-owned Rossiya TV channel for special information projects; Mikhail Nikolaevich PETROV, Deputy General Director - Chief Editor of the Federal State Unitary Enterprise IA "Information Telegraph Agency of Russia (ITAR-TASS)"; Dmitry Sergeevich GORNOSTAEV, Deputy editor-in-chief of the Rossiya Segodnya international news agency; Tatiana Rostislavovna MITKOVA, editor-in-chief of the NTV information service department; Andrei Ivanovich KOLESNIKOV, journalist, publicist, editor, the editor-in-chief of the Russian Pioneer magazine; Alexander Evseevich KHINSHTAIN, Deputy of the State Duma, Chairman of the Committee of the State Duma on Information Policy, Information Technologies and Communications; Andrei Vladimirovich NORKIN, Russian journalist, media manager, TV and radio host;

		<p>Mikhail Sergeevich BOYARSKY, actor, public opinion leader; Andrey Georgievich BYSTRITSKY, Russian journalist, media manager, Dean of the Faculty of Communications, Media and Design of the National Research University Higher School of Economics, Chairman of the Board of the Foundation for Development and Support of the Valdai Discussion Club; Evgeny Evgenevich PODDUBNY, Russian military journalist, author and presenter of the War program on the Rossiya-24 TV channel; Valeriya Pavlovna KALABAYEVA, journalist, contributor to "SouthFront"; Aleyona Anatolyevna CHUGULEVA, SouthFront Employee; Marat Alimzhanovich BASHAROV, Russian actor and TV presenter; Nikolay Victorovich BASKOV, popular singer and TV host; Dima Nikolaevich BILAN, singer, composer, actor; Sergey Stanislavovich BOBUNETS, rock musician, poet, producer; Nikolay Vyacheslavovich RASTORGUYEV, vocalist, soloist of the Russian group "Lyube", confidant of Vladimir Putin; Oleg Mikhaylovich GAZMANOV, singer; Alexander Vitalievich MARSHAL, singer, composer, TV host; Polina Sergeevna GAGARINA, actress, singer, composer, fashion model; Nadezhda Georgievna BABKINA, singer; Alexander Nikolaevich BUINOV, singer, film actor, musician, composer, showman; Dana Alexandrovna BORISOVA, actress, journalist, TV presenter; Sergey Alexandrovich KARAGANOV, political scientist and economist, founder and Chairman of the Editorial Board of the magazine "Russia in Global Politics", Academic Supervisor of the Faculty of World Economy and International Affairs, National Research University Higher School of Economics, Honorary Chairman of the Presidium of the Council on Foreign and Defense Policy; Yevgeniy Eduardovich GLOTOV, Deputy director of "News Front"; Aleksandr Viktorovich IONOV, President and founder of the Anti-Globalization Movement of Russia (AGMR), domain owner STOP-Imperialism; Maksim Iosifovich KRANS, journalist; Nina Viktorovna DOROKHOVA, General Director of LLC IA "Inforos"; Anastasiya Sergeevna KIRILLOVA, CEO of InfoRos; Irina Aleksandrovna ALLEGROVA, pop singer, actress; Maksim Viktorovich AVERIN, theater and film actor, director, TV presenter; Timofei Viacheslavovich BORDACHEV, political scientist, Director of the Center for Comprehensive European and International Studies, Faculty of World Economy and World Politics, Higher School of Economics, Program Director of the Valdai Club; Igor Mikhailovich BUTMAN, member of the General Council of the UNITED RUSSIA Party, saxophonist, Artistic Director of the Moscow Jazz Orchestra; Larisa Aleksandrovna DOLINA, pop singer, actress; Dmitriy Petrovich DYUZHEV, theater and film actor, film director; Victoria Petrovna DAINEKO, singer and actress; Mikhail Sergeevich GALUSTYAN, actor-comedian, screenwriter, film producer, television host, singer; Vladimir Ilich MAKSIMENKO, Director at the online magazine Strategic Culture Foundation.</p>
23 Feb 2023	Russia	<p>129 individuals:  – <i>8 members of the Government of Russia</i> – Andrei Removich BELOUSOV, First Deputy Prime Minister of Russia; Viktoria Valeriyevna ABRAMCHENKO, Deputy Prime Minister of Russia; Dmitry Nikolayevich CHERNYSHENKO, Deputy Prime Minister of Russia; Tatyana Alekseyevna GOLIKOVA, Deputy Prime Minister of Russia; Marat Shakirzyanovich KHUSNULLIN, Deputy Prime Minister of Russia; Alexei Logvinovich OVERCHUK, Deputy Prime Minister of Russia; Vitaly Gennadyevich SAVELYEV, Minister of Transport of Russia; Irek Envarovich FAIZULLIN, Minister of Construction and Housing and Communal Services of Russia;  – <i>87 members of State Duma of Russia</i> – Veronika Valerievna VLASOVA, Evgeny Evgenievich MARCHENKO, Oksana Genrikhovna DMITRIEVA, Otary Ionovich ARSHBA, Larisa Nikolaevna BURANOVA, Artur Nikolaevich CHILINGAROV, Vyacheslav Anatolievich DAMDINTSURUNOV, Alexey Vasilievich GORDEYEV, Vladimir Vladimirovich GUTENEV, Raisa Vasilievna KARMAZINA, Artem Alexandrovich KAVINOV, Olga Mikhailovna KAZAKOVA, Gleb Yakovlevich KHOR, Dmitry Anatolievich KHUBEZOV, Artem Yurievich KIRYANOV, Lev Igorevich KOVPAK, Andrey Leonidovich KRASOV, Rizvan Daniyalovich KURBANOV, Eduard Anatolievich KUZNETSOV, Anna Yurievna KUZNETSOVA, Tatiana Petrovna LARIONOVA, Andrey Mikhailovich MAKAROV, Oleg Anatolievich MATVEICHEV, Artem Pavlovich METELEV, Oleg Victorovich MOROZOV, Evgeny Sergeevich MOSKVICHEV, Zelimkhan Alikoevich MUTSOEV, Victoria Victorovna NIKOLAEVA, Marat Abdulhaevich NURIEV, Marina Eduardovna ORGEYEVA, Vladimir Victorovich PAVLOV, Alexander Petrovich PETROV, Victor Vitalievich PINSKY, Vasily Ivanovich PISKAREV, Alexander Alekseevich POLYAKOV, Svetlana Victorovna RAZVOROTNEVA, Evgeny Vasilievich REVENKO, Dmitry Vadimovich SABLIN, Alexander Mikhailovich SHOLOKHOV, Dmitry Stanislavovich SKRIVANOV, Ivan Alexandrovich SOLODOVNIKOV, Tatiana Vasilievna SOLOMATINA, Yuri Arkadievich STANKEVICH, Alexander Mikhailovich STRELYUKHIN, Valentina Vladimirovna TERESHKOVA, Olga Victorovna TIMOFEYEVA, Alexey Nikolaevich TKACHEV, Alexander Romanovich TOLMACHEV, Maxim Anatolievich TOPILIN, Vladislav Alexandrovich TRETIAK, Saygidpasha Darbishevich UMAKHANOV, Dzhasharbek Borisovich UZDENOV, Alexey Anatolievich VOLOTSKOV, Elena Andreyevna VTORYGINA, Dmitry Fedorovich VYATKIN, Elena Alexandrovna YAMPOLSKAYA, Irina Anatolievna YAROVAYA, Konstantin Fedorovich ZATULIN, Pavel Nikolaevich ZAVALNY, Victor Mikhailovich ZAVARZIN, Alexander Dmitrievich ZHUKOV, Georgy Konstantinovich ARAPOV, Sardana</p>

		<p>Vladimirovna AVKSENTIEVA, Olga Nikolaevna ALIMOVA, Mikhail Nikolaevich BERULAVA, Roza Basirovna CHERMERIS, Alexey Vasilievich CHEPA, Vladislav Andreyevich DAVANKOV, Alexander Vyacheslavovich DEMIN, Elena Grigorievna DRAPEKO, Ksenia Alexandrovna GORYACHEVA, Maxim Alexeyevich GULIN, Anatoly Nikolaevich GRESHNEVIKOV, Sholban Valerievich KARA-OOL, former Head of the Republic of Tuva, Amir Makhsudovich KHAMITOV, Dmitry Nikolaevich KOBYLKIN, Robert Ivanovich KOCHIEV, Oleg Yurievich LEONOV, Oleg Alexeyevich MIKHAILOV, Nikolay Vladimirovich NOVICHKOV, Svetlana Evgenievna SAVITSKAYA, Rifat Gabdulkhakovich SHAYKHUTDINOV, Vladimir Vladimirovich PLYAKIN, Alla Viktorovna POLYAKOVA, Grigory Vladimirovich SHILKIN, Sangadzhi Andreyevich TARBAEV, Anton Olegovich TKACHEV;</p> <p>– 1 <i>representative of the judicial authority</i> – Valery Dmitrievich ZORKIN, Chairman of the Constitutional Court of the Russia;</p> <p>– 2 <i>officials of the Administration of the President of Russia</i> – Larisa Igorevna BRYCHYOVA, Assistant to the President of Russia - Head of the State Legal Department of the President of Russia; Maxim Stanislavovich ORESHKIN, Assistant to the President of Russia;</p> <p>– 1 <i>bank official</i> – Andrey Nikolayevich KLEPACH, Chief Economist of VEB.RF, Chairman of the Public Council under Rosstat;</p> <p>– 2 <i>military officials</i> – Mikhail Viktorovich BABICH, Major General, Deputy Director of the Federal Service for Military-Technical Cooperation; Alexander Leonidovich LINETS, Head of the Main Directorate for Special Programs of the President of Russia;</p> <p>– 3 <i>military leaders</i> – Igor Anatolyevich KIRILLOV, Lieutenant General, Head of the Radiation, Chemical and Biological Protection Troops of the Armed Forces of Russia, Alexey Yurevich AVDEEV, Lieutenant General, Deputy Commander of the Southern Military District; Rustam Usmanovich MURADOV, Colonel General, Commander of the Eastern Military District;</p> <p>– 5 <i>businesspersons and senior managers</i> – Alexei Alexandrovich MORDASHOV, Chairman of Severstal and Severgroup; Andrey Igorevich MELNICHENKO, Non-Executive Director of SUEK JSC, Member of the Board of Directors of EuroChem Group; Vladimir Viktorovich KHRISTENKO, President of "Nanolek" LLC; God Semenovich NISANOV, Chairman of the Board of Directors of the Kyiv Ploshchad company; Sergey Nikolayevich ARTEMYEV, General Director of JSC "AEROPRIBOR-VOSHOD";</p> <p>– 3 <i>senior executives of Russian state-owned enterprises</i> – Yury Ivanovich BORISOV, Director General of Roscosmos; Larisa Vyacheslavovna KALANDA, Vice President of Transneft; Mikhail Feliksovich SHEBAKPOLSKIY, CEO of "Design Bureau "Luch" JSC;</p> <p>– 12 <i>family members of previously sanctioned persons</i> – Nadezhda Sergeevna KIRIYENKO, daughter of Sergei Kiriyenko; Maria Vladislavovna KIRIYENKO, wife of Sergei Kiriyenko; Lyubov Sergeevna KIRIYENKO, daughter of Sergei Kiriyenko; Ilya Dmitrievich MEDVEDEV, son of Dmitry Medvedev; Svetlana Vladimirovna MEDVEDEVA, wife of Dmitry Medvedev; Aleksandra MELNICHENKO, wife of Andrei Melnichenko; Tabarik Ramzanovna KADYROVA, daughter of Ramzan Kadyrov; Marina Alexandrovna MORDASHOVA, Wife of Alexei Mordashov; Ilya Alekseevich MORDASHOV, son of Alexei Mordashov; Kirill Alekseevich MORDASHOV, son of Alexei Mordashov; Nikita Alekseevich MORDASHOV, son of Alexei Mordashov; Viktor Borisovich KHRISTENKO, husband of the Deputy Prime Minister of Russia Tatyana Golikova, President of the Business Council of the Eurasian Economic Union;</p> <p>– 1 <i>governor</i> – Igor Yurievich BABUSHKIN, Member of the State Council of Russia, Governor of the Astrakhan region;</p> <p>– 1 <i>individual involved in Russia's disinformation and propaganda actions</i> – Margarita Arvitovna LYANGE, member of the Council under the President of Russia for Interethnic Relations, member of the Public Council of the Federal Agency for Ethnic Affairs of Russia, expert of the advisory council of the Interdepartmental Working Group on Interethnic Relations of the Government of Russia and the Committee on Nationalities of the State Duma of the Federation Council of Russia, Academician of the Eurasian Academy of TV and Radio, Deputy Chairman of the Council of the Assembly of Peoples of Russia, President of the Guild of Interethnic Journalism, Editor-in-Chief of the National Accent portal;</p> <p>– 2 <i>senior officials of federal executive bodies, government agencies</i> – Vladimir Alexandrovich KALANDA, First Deputy Director of the Federal Drug Control Service; Yury Anatolyevich CHIKHANCHIN, Member of National Financial Board of Central Bank of the Russian, Director of the Federal Financial Monitoring Service;</p> <p>– 1 <i>other person</i> – Umar SUGAIPOV, Chechen individual who is considered involved in the assassination attempt on Akhmed Zakayev.</p>
27 Mar 2023	Iran	<p>3 <i>individuals</i>:</p> <p>– 2 <i>senior executives of Iranian entities involved in the elaboration, production and supply of drones to Russia</i> – Ghassem DAMAVANDIAN, Managing Director of Qods Aviation Industries (QAI); Hamidreza SHARIFI-TEHRANI, member of the Board of Directors of Qods Aviation Industries (QAI);</p>

		– 1 senior official involved in unmanned aerial vehicle and ballistic missile production in Iran – Nader Khoon SIAVASH, Director of Iran's Aerospace Industries Organization (AIO).
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#### Japan

Date	Target country	Description
28 Feb 2023	Russia / Ukrainian TOT	<p>39 individuals:</p> <ul style="list-style-type: none"> <li>– 1 member of the Government of Russia – Viktor GOREMIYKIN, Deputy Minister of Defence of Russia and Head of the Main Military-Political Directorate of the Armed Forces of Russia;</li> <li>– 31 military officials, namely members and executives of the Missile Pre-Planning unit at the Main Computing Centre of the General Staff of Russia's Armed Forces General Staff – Georgiy STAROSTIN, member; Sergey ILIN, member; Yuriy NIKONOV, member; Ekaterina CHUGUNOVA, member; Igor GROZA, member; Ivan POPOV, member; Matvey LYBAVIN, member; Roman KUROCHKIN, member; Dmitri TIKHONOV, member; Nikolay TARASOV, member; Anton SHATUN, member; Alexey BETEKHTIN, member; Anton CHULIKOV, member; Artyom CHERNOV, member; Stanislav MINKOV, member; Alexey VOLKOV, member; Andrey IVANYUTIN, member; Olga PISMENSKAYA, member; Pavel VASILYEV, member; Alexey MIKHAYLOV, member; Elvira OBUKHOVA, member; Pavel OBUKHOV, member; Vitaly YASKELAYNEN, member; Alexandr GREGORYAN, member; Artyom VEDENOV, member; Nikita POPLAVSKIY, member; Vladimir PETROV, member; Evgeniy KAPSHUK, Commander; Anton TIMOSHINOV, Commander; Igor BAGNYUK, Commander; Robert BARANOV, Commander;</li> <li>– 2 officials of the Administration of the President of Russia – Aleksander KHARICHEV, Head of the Division of Operation of the State Council in the Administration of the President of Russia; Boris RAPOPORT, Deputy Head of the Division of Operation of the State Council in the Administration of the President of Russia;</li> <li>– 1 family member of previously sanctioned person – Turpal-Ali IBRAGIMOV, Relative of Ramzan Kadyrov;</li> <li>– 2 businesspeople – Alan LUSHNIKOV, the largest shareholder of JSC Kalashnikov Concern; Aleksei MALYAREVICH, founder and CEO of Charter Green Light;</li> <li>– 2 representatives of illegal military entity waging war on behalf of Russia – Denis GARIYEV, Head of the "Russian Imperial Legion"; Stanislav VOROBYOV, Head of the Russian Imperial Movement;</li> <li>– 9 so-called officials in areas of Ukraine illegally occupied by Russian forces or controlled by Russian-backed proxies – Andriy ALEKSEENKO, self-proclaimed "Head of the authorities in the Kherson region"; Volodymyr BOBRYSHEV, former self-proclaimed "Head of the Human Resources Department of the Kherson Region Ministry of Internal Affairs"; Hennadiy HARKUSHA, former self-proclaimed "Commander of the Berkut police battalion in the Kherson region"; Volodymyr LIPANDIN, former self-proclaimed "Chief of police of the city of Kherson"; Vasilii NOSKOV, self-proclaimed "Deputy Minister of Culture, Sports and Youth of the Luhansk People's Republic"; Denys KURASHOV, self-proclaimed "Deputy Minister of Communications of the People's Republic of Donetsk"; Dmytro SHMELEV, self-proclaimed "Minister of Revenue of the People's Republic of Donetsk"; Timur SAMATOV, self-proclaimed "Minister of Industry and Trade of the People's Republic of Luhansk"; Kostyantyn ZAVIZENOV, self-proclaimed "Minister of Energy of the People's Republic of Luhansk".</li> </ul>

#### Australia

Date	Target country	Description
23 Feb 2023	Russia	<p>90 individuals:</p> <ul style="list-style-type: none"> <li>– 15 members of the Government of Russia – Alexander Valentinovich NOVAK, Deputy Prime Minister of Russia; Nikolai Grigorievich SHULGINOV, Minister of Energy of Russia; Denis Valentinovich MANTUROV, Deputy Prime Minister and Minister of Trade and Industry of Russia; Viktoriya Valerevna ABRAMCHENKO, Deputy Prime Minister of Russia; Tatyana Alekseevna GOLIKOVA, Deputy Prime Minister of Russia; Aleksey Logvinovich OVERCHUK, Deputy Prime Minister of Russia; Aleksey Olegovich CHEKUNKOV, Minister of Russia for the Development of the Far East and the Arctic; Valeriy Nikolaevich FALKOV, Minister of Science and Higher Education of Russia; Anton Olegovich KOTYAKOV, Minister of Labour and Social Protection of Russia; Aleksandr Aleksandrovich KOZLOV, Minister of Natural</li> </ul>



Resources and Environment of Russia; Sergey Sergeevich KRAVSTOV, Minister of Education of Russia; Aleksandr Vyacheslavovich KURENKOV, Minister of Civil Defence, Emergencies and Disaster Relief; Olga Borisovna LYUBIMOVA, Minister of Culture of Russia; Mikhail Albertovich MURASHKO, Minister of Health of Russia; Alan Valerievich LUSHNIKOV, Former Deputy Transport Minister of Russia;

– 39 members of the State Council of Russia - Anton Andreyevich ALIKHANOV, Governor of the Kaliningrad region; Igor Georgievich ARTAMONOV, Governor of the Lipetsk region; Dmitry Igorevich AZAROV, Governor of the Samara region; Andrey Ivanovich BOCHAROV, Governor of the Volgograd region; Aleksandr Yuryevich DROZDENKO, Governor of the Leningrad region; Maksim Borisovich EGOROV, Interim Governor of the Tabov Oblast; Vyacheslav Vladimirovich GLADKOV, Governor of the Belgorod region; Vasily Yuryevich GOLUBEV, Governor of the Rostov region; Alexander Viktorovich GUSEV, Governor of the Voronezh region; Radiy Faritovich KHABIROV, Head of the Republic of Bashkortostan; Oleg Aleksandrovich KUVSHINNIKOV, Governor of Vologda Oblast; Aleksandr Viktorovich MOOR, Governor of Tyumen Oblast; Aysen Sergeyeovich NIKOLAYEV, Chairman of the Republic of Sakha (Yakutia) and Member of the State Council for the Russian Federation; Oleg Alekseyevich NIKOLAYEV, Head of the Chuvash Republic - Chuvashia; Denis Vladimirovich PASLER, Governor of the Orenburg Oblast; Aleksey Leonidovich TEKSLER, Governor of Chelyabinsk Oblast; Viktor Petrovich TOMENKO, Governor of Altai Krai; Andrey Aleksandrovich TRAVNIKOV, Governor of Novosibirsk Oblast; Vladimir Viktorovich UYBA, Head of the Komi Republic; Vladimir Vladimirovich VLADIMIROV, Governor of the Stavropol Krai; Andrey Yuryevich VOROBYOV, Governor of the Moscow Oblast; Igor Mikhaylovich RUDENYA, Governor of the Tver Oblast; Vladislav Valeryevich SHAPSHA, Governor of the Kaluga Oblast; Andrei Vladimirovich CHIBIS, Governor of the Murmansk Oblast; Igor Yuryevich BABUSHKIN, Governor of the Astrakhan Oblast; Vasily Aleksandrovich ORLOV, Governor of the Amur Oblast; Veniamin Ivanovich KONDRATYEV, Governor of Krasnodar Krai; Alexander Leonidovich BURKOV, Governor of Omsk Oblast; Alexander Vitalyevich TSYBULSKY, Governor of Arkhangelsk Oblast; Sergey Konstantinovich NOSOV, Governor of Magadan Oblast; Sergey Alimovich MELIKOV, Head of the Republic of Dagestan; Sergey Yevgenyevich TSIVILYOV, Governor of Kemerovo Oblast; Roman Viktorovich BUSARGIN, Governor of Saratov Oblast; Andrey Sergeevich NIKITIN, Governor of Novgorod Oblast; Roman Vladimirovich STAROVOYT, Governor of Kursk Oblast; Alexander Viktorovich USS, Governor of Krasnoyarsk Krai; Aleksandr Vasilyevich BOGOMAZ, Governor of Bryansk Oblast; Aleksandr Aleksandrovich AVDEYEV, Governor of Vladimir Oblast; Dmitry Andreevich ARTYUKHOV, Governor of Yamalo-Nenets Autonomous Okrug;

– 15 members of the Central Election Commission of Russia – Ella Aleksandrovna PAMFILOVA, Chairwoman; Nikolay Ivanovich BULAYEV, Deputy Chairman; Natalya Alekseevna BUDARINA, Secretary; Pavel Viktorovich ANDREEV, member; Igor Borisovich BORISOV, member; Boris Safarovich EBZEEV, member; Elmira Abdulbarievna KHAIMOURZINA, member; Yevgeny Ivanovich KOLYUSHIN, member; Aleksandr Borisovich KURDIUMOV, member; Nikolay Vladimirovich LEVICHEV, member; Anton Igorevich LOPATIN, member; Liudmila Leonidovna MARKINA, member; Konstantin Sergeevich MAZUREVSKII, member; Yevgeny Aleksandrovich SHEVCHENKO, member; Andrey Yurievich SHUTOV, member;

– 2 military leaders – Azatbek Asanbekovich OMURBEKOV, Commanding Officer of the Russian 64th Separate Motorised Rifle Brigade; Valery Ivanovich FLYUSTIKOV, Commander of the Special Operations Forces of the Russian Armed Forces;

– 1 representative of illegal military entity waging war on behalf of Russia – Yan Igorevich PETROVSKIY, co-founder and leader in Task Force Rusich;

– 4 senior officials of federal executive bodies, government agencies – Vladimir Grigorevich KULISHOV, Head of Russia's Border Service and Deputy Director of the Federal Security Service (FSB) of Russia; Arkadiy Aleksandrovich GOSTEV, Director of the Federal Penitentiary Service of Russia; Dmitry Nikolaevich BEZRUKIH, Head of the Office of the Federal Penitentiary Service for the Rostov Region in Russia; Boris Yuryevich TITOV, Presidential Commissioner for Entrepreneur's Rights and member of the Presidential Economic Council;

– 7 individuals involved in Russia's disinformation and propaganda actions – Alexander Gelyevich DUGIN, Russian political philosopher; Konstantin Lvovich ERNST, CEO of Channel One Russia; Igor Yurievich KOROTCHENKO, Russian propagandist and former Chair of the Public Council at the Ministry of Defence of Russia; Vadim Alekseevich SUBBOTIN, Deputy Head of the Federal Service for Supervision of Communications, Information and Mass Media (Roskomnadzor); Oleg Aleksandrovich TERLYAKOV, Deputy Head of the Federal Service for Supervision of Communications, Information and Mass Media (Roskomnadzor); Milosh Eduardovich VAGNER, Deputy Head of the Federal Service for Supervision of Communications, Information and Mass Media (Roskomnadzor); Vladimir Viktorovich LOGUNOV, Deputy Head of the Federal Service for Supervision of Communications, Information and Mass Media (Roskomnadzor);

– 1 religious leader – Vladimir Mikhailovich GUNDYAYEV, Head of the Russian Orthodox Church;

		– 6 <i>businesspeople</i> – Aleksander Viktorovich KOCHKIN, Executive Director of Tecmash; Pavel Borisovich TITOV, Chairman of the Board of Directors of Abrau-Durso and President of Delovaya Rossiya (Business Russia); Viktor Evgenyevich MYACHIN, General Director of Aerostart; Alexey Evgenyevich REPIK, Chairman of the Board of R-Pharm, Chairman of Delovaya Rossiya; Evgeny Mikhailovich SHKOLOV, Deputy Chairman of the Board of Directors for JSC System Operator of the Unified Energy System; Yury Yuryevich OREKHOV, procurement agent, owner of Nord-Deutsche Industrieanlagenbau GmbH and Opus Energy Trading LLC.
17 Mar 2023	Iran	13 senior executives of Iranian entities involved in the elaboration, production and supply of drones to Russia: – 5 <i>senior executives of Qods Aviation Industries (QAI)</i> – Ghassem DAMAVANDIAN, Managing Director of Qods Aviation Industries (QAI); Hamidreza SHARIFI-TEHRANI, Member of the Board of Directors of Qods Aviation Industries (QAI); Reza KHAKI, Member of the Board of Directors of Qods Aviation Industries (QAI); Majid Reza NIYAZI-ANGILI, Member of the Board of Directors of Qods Aviation Industries (QAI); Vali ARLANIZADEH, Member of the Board of Directors of Qods Aviation Industries (QAI); – 8 <i>senior executives of Paravar Pars Company</i> – Hossein SHAMSABADI, Managing Director and Chief Executive Officer (CEO) of Paravar Pars Company; Ali Reza TANGSIRI, Commander of the IRGC Navy; Chairman of the Board of Directors of Paravar Pars Company; Abulfazl NAZERI, Vice Chairman of the Board of Directors of Paravar Pars Company; Mohsen ASADI, Member of the Board of Directors of Paravar Pars Company; Mohammad Sadegh HEIDARI MOUSA, Member of the Board of Directors of Paravar Pars Company; Abulfazl SALEHNEJAD, Member of the Board of Directors of Paravar Pars Company; Mohammad Reza MOHAMMADI, Member of the Board of Directors of Paravar Pars Company; Abulghasem VALAGOHAR, Member of the Board of Directors of Paravar Pars Company.
30 Mar 2023	Ukrainian TOT	30 March 2023 Ukrainian TOT 7 individuals responsible for, or complicit in, the threat to the sovereignty and territorial integrity of Ukraine – Ekaterina Borisovna ALTABAEVA, Member of the Federation Council of Russia for the city of Sevastopol; Lidia Aleksandrovna BASOVA, Former Deputy Chair of the Sevastopol Electoral Commission; Sergei Andreevich DANILENKO, Former Chair of the Sevastopol Electoral Commission; Ekaterina Eduardovna PYRKOVA, Secretary of the Sevastopol Electoral Commission; Yuriy Mikhailovich GOTSANYUK, Chairman of the Council of Ministers of the Republic of Crimea, and “Prime Minister” of the so-called “Republic of Crimea” commencing 1 October 2019; Vladimir Vladimirovich NEMTSEV, “Chairman” of the so-called “Legislative Assembly” of Sevastopol commencing 14 September 2019; Mikhail Vladimirovich RAZVOZHAEV, “Governor” of Sevastopol commencing 2 October 2020;

#### New Zealand

Date	Target country	Description
16 Feb 2023	Iran	4 Iranian individuals involved in supply of drones to Russia – Yousef ABOUTALEBI, Managing Director of Oje Parvaz Mado Nafar Company (Mado Company); Abdollah MEHRABI, Iranian Brigadier-General of the Islamic Revolutionary Guard Corps (IRGC), Chief of the IRGC Aerospace Force Research and Self-Sufficiency Jihad Organisation (ASF SSJO), former co-owner/chair of Oje Parvaz Mado Nafar Company (Mado Company); Seyed Hojjatollah QUREISHI, Iranian Brigadier-General, Head of the Supply, Research and Industrial Affairs Division at the Iranian Ministry of Defense and Armed Forces Logistics; Hamid VAHEDI, Brigadier-General and Commander of the Iranian Air Force.
24 Feb 2023	Russia	87 individuals from the Russian political and military elite for their material or strategic support for Russia's illegal invasion of Ukraine: – 15 <i>members of the Central Election Commission of Russia</i> – Pavel Viktorovich ANDREEV; Igor Borisovich BORISOV; Nataliya Alekseevna BUDARINA, Secretary; Nikolay Ivanovich BULAYEV, Deputy Chairman; Boris Safarovich EBZEEV; Elmira Abdulbarievna KHAIMOURZINA; Yevgeny Ivanovich KOLYUSHIN; Aleksandr Borisovich KURDIUMOV; Nikolay Vladimirovich LEVICHEV; Anton Igorevich LOPATIN; Liudmila Leonidovna MARKINA; Konstantin Sergeevich MAZUREVSKII; Ella Aleksandrovna PAMFILOVA, Chairperson; Yevgeny Aleksandrovich SHEVCHENKO; Andrey Yurievich SHUTOV; – 40 <i>members of the State Council of Russia</i> – Anton Andreyevich ALIKHANOV, governor of the Kaliningrad region; Igor Georgiyevich ARTAMONOV, governor of the Lipetsk region; Dmitriy Andreevich ARTYUKHOV, governor of the Yamalo-Nenets Autonomous Okrug; Aleksandr Aleksandrovich AVDEYEV, Governor of the Vladimir region; Dmitriy Igorevich AZAROV, governor of the Samara region; Igor Yuryevich BABUSHKIN, governor of the Astrakhan region; Aleksandr Dmitriyevich BEGLOV, Governor of St. Petersburg; Andrey Ivanovich BOCHAROV, governor of the Volgograd region, deputy of the State Duma of the Federal Assembly of Russia; Aleksandr Vasilyevich BOGOMAZ, Governor of the Bryansk region; Alexander Leonidovich BURKOV, governor of the Omsk region; Roman Viktorovich

BUSARGIN, Governor of the Saratov Region; Andrei Vladimirovich CHIBIS, governor of the Murmansk region; Aleksandr Yuryevich DROZDENKO, governor of the Leningrad region; Maksim Borisovich EGOROV, Governor of the Tambov Region; Vyacheslav Vladimirovich GLADKOV, governor of the Belgorod region; Vasilii Yuryevich GOLUBEV, governor of the Rostov region; Alexander Viktorovich GUSEV, governor of the Voronezh region; Radiy Faritovich KHABIROV, head of the Republic of Bashkortosta; Veniamin Ivanovich KONDRATYEV, governor of the Krasnodar Territory; Oleg Aleksandrovich KUVSHINNIKOV, governor of the Vologda region; Sergey Alimovich MELIKOV, governor of Dagestan; Aleksandr Viktorovich MOOR, governor of the Tyumen region; Andrey Sergeevich NIKITIN, governor of the Novgorod region; Aysen Sergeevich NIKOLAYEV, head of the Republic of Sakha (Yakutia), secretary of the Yakut regional branch of the party "United Russia"; Oleg Alekseyevich NIKOLAYEV, head of the Chuvash Republic - Chuvashia; Sergey Konstantinovich NOSOV, governor of the Magadan; Vasily Aleksandrovich ORLOV, governor of the Amur region; Denis Vladimirovich PASLER, governor of the Orenburg region; Igor Mikhaylovich RUDENYA, governor of the Tver region; Vladislav Valeryevich SHAPSHA, governor of the Kaluga region; Roman Vladimirovich STAROVOIT, governor of the Kursk region; Aleksey Leonidovich TEKSLER, governor of the Chelyabinsk region; Viktor Petrovich TOMENKO, governor of the Altai Territory; Andrey Aleksandrovich TRAVNIKOV, governor of the Novosibirsk region; Sergei Evgenievich TSIVILEV, Governor of the Kemerovo Region – Kuzbass; Alexander Vitalyevich TSYBULSKY, governor of the Arkhangelsk region; Alexander Viktorovich USS, governor of the Krasnoyarsk Territory; Vladimir Viktorovich UYBA, head of the Komi Republic; Vladimir Vladimirovich VLADIMIROV, governor of the Stavropol Territory; Andrey Yuryevich VOROBYEV, governor of the Moscow region;

– 9 *military leaders* – Alexey Vyacheslavovich AVDEEV, Major General, Commander of the 3rd motorized rifle division; Yuri Nikolaevich GREKHOV, Colonel-General, Deputy Commander-in-Chief of the Russian Aerospace Forces; Sergey Viktorovich KARAKAEV, Commander of the Strategic Missile Forces; Mikhail Mikhaylovich MATVEEVSKY, Commander of Missile Troops and Artillery; Alexander Mikhailovich NOSATOV, Admiral, Chief of the Main Staff of the Russian Navy, Commander of the Russian Baltic fleet, former Commander of the Black Sea Fleet; Alexander Semyonovich SANCHIK, Commander of the 35th Combined Arms Army; Mikhail Yuryevich TEPLINSKIY, Commander of Airborne Forces of the Armed Forces of Russia; Oleg Yurievich TSOKOV, Commander of the 144th Motorized Rifle Division; Evgeny Nikolaevich ZHURAVLEV, Commander of the 4th Tank Division; Mikhail Stepanovich ZUSKO, Chief of Staff Russian Forces Group (West);

– 2 *military officials* – Aleksandr Vladimirovich NOVIKOV, Head of the Department for Construction and Management of Unmanned Aerial Vehicles of the Armed Forces of Russia; Nikolay Mikhaylovich PARSHIN, Head of the Main Missile-Artillery Directorate of the Ministry of Defense of Russia;

– 14 *members of the Government of Russia* – Viktoria Valerievna ABRAMCHENKO, Deputy Prime Minister of Russia, responsible for Agro-Industrial Complex, Natural Resources and Ecology; Tatyana Alekseevna GOLIKOVA, Deputy Prime Minister of Russia, responsible for social policy, labour, health and pension provision; Denis Valentinovich MANTUROV, Deputy Prime Minister, Minister of Industry and Trade; Alexei Logvinovich OVERCHUK, Deputy Prime Minister of Russia, responsible for Eurasian integration, cooperation with the Commonwealth of Independent States, BRICS, G20, and international events; Alexei Olegovich CHEKUNKOV, Minister of Russia for the Development of the Far East and the Arctic; Valery Nikolaevich FALKOV, Minister of Science and Higher Education of Russia; Anton Olegovich KOTYAKOV, Minister of Labor and Social Protection of Russia; Alexander Alexandrovich KOZLOV, Minister of Natural Resources and Ecology of Russia; Sergei Sergeevich KRAVTSOV, Minister of Education of Russia; Alexander Vyacheslavovich KURENKOV, Minister of Russia for Civil Defense, Emergency Situations and Liquidation of the Consequences of Natural Disasters; Olga Borisovna LYUBIMOVA, Minister of Culture of Russia; Oleg Vasilievich MATYTSIN, Minister of Sports of Russia; Mikhail Albertovich MURASHKO, Minister of Health of Russia; Nikolai Grigorievich SHULGINOV, Minister of Energy of Russia;

– 3 *Federal Penitentiary Service officials*, that work close with Prigozhin to fill the ranks of the Wagner Group – Dmitry Nikolaevich BEZRUKIKH, Head of the Federal Penitentiary Service of the Rostov region; Arkady Alexandrovich GOSTEV, Director of the Federal Penitentiary Service of Russia; Ivan Pavlovitch PROKOPENKO, Head of the Tula Office of the Federal Penitentiary Service of the Russia;

– 3 *individuals involved in filtration operations in occupied areas of Ukraine* – Yevgeniy Radionovich KIM, employee of the Administration of the President of Russia directly involved in the planning for and implementation of filtration points in Russia-occupied Ukraine; Oleg Yuryevich NESTEROV, employee of the Administration of the President of Russia directly involved in the planning for and implementation of filtration points in Russia-occupied Ukraine; Marina Konstantinovna SEREDA, Russian national which worked with the so-called Donetsk

		People's Republic (DNR) Ministry of Internal Affairs to manage filtration points in Russia-occupied Donetsk Oblast.
27 Mar 2023 (effective as 31 Mar 2023)	Russia / Belarus	<p>27 individuals of the Russian and Belarusian elite, as well as military actors:</p> <ul style="list-style-type: none"> <li>– 2 <i>Russian senior officials of federal state bodies</i> – Yury Anatolyevich CHIKHANCHIN, Director of the Federal Financial Monitoring Service of Russia; Maria Alekseevna LVOVA-BELOVA, Commissioner for Children's Rights under the President of Russia;</li> <li>– 12 <i>Russian military leaders</i> – Ramil Rakhmatulloevich IBATULLIN, Colonel, Commander of the 90th Guards Tank Vitebsk-Novgorod Twice Red Banner Division of the Land Forces of the Armed Forces of Russia; Zabit Sabirovich KHEIRBEKOV, Lieutenant General of the Russian Aerospace Forces, Deputy Commander-in-Chief of the Aerospace Forces of Russia for Logistics; Aleksey Stepanovich BEZZUBIKOV, Deputy Director of the Federal Service of the National Guard of Russia (Rosgvardia), Commander-in-Chief of the Rosgvardia; Alibek Sultanovich DELIMKHANOV, Deputy Commander of the Chechen Unit of the National Guard of Russia (Rosgvardia); Igor Anatolyevich ILYASH, Deputy Director of the Federal Service of the National Guard of Russia (Rosgvardia), Commander-in-Chief of the Rosgvardia; Aleksey Mikhailovich KUZMENKOV, Deputy Director of the Federal Service of the National Guard of Russia (Rosgvardia), Commander-in-Chief of the Rosgvardia; Sergei Anatolyevich LEBEDEV, Deputy Director of the Federal Service of the National Guard of Russia (Rosgvardia), Commander-in-Chief of the Rosgvardia; Oleg Anatolyevich PLOKHOI, State Secretary, Deputy Director of the Federal Service of the National Guard of Russia (Rosgvardia), Commander-in-Chief of the Rosgvardia; Viktor Nikolaevich STRIGUNOV, First Deputy Director of the Federal Service of the National Guard of Russia (Rosgvardia), Commander-in-Chief of the Rosgvardia; Yury Viktorovich YASHIN, Chief of the General Staff of the National Guard of Russia (Rosgvardia); Igor BAGNIUK, Colonel, Commander of the Missile Weapons Pre-Planning Group of the Main Computing Centre of the General Staff (GVC) of the General Staff of the Russian Armed Forces; Anton TIMOSHINOV, Lieutenant Colonel, Commander of the Missile Weapons Pre-Planning Group of the Main Computing Centre of the General Staff (GVC) of the General Staff of the Russian Armed Forces;</li> <li>– 5 <i>Belarussian military leaders</i> – Igor Viktorovich DEMIDENKO, Commander of the troops of the Western Operational Command of the Republic of Belarus; Vladimir Nikolaevich KUPRIYANYUK, Chief of Staff, First Deputy Commander of the Troops of the Western Operational Command of the Armed Forces of the Republic of Belarus; Aleksandr Vitalevich LOZITSKY, Commander of Unit 65408 (Luninets Airfield); Andrey Yulianovich LUKYANOVICH, Colonel, Deputy Commander of the Air Force and Air Defence Forces of the Armed Forces, Chief of Aviation of the Republic of Belarus; Andrey Konstantinovich NEKRASHEVICH, Head of the Main Directorate of Combat Training of the Armed Forces of the Republic of Belarus;</li> <li>– 4 <i>individuals involved in Russia's disinformation and propaganda actions</i> – Vladimir Viktorovich LOGUNOV, Deputy Head of the Federal Service for Supervision of Communications, Information and Mass Media (Roskomnadzor); Vadim Alekseevich SUBBOTIN, Deputy Head of the Federal Service for Supervision of Communications, Information and Mass Media (Roskomnadzor); Oleg Aleksandrovich TERLYAKOV, Deputy Head of the Federal Service for Supervision of Communications, Information and Mass Media (Roskomnadzor); Milosh Eduardovich VAGNER, Deputy Head of the Federal Service for Supervision of Communications, Information and Mass Media (Roskomnadzor);</li> <li>– 2 <i>representatives of paramilitary entity</i> – Yuriy Valeryvich SHEVCHENKO, Deputy Chairman of the Board of Commanders of the Interregional Social Organization Union of Donbas Volunteers; Aleksey Petrovich SOSONYY, Chief of Staff of the Interregional Social Organization Union of Donbas Volunteers;</li> <li>– 2 <i>representatives of an illegal military entity waging war on behalf of Russia</i> – Anton Olegovich ELIZAROV, Wagner Group Commander; Hayk Arsenovich GASPARYAN, Commander of the Air Assault forces of Wagner Group.</li> </ul>

#### Switzerland

Date	Target country	Description
15 Feb 2023	Russia	De-listing of 2 individuals – Dmitry Vladimirovich OVSYANNIKOV, former "Governor of Sevastopol" (until Jul 2019), former Deputy Minister for Industry and Trade of Russia (until Apr 2020); Sergey Pavlovich IVANOV, member of the Federation Council who on 4 October 2022 ratified the four treaties between Russia and the Donetsk People's Republic, the Luhansk People's Republic, the Zaporizhzhia region, and the Kherson region, and their admission to Russia.
1 Mar	Russia /	87 individuals

2023	Ukrainian TOT	<p>– 4 members of the Federation Council of Russia – Olga Yevgenyevna BAS, Member of the Federation Council of Russia since 20 December 2022, as the representative of the illegally annexed so-called “Luhansk People’s Republic”; Konstantin Vladimirovich BASYUK, Member of the Federation Council of Russia since 20 December 2022, as the representative of the illegally annexed Kherson region; Dmitry Nikolayevich VORONA, Member of the Federation Council of the Russian Federation since 20 December 2022, as the representative of the illegally annexed Zaporizhzhia region, Former CEO of the Crimea Development Corporation; Dariya Sergeevna LANTRATOVA, Deputy Secretary of the General Council of the “United Russia” Party, Member of the Federation Council of Russia since 20 December 2022, as the representative of the illegally annexed so-called “Luhansk People’s Republic”;</p> <p>– 4 members of the State Duma of Russia – Tatiana Petrovna LARIONOVA; Oleg Alexeyevich MIKHAILOV; Zelimkhan Alikoevich MUTSOEV; Vladimir Viktorovich PAVLOV;</p> <p>– 20 members of the Government of Russia – Vasiliy Sergeevich OSMAKOV, Deputy Minister of the Ministry of Industry and Trade; Oleg Evgenievich BOCHAROV, Deputy Minister of Industry and Trade; Kirill Alekseevich LYSOGORSKY, Deputy Minister of Industry and Trade; Vasily Viktorovich SHPAK, Deputy Minister of Industry and Trade; Alexey Sergeevich BESPROZVANNYKH, Deputy Minister of Industry and Trade; Ekaterina Gennadiyevna PRIEZZHEVA, Deputy Minister of Industry and Trade; Albert Anvarovich KARIMOV, Deputy Minister of Industry and Trade; Viktor Leonidovich YEVTUKHOV, Deputy Minister of Industry and Trade, and State Secretary of Ministry of Industry and Trade; Aleksey Aleksandrovich UCHENOV, Deputy Minister of Industry and Trade; Mikhail Igorevich IVANOV, Deputy Minister of the Ministry of Industry and Trade; Tatyana Alexandrovna ILYUSHNIKOVA, Deputy Minister of the Russian Ministry of Economic Development; Polina Viktorovna KRYUCHKOVA, Deputy Minister of the Russian Ministry of Economic Development; Vladimir Evgenievich ILYICHEV, Deputy Minister of the Russian Ministry of Economic Development; Ilya Eduardovich TOROSOV, Deputy Minister of the Russian Ministry of Economic Development; Aleksey Igorevich KHERSONTSEV, Deputy Minister of the Russian Ministry of Economic Development; Sergey Makarovich NAZAROV, Deputy Minister of the Russian Ministry of Economic Development; Dmitriy Valer’yevich VOLVACH, Deputy Minister of the Russian Ministry of Economic Development; Dmitriy Sergeevich VAKHRUKOV, Deputy Minister of the Russian Ministry of Economic Development; Murat Anatolyevich KEREOFV, Deputy Minister of the Russian Ministry of Economic Development; Maxim Andreevich KOLESNIKOV, Deputy Minister of the Russian Ministry of Economic Development;</p> <p>– 1 official of the Administration of the President of Russia – Vyacheslav Nikolaevich SMIRNOV, Advisor to the Deputy Head of the State Council of the Presidential Administration;</p> <p>– 2 senior officials of federal executive bodies, government agencies – Vladimir Ivanovich BULAVIN, Head of the Federal Customs Service of Russia; Tatiana Nikolaevna MOSKALKOVA, Commissioner for Human Rights of Russia;</p> <p>– 25 individuals involved in Russia’s disinformation and propaganda actions – Yevgeny Alexandrovich PRIMAKOV, Head of the Federal Agency for the Commonwealth of Independent States, Compatriots Living Abroad and International Humanitarian Cooperation (Rossotrudnichestvo); Alexey Gennadyevich KOMISSAROV, Co-Chairman of the Central Headquarters of the All-Russia People’s Front; Leonid Mikhailovich ROSHAL, Co-Chairman of the Central Headquarters of the All-Russia People’s Front; Elena Vladimirovna SHMELEVA, Co-Chairman of the Central Headquarters of the All-Russia People’s Front, Head of the educational fund “Talent and Success”, Chairman of the Sirius Federal Territory Council; Mikhail Mikhailovich KUZNETSOV, Head of the Executive Committee of the All-Russia People’s Front; Sergei Olegovich GORBUNOV, Deputy Head of the Executive Committee of the All-Russia People’s Front; Yulia Alexandrovna BELEKHOVA, Member of the Presidential Council for Civil Society and Human Rights, Head of the Moscow regional branch of the pro-Putin political coalition, the All-Russia People’s Front; Oleg Aleksandrovich TERLIAKOV, Deputy Head of the Russian Federal Service for Supervision of Communications Information Technology and Mass Media (Roskomnadzor); Vadim Alekseevich SUBOTIN, Deputy Head of the Russian Federal Service for Supervision of Communications Information Technology and Mass Media (Roskomnadzor); Alexandr Semenovich BROD, Member of the Presidential Council for the Development of Civil Society and Human Rights, Chairman of the coordinating council of the All-Russian public organisation “Lawyers for the rights and worthy life of a person”; Valery Aleksandrovich FADEYEV, journalist, former secretary of the Civic Chamber of the Russian Federation and incumbent Chairman of the Presidential Council for Civil Society and Human Rights; Igor Stanislavovich ASHMANOV, Member of the Presidential Council for Civil Society and Human Rights, Information Technology expert, CEO of Ashmanov &amp; Partners and President of Kribrum; Kirill Valeryevich VYSHINSKY, Member of the Presidential Council for Civil Society and Human Rights, Executive Director of the Rossiya Segodnya Media Group; Alexandr Igorevich KOTS, Member of the Presidential Council for Civil Society and Human Rights, Special correspondent of</p>
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Komsomolskaya Pravda; Marina Magomednebiyevna AKHMEDOVA, writer and journalist, editor of the online edition of Regnum, Vice editor-in-chief of the Russkiy Reporter magazine; Maxim Adolfovich ZAMSHEV, Member of the Presidential Council for Civil Society and Human Rights, Editor-in-Chief of Literaturnaya Gazeta; Nikolai Fyodorovich IVANOV, Member of the Presidential Council for Civil Society and Human Rights, Chairman of the Board of the All-Russian public organisation "Union of Writers of Russia"; Kirill Alekseevich KLEIMENOV, Deputy Director General, Director of the Information Programmes Directorate, Member of the Board of Directors of Channel One (Pervyi Kanal); Alexander Zavenovich AKOPOV, Deputy CEO of "National Media Group"; Evgeniy Vladimirovich BEKASOV, Editor-in-chief of Rossiya 24 TV Channel; Milosh Eduardovich WAGNER, Deputy Head of the Russian Federal Service for Supervision of Communications Information Technology and Mass Media (Roskomnadzor); Vladimir Viktorovich LOGUNOV, Deputy Head of the Russian Federal Service for Supervision of Communications Information Technology and Mass Media (Roskomnadzor); Yakov Iosifovich KAZAKOV, former politician and diplomat who is a regular participant on State TV and pro-Kremlin talk shows; Sergey Yervandovich KURGINYAN, Russian politician and founder and leader of a Russian movement "Essence of Time"; Vitaliy Tovievich TRETYAKOV, Russian journalist and political scientist, the Dean of Higher School of Television at M.V. Lomonosov Moscow State University;

– *3 individuals responsible for the illegal transfer, deportation and forced adoption of Ukrainian children* – Lenara Khakimovna IVANOVA, Deputy prime minister of the government of the Republic of Bashkortostan and minister of family, labour and social protection of the Republic of Bashkortostan; Vyacheslav Vyacheslavovich DUKHIN, Deputy Head of the Moscow Oblast Duma; Viktoria Vyacheslavovna YAKIMOVA, Chair of the Board of the Gulfstream Foundation and contributor to Russia's so-called "charitable" action "Into the Hands of Children";

– *8 so-called officials in areas of Ukraine illegally occupied by Russian forces or controlled by Russian-backed proxies* – Gleb Leonidovich MIKHAILOV, Prosecutor of the so-called "Luhansk People's Republic" appointed by the President of Russia; Kirill Nikolaevich OSIPCHUK, Prosecutor of the illegally annexed Zaporizhzhia region appointed by the President of Russia; Andrey Yuryevich PETROV: Prosecutor of the Kherson region appointed by the President of Russia; Andrey SPIVAK, Prosecutor of the illegally annexed "Donetsk People's Republic" appointed by the President of Russia; Alexey Nikolaevich PARIKIN, "First Deputy Governor" of the illegally annexed City of Sevastopol, previously "Deputy Governor" of the illegally annexed City of Sevastopol; Sergey Yurievich TOLMACHEV, "Deputy Governor" of the illegally annexed "Zaporizhzhia region"; Andriy Yuriovich TROFIMOV, so-called deputy head of the Russian temporary controlled military-civilian administration in the Zaporizhzhia region and Head of the Crimean Union of Journalists; Pavlo Igorovych FILIPCHUK, so-called Head of the seized city of Kakhovka;

– *3 military officials* – Alexander Vladimirovich NOVIKOV, Major-General, Head of the Directorate for construction and development of unmanned aerial vehicles; Nikolay Mikhailovich PARSHIN, Lieutenant-General, Head of the Main Rocket and Artillery Directorate of the Ministry of Defense of Russia; Vladimir Viktorovich SELIN, Director of the Federal Service for Technical and Export Control;

– *10 military leaders* – Alexander Semyonovich SANCHIK, Lieutenant General, Commander of the 35th Combined Arms Army; Alexey Vyacheslavovich AVDEEV, Major-General, Commander of the 3rd Vislenskaya Red Banner Order of Suvorov and Kutuzov Motor Rifle Division; Evgeny Nikolaevich ZHURAVLEV, Major-General, Commander of the Guards 4th (Kantemirovskaya) Tank Division of the Tank Army of the Western Military District; Georgy Ivanovich SHUVAEV, Colonel, Head of Missile Troops and Artillery of the 1st Tank Army of the Western Military District of the Russian Armed Forces; Mikhail Mikhailovich MATVEEVSKY, Lieutenant General, Head of Missile Troops and Artillery of the Ground Forces of Russia; Mikhail Stepanovich ZUSKO, Lieutenant-General, Chief of staff of the "West" grouping and former Commander of the 58th Combined Arms Army of the Southern Military District; Mikhail Yuryevich TEPLINSKIY, Colonel-General, Commander of Airborne Forces of the Armed Forces of Russia; Oleg Yurievich TSOKOV, Major-General, Commander of the 144th Motor Rifle Division of the 20th Combined Arms Army of the Armed Forces of Russia; Ramil Rakhmatulovich IBATULLIN, Major-General, Commander of the 90th Guards Tank Division; Sergey Viktorovich KARAKAEV, Colonel-General, Commander of the Strategic Missile Forces;

– *2 representatives of illegal military entity waging war on behalf of Russia* – Hayk Arsenovich GASPARYAN, Commander of the assault forces of the mercenary group Wagner Group during the battle of Soledar in Ukraine; Anton Olegovich ELIZAROV, military commander of the mercenary group Wagner Group;

– *4 senior executives of Iranian entities involved in the elaboration, production and supply of drones to Russia* – Abualfazl NAZERI, Vice Chairman of the Board of Paravar Pars Company; Abulghasem VALAGOHAR, Member of the Board of Paravar Pars Company; Hossein

		SHAMSABADI, Managing Director and CEO of Paravar Pars Company; Ghassem DAMAVANDIAN, Member of the Board of Directors of Qods Aviation Industries; – 1 Ukrainian collaborator businessperson – Vyacheslav Oleksandrovych BOGUSLAYEV, General director of JSC MOTOR SICH, former member of the Ukrainian parliament.
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#### Latvia

Date	Target country	Description
17 Mar 2023	Russia	35 individuals who have supported Russian aggression in Ukraine are added to the list of undesirable persons in Latvia – Yaroslav DRONOV, Ruslan OSTASHKO, Yuliya BARANOVSKAYA, Natalya KACHURA, Kirill KUZNETSOV, Akim GASANOV, Polina AGUREEVA, Vladimir BARINOV, Dmitriy DONETSKIY, Denis BOCHAROV, Vasilii SALZHENIKIN, Alexander NOSKOV, Alexey IOVCHEV, Sergey KIFAK, Valentin LEZOV, Stanislav STAROVOITOV, Valeria KUDRJAVCEVA, Nadezhda BABKINA, Alexander MARSHAL, Vyacheslav MANUCHAROV, Semen BAGDASAROV, Rostislav ISHCENKO, Spiridon KILINKAROV, Vladimir KORNILOV, Rodion MIROSHNIK, Gevorg MIRZAYAN, Evgeny SATANOVSKY, Anna SHAFRAN (PALYUKH), Mikhail SHAKHNAZAROV, Andrey SIDORCHIK, Alexander SOSNOVSKIY, Sergey STANKEVICH, Stanislav YAKOVLEV, Yulia LOZANOVA (VITYAZEVA), Dmitriy EVSTAFYEV

#### FIRM-SPECIFIC FINANCIAL RESTRICTIVE MEASURES

#### United States

Date	Target country		Description
1 Feb 2023	Russia	OFAC	12 entities across multiple countries, which are connected to a sanctions evasion network, led by a Russia- and Cyprus-based arms dealer Igor Zimenkov, supporting Russia's military-industrial complex and Russian sanctioned state-owned defense entities Rosoboronekспорт OAO and State Corporation Rostec: – 1 construction shell company – <b>Asia Trading &amp; Construction PTE LTD</b> , Singapore-based Zimenkov network shell company; – 1 entity operating in the technology sector – <b>TEXEL F.C.G. TECHNOLOGY 2100 LTD</b> , Israel-based company which supplied a Russian company with electro-optic and infrared devices and was engaged in extensive funds transfers to Asia Trading & Construction PTE LTD; – 1 engineering consultancy firm – <b>Elektrooptika SIA</b> , Latvia-based entity which is owned by Marks Blats and operates in business services industry; – 1 trade company – <b>GBD Limited</b> , Cyprus-based non-specialized wholesale trade company owned by Alexander Volfovich that has attempted to supply weapons systems to an African government and has sent millions of dollars to Igor Zimenkov over a period of years, – 8 companies owned or controlled by sanctioned persons – <b>Mateas Limited</b> , located in Cyprus; <b>Kliosa Limited</b> , Cyprus-based wholesale trade firm owned by Alexander Volfovich; <b>VFC Solutions LTD</b> , Cyprus-based firm owned by Alexander Volfovich; <b>U-Stone Limited EOOD</b> , Bulgaria-based firm owned by Alexander Volfovich; <b>GMI Global Manufacturing &amp; Integration Limited</b> , Cyprus-based firm owned by Alexander Volfovich, involved in a contractual relationship between Alexander Volfovich and Jonatan Zimenkov; <b>D.E.S. Defense Engineering Solutions LTD</b> , Israel-based firm owned by Alexander Volfovich which is linked to Russian state military manufacturers; <b>Pitaron Limited</b> , Cyprus-based firm owned by Igor Palnychenko; <b>Terra-Az Limited</b> , Cyprus-based firm owned by Igor Palnychenko.
24 Feb 2023	Russia	OFAC	83 entities: – 11 banks – <b>Credit Bank of Moscow PJSC</b> , one of Russia's ten largest banks by asset value and Russia's largest non-state public bank; <b>JSC Commercial Bank Lanta Bank</b> , bank located in Moscow; <b>PJSC Commercial Bank Metallurgical Investment Bank</b> , bank located in Moscow, which has used alternative payment routes to facilitate the receipt of payments for Russian exports; <b>PJSC MTS Bank</b> , bank located in Moscow, Russia and Abu Dhabi, United Arab Emirates; <b>Novosibirsk</b>

**Social Commercial Bank Levoberezhny PJSC**, bank located in Novosibirsk; **Bank Saint-Petersburg PJSC**, a bank located in Saint Petersburg; **Joint Stock Commercial Bank Primorye**, a bank located in Vladivostok; **SDM-Bank PJSC**, a bank located in Moscow; **PJSC Ural Bank for Reconstruction and Development (UBRD)**, a bank located in Yekaterinburg; **PJSC Bank Uralsib**, a bank located in Moscow; **Bank Zenit PJSC**, a bank located in Moscow;

– *6 entities in the financial sector* – **OOO Zenit Finance**, company that provides a full range of financial services, owned by Bank Zenit; **OOO Zenit Leasing**, leasing company owned by Bank Zenit; **OOO Zenit Factoring MSP**, company that provides a full range of financial services, owned by Bank Zenit; **Veles Aktiv OOO**, company that provides a full range of financial services of the Russian economy; **Veles Management Ltd**, company that provides a full range of financial services of the Russian economy; **LLC Veles Trust**, company that provides a full range of financial services of the Russian economy;

– *2 wealth management-related entities* – **CONFIDERI Pte Ltd**, Russian multi-family office, a type of financial services firm specializing in high-net-worth individuals, with offices in Moscow and Singapore, which specializes on asset structuring and wealth management; **IC Veles Capital LLC**, Moscow-based investment and wealth management firm;

– *7 non-Russian entities assisting with sanctions evasion and backfilling* – **Taerio Limited**, Malta-based company that that were used to conceal procurement schemes of Walter Moretti; **Tamyna FZE**, UAE-based company operating in wholesale of electronic and telecommunications equipment and parts that were used to conceal procurement schemes of Walter Moretti; **Swisstec 3D AKUS AG**, Switzerland-based company that develops high-precision machines, including laser technology and micro high speed machining, which assisted Walter Moretti in the procurement of sensitive Western technologies and equipment for Russian intelligence services and the Russian military; **Stratton Investment Group LTD**, Malta-based venture capital investment firm, owned or controlled by Taerio Limited; **Tamyna AG**, Switzerland-based company that produces and sells medical products, develops IT software and applications, and has reportedly made multiple large wire transfers to Taerio Limited, Walter Moretti's company; **Taerio International LTD EOOD**, Bulgaria-based company, owned by Markus Gerhard Mueller, that specializes in the trade of goods, software, and security technologies; **Interpolytrade Limited Company**, company, owned by Markus Gerhard Mueller, which provides trade in goods, software and security technologies;

– *30 entities in Russia's military supply chains*:

- *5 entities that produce carbon fiber and related materials* – **UMATEX JSC**, Russia's largest producer of a wide range of carbon fibers and fiber-based items; **UMATEX Group Europe SRO**, Czechia-based subsidiary of UMATEx; **Argon OOO**, Russia-based subsidiary of UMATEx that produces carbon fiber materials used by aircraft-building companies; **Zavod Ulgerodnykh I Kompozitsionnykh Materialov**, Russia-based subsidiary of UMATEx that produces carbon fiber used in the aerospace industry; **UVICOM LTD**, company that produces carbon fibrous materials and develops technologies for carbon fiber materials;
- *5 entities operating in aerospace sector* – **JSC Prepreg Advanced Composite Materials**, company that produces an assortment of materials used in aircraft engineering; **LLC Alabuga-Fibre**, company that produces various types of carbon fibers used in aerospace and aircraft engineering; **LLC Prepreg-Dubna**, company that produces an assortment of materials used in aircraft engineering; **JSC Research Institute of Graphite-Based Materials NIIGRAFIT**, research institution and company that was created for the study and development of special types of carbon materials and products, including those used in rocket and space technology and the aviation industry; **JSC Urals Scientific Research Institute of Composite Materials**, research institution and company that specializes in research, development, and fabrication of composite goods for rocket-and-space hardware;
- *4 entities operating in the defense and related materiel sector* – **Perm Scientific Research Technological Institute**, research institute that provides solutions related to the development and application of modern equipment including artillery mounts and missile systems; **JSC Military-Industrial Corporation NPO Mashinostroyenia**, company that develops and fabricates weapons and military hardware; **Federal State Unitary Enterprise Central Scientific Research Institute of Economics, Informatics and Management Systems (TsNII EISU)**, organization that carries out scientific and technical support and execution of key works on the problems of improvement, modernization, development of the technical basis of management and communication in the field of the military-industrial complex.s; **Independent Insurance Group LTD (IIG)**,



company which provides insurances services to companies in Russia's defense sector;

- *16 entities operating in the electronics sector* – **ODay Technologies**, cybersecurity consulting firm which provided databases of western nation citizens' personally identifiable information to Russian intelligence; **OOO Iteranet**, technology company, has helped the Government of Russia circumvent U.S. sanctions by purchasing U.S.-origin equipment on behalf of sanctioned end-users; **OKB Spektr OOO**, manufacturer of spectral analytical instruments, which also specializes in developing electronic-printed circuits and providing telemetry support for ballistic missile flight testing at missile test ranges in Russia; **LLC Maxtech**, technology company specializing in server hardware; **Novilab Mobile LLC**, software developer, which has worked with U.S.-designated Russia-based company AO Advanced System Technology on a project to enable mobile device monitoring; **LLC Promtekhekspert**, technology equipment and consulting firm formerly partially owned by Eshstrut that shares an address with Maxtech; **PSV Technologies LLC**, technology company that delivers high-tech equipment into Russia and has distribution relationships with both Russia-based and foreign technology and equipment manufacturers; **Tamimed**, technology company, owned or controlled by Svetlana Moretti; **AO Russian High Technologies**, information technology company which has worked on behalf of Russian intelligence services; **Forward Systems R&DC**, computer programming and IT company, which has developed specialized software and algorithms in support of contracts with the Russian Federal State Unitary Enterprise 18th Central Scientific Research Institute (TsNII), which is part of the Russian Main Intelligence Directorate's (GRU) efforts in offensive cyber operations; **ZAO Akuta**, computer programming company, provided programming services for a telecommunications system for a new GRU facility in Russia; **JSC Vakuuum.ru**, company specializing in the sale of manufacturing and technological equipment to Russia-based customers which worked with the Russian intelligence-linked procurement network of U.S.-sanctioned Malberg Ltd. to obtain advanced equipment with applications in the microelectronics and quantum industries; **By Trade OU**, Estonian entity specializing in electronic component distribution, which facilitated hundreds of thousands of dollars of shipments by Malberg Ltd. to Russia and attempted to illegally ship a U.S.-made precision jig grinder with nuclear applications to a Russian entity; **OOO Lavina PULS**, IT and computer service company which has provided technical support to malign influence operations conducted by the GRU, including the management of false social media personas; **AO Inforus**, IT and computer service company which provided technical support to malign influence operations conducted by the GRU, including the management of false social media personas; **OJSC Ilyenko Elara Research and Production Complex**, manufacturer of electronic equipment and devices, which produces electronic instruments for Russian amphibious and military aircraft and has worked with one or more sanctioned Russian firms;
  - *1 illegal military entity waging war on behalf of Russia* – **Private Military Company Redut (PMC Redut)**, Russian private military company that claims to offer security services but is actually a mercenary force involved in the fighting in Ukraine, and is believed to be connected to the GRU and Russian Ministry of Defense;
  - *4 entities operating in the mining and metals sector* – **JSC Burevestnik Central Scientific Research Institute**, research and production enterprise specializing in the development, upgrading, and production of naval artillery weapons, artillery systems and mortars for Land Forces, main armament of armored fighting vehicles, unified large-caliber artillery weapons for Land Forces and Navy, as well as equipment and systems for the maintenance of artillery and tank weapons, that is also involved in manufacturing metals; **OOO Metallurg-Tulamash**, steel manufacturer that also manufactures armaments for Russia's navy; **TPZ-Rondol OOO**, company that specializes in coating metals and is a subsidiary of one of Russia's leading ammunition manufacturers; **Mtsenskprokat**, company that produces unique metal alloys and products for Russia's aviation and defense industries;
  - *22 entities owned or controlled by newly sanctioned person* – **Hadlerco Limited**, Cyprus-based firm owned by Dmitry Bugayenko; **Veles International Limited**, Cyprus-based firm owned by Dmitry Bugayenko; **LLC Aforra Management**, Moscow-based management consulting firm owned by Aleksandr Udodov; **Stella Leone Limited**, Cyprus-based firm owned by Nurmurad Kurbanov; **LLC Aforra Development**, seller of real estate, owned by Aleksandr Udodov; **LLC Aforra Engineering**, company providing activities in the field of architecture, engineering surveys and technical advice in these areas, owned by Aleksandr Udodov; **LLC Aforra Property**, company providing activities in the field of architecture, engineering surveys and

			<p>technical advice in these areas, owned by Aleksandr Udodov; <b>LLC Aktiv R</b>, company engaged in wholesale non-specialized trade, owned by Aleksandr Udodov; <b>LLC Arendoff</b>, real estate agency, owned by Aleksandr Udodov; <b>LLC Atlas Real Estate</b>, real estate agency owned by Aleksandr Udodov; <b>LLC Ayaks</b>, real estate agency owned by Aleksandr Udodov; <b>LLC Garantiya</b>, company providing activities in the field of architecture, engineering surveys and technical advice in these areas, owned by Aleksandr Udodov; <b>LLC Mushroom Rainbow</b>, the leading producer and supplier of fresh mushrooms on the Russian market, estate agency, owned by Aleksandr Udodov; <b>LLC Atlas Real Estate</b>, real estate agency owned by Aleksandr Udodov; <b>LLC New City</b>, company providing activities in the field of architecture, engineering surveys and technical advice in these areas, owned by Aleksandr Udodov; <b>LLC Nikoliya</b>, company engaged in the activities of restaurants and food delivery services, owned by Aleksandr Udodov; <b>LLC Optima Invest</b>, investment company in Moscow owned by Aleksandr Udodov; <b>LLC Russul</b>, company providing activities in the field of architecture, engineering surveys and technical advice in these areas, owned by Aleksandr Udodov; <b>LLC Stork</b>, company providing activities in the field of architecture, engineering surveys and technical advice in these areas, owned by Aleksandr Udodov; <b>Avrora Capital SRO</b>, Prague-based real estate company, owned by Aleksandr Udodov; <b>Leading Capital Investment Ltd</b>, real estate holding company registered in the British Virgin Islands, owned by Aleksandr Udodov; <b>Caliber Wealth Management Ltd.</b>, Bahamas-based real estate holding company owned by Aleksandr Udodov.</p>
24 Feb 2023	Russia	Department of State	<p>52 entities:</p> <ul style="list-style-type: none"> <li>– 3 subsidiary enterprise of the State Atomic Energy Corporation Rosatom that develop and operate Russia's nuclear weapons</li> <li>– <b>Russian Federal Nuclear Center – Zababakhin All-Russia Research Institute of Technical Physics (VNIITF)</b>, research institute that focuses on the development of nuclear weapons and military technologies; <b>All-Russian Scientific Research Institute of Experimental Physics (VNIIEF)</b>, research institute responsible for the development and experimental testing of nuclear weapons; <b>Federal State Unitary Enterprise Dukhov Automatics Research Institute (VNIIA)</b>, research institute primarily focusing on the development of nuclear weapons and their components, production of electric and neutron initiation systems, and involvement in the development of nuclear munitions, equipment, process control systems, sensors, and measuring equipment;</li> <li>– 5 entities operating in the defense and related materiel sector – <b>JSC Votkinskiy Zavod</b>, manufacturer of machines and ballistic missiles, including the RS-24 Yars ICBM and the Bulava SLBM; <b>PJSC Zavod Tula</b>, main developer and serial supplier of radiation, chemical and non-specific biological reconnaissance and rescue vehicles for the Ministry of Defence of Russia and other law enforcement agencies of Russia; <b>Kazanskii Optiko-Mekhanicheskii Zavod AO</b>, producer of optical devices and electronic warfare equipment, including the Moscow-1, Rychag-AV, and Quicksilver-BM electronic warfare systems that are being used in Ukraine; <b>LLC Scientific and Production Company Tekhinkom</b>, military-industrial enterprise that produces personal armor protection equipment, such as bulletproof vests and high-level armored panels, for the Ministry of Defense of Russia; <b>CJSC Special Construction Bureau</b>, subsidiary of PAO "Motovilikhinskiye Zavody", manufacturer of weapons systems and ammunition, the exclusive manufacturer in Russia of combat and transport-loading vehicles for multiple launch rocket systems such as "Tornado", "Grad," "Smerch," and their modified versions "Tornado-G" and "Tornado-S";</li> <li>– 2 branches of the Russian military forces – <b>Main Directorate of Deep Sea Research (GUGI)</b>, one of the departments of the Russian Ministry of Defense, engaged in the training of specialists in the field of deep-sea activity ("underwater special forces of the Navy"), the maritime equivalent of a Russian military intelligence agency; <b>Main Computation Center of the General Staff of the Armed Forces of the Russian Federation</b>, computer center of the missile division of the Strategic Missile Forces which carries out operational tactical calculations and is designed for calculating flight tasks, automated collection, and storage of information;</li> <li>– 4 nuclear related entities, including 3 Russian civil nuclear entities under the Rosatom organizational structure – <b>JSC Operating Organization of Zaporizhzhya Nuclear Power Plant</b>, entity created by decree of the President of Russia to usurp control of Ukraine's Zaporizhzhia nuclear power plant; <b>Energospetsmontazh JSC</b>, construction subsidiary of the State Atomic Energy Corporation Rosatom, Russia's state-owned nuclear power supplier, which is involved in constructing nuclear power facilities abroad; <b>Trest Rosspetsenergomontazh OOO</b>, construction subsidiary of the State Atomic Energy Corporation</li> </ul>

Rosatom; **JSC State Research Center of the Russian Federation Troitsk Institute for Innovation and Fusion Research**, research institute of the State Atomic Energy Corporation Rosatom conducting R&D in such fields as plasma physics, controlled thermonuclear fusion, laser physics and technology, physics of extreme states of matter, physics of energy conversion processes;

– 4 entities operating in the marine sector, including 3 entities involved in expanding Russia's future energy production and export capacity through designing and building the Sever Bay Terminal as part of the Vostok oil projects – **JSC Marine Arctic Geological Expedition (JSC MAGE)**, one of the leading Russian companies providing a wide range of geological-geophysical services for study of geological structure of the shelf areas, transition zones and adjacent onshore areas of the World Ocean under Federal programs of Russia and foreign-economic projects; **JSC Lenmorniiproekt**, one of Russia's largest seaport designers which is contracted to design the Sever Bay Terminal as a part of Russia's Vostok Oil Project; **OOO Taimyrneftegaz-Port**, the main construction contractor for the Sever Bay Terminal as a part of Russia's Vostok Oil Project; **Pola Raiz OOO**, Russian shipping company involved in increasing Russia's trade with Turkey and facilitating shipments of materials to Arctic construction sites;

– 23 entities operating in Russia's advanced technology sector, including 13 entities associated with the manufacturing of hardware and development of software for Russia's System for Operational-Search Measures (SORM) capabilities that enables Russia's domestic and foreign intelligence collection, monitoring and suppression of dissent, and has been installed on infrastructure in occupied parts of Ukraine to further aid Russia's attempts to integrate Ukraine's territory into Russia – **LLC Titan-Avangard**, entity provides full-cycle production and engineering company, specifically in the military-industrial complex, aerospace industry, and metallurgy; **LLC Spetsavia**, manufacturer of construction 3D printers and large FDM printers; **OJSC Corporation Novosibirsk Plant Elektrosignal**, entity specializing in the development and production of radio-electronic equipment for various industries in Russia, including law enforcement agencies; **LLC Astrakom**, manufacturer of communications systems and a leader in the development and implementation of professional radio communication systems in Russia; **CJSC RSK Technologies**, electrical and microelectronics company; **LLC RSK Labs**, entity engaged in the development of advanced supercomputer architectures, owned or controlled by Alexey Shmelev who serves as the Director General and 50 % shareholder of RSK Labs; **Botlikh Radio Plant LLC**, manufacturer of electronic components, including communication equipment, radar equipment, radio navigation and radio remote control equipment, military fighting vehicles, and other telecommunications devices; **JSC Moscow Order of the Red Banner of Labor Research Radio Engineering Institute (MNIRTI)**, manufacturer of digital radio-relay stations, satellite communication centers, data transmitting systems and complexes for various purposes, means of electronic countermeasures, and equipment for wideband wireless radio access and video surveillance systems; **LLC Antels**, entity engaged in the manufacturing of electronic audio and video equipment; **Federal State Unitary Enterprise Federal Center of Dual Technologies Soyuz**, one of the leading Russian enterprises in the field of chemistry and the technology of solid propellants, development of power units for missile systems, space systems, and systems of direct energy conversion, and the creation of dual-use technologies; **LLC Citadel**, manufacturer of legal control systems and information security solutions, a major player in the Russian SORM equipment market, occupies approximately 60-80 % of the Russian SORM production market; **LLC Osnova Lab**, Russian innovation company, developer of software and systems for legal control and means of carrying out operational and investigative activities, owned or controlled by Citadel; **LLC Malvin Systems**, Russian innovation company, developer of software and systems for legal control and means of carrying out operational and investigative activities, owned or controlled by Citadel; **LLC MFI Soft**, computer software developer, owned or controlled by Citadel; **LLC Tekhargos**, organization engaged in the development, production and implementation of technical means of ORM (TS ORM) to implement the requirements of the legislation on the networks of telecom operators in Russia and CIS countries, owned or controlled by Citadel; **LLC Signatek**, one of the leading Russian developers of professional equipment for collection, distribution and processing of information for the subjects of operational and investigative activities, as well as SORM solutions (TS SORM) for telecom operators and manufacturers of telecommunications equipment, owned or controlled by Citadel; **LLC Bastion**, computer software development entity, owned or controlled by Citadel; **LLC ADM Systems**, software developer for telecom operators, owned or controlled by Citadel; **LLC**

			<p><b>Garda Technologies</b>, Russian developer of information security threat protection, anti-fraud and incident investigation systems, owned or controlled by Citadel; <b>LLC Holding Intelligence Computer Systems (IKS)</b>, Russian multidisciplinary technology company engaged in investment, management and consolidation in the telecom media and technology market, owned or controlled by Anton Cherepennikov; <b>KNS Group OOO</b>, manufacturer of servers, storage systems, software and specialized computing systems, owned or controlled by IKS; <b>JSC Scientific and Production Company Kryptonit</b>, company engaged in cryptography, telecommunications, technology and solutions in the field of storage, processing and management of big data, owned or controlled by IKS; <b>CJSC Norsis Trans</b>, one of the few companies in Russia manufacturing, developing, and selling hardware and software related to SORM capabilities;</p> <p>– 1 entity operating in the shipbuilding sector – <b>Vostochnaya Verf JSC</b>, shipbuilding company, which manufactured the Serna-class landing craft used during Russia’s assault on Zmiinyi Island and supplies ships for Russia’s Far East and Pacific Fleets;</p> <p>– 1 entity operating in the aerospace sector – <b>JSC Eniks</b>, entity involved in maintaining aircraft and aircraft engines for the Russian military and manufacture of UAVs, including the Eleron-3, which is used for aerial reconnaissance and electronic warfare;</p> <p>– 1 entity facilitating grain theft – <b>State Unitary Enterprise State Grain Operator</b>, organization created by the Russia-backed illegitimate military-civilian administration of Zaporizhzhya to handle stolen grain in Ukraine;</p> <p>– 7 entities owned or controlled by newly sanctioned persons – <b>LLC STK</b>, business and management consulting company and provider of activities in the field of architecture, engineering surveys and provision of technical advice in these areas, owned by Viktor Khristenko; <b>LLC Golfesteit</b>, business and management consulting company owned by Viktor Khristenko; <b>LLC Laifinvest</b>, entity providing activities of holding companies, owned by Viktor Khristenko; <b>JSC Argus Holding</b>, holding company owned by Anna Surovikina; <b>JSC Argus SFK</b>, subsidiary of Argus Holding tied to dealings with companies owned by SDN-listed oligarch Gennadiy Timchenko, owned by Anna Surovikina; <b>LLC Iskusstvo Krasoty</b>, hospital entity operating in medical, cosmetic activities, owned by Anna Surovikina; <b>LLC Rudniy</b>, company involved in mining of ornamental and building stone, limestone, gypsum, chalk and shale, owned by Anna Surovikina;</p> <p>– 1 illegal military entity waging war on behalf of Russia – <b>Sparta Battalion</b>, military unit that was part of the armed forces of the former so-called Donetsk People’s Republic.</p>
8 Mar 2023	Russia	OFAC	Removal of the former Kazakh subsidiary of Sberbank (Subsidiary Bank Sberbank of Russia JSC) from sanctions list, which has been sold to National Managing Holding Co. Baiterek, owned by the Kazakh government, and renamed Bereke Bank Joint Stock Co.
9 Mar 2023	China	OFAC	5 companies in China supporting Iran’s unmanned aerial vehicle (UAV) procurement efforts – <b>Hangzhou Fuyang Koto Machinery Co., Ltd</b> , a China-based company, used its business infrastructure to facilitate the sale and shipment of aerospace components, including light aircraft engines applicable for Iran’s Shahed series UAVs, to HESA in Iran; <b>Raven International Trade Limited</b> , Hong Kong-based front company used by Hangzhou Fuyang Koto Machinery Co., Ltd to facilitate transactions worth millions of dollars for aerospace components; <b>Guilin Alpha Rubber &amp; Plastics Technology Co., Ltd</b> , China-based company that has facilitated the sale and shipment of thousands of aerospace components worth over a million dollars to HESA in Iran; <b>S&amp;C Trade PTY Co., Ltd</b> , China-based company that facilitated the sale and shipment of aerospace components for fixed-wing, rotorcraft, and UAV applications to HESA in Iran, <b>Shenzhen Caspro Technology Co., Ltd</b> , China-based company (Hong Kong) that facilitated the sale and shipment of aerospace components for fixed-wing, rotorcraft, and UAV applications to HESA in Iran.
21 Mar 2023	Iran / Turkey	OFAC	4 entities from Iran and Turkey involved in the procurement of equipment in support of Iran’s UAV and weapons programs – <b>Defence Technology and Science Research Centre (DTSRC)</b> , Iranian entity majority-owned by and subordinate to MODAFL, which conducts defense-related procurement and R&D; <b>Farazan Industrial Engineering, Inc.</b> , Iranian entity that acquires defense equipment for the DTSRC and, in one case, attempted to procure European-origin turbine engines applicable for UAVs and Iranian surface-to-air missiles; <b>Ozone Havacilik Ve Savunma Sanayi Ticaret Anonim Sirketi (Ozone</b>

			<b>Aviation</b> ), Turkish entity which facilitated Murat Bukey's business with Iran; <b>Selin Technic Co.</b> , front company owned and operated by Asghar Mahmoudi to facilitate his trade business with Amanallah Paidar and other U.S.-designated Iranian military entities.
24 Mar 2023	Belarus	OFAC	3 entities, including revenue generating state-owned enterprises: – 2 <i>machine-building entities</i> – <b>OJSC Belarusian Automobile Plant (BelAZ)</b> , one of the largest manufacturers of large trucks and large dump trucks in the world; <b>OJSC Minsk Automobile Plant (MAZ)</b> , one of the biggest automotive manufacturers in Belarus; – 1 <i>executive body, government agency</i> – <b>the Central Election Commission of the Republic of Belarus (CEC)</b> , government agency responsible for organizing and conducting elections and referendums in Belarus which played a role in barring opposition candidates, denying access to poll observers, and certifying inaccurate vote tallies.

### United Kingdom

Date	Target country	Description
8 Feb 2023	Russia	7 entities: – 2 <i>entities operating in the aerospace sector</i> – <b>AO NPP Topaz</b> , avionics company engaged in the development and production of hardware and software for the control of aircraft for ground-based and ship-based use; <b>LLC RT-Komplekt</b> , enterprise providing components, units, and assemblies for the aviation, instrument-making, and shipbuilding industries; – 3 <i>machine-building entities</i> – <b>JSC Plant Universalmash</b> , subsidiary of Kirovsky Zavod JSC, manufacturing plant which produces diverse equipment on wheeled, tracked, and combined mode, and primarily focuses on manufacturing tracked chassis of the S-300V4 anti-aircraft missile system used by Russia's armed forces in Ukraine; <b>LLC CST</b> , manufacturer and supplier of the Lancet range of drones which are used by the Russian military in its invasion of Ukraine; <b>Lipetsk Mechanical Plant LLC</b> , manufacturer of modernized self-propelled tractors for the S-300V4 anti-aircraft missile system; – 1 <i>operating in the advanced technology sector</i> – <b>MOSCOMS LLC</b> , IT services company acting as a nexus for the Russian elite, providing host domains to many involved in destabilising Ukraine; – 1 <i>entity operating in the transport and logistic sector</i> – <b>Oboronlogistics LLC</b> , Russian Ministry of Defence owned and controlled shipping and logistics company that organises the transportation and delivery for Russian military equipment and special purpose goods.
24 Feb 2023	Russia	12 Russian entities: – 4 <i>banks</i> - <b>Bank St Petersburg PJSC, Bank Uralsib PJSC, Bank Zenit PJSC</b> and <b>MTS Bank PJSC</b> ; – 6 <i>entities operating in the military-industrial complex involved in the manufacture or repair of military equipment for Russia's armed forces, including aviation and navy</i> – <b>AO Izumrud</b> , company that develops and manufactures shipborne radar systems to control the firing of shipborne anti-aircraft artillery, radio navigation equipment and remote control radio equipment for Russian navy; <b>AO Zavod Elekon</b> , privately owned manufacturing company specialising in the design and manufacture of electrical connectors, and supplying Russian defence sector; <b>JSC Repair base for repair of aircraft instruments and aerodrome equipment</b> , Russian Ministry of Defense enterprise that manufactures and repairs military equipment for the Strategic Missile Forces and other military entities, providing supply, repair and restoration work, and supervision of automated systems and technical means for missile positions, as well as producing training devices for personnel and military equipment for mobility; <b>JSC LOMO</b> , entity involved in the manufacture of optical systems for weapons detection; <b>JSC Zvezda</b> , manufacturer involved in the development, production, maintenance, repair and sale of military equipment; <b>LLC Zavod Sokol</b> , manufacturing plant focused on the repair and maintenance of aircraft; – 2 <i>subsidiary enterprise of the State Atomic Energy Corporation Rosatom that develop and operate Russia's nuclear weapons</i> – <b>All-Russian Research Institute of Experimental Physics (VNIIEF)</b> , research institute responsible for the development and experimental testing of nuclear weapons; <b>Federal State Unitary Enterprise Zababakhin All-Russia Research Institute of Technical Physics (VNIITF)</b> , research institute that focuses on the development of nuclear weapons and military technologies.
17 Mar 2023	Russia	The UK deleted a duplicate entry for the Minsk Wheel Tractor Plant introduced under Russia sanction regime on 24 March 2022. This entity remains listed on the Belarus sanctions list from 18 December 2020.

## European Union

Date	Target country	Description
25 Feb 2022	Russia, Iran	<p>34 entities:</p> <ul style="list-style-type: none"> <li>– 4 banks – <b>Bank St Petersburg PJSC</b>, diversified bank whose main services are in corporate and retail banking; <b>Bank Uralsib PJSC</b>, commercial bank providing retail and corporate banking services; <b>Bank Zenit PJSC</b>, commercial bank providing both retail and corporate banking services; <b>MTS Bank PJSC</b>, universal commercial bank on a federal scale, being among the largest banks of Russia in terms of assets;</li> <li>– 1 national wealth fund – <b>The National Wealth Fund of the Russian Federation</b>, reserve fund controlled by the government and used to cover budget deficits;</li> <li>– 1 reinsurance company – <b>Russian National Reinsurance Company (RNRC)</b>, Russian state-controlled reinsurance company and subsidiary of the Bank of Russia;</li> <li>– 10 entities operating in the defense and related materiel sector – <b>Design Bureau Ametist JSC</b>, leading developer of artillery systems for the Russian Navy; <b>Dubnensky Machine-Building Plant JSC</b>, Russian company that contributes to the country's military-industrial complex by developing Orion reconnaissance and strike drones for the Russian armed forces; <b>Instrument-Making Plant Typhoon JSC</b>, Russian enterprise that develops and supplies weapons systems for Russian armed forces, including the BAL-E coastal missile system and Rubezh-ME missile system; <b>JSC Scientific and Production Association 'Impuls'</b>, entity that develops and implements automated control systems for the Strategic Rocket Forces of the Ministry of Defence of Russia; <b>JSC State Machine Building Design Bureau "Raduga"</b>, Russian developer and manufacturer of missiles that provides weapons to the Armed Forces of Russia; <b>Special Technology Center Ltd.</b>, Russian defense industry company that provided the Orlan-10 unmanned aerial vehicles used by the Armed Forces of Russia; <b>Lipetsk Mechanical Plant</b>, Russian military industry company that manufactured self-propelled tracked chassis for the S-300V4 surface-to-air missile systems for Russian armed forces; <b>PJSC "Scientific and Production Association 'Almaz' named after Academician A.A. Raspletin"</b>, part of the Russian state-owned aerospace defence concern "Almaz-Antey" that produces surface-to-air missile systems for the Troops of National Air Defense; <b>PJSC Krasnogorsk Plant named after S.A. Zvereva</b>, enterprise owned by JSC Shvabe that produces military technology and hardware; <b>195 Repair Plant of Rocket and Artillery Weapons</b>, military-industrial enterprise that repairs and maintains military products used by the Russian armed forces in the ongoing war of aggression against Ukraine, with licenses provided by the Russian government to develop and repair weapons and military equipment;</li> <li>– 3 entities operating in the technology sector – <b>Battery Company Rigel JSC</b>, manufacturer of nickel-metal hydride and silver-zinc batteries that has been a supplier to the Russian navy for more than 15 years; <b>JSC Shvabe</b>, holding firm owned by Rostec that specializes in research and mass manufacture of optical and laser systems and complexes; <b>AO Plasma</b>, Russia's largest developer and manufacturer of plasma electronics, gas lasers and systems based on them, information display facilities;</li> <li>– 4 entities operating in the shipbuilding sector – <b>Avrora JSC</b>, leading enterprise in Russia's maritime defense sector, holding licenses from the Russian Ministry of Industry and Trade to develop weapons and military equipment, and from Rosatom to work on the use of atomic energy for defense purposes, primarily involved in the development, production, and supply of automated control systems for surface ships and submarines of the Russian Navy, including on-board hardware systems; <b>Elektropribor JSC</b>, leading company in the Russian maritime defense industry that specializes in developing and manufacturing high-precision navigation, gyroscopic, gravimetric, and optical electronic systems for submarines, as well as marine communication systems; the company holds an active license from the Russian Ministry of Industry for the development of weapons, ammunition, and military equipment, and it produces navigation systems for combat ships of the Russian Navy; <b>Morinformsystem Agat JSC</b>, leading company in the Russian shipbuilding industry that specialises in the development, production and maintenance of combat information and control systems as well as integrated systems, integrated control automation systems for marine formations, sea-based cruise and ballistic missile fire control systems, ship-based and coastal missile and radar systems, and sonar systems; <b>Zelenodolsk Design Bureau JSC</b>, leading shipbuilding company in Russia's military-industrial complex that designs warships for the Russian armed forces and has particular expertise in the construction of anti-submarine combat ships, military patrol ships, and spy ships;</li> </ul>

		<ul style="list-style-type: none"> <li>– 2 entities operating in the maritime sector – <b>Atomflot</b>, Russian company that maintains Russia’s icebreaker fleet designed to meet maritime transportation objectives along the Northern Sea Route; <b>SUN Ship Management (D) Ltd.</b>, Dubai-based ship management company part of PAO Sovcomflot that manages and operates a fleet of oil, liquefied natural gas and chemical vessels;</li> <li>– 2 machine-building entities – <b>LLC “Commercial Vehicles – GAZ Group”</b>, Russia’s top producer of commercial vehicles; <b>LLC United Machine-Building Group</b>, industrial holding broadly engaged in the market for powertrains for all-wheel drive trucks and motor graders;</li> <li>– 2 entities operating in the construction sector – <b>Avtodor</b>, construction company subordinated to the “Department of roads” of the “Ministry of Transport” of the so-called “Donetsk People’s Republic”; <b>Nizhneangarsktransstroy</b>, construction company that specialises in road and highway repairs;</li> <li>– 3 entities involved in Russia’s disinformation and propaganda actions – <b>All-Russia People’s Front (ONF)</b>, social movement created in May 2011 as a coalition of socio-political organisations at the suggestion of Vladimir Putin; <b>Patriot Media Group</b>, Russian media organisation headed by Yevgeny Prigozhin that spreads pro-Government propaganda and disinformation on Russia’s war against Ukraine; <b>Rossiya Segodnya</b>, Russian government-linked media group spreading pro-government propaganda and disinformation through its subordinate media outlet, Sputnik;</li> <li>– 1 proxy authority installed by Russia in illegally annexed regions of Ukraine – <b>Ministry of Emergency Situations of the so-called “Donetsk People’s Republic”</b>, unrecognised government entity of the self-proclaimed “Donetsk People’s Republic”;</li> <li>– 2 entities operating in the aerospace sector – <b>JSC “State Space Research and Production Center named after M.V. Khrunichev”</b>, part of the State Corporation “Roscosmos” and leading enterprise of the Russian rocket and space industry developing and manufacturing spacecraft and space-launch systems, including “Proton-M” heavy-lift launch vehicles, “Angara” launch vehicles, and “Rokot” light launch vehicles, and the Russian modules of Mir and the International Space Station; <b>JSC Ural Civil Aviation Factory</b>, aircraft manufacturer and maintenance company that provides weapons to the Armed Forces of Russia.</li> </ul>
25 Feb 2022	Russia	<p>7 entities with alleged links to the Wagner Group in Sudan and the Central African Republic – <b>Lobaye Invest SARLU</b>, private company registered in the Central African Republic (CAR), subsidiary of the Russian company M-Finans, controlled by Yevgeny Prigozhin; <b>DIAMVILLE</b>, screen company used by the Wagner Group present in the Central African Republic (CAR) to illegally trade diamonds; <b>Foundation for the Defence of National Values (FDNV)</b>, entity linked with the head of the Wagner Group, Yevgeny Prigozhin, which operates as the public relations arm of the Wagner Group; <b>Radio Centrafricaine Lengo Sengo</b>, Central African radio station engaged in online influence operations on behalf of the Wagner Group; <b>Meroe Gold Co. Ltd</b>, cover entity for the Wagner Group’s operations in Sudan; <b>M-Invest</b>, cover entity for the Wagner Group’s operations in Sudan, exploiting and exporting of Sudanese gold to Russia, associated with serious human rights abuses; <b>Sewa Security Services</b>, Central African Republic (CAR)- based private company that provides protection for senior CAR government officials and serves as a cover for the Wagner Group’s activities in CAR, subsidiary of Lobaye Invest.</p>

**Canada**

Date	Target country	Description
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2 Feb 2023	Russia	<p><i>16 entities involved in Russia's disinformation and propaganda actions</i> – <b>Rossiia Segodnya MIA</b>, state-owned media company that unites Russian-language information resources RIA Novosti, PRIME, InoSMI, TOK, KOT, Baltnews, Ukraina.ru, Social Navigator and Arctic.ru; <b>RIA Novosti</b>, Russian agency of international information; <b>SouthFront</b>, multilingual website which spread disinformation relating to Ukraine and promoted the Government of Russia's false narrative about the Russian invasion of Ukraine; <b>InfoRos</b>, online news agency; <b>Geopolitika</b>, Russian magazine, a platform for continuous monitoring of the geopolitical situation in the world; <b>New Eastern Outlook</b>, Internet journal published by the Institute of Oriental Studies of the Russian Academy of Sciences, and run by SVR, Russia's foreign intelligence agency; <b>Strategic Culture Foundation</b>, think tank that primarily publishes an online current affairs magazine of the same name; <b>Journal Kamerton</b>, news outlet that is affiliated with the Strategic Culture Foundation; <b>United World International</b>, online news site which promotes pro-Russian disinformation, closely linked to Yevgeny Prigozhin, the founder and owner of Wagner PMC; <b>Oriental Review</b>, online media outlet based in Russia; <b>Foundation for the Fight Against Repression</b>, non-profit organization, disinformation actor closely linked to Yevgeny Prigozhin, the founder and owner of Wagner PMC; <b>Tsargrad Media</b>, pro-government media outlet, a part of a network led by Russian oligarch Konstantin Malofeev; <b>Russkiy Mir Foundation</b>, government-sponsored organization aimed at promoting the Russian language and culture worldwide, and "forming the Russian World as a global project", co-operating with the Russian Orthodox Church in promoting values that challenge the Western cultural tradition; <b>The Alexander Gorchakov Public Diplomacy Fund</b>, Russian think tank closely linked to Russian Ministry of Foreign Affairs designed to support Russian compatriots in the post-Soviet space in line with the Kremlin's ideological objectives; <b>Internet Research Agency (IRA)</b>, company linked to Russian oligarch Yevgeny Prigozhin which is engaged in online propaganda with the ultimate goal of manipulating public opinion on behalf of Russian business and political interests; <b>Analiticheski Tsentr Katekhon LLC</b>, think tank that is a proliferator of anti-Western and pro-Kremlin disinformation and propaganda that clearly targets fringe audiences in the West.</p>
23 Feb 2023	Russia	<p>63 entities:</p> <ul style="list-style-type: none"> <li>– <i>2 Russian federal decision-making institutions</i> – <b>The State Duma</b>, the lower chamber of the Federal Assembly of Russia, the country's legislative branch; <b>The Federation Council</b>, the upper house of the Federal Assembly of Russia, the country's legislative branch;</li> <li>– <i>4 Russian law enforcement and security executive bodies, government agencies</i> – <b>Federal Security Service of the Russian Federation</b>, main domestic security agency of Russia responsible for counterintelligence, internal security, border security, counter-terrorism, and surveillance; <b>The Chief Directorate for Special Programmes of the Russian President</b>, Russian federal executive agency that performs functions to ensure the fulfillment of the authority of the President of Russia in the field of mobilization training and mobilization in Russia; <b>The Federal Guard Service</b>, Russian federal executive agency responsible for state protection, regulatory oversight, and information support for the President, the government, and other state bodies; <b>Federal Financial Monitoring Service of the Russian Federation</b>, Russian executive authority responsible for preventing and combating money laundering and terrorist financing in Russia;</li> <li>– <i>1 branch of the Russian military forces</i> – <b>The Main Directorate of the General Staff of the Armed Forces of the Russian Federation</b>, foreign military intelligence agency of the General Staff of the Armed Forces of Russia;</li> <li>– <i>1 nuclear related entity</i> – <b>Operating Organisation of the Zaporizhzhia NPP</b>, entity created by decree of the President of Russia to usurp control of Ukraine's Zaporizhzhia nuclear power plant;</li> <li>– <i>17 entities operating in the defense and related materiel sector</i> – <b>Luch Design Bureau JSC</b>, company specializing in the development of radio-electronic equipment or airborne and ground measuring systems, including air reconnaissance systems using unmanned aerial vehicles and command radio links, with a focus on the "Tipchak" air reconnaissance complex; <b>NPO Novator</b>, company that designs long-range anti-aircraft missiles; <b>Machine Building Company "Vityaz"</b>, company engaged in the development, production, operation and repair of armoured military vehicles; <b>Uralvagonzavod</b>, Russian state-owned machine building enterprise that specializes in heavy equipment production, particularly military equipment like tanks, railway cars, and armored vehicles, as well as commercial products like trams, electric locomotives, agricultural machinery, and road-building equipment; <b>Specialnoe Konstruktorskoe Byuro</b>, subsidiary of PAO "Motovilikhinskiye Zavody", manufacturer of weapons systems and ammunition, the exclusive manufacturer in Russia of combat and transport-loading vehicles for multiple launch rocket systems such as "Tornado", "Grad," "Smerch," and their modified versions "Tornado-G" and "Tornado-S"; <b>ENICS JSC</b>, Russian company engaged in the development, production, operation and repair of aerial target complexes and unmanned aerial vehicles (UAVs), remote surveillance systems and other warfare equipment; <b>V.A. Degtyarev Plant</b>, firearms manufacturer which provides weapons to the Russian Armed Forces; <b>Tula Plant JSC</b>, one of the largest manufacture of firearms and ammunition, such as rifles, pistols, shotguns, and cartridges; <b>EGO-HOLDING</b>, group of several enterprises of the military-industrial complex,</li> </ul>



which are the leaders in Russia in their areas of the defence industry for the development and manufacture of means and complexes of radio communication and electronic warfare; **Bryanskij Avtomobilnyj Zavod**, the only Russian manufacturer that produces special wheeled chassis and tractors (SKST) of high cross-country ability, which are the basis of future means of air and rocket and space defence; **Volgograd Machine Building Company VGTZ LLC**, Russian developer and manufacturer of landing combat vehicles, such as BMD-4M, BTR-MDM, BMP-2 and BMP-3; **Special Mechanical Building and Metallurgy "Motovilihinskie Zavody"**, majority privately-owned company specializing in the design and manufacturing of metallurgical equipment, weapons, and military equipment, including field artillery guns, mine-throwers, self-propelled artillery, Multiple Launch Rocket Systems (MLRS), as well as metallurgical products, special oilfield and drilling equipment, construction equipment, and equipment for the coal industry and various engineering products; **Central Research Institute "Burevestnik"**, research and production enterprise specializing in the development, upgrading, and production of naval artillery weapons, artillery systems and mortars for Land Forces, main armament of armored fighting vehicles, unified large-caliber artillery weapons for Land Forces and Navy, as well as equipment and systems for the maintenance of artillery and tank weapons, that is also involved in manufacturing metals; **A.E. Nudelman Design Bureau of Precision Machine Building JSC**, part of the Russian state-owned enterprise Almaz-Antey Concern, Russian weapons developer that manufactures a broad array of anti-aircraft defence systems, MANPADS, missiles, including high-precision weapons; **Izhevsk Electromechanical Plant Kupol JSC**, Russian company engaged in the development, production, operation and repair of Tor missile systems, an all-weather, low to medium-altitude, short-range surface-to-air missile system designed for destroying airplanes, helicopters, cruise missiles; **Research and Production Corporation Uralvagonzavod JSC**, Russian state-owned machine building enterprise that specializes in heavy equipment production, particularly military equipment like tanks, railway cars, and armored vehicles, as well as commercial products like trams, electric locomotives, agricultural machinery, and road-building equipment; **Scientific and Production Association Strela**, enterprise engaged in the development and manufacture of radar equipment for the surveillance and detection of ground and sea surface targets;

– 14 entities operating in the technology sector – **Multiclet Corporation**, developer of fault-tolerant, energy-efficient, highly performant multicellular processors and devices based on them; **Research and Production Company Optolink**, research and production company that specializes in the development of fiber optic gyroscopes and inertial navigation systems; **Scientific and Production Association Russian Basic Information Technology JSC**, technology company specialising in the production of high technology solutions for Russian enforcement structures, mainly for Russian Armed Forces; **Kazan Optical and Mechanical Plant JSC**, diversified enterprise specialising in the development and production of optical devices and electronic warfare equipment (including radars, binoculars); **Scientific and Technical Center Zaslon JSC**, scientific and technical center with competencies in the field of development, production and supply of information and integrated automated control systems, software, instrumentation and microelectronics; **Energiya JSC**, power development company that develops and produces autonomous power sources for consumer, general industrial and special equipment such as aviation, civil river and sea fleet, radio engineering, household electronic and electrical devices, medical equipment, toys and games, emergency communication and alarm systems for water, air, and land, as well as firefighting systems and other equipment for various purposes; **Research Center Elins JSC**, research and development enterprise specializing in IT and computer technology for unique control systems, designing and developing electronic equipment for the Ministry of Defense of Russia; **Additive Technologies Center JSC**, integrator of additive technologies and is involved in implementing and using additive technologies; **International Center for Quantum Optics and Quantum Technologies LLC**, non-profit scientific and technological center focuses on the development of high-tech commercial products utilizing quantum technologies, including lasers, semiconductor devices, and magnetic resonance scanners, with a particular emphasis on their quantum communication system for secure information transfer in sectors such as finance, telecommunications, and government; **Production Association Sever JSC**, Russian diversified research and production entity that develops and manufactures a wide range of radio-electrotechnical products, including electric motors, electrical equipment, power systems, and other electrical products; **Federal Joint Venture Quantum Technologies**, joint venture under the Rosatom structure, which specializes in the production of electronic equipment components as well as the manufacturing of instruments and devices for measurement, testing, and navigation purposes; **Aquarius**, Russian enterprise in the radio-electronic industry that specializes in the development, manufacturing, and supply of computer equipment and IT solutions; **YADRO**, electronics company specializing in the manufacture of electronic components, particularly circuit boards, and is currently undertaking a project to establish Russia's largest modern production plant for circuit board production; **Element JSC**, joint venture between AFK Sistema and Rostec, a leading Russian microelectronics entity offering comprehensive services in design, production, testing, and integration of

electronic devices and systems, holding a prominent position in both sales volume and technology in Russia's microelectronic industry;

- 6 machine-building entities – **RM-Terex LLC**, joint venture between Russian holding company "Ruskie Mashiny" and global manufacturer Terex Corporation, specializing in the production and distribution of construction and road-building equipment; **Obedinennaya Mashinostroitel'naya Gruppya**, Russian industrial holding broadly engaged in the market for powertrains for all-wheel drive trucks and motor graders; **Russian Machines JSC**, diversified machine-building corporation that brings together production and engineering assets across various sectors including mechanical engineering, automobile construction, road-building technology, auto-components, railroad and aviation machine building, and the production of special equipment for the armed forces; **Avtomobilnij Zavod Ural**, manufacturer of trucks and one of the main suppliers of armored trucks for the Russian armed forces; **Zavolzhskij Zavod Gusenichnyh Tyagachej**, Russian mechanical engineering enterprise which specializes in the manufacturing of tracked all-terrain vehicles, specifically the GAZ-3344-20 Aleut two-link floating tracked snow and swamp vehicle, which is supplied to the Russian Armed Forces; **Kommercheskie Avtomobili – Gruppya Gaz LLC**, Russia's top producer of commercial vehicles, specialty vehicles, buses and powertrains;
- 3 entities in the aerospace sector – **Zhukovskiy Central Aerohydrodynamics Institute (TsAGI)**, national aerospace research center; **Research and Production Association named after S.A. Lavochkina JSC**, aerospace company that specializes in the development and production of spacecraft and space systems; **Aeropribor Voskhod JSC**, company that specializes in developing and producing avionics and other aircraft equipment (aerometric instruments, safety and life support systems, high-precision navigation systems, radio electronic systems, communication systems, flight control systems, and other specialized equipment for civil and military aircraft);
- 1 entity in the shipbuilding sector – **Vostochnaya Verf JSC**, shipbuilding company, which manufactured the Serna-class landing craft used during Russia's assault on Zmiinyi Island and supplies ships for Russia's Far East and Pacific Fleets;
- 1 oil and gas company – **Rosneftegaz**, producer of crude oil and refines it into various grades of gaseous and liquid fuels;
- 7 scientific research organizations in the technology sector – **Rzhanov Institute of Semiconductor Physics Siberian Branch of Russian Academy of Sciences**, research institute specializes in microsensoric technologies and semiconductors, actively engaging in military robotics activities for the benefit of the Russian Ministry of Defense; **NIHIT JSC (JSC Research Institute of Chemical Power Sources)**, developer and manufacturer of backup power sources for autonomous electrical power supply of military and special equipment, including nickel-cadmium batteries, ampoule cells, and thermal power sources; **Federal State Financed Institution of Science Higher Education Institution Spectroscopy of the Russian Federation Academy of Sciences**, research institute that conducts research activities focused on analytical spectroscopy and its applications in technology control, nanotechnologies, and the development of new technologies; **The Federal Research Center Institute of Applied Physics of the Russian Academy of Sciences**, research institute that conducts research across various domains of applied physics, including high-power electronics, plasma electrodynamics, physical phenomena in natural media and their diagnostics, low-frequency hydroacoustics, physical acoustics, nonlinear dynamics, laser physics and nonlinear optics, quantum systems, X-ray optics, nanomaterials and devices on their basis, strengthening and resource-saving technologies; **L.D. Landau Institute for Theoretical Physics – Russian Academy of Sciences (RAS)**, leading research institution in the field of theoretical physics specializing in condensed matter physics, low-dimensional and mesoscopic systems, nonlinear dynamics, quantum field theory, relativistic astrophysics and cosmology, quantum computing, mathematical physics, computational physics, and network studies; **Valiev Institute of Physics and Technology of Russian Academy of Sciences**, research institution focused on various fields of physics and technology, including quantum computing, quantum information processing, nanotransistors, nanostructures, micro- and nanosystem technology, mathematical modeling, solid-state quantum computers, low-temperature plasma sources, ion beams, ion-plasma technologies, and diagnostics of micro- and nanostructures; **Lebedev Physical Institute**, leading research institute in the field of physics, conducting research and activities encompassing microelectronics, vacuum and plasma electronics, optoelectronics, as well as research related to weapons;
- 1 military/defense research organization – **Federal Institute for Scientific Research Vychislitelnykh Kompleksov named after M.A. Kartseva JSC**, defense industry enterprise in Russia's radio-electronic industry that conducts research and development of fundamental technologies in the field of computer engineering, including real-time signal processing for radar and hydroacoustic systems, seismic and geophysical problem-solving, and the development of hardware and software for information systems used in transportation, security, uninterruptible power supply, and solar power plants;
- 1 entity in the financial sector – **RS-LIZING**, provider of financial leasing services;
- 1 paramilitary entity – **Yunarmy**, fascist youth movement sponsored by state;

		<ul style="list-style-type: none"> <li>– 1 Russian political party – <b>United Russia</b>, the largest party in Russia;</li> <li>– 2 other entities – <b>Gruppa Impuls</b>, distributor of household appliances and electronics; <b>TRV Auto LLC</b>, company providing maintenance and repair services for motor vehicles.</li> </ul>
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**Japan**

Date	Target country	Description
28 Feb 2023	Russia	<p>74 entities:</p> <ul style="list-style-type: none"> <li>– 1 bank – <b>PJSC Rosbank</b>, one of the largest financial structures and top lenders in Russia listed as a systemically-important credit institution by the Central Bank of Russia;</li> <li>– 11 entities in the military and defence sector – <b>JSC Research and Production Association Kvant</b>, military company involved in the production of electronic warfare systems for the Russian Armed Forces, including the co-design and co-production of the Krasucha-4 electronic warfare system and the manufacturing of equipment for the Rtut-BM electronic warfare system; <b>Aktsionernoe Obshchestvo Petrovskii Elektromekhanicheskii Zavod Molot</b>, enterprises manufacturing radio equipment for systems for detecting, navigating and controlling weapons of the Navy; <b>Aktsionernoe Obshchestvo Ravenstvo-Service</b>, one of the leading enterprises in Russia in the field of ensuring the reliable operation of shipborne radar systems, digital computing systems for missile systems installed on strategic nuclear submarines; <b>Aktsionernoe Obshchestvo Verkhneufaleiskii Zavod Uralelement</b>, strategic enterprise of the Russian military-industrial complex specializing in the development and production of chemical current sources for various electrochemical systems; <b>JSC Machine-Building Engineering Office Fakel Named after Akademika P. D. Grushina</b>, defense entity that develops and manufactures missiles for Russian military's air defense systems; <b>JSC Saratovski Radiopribornyi Zavod</b>, enterprise engaged in the development, production, and supply of advanced radio engineering systems, modern surface lighting systems, and weapon guidance systems for the Navy, including radar stations designed for deployment on both ships and coastal installations; <b>JSC A.N. Ganichev Scientific and Production Association "SPLAV"</b>, leading company specializing in the design and production of multiple launch rocket systems (MLRS) for the Russian Army and Navy, as well as unguided airborne weapons for the Airspace Force; <b>JSC Rawenstvo</b>, instrument engineering enterprise specializing in development, production, service support, modernization, and repair of radio technical complexes for illuminating surface conditions and weapon targeting, marine and mobile land-based radar stations, information-control complexes for radio-electronic weapons, and "Rokus" medical complexes used in cancer treatment; <b>JSC Production Association Strela</b>, diverse manufacturing complex producing rocket-and-space hardware and radioelectronic equipment, including sea-based anti-ship missiles, advanced combat systems equipped with cruise missiles, strategic missile systems, space surveillance systems, light multi-purpose helicopters KA-226 and KA-226AG, data management and control systems of radioelectronic equipment, shaped elements and blocks for nuclear and thermal power plants, maritime vessels, icebreakers, and oil and gas industry; <b>JSC Severniy Press</b>, company involved in the design, manufacturing, sale, service maintenance, and repair of radio-electronic devices and equipment, including on-board control systems for cruise missiles, shipboard fire control systems for anti-submarine and anti-torpedo weapons of surface ships, as well as automatic steering control systems for nuclear submarines, radars, and simulators; <b>JSC Dagdizel Plant</b>, defense industry enterprise specializing in the development and manufacturing of marine special equipment, including naval underwater weapons, diesel engines, power stations, ship fittings, and various machinery;</li> <li>– 12 entities in the aerospace sector – <b>JSC Reductor-PM</b>, enterprise specializing in the production and after-sales service of helicopter gearboxes and transmissions; <b>JSC Ulan-Ude Aviation Plant</b>, producer of various types of fighter airplanes and helicopters; <b>JSC 150 Aircraft Repair Plant</b>, enterprise specializing in the comprehensive overhaul, maintenance, and modernization of various helicopter models, including their components, engines, gearboxes, and auxiliary power units, as well as providing technical support for weapons, tools, radio equipment, and electrical systems; <b>JSC Stupino Engineering Productive Enterprise</b>, company engaged in the production and after-sales service of carrier systems for helicopters; <b>Rostov Helicopter Production Complex</b>, one of the largest manufacturers of modern helicopters "Mi" for civilian and military purposes; <b>JSC 810 Aircraft Repair Plant</b>, facility that focuses on the repair and technical maintenance of a wide range of military and civilian helicopters, including Mi-8/17, Mi-24 attack helicopters, and main gearboxes VR-14 and VR-24; <b>LLC Center of Purchases and Logistics of the Helicopter Industry</b>, subsidiary of the Russian Helicopters holding, established to optimize and consolidate procurement activities for the benefit of all helicopter manufacturing enterprises within the holding;</li> </ul>

**RApart Servisez OOO**, company providing material and technical support for the operation of the Russian-built commercial aircraft, serving as the spare parts support center of competence for Irkut Corporation; **Technodinamika**, holding company under Rostec, which specializes in the design, manufacturing, supply, maintenance, repair, and after-sales service of systems and units for commercial and military aircraft; **JSC 356 Aircraft Repair Plant**, company engaged in overhaul and maintenance of helicopters; **JSC Concern Radio-Electronic Technologies (KRET)**, radio-electronics holding company engaged in the development and manufacturing of avionics instruments for both civil and military aviation; **JSC Center of Research and Technology Services Dinamika**, defense entity that designs and manufactures flight simulators for Russia's military aircrews;

– 27 entities in the shipbuilding sector – **Almaz Central Marine Design Bureau JSC**, leading designer of high-speed combat ships and boats, specializing in hydrofoils, hovercraft, and surface-effect ships; **Federal State Unitary Enterprise Kronshtadtsky Morskoy Factory Minoboronyrossii**, Russian state-owned defense shipbuilding enterprise engaged in repair and maintenance of military and civil vessels, as well as repair of ship gas-turbine units, diesel engines, complex metal processing, galvanizing, and painting works; **PJSC Nevskoe Design Bureau**, Russian surface shipbuilding company specializing in the design of warships, aircraft carriers, landing ships, shipborne aircraft equipment, and naval aviation training complexes; **JSC Admiralty Shipyards**, shipbuilding enterprise that specializes in the construction of diverse civilian and military vessels, including tankers, icebreakers, submarines, and deep-water vehicles, and serves as the primary production center for non-nuclear submarines within the country, while also engaging in non-military endeavors like underwater technologies for oceanic exploration and advancement; **JSC Northern Production Association Arktika**, company specializing in electrical installation, adjustment, and servicing of radio-electronic weapons, as well as wiring works and testing of electric systems in warships; **JSC Production Association Northern Machine-Building Enterprise**, largest shipbuilding complex that builds submarines for the Russian Navy, including nuclear-powered ones; **JSC Shipbuilding Plant Lotos**, shipbuilding company that specializes in the manufacturing of vessels, tanks, and metal structures for the oil and gas industry, and also provides ship repairing services; **JSC Shiprepairing Center Zvyozdochka**, leading Russian enterprise involved in ship repair, shipbuilding, and machine-building, specializing in the repair, re-equipment, and modernization of diesel and nuclear submarines of all classes, as well as surface warships and platforms; **JSC Sredne-Nevisky Shipyard**, leading shipbuilding company in Russia, specializing in the construction of mine warfare ships for the Russian navy, as well as ships and vessels made of non-magnetic steels, aluminum, and fiberglass, while also offering a wide range of civilian products and repair services; **JSC Sudoexport**, Russian company specializing in the export of ships and floating facilities, acting as the representative of JSC United Shipbuilding Corporation in the global shipbuilding market; **PJSC Amursky Shipbuilding Plant**, shipyard specializing in the construction of civilian ships, military vessels including nuclear submarines and combat surface ships, as well as metal structures for diverse applications, and floating facilities and technological modules for the oil and gas industry; **PJSC Proletarsky Zavod**, shipbuilding and power engineering company that specializes in manufacturing a wide range of products for military and civilian vessels, including aircraft carriers, nuclear submarines, supertankers, pumping equipment, gas turbine power stations, and generators for various power plants and the oil industry; **Severnoe Design Bureau JSC**, leading entity that specializes in the design and construction of combatant surface ships, including corvettes, frigates, cruisers, destroyers, patrol boats, and landing ships, as well as a wide range of commercial vessels such as dry freight ships, chemical tankers, scientific research vessels, refrigerator ships, and LNG carriers; **JSC Design Bureau Vympel**, project organization specializing in shipbuilding design and technical support for a wide range of vessels, including research vessels, fishing vessels, icebreakers, arctic exploration ships, floating offshore facilities, cargo carriers, passenger ships, as well as auxiliary and special-purpose vessels for the Russian Navy; **JSC Zavod Kulakova**, marine instrument engineering plant specializing in the production of low-voltage equipment, automatic control systems, technical monitoring systems for ship communication equipment, electronic units, and specialized systems for ships and vessels of all classes; **Baltic Shipyard JSC**, shipbuilding enterprise involved in construction of surface ships of the 1st rank, ice-class vessels, multifunctional supply vessels, offshore support vessels equipped with nuclear and diesel-electric power plants, as well as nuclear floating power units and floating desalination plants, and ship engineering products; **JSC 10 Ordena Trudovogo Krasnogo Znameni Dockyard**, shipbuilding company involved in the repair and servicing of all types surface ships and submarines, weapon systems, and military equipment; **JSC Central Design Bureau for Marine Engineering Rubin**, leading submarine designer in Russia; **JSC Khabarovsk Shipbuilding Yard**, shipbuilding plant that manufactures a diverse range of vessels including fishing trawlers, refrigerated ships, barges, boats of various functions, passenger motor ships, multi-purpose amphibious boats, support vessels for the port fleet (tugs, fuel carriers, oil collectors, barges, platform vessels), as well as

transport vessels on airbags for the oil and gas industry (TSVP); **JSC Research Design and Technological Bureau Onega**, one of the leading design and technology organizations in the Russian shipbuilding industry; **JSC Svetlovsky Enterprise ERA**, company engaged in electrical work on ships, repair, installation, adjustment and testing of ship electrical equipment, as well as the manufacture of electrical distribution devices; **JSC the St. Petersburg's Sea Bureau of Mechanical Engineering Malachite**, design bureau specializing in the design of marine equipment, including those with a nuclear power plant, the construction and testing of nuclear and diesel submarines; **JSC 33 Shipyard**, shipbuilding and repair company that offers a comprehensive range of ship repair services, with a specialization in the repair of warships; **PJSC Krasnoye Sormovo Shipyard**, shipbuilding enterprise in the Russian Federation, focusing on the construction of river vessels, river-sea vessels, and the production of equipment for drilling rigs, pontoons, and agricultural machinery; **PJSC Shipbuilding Plant Severnaya Verf**, shipyard specializing in serial construction, modernization and repair of combat surface ships and commercial vessels; **PJSC Vyborg Shipyard**, shipbuilding company that specializes in constructing icebreakers, icegoing vessels for arctic conditions, trawlers, and offshore drilling and production platforms; **JSC Aysberg Central Design Building**, Russian design bureau specializing in the development of projects for icebreakers, auxiliary and special vessels, as well as floating power units;

- 4 entities in the machinery sector – **Aktsionerhoe Obshchestvo Elektrotyaga**, leading enterprise that designs and manufactures diverse lead-acid batteries, including the sole provider of emergency reserve and rechargeable lead batteries for all Russian submarine types; **JSC Krasnodarskiy Avtocentr KAMAZ**, official dealer with the authority to sell Kamaz vehicles as well as Nefaz buses; **Nefaz Publicly Traded Company**, company involved in manufacturing and distributing of truck trailers and commercial vehicles, including passenger buses, trucks, chassis superstructures, drop-side trailers, semitrailers, tank vehicles, and haymaking machinery, and spare parts; **PJSC Tutaev Motor Plant**, manufacturer of V8 diesel engines and spare parts, specializing in a wide range of applications including trucks, buses, tractors, specialized vehicles, diesel generators, river towboats, and engines for sports trucks "KAMAZ," along with manufacturing transmissions and spare parts for the YAMZ and TMZ engine families and diesel power units;
- 5 entities in the technology sector – **OJSC Radioavionika**, technological company specializing in R&D, production, and technological work for the Russian railways, focusing on railway automation, telematics devices, ultra-wideband radar systems, non-destructive testing tools, as well as the development of 'Strelets-M' reconnaissance, control, and communications systems for the Russian military; **JSC Kronshtadt tekhnologii Group of Companies**, Russian military contractor which develops and manufactures equipment, software and integrated solutions for unmanned aerial vehicles and Russian defence industry; **JSC Terra Tech**, technology firm that supplies space imagery acquired by commercially active satellites, as well as aerial images acquired by unmanned systems; **JSC Research and Production Concern BARL**, Russian space company supporting Russia's military activities in Ukraine by sharing foreign high-resolution satellite imagery with Russia's military; **Aktsionerhoe Obshchestvo Elektron Optronik**, technology company which specializes in the development and implementation of ion implantation operations for semiconductor devices and integrated circuits;
- 1 military/defence research organization – **JSC Research and Design Bureau Institute Sea Thermal Engineering**, Leading Russian organization in the field of development and production of thermal (combined-cycle) torpedoes and their power plants for the Navy;
- 1 entity in oil and gas sector – **LLC Kaspiyskaya Energiya Administration Office**, company responsible for executing initiatives of the JSC United Shipbuilding Corporation (USC) in the oil and gas industries;
- 1 air transport company – **LLC Charter Green Light Moscow**, aircraft charter services provider that is the preferred company of the Wagner Group for transporting personnel and equipment;
- 2 real estate entities – **Lakhta Park OOO**, real estate and building company related to Pavel Prigozhyn; **Lakhta Park Premium OOO**, real estate and building company related to Pavel Prigozhyn;
- 3 entities related to previously sanctioned companies – **Sportivno-Ozdorovitelnyi Tsentir Irkut-Zenit**, leisure company based in Irkutsk, Russia; **LLC Networking Company Irkut**, utilities company based in Irkutsk, Russia; **Tipografiya Irkut OOO**, printing and publishing company in Irkutsk, Russia;
- 1 other entity – **OOO Vr-Resurs**, service company that provides a range of services for managing non-core business processes of partner organizations, including technical maintenance and operation of non-residential buildings, transportation services for events and organizations, comprehensive helicopter maintenance services, cleaning services, and event organization and catering;
- 3 entities in the financial sector – **Mikam Holdings Limited**, Cyprus-based offshore investment holding company related to KAMAZ; **Lakhta Plaza OOO**, venture capital investments and construction company related to Pavel Prigozhyn; **Non-state Pension Fund First**

		<p><b>Industrial Alliance</b>, pension fund provider in Russia that is affiliated with KAMAZ Publicly Traded Company;</p> <p>– 2 paramilitary entities – <b>The Interregional Social Organization Union of Donbas Volunteers</b>, paramilitary organization contracted by the Russian Ministry of Defence and actively engaged in the war of aggression against Ukraine, responsible for recruiting, training, and deploying fighters to support Russia's military operations, while also conducting reconnaissance operations to identify targets in Ukraine;</p> <p><b>Russian Imperial Movement</b>, Russian ultranationalist, white supremacist, far-right paramilitary organization which operates out of Russia.</p>
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#### Australia

Date	Target country	Description
23 Feb 2023	Russia	<p>40 Russian entities:</p> <p>– 2 banks – <b>Far Eastern Bank JSC</b>, Russian commercial bank that provides banking services in the Far East region of Russia; <b>State Specialised Russian Export-Import Bank JSC</b>, Russian state-owned bank that provides financing for foreign trade operations;</p> <p>– 8 entities in the military and defence sector – <b>JSC Kalashnikov Concern</b>, Russian developer and manufacturer of army equipment, including personal rifles, missiles and vehicles; <b>Federal Research and Production Center Titan Barrikady</b>, military-industrial company that produces artillery and ballistic missile launchers; <b>Izhevsk Unmanned Systems Research and Production Associated LLC</b>, Russian defense company that makes unmanned aerial vehicles (UAVs) for Russia's military; <b>Kurganmashzavod PJSC</b>, manufacturing company known for its BMP series of infantry fighting vehicles; <b>Research and Production Corporation Konstruktorskoye Byuro Mashynostroyeniya JSC</b>, major design, research and production center engaged in development, manufacture, tests, and other activities of end-to-end creation of armament and military hardware of various types; <b>Makeyev Rocket Design Bureau</b>, Russian missile design company that is the main designer of submarine-launched ballistic missiles (SLBM) in Russia; <b>LLC Promtekhlogiya</b>, private defense company that manufactures rifles under the ORSIS brand and supplies them to Russia's military and intelligence services; <b>Uralvagonzavod</b>, Russian state-owned machine building enterprise that specializes in heavy equipment production, particularly military equipment like tanks, railway cars, and armored vehicles, as well as commercial products like trams, electric locomotives, agricultural machinery, and road-building equipment;</p> <p>– 2 machine-building entities – <b>Lipetsk Mechanical Plant LLC</b>, manufacturer of modernized self-propelled tractors for the S-300V4 anti-aircraft missile system; <b>Plant Universalmash JSC</b>, subsidiary of Kirovsky Zavod JSC, manufacturing plant which specializes in producing diverse equipment on wheeled, tracked, and combined modes, with a primary focus on manufacturing tracked chassis for the S-300V4 anti-aircraft missile system used by Russia's armed forces in Ukraine;</p> <p>– 1 entities in the shipbuilding sector – <b>JSC Admiralty Shipyards</b>, prominent Russian shipbuilding company involved in the construction of both civilian and military vessels, including tankers, icebreakers, submarines, and deep-water vehicles;</p> <p>– 1 illegal military entity – <b>Task Force Rusich</b>, armed separatist group involved in the fighting in eastern Ukraine;</p> <p>– 5 entities in the advanced technology sector – <b>JSC Concern Avtomatika</b>, holding company focusing on the development and production of information security technologies, serving customers across multiple sectors, including state authorities, law enforcement agencies, and commercial organizations; <b>JSC Shvabe</b>, Holding company engaged in development and serial production of optical and laser systems and complexes, modern optical materials and technologies, systems for aerospace monitoring and remote sensing of the Earth; <b>Radioavionika JSC</b>, technological company specializing in R&amp;D, production, and technological work for the Russian railways, focusing on railway automation, telematics devices, ultra-wideband radar systems, non-destructive testing tools, as well as the development of 'Strelets-M' reconnaissance, control, and communications systems for the Russian military; <b>The Planar Company</b>, one of the leading enterprises in Russia producing high-tech electronic equipment; <b>AO Nil-Vektor</b>, military-industrial complex enterprise specializing in the development and production of radio technology and electronics, including detection systems for unmanned aerial vehicles, equipment in the fields of radio technology and electronics, and voltage stabilization systems;</p> <p>– 11 entities in the aerospace sector – <b>Branch of AO Company Sukhoi Yuri Gagarin Komsomolsk-on-Amur Aircraft Plant</b>, aircraft manufacturer that specializes in producing Sukhoi aircraft, including the Su-35 fighter and the Sukhoi Superjet 100 passenger aircraft, as well as providing comprehensive repair and modernization services for the Russian military's aircraft fleet; <b>Branch of RSK MiG Nizhny Novgorod Aviation Construction Plant Sokol</b>, aircraft manufacturer specializing in the production of military and civilian aircraft, helicopters, and aerospace equipment, while also engaged in the development of new aircraft technologies and system; <b>Aviastar-SP JSC</b>,</p>

		<p>aircraft factory that manufactures cargo aircraft An-124 Ruslan, Il-76 and Tu-204 family aircraft and provides maintenance and repair services for aircraft; <b>PJSC Tupolev PJSC</b>, aerospace and defense company specializing in aircraft design and engineering; <b>United Aircraft Corporation</b>, Russian aerospace and defense corporation, manufacturer of civil and military aircraft; <b>LLC CST</b>, Russian company that designs and manufactures unmanned aerial vehicles; <b>LLC RT-Komplekt</b>, enterprise providing components, units, and assemblies for the aviation, instrument-making, and shipbuilding industries; <b>AO NPP Topaz</b>, avionics company engaged in the development and production of hardware and software for the control of aircraft for ground-based and ship-based use; <b>ODK-Kuznetsov</b>, producer of aircraft engines, liquid-propellant rocket engines as well as aeroderivative gas turbines and modular stations; <b>JSC ODK-Klimov</b>, developer of gas turbine engines, main gearboxes and accessory drive gearboxes for military and civil aircraft; <b>JSC United Engine Corporation</b>, Russian state-owned enterprise that specializes in the development, production and servicing of military aviation, rocket engines and marine gas-turbine engines;</p> <p>– 3 research entities in the aerospace sector – <b>A. Lyulki Science and Technology Center</b>, research and development facility that focuses on designing military aircraft engines; <b>State Flight Testing Center Named After V.P. Chkalov</b>, aviation research and testing military institution; <b>All-Russian Scientific-Research Institute of Aviation Materials of National Research Center Kurchatov Institute</b>, metallurgical research centre that specializes in the development of composite technologies as well as intermetallic alloys, steels products, heat-resistant coating and super-light alloys for the aviation industry;</p> <p>– 2 military/defense-related research organizations – <b>Central Research Institute of Automation and Hydraulics JSC</b>, research institute that focuses on developing high-precision control systems for aircraft and used in weapon systems such as Iskander, Topol-M, and Bulava missile systems; <b>Advanced Research Foundation (FPI)</b>, Russian government-funded defense research organization aiming to facilitate cutting edge research and development for the purposes of national defense and security, modernization of Russia’s armed forces, and creation of innovative technologies and high-tech products for military, special, and dual-use applications;</p> <p>– 1 entity in oil and gas sector – <b>Lukoil PJSC</b>, oil and gas company that specializes in the exploration, production, refining, and marketing of petroleum products;</p> <p>– 1 entity in the transport and logistic sector – <b>Oboronlogistics LLC</b>, Russian Ministry of Defence owned and controlled shipping and logistics company that organises the transportation and delivery for Russian military equipment and special purpose goods;</p> <p>– 1 research and education-related entity – <b>Skolkovo Institute of Science and Technology</b>, Russian private technological higher educational institution that focuses on scientific, research and educational activities in the field of science, technology and business;</p> <p>– 1 entity in the technology transfer and commercialization sector – <b>Foundation for Development of the Center for Elaboration and Commercialization of New Technologies</b>, Russian non-profit organization that supports the development of technology startups;</p> <p>– 1 entity involved in Russia’s disinformation and propaganda actions – <b>Sputnik</b>, Russian state-controlled news agency and broadcaster.</p>
17 Mar 2023	Iran	<p>1 Iranian entity involved in the elaboration, production and supply of drones to Russia – <b>Safir Air Services</b>, company specializing in services related to air transportation, which was involved in coordinating Russian military flights between Iran and Russia, including the transportation of Iranian unmanned aerial vehicles (UAVs), personnel, and equipment.</p>

**New Zealand**

Date	Target country	Description
16 Feb 2023	Iran	<p>4 Iranian entities involved in the elaboration, production and supply of drones to Russia – <b>Islamic Revolutionary Guard Corps Research and Self-Sufficiency Jihad Organization (IRGC SSJO)</b>, R&amp;D unit of the Islamic Revolutionary Guard Corps (IRGC) that develops and manufactures ground penetrating radar, communication systems, weaponry, combat vehicles and electronic cyberwarfare equipment; <b>Paravar Pars Company</b>, Iranian entity closely associated with Imam Hossein University, which is controlled by the Islamic Revolutionary Guard Corps (IRGC), and involved in manufacture of Unmanned Aerial Vehicles (UAVs) for the IRGC Aerospace Force (IRGC AF) and testing of UAVs for the IRGC Navy; <b>Design and Manufacturing of Aircraft Engines (DAMA)</b>, Iranian company involved in the research, development and production of the Iranian Shahed-171 Unmanned Aerial Vehicles (UAVs) programme, which is owned by the Islamic Revolutionary Guard Corps Aerospace Force (IRGC AF), as well as carries out covert procurement activities for Iran’s Aircraft Manufacturing Industries (HESA), an entity affiliated with Iran’s Ministry of Defence and Armed Forces Logistics (MODAFL).</p>

27 Mar 2023 (effective as 31 Mar 2023)	Russia	5 entities of strategic significance to Russia: <ul style="list-style-type: none"> <li>– 1 <i>paramilitary entity</i> – <b>Interregional Social Organisation Union of Donbas Volunteers</b>, Russian paramilitary organization;</li> <li>– 1 <i>federal state body</i> – <b>Rosfinmonitoring</b>, Russian Financial Intelligence Unit;</li> <li>– 1 <i>military body</i> – <b>Rosgvardia</b>, the internal armed forces of Russia, separate from the army;</li> <li>– 1 <i>illegal military entity</i> – <b>RSB Group</b>, Russian private military company;</li> <li>– 1 <i>entity in technology sector of the Russian economy</i> – <b>UMATEX JSC</b>, Russian producer of carbon fibres and fibre-based items.</li> </ul>
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#### Switzerland

Date	Target country	Description
15 Feb 2023	Iran	Iranian entity involved in the production and supply of drones to Russia for use in its war against Ukraine – <b>Iran Aircraft Manufacturing Industries Corporation (HESA)</b> , Iranian company specialised in manufacturing military and civilian aircraft, and unmanned aerial vehicles (UAVs) which are used by Russia in the war of aggression against Ukraine. HESA is a subsidiary of the Iran Aviation Industries Organization (IAIO), a state-owned enterprise subordinate to the Iranian Ministry of Defense and Armed Forces Logistics (MODAFL).
1 Mar 2023	Russia, Iran	34 entities: <ul style="list-style-type: none"> <li>– 3 <i>banks</i> – <b>Alfa-Bank JSC</b>, the largest private bank in Russia included on the list of systemically-important credit institutions by the Central Bank of Russia; <b>PJSC Rosbank</b>, one of the largest financial structures and top lenders in Russia listed as a systemically-important credit institution by the Central Bank of Russia; <b>Tinkoff Bank</b>, one of the three largest banks in Russia holding a leading position in financial technologies and included on the list of systemically-important credit institutions by the Central Bank of Russia;</li> <li>– 1 <i>national wealth fund</i> – <b>The National Wealth Fund of the Russian Federation</b>, reserve fund controlled by the government and used to cover budget deficits;</li> <li>– 1 <i>reinsurance company</i> – <b>Russian National Reinsurance Company (RNRC)</b>, Russian state-controlled joint stock company and subsidiary of the Bank of Russia;</li> <li>– 10 <i>entities in the military and defence sector</i> – <b>Design Bureau Ametist JSC</b>, leading developer of artillery systems for the Russian Navy; <b>Dubnensky Machine-Building Plant JSC</b>, Russian company that contributes to the country's military-industrial complex by developing Orion reconnaissance and strike drones for the Russian armed forces; <b>Instrument-Making Plant Typhoon JSC</b>, Russian enterprise that develops and supplies weapons systems for Russian armed forces, including the BAL-E coastal missile system and Rubezh-ME missile system; <b>JSC Scientific and Production Association 'Impuls'</b>, entity that develops and implements automated control systems for the Strategic Rocket Forces of the Ministry of Defence of Russia; <b>JSC State Machine Building Design Bureau "Raduga"</b>, Russian developer and manufacturer of missiles that provides weapons to the Armed Forces of Russia; <b>Special Technology Center Ltd.</b>, Russian defense industry company that provided the Orlan-10 unmanned aerial vehicles used by the Armed Forces of Russia; <b>Lipetsk Mechanical Plant</b>, Russian military industry company that manufactured self-propelled tracked chassis for the S-300V4 surface-to-air missile systems for Russian armed forces; <b>PJSC "Scientific and Production Association 'Almaz' named after Academician A.A. Raspletin"</b>, part of the Russian state-owned aerospace defence concern "Almaz-Antey" that produces surface-to-air missile systems for the Troops of National Air Defense; <b>PJSC Krasnogorsk Plant named after S.A. Zvereva</b>, Russian enterprise owned by JSC Shvabe that produces military technology and hardware; <b>195 Repair Plant of Rocket and Artillery Weapons</b>, Russian military-industrial enterprise that repairs and maintains military products used by the Russian armed forces in the ongoing war of aggression against Ukraine, with licenses provided by the Russian government to develop and repair weapons and military equipment;</li> <li>– 3 <i>entities in the technology sector</i> – <b>Battery Company Rigel JSC</b>, manufacturer of nickel-metal hydride and silver-zinc batteries that has been a supplier to the Russian navy for more than 15 years; <b>JSC Shvabe</b>, holding company engaged in development and serial production of optical and laser systems and complexes, modern optical materials and technologies, systems for aerospace monitoring and remote sensing of the Earth; <b>AO Plasma</b>, Russia's largest developer and manufacturer of plasma electronics, gas lasers and systems based on them, information display facilities;</li> <li>– 4 <i>entities in shipbuilding sector</i> – <b>Avrora JSC</b>, enterprise in Russia's maritime defense sector, specializing in the development, production, and supply of automated control systems for surface ships and submarines, with licenses for the development of weapons, military</li> </ul>



		<p>equipment, and the use of atomic energy for defense purposes; <b>Elektropribor JSC</b>, leading company in the Russian maritime defense industry that specializes in developing and manufacturing high-precision navigation, gyroscopic, gravimetric, and optical electronic systems for submarines, as well as marine communication systems; the company holds an active license from the Russian Ministry of Industry for the development of weapons, ammunition, and military equipment, and it produces navigation systems for combat ships of the Russian Navy; <b>Morinformsystem Agat JSC</b>, leading company in the Russian shipbuilding industry that specialises in the development, production and maintenance of combat information and control systems as well as integrated systems, integrated control automation systems for marine formations, sea-based cruise and ballistic missile fire control systems, ship-based and coastal missile and radar systems, and sonar systems; <b>Zelenodolsk Design Bureau JSC</b>, leading shipbuilding company in Russia's military-industrial complex that designs warships for the Russian armed forces and has particular expertise in the construction of anti-submarine combat ships, military patrol ships, and spy ships;</p> <p>– 2 entities in the maritime transport sector – <b>Atomflot</b>, Russian company that maintains Russia's icebreaker fleet designed to meet maritime transportation objectives along the Northern Sea Route; <b>SUN Ship Management (D) Ltd.</b>, Dubai-based ship management company, which is a part of PAO Sovcomflot, that manages and operates a fleet of oil, liquefied natural gas and chemical vessels;</p> <p>– 2 machine-building entities – <b>LLC "Commercial Vehicles – GAZ Group"</b>, Russia's top producer of commercial vehicles, specialty vehicles, buses and powertrains; <b>LLC United Machine-Building Group</b>, Russian industrial holding broadly engaged in the market for powertrains for all-wheel drive trucks and motor graders;</p> <p>– 2 construction companies – <b>Avtodor</b>, construction company subordinated to the "Department of roads" of the "Ministry of Transport" of the so-called "Donetsk People's Republic"; <b>Nizhneangarsktransstroy</b>, Moscow-based construction company that specialises in road and highway repairs;</p> <p>– 3 entities involved in Russia's disinformation and propaganda actions – <b>All-Russia People's Front (ONF)</b>, social movement created in May 2011 as a coalition of socio-political organisations at the suggestion of Vladimir Putin; <b>Patriot Media Group</b>, Russian media organisation headed by Yevgeny Prigozhin that spreads pro-Government propaganda and disinformation on Russia's war against Ukraine; <b>Rossiia Segodnya</b>, Russian government-linked media group spreading pro-government propaganda and disinformation through its subordinate media outlet, Sputnik;</p> <p>– 1 unrecognised government entity – <b>Ministry of Emergency Situations of the so-called "Donetsk People's Republic"</b>, unrecognised government entity of the self-proclaimed "Donetsk People's Republic";</p> <p>– 2 entities in the aerospace sector – <b>JSC "State Space Research and Production Center named after M.V. Khrunichev"</b>, part of the State Corporation "Roscosmos" and leading enterprise of the Russian rocket and space industry developing and manufacturing spacecraft and space-launch systems, including "Proton-M" heavy-lift launch vehicles, "Angara" launch vehicles, and "Rokot" light launch vehicles, and the Russian modules of Mir and the International Space Station; <b>JSC Ural Civil Aviation Factory</b>, Russian aircraft manufacturer and maintenance company that provides weapons to the Armed Forces of Russia.</p>
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Kosovo		
Date	Target country	Description
22 Mar 2023	Russia	Russian private military company " <b>Wagner</b> "

#### EXPORT SANCTIONS TARGETED AGAINST INDIVIDUALS

United States		
Date	Target country	Description
24 Feb 2023	Russia	Temporary Denial Order (TDO) suspending the export privileges of Russian individual <b>Ilya BALAKAEV</b> , for unauthorized export of controlled counterintelligence items to Russia and North Korea.

FIRM-SPECIFIC TRADE RESTRICTIVE MEASURES

United States		
Date	Target country	Description
24 Feb 2023	Russia	<p>76 Russian entities are added to the Entity List:</p> <ul style="list-style-type: none"> <li>– 5 entities for providing support for Russia’s filtration operations in occupied areas of Ukraine, which include the use of biometric technology in suppressing Ukrainian resistance and enforcing loyalty among the Ukrainian population in occupied areas: <ul style="list-style-type: none"> <li>• 4 entities in technology sector – <b>3DiVi</b>, international software development company providing machine learning and creating neural networks of machine vision, supplying algorithms for recognizing faces, gestures, objects and fingerprints; <b>AO Papiilon</b>, advanced Russian manufacturing and IT company engaged in the comprehensive development, implementation and maintenance of biometric and forensic systems of national levels for law enforcement agencies, government and business; <b>IT-Papillon OOO</b>, creator of software products for multibiometric and ballistic identification and for integrated security; <b>Papillon Systems LLC</b>, producer of special equipment and electrical components for software and hardware complexes. For these entities, BIS imposes a license requirement for all items subject to the EAR and will review license applications under a presumption of denial;</li> <li>• 1 entity in real estate activities – <b>OOO Adis</b>, real estate renting company;</li> </ul> </li> <li>– 5 entities in technology sector for acquiring and attempting to acquire U.S.-origin items in support of activities contrary to U.S. national security and foreign policy interests – <b>JSC Elektron Optronik</b>, technology company that develops and implements operations in ion implantation technology; <b>JSC Zelenograd Nanotechnology Center</b>, one of the leading innovation R&amp;D companies in the field of nano- and microsystem technologies; <b>PJSC Kremny</b>, Russian electronics entity that produces components for power electronics, manufacturer of silicon crystals and silicon wafers; <b>Technopark Skolkovo LLC</b>, Russia’s largest innovation incubator providing labs and flexible office space where businesses and academia can conduct research and test out innovative, marketable ideas, develop and commercialize new technologies; <b>VisionLabs LLC</b>, technology company that builds a biometric platform to identify people through face, voice and retina recognition technologies. For these entities, BIS imposes a license requirement for all items subject to the EAR and will review license applications under a policy of denial;</li> <li>– 66 Russian entities for acquiring and attempting to acquire U.S.-origin items in support of Russia’s military. These entities are determined as Russian or Belarusian ‘military end users’ and received a footnote 3 designation which subjects them to the Russia/Belarus-Military End User Foreign Direct Product (FDP) rule: <ul style="list-style-type: none"> <li>• 61 entities are added with a license requirement for all items subject to the EAR and a license review policy of denial – <b>Advanced Research Foundation</b>; <b>Federal Service for Military-Technical Cooperation</b>; <b>Federal State Budgetary Scientific Institution Research and Production Complex Technology Center</b>, developer and producer of integrated circuits including application specific-integrated circuits, which are a type of high-technology electronic component, and also is involved in Russia’s semiconductor industry; <b>Federal State Institution Federal Scientific Center JSC Shipbuilding Corporation Ak Bars</b>; <b>JSC Special Design Bureau of Computer Engineering</b>; <b>JSC Special Design Bureau of Control Means</b>; <b>JSC Special Design Bureau Turbina</b>; <b>JSC Special Relay System Design and Engineering Bureau</b>; <b>JSC State Missile Center Named After Akademika V.P. Scientific Research Institute for System Analysis of the Russian Academy of Sciences</b>; <b>JSC All Russian Research Institute of Radio Engineering</b>; <b>JSC All-Russian Research Institute Signal</b>; <b>JSC Center of Research and Technology Services Dinamika</b>; <b>JSC Concern Avtomatika</b>, Rostec-owned holding company that develops and produces information security systems; <b>JSC Design Center Soyuz</b>, leading Russian design center for the development of analogue and analogue-to-digital microcircuits; <b>JSC Design Technology Center Elektronika</b>, a part of a Russian radioelectronics technology competencies cluster formed on the basis of JSC Concern Sozvezdie, which specializes in developing electronic warfare systems and other specialized equipment for Russia’s armed forces; <b>JSC Institute for Scientific Research Microelectronic Equipment Progress</b>, design center on development of specialized microelectronic element base; <b>JSC Kizlyar Electromechanical Plant</b>; <b>JSC Machine-Building Engineering Office Fakel Named After Akademika P.D.</b></li> </ul> </li> </ul>

**Grushina; JSC North Western Regional Center of Almaz Antey Concern Obukhovsky Plant; JSC Penza Electrotechnical Research Institute**, enterprise resolving issues in the field of information security; **JSC Production Association Sever**, Russian multi-profile scientific and production entity that Develops and manufactures a wide range of radio-electrotechnical and precision-mechanical products for nuclear power plants and enterprises in the fuel and energy industry, including electric motors and other electrical equipment; **JSC Production Association Ural Optical and Mechanical Plant Named After E.S. Yalamov**, one of the largest optical industry enterprises in Russia, company also develops instruments for Russia's combat aircraft, helicopters, and naval ships; **JSC Ramenskoye Design Company; JSC Research and Production Association Named After S.A. Lavochkina; JSC Research and Production Association of Measuring Equipment**, entity in digital circuitry activities and microelectronics for space technologies; **JSC Research and Production Enterprise Radar MMS**, one of the leaders in the field of creating radio-electronic systems and complexes, precision instrumentation, and software; **JSC Research and Production Enterprise Sappfir**, entity in research and production sector related to semiconductor electronics and supplies microprocessors to the Government of Russia, including producing products for computer systems that are used on Russian missiles; **JSC Research Center ELINS**, a Russian research and development enterprise in the area of IT and computer technology for unique control systems; **JSC RT-Tekhpriemka**, a Rostec Competence Center that offers services such as quality control, training, certification, material and technical support, and production automation; **JSC Russian Research Institute Electronstandart**, researcher on the reliability and stability of electronic components and electronic equipment and components; **JSC Ryazan Plant of Metal Ceramic Instruments; JSC Scientific Production Enterprise Digital Solutions**, developer of algorithms for digital radio, image processing, radar, as well as designing; **JSC Scientific Production Enterprise Kontakt**, leading enterprise of Russia for the development and serial production of noise-proof ground stations for satellite and tropospheric communications, navigation systems and radio navigation complexes; **JSC Scientific Production Enterprise Topaz; JSC Scientific Research Institute Giricond**, basic enterprise of a radio-electronic complex of the RF in the field of condensers and nonlinear semiconductor resistors; **JSC Scientific Research Institute of Computer Engineering NII SVT**, provider of research and development in the field of computer hardware, automated systems, and communications; **JSC Scientific Research Institute of Electrical Carbon Products**, Russian company that specializes in the production of electrical carbon products; **JSC Scientific Research Institute of Electronic and Mechanical Devices**, Russian company that specializes in the development and production of complex high-technology electronic and mechanical devices; **JSC Scientific Research Institute of Electronic Engineering Materials**, russian company that specializes in the development and production of electronic components and materials for them such as condensers, nonlinear semiconductor; **JSC Scientific Research Institute of Gas Discharge Devices Plasma**, leading developer and manufacturer of gas-discharge devices in Russia; **JSC Scientific Research Institute of Industrial Television Rastr**, one of the main developers in Russia of television equipment for extreme operating conditions; **JSC Scientific Research Institute of Precision Mechanical Engineering**, Russian electronics entity that develops process equipment for Russia's electronic industry, including for semiconductor production; **JSC Shipbuilding Corporation Ak Bars; JSC Special Design Bureau of Computer Engineering**, specializes in the development, production and implementation of microprocessor-based APCS devices, automated systems of special equipment and embedded digital control units of various electrical equipment; **JSC Special Design Bureau of Control Means**, Russian company that provides services of software development, implementation, and maintenance; **JSC Special Design Bureau Turbina; JSC Special Relay System Design and Engineering Bureau**, company that designs and manufactures various types of relays and switches; **JSC State Missile Center Named After Akademika V.P. Makeyeva; JSC State Scientific Research Institute Kristall; JSC Svetlana Semiconductors**, a company that specializes in the research, design, and manufacturing of electronic and microelectronic instruments, it is a part of Ruselectronics; **JSC Tekhnodinamika**, provider of production and export of high-technology products for civil aviation markets; **JSC The Institute of Electronic Control Computers Named After I.S. Bruk**, academic researcher about microprocessors and SoCs; high-performance multiprocessor server and computing systems; **JSC Vologda Optical and Mechanical Plant**, producer of complex optical-electronic and thermal imaging products of special purpose, as well as optical-electronic devices of medical and civil designation; **JSC Voronezh Semiconductor Devices Factory Assembly**, a major manufacturer of semiconductor devices; **JSC Vyatka Machine-Building Enterprise Avitek; KAMAZ Publicly Traded Company; Keldysh Institute of Applied Mathematics of the Russian Academy of Sciences; LLC Research and Production Association Radiovolna**, a leading enterprise of the radio engineering industry, specializing in the

		<p>development and production of civil and dual-use radio-transparent material products; <b>LLC RSB-Group; Mitishinskiy Scientific Research Institute of Radio Measuring Instruments</b>, a leader of Russia's radio-electronic industry, conducts research regarding components for electronics systems; <b>OJSC Ilyushin Aviation Complex; OJSC Khabarovsk Radio Engineering Plant; OJSC Mariyskiy Machine-Building Plant; OJSC Scientific and Production Enterprise Pulsar</b>, a research and production center specializing in the production of microwave electronics products, is part of the Roselectronics holding company of Rostec State Corporation; <b>PJSC Megafon</b>, Russian telecommunications company providing cellular, local telephone, and broadband Internet access services; <b>PJSC Tutaev Motor Plant; PJSC Vypel Interstate Corporation; RT-Inform LLC; Skolkovo Foundation; Skolkovo Institute of Science and Technology; State Flight Testing Center Named After V.P. Chkalov;</b></p> <ul style="list-style-type: none"> <li>5 entities have a license requirement for all items subject to the EAR – <b>Federal State Budgetary Scientific Institution Research and Production Complex Technology Center; JSC Research and Production Association Named After S.A. Lavochkina; JSC Research and Production Association of Measuring Equipment; JSC Scientific Research Institute of Industrial Television Rastr; JSC State Missile Center Named After Akademika V.P. Makeyeva (GRTS Makeyev)</b>. License Exception GOV is available for these entities. The license review policy for these entities is a policy of denial for all items subject to the EAR, except for food and medicine designated as EAR99, and for items intended for U.S. Government-supported use in the International Space Station (ISS), which will be reviewed on a case-by-case basis.</li> </ul>
24 Feb 2023	Russia	10 entities are added to the Entity List for contributing significantly to Russia's military and defense industrial base – <b>AOOK Technology Ltd.</b> (China); <b>CPUNTO Inc.</b> (Canada); <b>Dexias Industrial Products and Trade Limited Company</b> (Russia); <b>Electronic Network Inc.</b> (Canada); <b>Innovation and Technologies LLC</b> (Russia); <b>Promtekhkomplekt JSC</b> (Russia), <b>Beijing Ti-Tech Science and Technology Development Co.</b> (China); <b>Beijing Yunze Technology Co., Ltd.</b> (China); <b>China HEAD Aerospace Technology Co.</b> (China, France, and the Netherlands); <b>Spacety Co., Ltd.</b> (China and Luxembourg).
24 Feb 2023	Russia	Temporary Denial Order (TDO) suspending the export privileges of Russian company <b>Radiotester OOO</b> (Radiotester LLC), a Russian company owned or controlled by Ilya Balakaev that was indicted for conspiring to violate US export control laws; a company helped to resolve issues related to the supply and repair of foreign-made measuring equipment.
2 Mar 2023	Russia	3 entities are added to the Entity List for significantly contributing to Russia's military and/or defense industrial complex – <b>DMT Electronics</b> (Russia), <b>DMT Trading LLC</b> (Belarus), and <b>Neotec Semiconductor Ltd.</b> (Taiwan). These entities were given a footnote 3 designation, which means that they are classified as Russian or Belarusian 'military end users' and are subject to the Russia/Belarus-Military End User Foreign Direct Product (FDP) rule. These entities are now subject to a license requirement for all items subject to the Export Administration Regulations (EAR). License applications for these entities will be reviewed under a policy of denial for all items subject to the EAR, with the exception of food and medicine designated as EAR99, which will be reviewed on a case-by-case basis.
28 Mar 2023	Russia	2 entities are added to the Entity List for engaging in activities that go against U.S. foreign policy interests. These entities are involved in selling, procuring, and servicing military equipment that enables Burma's military regime to commit human rights violations and carry out brutal aerial attacks that harm innocent civilians. The listed entities are <b>Aviatech Supply Ltd.</b> , Russian aviation parts supply company, and <b>Aviazapchast PLC</b> , Russian company specializing in supplying and providing after-sales service for domestic aviation equipment abroad.
29 Mar 2023	Russia.	Renewed Temporary Denial Orders (TDOs) suspending the export privileges of Russian airlines <b>Azur Air JSC, UTair Aviation JSC</b> and <b>PJSC Aeroflot</b> .

#### European Union

Date	Target country	Description
25 Feb 2023	Russia	<p>96 entities:</p> <ul style="list-style-type: none"> <li>– 26 defense and military-related entities – <b>Ural Optical-Mechanical Plant ES Yalamova JSC</b>, Russian defense entity that develops instruments for specializes in the development and manufacturing of optronic instruments for civil and military application; <b>Ramenskoye Engineering Design Office JSC</b>, Russian integrator and supplier of avionics for Russia's aircraft, helicopters, and unmanned aerial</li> </ul>

vehicles, including manufacturing heads-up displays for Russia's fighter aircraft; **Ulyanovsk Mechanical Plant**, producer of anti-aircraft defence systems, missiles, autocannons, and ammunition; **Concern Oceanpribor JSC**, leader in design and manufacture of hydroacoustic equipment for submarines and surface ships of the Russian Navy and exported ships; **JSC Concern Avtomatika**, manufacturer of products tied to public security, cyber warfare, information security, and unmanned aerial vehicles; **JSC Machine-Building Engineering Office Fakel Named After Akademika PD Grushina**, manufacturer of missiles for the Russian Federation military's air defense systems; **JSC North Western Regional Center of Almaz Antey Concern Obukhovskiy Plant**, defense entity that designs and manufactures weapons systems and military equipment and is involved in producing Russia's S-400 air defense missile system; **JSC Production Association Sever**, producer of semiconductor electronics and microprocessors for the Russian government and military; **JSC Research Center ELINS**, electronics entity that designs and develops electronic equipment for Russia's Ministry of Defense; **JSC Research and Production Enterprise Radar MMS**, defense entity that has been involved in developing targeting complexes for Russia's Ministry of Defense combat aircraft; **JSC Research and Production Enterprise Sapfir**, research company related to semiconductor electronics and supplies microprocessors to Russian Federation, including producing products for computer systems that are used on missiles; **JSC Scientific Production Enterprise Topaz**, avionics company engaged in the development and production of hardware and software for the control of aircraft for ground-based and ship-based use; **JSC Special Design Bureau Turbina**, defense entity that produces engines for Russia's armored vehicles, missiles, and artillery systems; **JSC State Scientific Research Institute Kristall**, defense entity that produces ammunition and bombs; **JSC Tekhnodinamika**, aerospace and defense holding company within Rostec's structure, and is a designer and manufacturer of aircraft equipment; **OJSC Khabarovsk Radio Engineering Plant**, defense entity that specializes in activities related to Russia's anti-aircraft missile systems; **OJSC Mariyskiy Machine-Building Plant**, defense entity that manufactures Russia's air defense systems; **OJSC Scientific and Production Enterprise Pulsar**, scientific research and development company, a producer of various equipment and devices for military and civilian purposes; **PJSC Vypel Interstate Corporation**, Russian defense industry leader in the field of missile and space defence; **State Flight Testing Center Named After VP Chkalov**, aviation research and testing military institution that tests military aviation equipment and weapons before entering service; **Limited Liability Company Research and Production Association Radiovolna**, leading enterprise in the radio engineering industry, specializing in the protection of airborne radar equipment and manufactures high-strength caps and fairings for civil aircraft and aircraft of the Ministry of Defense, as well as any types of warheads mounted on various types of missiles and rocket torpedoes; **Concern Morinformsystem-Agat**, developer and producer of integrated structures for the military-industrial sector in the Russian Federation and internationally;

– 10 defense research organizations – **All-Russian Research Institute of Radio Engineering**, performer of scientific research and experimental design work on radars for both the strategic air defense forces and for the ground forces; **PJSC „Scientific and Production Association „Almaz“ named after Academician AA Raspletin“**, military R&D enterprise that develops and produces air defence missile systems and radars; **IT-Papillon OOO**, developer of software products for multibiometric and ballistic identification and for integrated security; **Federal Service for Military-Technical Cooperation**, regulator of military-technical cooperation between Russia and other countries; **JSC All-Russian Research Institute Signal**, defense entity that develops equipment for Russia's Armed Forces, including combat robots and unmanned ground vehicles; **JSC Center of Research and Technology Services Dinamika**, designer and manufacturer of flight simulators for Russia's military aircrews; **JSC Corporation Moscow Institute of Heat Technology**, researcher and developer of ballistic missiles and rockets for Russia's defense and space industry; **JSC Scientific Research Institute of Computer Engineering NII SVT**, producer of military and power supply systems;

– 4 entities in aerospace sector – **Special Technology Centre Limited Liability Company**, supplier of unmanned aerial vehicles (UAVs) such as Orlan-10 and radio direction finding systems such as Bars; **Technodinamika JSC**, producer of high-technology products for civil aviation markets; **JSC RT-Tekhpriemka**, provider of quality control and acceptance services for aerospace and defense products; **JSC Research and Production Association Named After SA Lavochkina**, aerospace company that produces space-related items for Russia's Ministry of Defense and has been involved in the development of missile and space-defense projects for the Russian Federation;

– 36 entities in technology and dual-use goods sector – **Vologda Optical and Mechanical Plant JSC**, Russian producer of complex optical-electronic and thermal imaging products of special purpose, as well as optical-electronic devices of medical and civil designation; **Videoglaz Project**, developer of integrated security systems for industrial enterprises, implement video surveillance projects for warehouse complexes and shopping centers and much more; **Innovative Underwater Technologies LLC**, developer and distributor of innovative

underwater technologies for commercial, recreational and sportive divers and dive organizations; **Concern OJSC - Kizlyar Electro-Mechanical Plant**, producer of electrical and mechanical products for the military and civilian sectors; **JSC Zelenogradsky Nanotechnology Center**, the first and only serial manufacturer of FIS for telecommunications and communications in the Russian Federation; **JSC „Urals Optical-Mechanical Plant named after Mr ES Yalamov“**, producer of optoelectronic systems for various purposes, medical products, geodetic instruments and measuring equipment; **Vest Ost Limited Liability**, leading supplier of electronic components; **Trade-Component LLC**, trader of electronic components, obsolete parts and custom solutions for Russian Federation; **Radiant Electronic Components JSC**, supplier of optoelectronic systems for various purposes; **JSC ICC Milandr**, provider of microcontrollers, microcircuits, power meters and other electronic products; **SMT iLogic LLC**, producer of electronic equipment, contract manufacturing, providing technical support for any task; **Device Consulting**, integrator of digital solutions for various industries and domains, supplier and producer of electronics; **Concern Radio-Electronic Technologies**, holding company within the Russian state-owned Rostec group that develops and manufactures military and civil products; **OOO „Unitek“**, wholesaler of construction and mining machinery, automobiles, furniture, computers and software; **CJSC TPK Linkos** and its subsidiary **CJSC TPK Linkos, Subdivision in Astrakhan**, manufacturer of electronic computers; **AO Pabilon**, manufacturer of special equipment and electrical components for biometric and forensic systems of national levels; **Pabilon Systems LLC**, producer of special equipment and electrical components for software and hardware complexes; **Federal State Budgetary Scientific Institution Research and Production Complex Technology Center**, developer integrated circuits and other high-technology electronic components for Russia's semiconductor industry; **JSC Institute for Scientific Research Microelectronic Equipment Progress**, developer and manufacturer of microelectronic devices; **JSC Obninsk Research and Production Enterprise Technologiya Named After AG Romashin**, developer and manufacturer of products from polymer composite, ceramic and glass materials for aviation, rocket-and-space equipment, transport; **JSC Penza Electrotechnical Research Institute**, supplier of microprocessors to the Government of the Russian Federation, including producing products for computer systems that are used on Russian missiles; **JSC Research and Production Association of Measuring Equipment**, developer of measuring instruments and systems for various applications, including aerospace, defense, and energy; **JSC Russian Research Institute Electronstandart**, research institute that offers a multipurpose approach to ensure the quality and reliability of electronic components; **JSC Ryazan Plant of Metal Ceramic Instruments**, manufacturer of reed switches, solar modules, and other products based in Ryazan, Russia; **JSC Scientific Production Enterprise Digital Solutions**, electronics entity that specializes in electronic engineering; **JSC Scientific Production Enterprise Kontakt**, leading manufacturer of vacuum electronic devices for radio and television broadcasting, remote space and satellite communications, radar, and boost machinery; **JSC Scientific Research Institute of Gas Discharge Devices Plasma**, developer and manufacturer of gas lasers, plasma display panels, gas discharge switching and protective devices, x-ray tubes, industrial ceramics, metal-ceramic units and other science-intensive and high-tech devices; **JSC Scientific Research Institute of Industrial Television Rastr**, designer and producer of electronic materials, equipment, semiconductor products and microwave technologies; **JSC Scientific Research Institute of Precision Mechanical Engineering**, developer and producer of complex, high-technology electronic and mechanical devices and electrical measuring devices; **JSC Special Design Bureau of Computer Engineering**, developer and manufacturer of radio-electronic equipment for military and civil purposes; **JSC Svetlana Semiconductors**, Semiconductors is a manufacturer and designer of integrated circuits and semiconductor devices based in Russia; **JSC Voronezh Semiconductor Devices Factory Assembly**, major manufacturer of semiconductor devices in Russia; **PJSC Megafon**, provider of telecommunication services in Russia; **PJSC Tutaev Motor Plant**, manufacturer and distributor of diesel engines for various vehicles and machinery; **RT-Inform LLC**, Russian entity engaged in the implementation of trade and procurement activities of holding companies and organizations of Rostec; **JSC Elektronstandart Pribor**, manufacturer of systems of fire and gas protection for oil and gas industry;

- 1 financial entity – **Advanced Research Foundation**, government fund that supports research and development in the fields of defense and state security, involving high-risk and high-reward projects;
- 2 machinery industry entities – **OOO Adis**, wholesaler of operational materials and accessories of machinery and equipment; **KAMAZ Publicly Traded Company**, largest manufacturer of heavy trucks in Russia;
- 1 military forces entity – **LLC RSBGroup**, private military company with close ties to Russia's intelligence services;
- 14 research and education-related entities – **Ramenskoye Instrument-Making Design Bureau JSC**, designer of on-board equipment for aerial vehicles and products for space objects, sea and land vehicles; **Federal State Institution Federal Scientific Center Scientific**

		<p><b>Research Institute for System Analysis of the Russian Academy of Sciences</b>, research institute that conducts fundamental and applied research in the fields of nanotechnology, information and telecommunication technologies, computing systems, mathematics, physics and informatics; <b>JSC Design Center Soyuz</b>, developer of semiconductors and integrated circuits for various applications; <b>JSC Design Technology Center Elektronika</b>, leading developer of electronic products, including for Russian government clients; <b>JSC Moscow Institute of Electromechanics and Automatics</b>, developer of navigation and control systems for main passenger aircrafts and heavy military aircrafts; <b>JSC Scientific Research Institute Giricond</b>, developer and producer of electronic components, such as capacitors, varistors, thermistors, and filters; <b>JSC Scientific Research Institute of Electrical Carbon Products</b>, research institute of electric and coal products based in Russia; <b>JSC Scientific Research Institute of Electronic and Mechanical Devices</b>, leading developer of microprocessors, computing systems, and nanotechnology; <b>JSC Scientific Research Institute of Electronic Engineering Materials</b>, developer and producer of electronic equipment materials; <b>JSC Special Design Bureau of Control Means</b>, provider of services of software development, implementation, and maintenance; <b>Keldysh Institute of Applied Mathematics of the Russian Academy of Sciences</b>, research institute involved in solving complex mathematical problems related to national projects of space exploration, nuclear and fusion energy, robotics, computational biology; <b>Mitishinskiy Scientific Research Institute of Radio Measuring Instruments</b>, leader of Russia's radio-electronic industry that has conducted research regarding components for electronics systems and has been involved in developing regulations for Russia related to specialized electronic components; <b>Skolkovo Foundation</b>, non-profit state company whose purpose is to support the development and commercialization of innovative technologies in Russia and abroad; <b>Skolkovo Institute of Science and Technology</b>, private research university located in Moscow, Russia;</p> <p>– 6 Iranian entities involved in the elaboration, production and supply of drones to Russia – <b>Islamic Revolutionary Guard Corps Aerospace Force</b>, strategic missile, air, and space force within the Islamic Revolutionary Guard Corps (IRGC) of Iran which helped facilitate Iran's supply of military UAVs to Russia; <b>Oje Parvaz Mado Nafar Company (Mado)</b>, manufacturer of unmanned aerial vehicle (UAV) components; <b>Paravar Pars Company</b>, Iranian entity closely associated with Imam Hossein University, which is controlled by the Islamic Revolutionary Guard Corps (IRGC), and involved in manufacture of Unmanned Aerial Vehicles (UAVs) for the IRGC Aerospace Force (IRGC AF) and testing of UAVs for the IRGC Navy; <b>Shahed Aviation Industries</b>, Iranian company affiliated with the Islamic Revolutionary Guard Corps Aerospace Force responsible for the design and advancement of the Shahed series of Unmanned Aerial Vehicles (UAVs), which have been provided to Russia and employed in the war against Ukraine; <b>Design and Manufacturing of Aircraft Engines (DAMA)</b>, Iranian company involved in the research, development and production of the Iranian Shahed-171 Unmanned Aerial Vehicles (UAVs) programme, which is owned by the Islamic Revolutionary Guard Corps Aerospace Force (IRGC AF), as well as carries out covert procurement activities for Iran's Aircraft Manufacturing Industries (HESA), an entity affiliated with Iran's Ministry of Defence and Armed Forces Logistics (MODAFL); <b>Islamic Revolutionary Guard Corps Research and Self-Sufficiency Jihad Organization (IRGC SSJO)</b>, R&amp;D unit of the Islamic Revolutionary Guard Corps (IRGC) that develops and manufactures ground penetrating radar, communication systems, weaponry, combat vehicles and electronic cyberwarfare equipment.</p>
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Japan		
Date	Target country	Description
25 Feb 2023 (effective as of 28 Feb 2023)	Russia	<p>21 Russian entities:</p> <p>– 2 entities operating in the technology sector – <b>Federal Center for Dual-Use Technology (FTsDT) Soyuz</b>, one of the leading Russian enterprises in the field of chemistry and the technology of solid propellants, development of power units for missile systems, space systems, and systems of direct energy conversion, and the creation of dual-use technologies; <b>Systems of Biological Synthesis LLC</b>, company that supplies a wide range of industrial and laboratory equipment and provides services, including delivery, commissioning, and servicing, for scientific research, production processes and process control;</p> <p>– 9 entities in technology and electronics sectors – <b>AO Kraftway Corporation PSC</b>, Russian technology company that specializes in the production of computer hardware and electronics, including personal computers, servers, and networking equipment, as well as providing IT services and solutions, such as data center infrastructure, cloud computing, and cybersecurity for various sectors, such as government, healthcare, education, telecom and banking, military-industrial; <b>AO PKK Milandr</b>, Russian electronics and semiconductor manufacturer that designs, produces, and sells computer equipment, including personal computers, servers, and telecommunications equipment,</p>

		<p>microcontrollers, digital signal processors, and power management integrated circuits; <b>LLC Fibersense</b>, one of the leading technological companies in the field of fiber-optic sensors in Russia; <b>Milandr EK OOO</b>, wholesale company that deals with the distribution of household appliances, electrical and electronic goods; <b>Milandr ICC JSC</b>, Russian company that specializes in the design and manufacture of semiconductors, integrated circuits, electronic modules, and flexible M2M systems; <b>Milur IS, OOO</b>, Russian manufacturer of intelligent energy meters for remote collection of energy consumption data, specializing in the development and serial production of a wide range of intelligent multi-tariff single- and three-phase electricity meters under the brand name "MILUR" using domestic electronic component base EKB technology; <b>OOO Microelectronic Production Complex (MPK) Milandr</b>, Russian company that specializes in the development and production of microelectronics products such as microcontrollers, microprocessors, memory microchips, interface microchips, voltage converter microchips, and radio frequency microchips, as well as electronic modules and industrial and commercial devices; <b>Ruselectronics JSC</b>, Russian state-owned holding company, which unites enterprises-manufacturers of electronic products, develops and manufactures a wide range of electronic devices, including radio components, video surveillance, navigation equipment, communication systems, avionics and space technology as well as provides consulting and engineering services; <b>Scientific Production Company Optolink</b>, Russian company that specializes in the development and production of optoelectronic devices and equipment, as well as integrated optical and fiber-optic elements, manufacture of high precision fiber optic gyroscopes;</p> <p>– 7 research entities connected with the Russian military and industrial complex – <b>A.A. Kharkevich Institute for Information Transmission Problems (IITP)</b>, <b>Russian Academy of Sciences (RAS)</b>, research institute that conducts fundamental scientific research and applied developments in the field of problems related to the transmission, distribution, processing of information, and control in technical and biological systems; <b>Federal State Budgetary Institution of Science P.I. K.A. Valiev RAS of the Ministry of Science and Higher Education of Russia</b>, scientific institution that is involved in research on physical metallurgy and materials science; <b>Special Research Bureau for Automation of Marine Researches Far East Branch Russian Academy of Sciences</b>, science and education entity based in Yuzhno-Sakhalinsk; <b>Federal State Unitary Enterprise All-Russian Research Institute of Physical, Technical and Radio Engineering Measurements</b>, scientific organization in Russia that conducts research and development in the fields of metrology, standardization, and certification; <b>Institute of Physics Named After P.N. Lebedev of the Russian Academy of Sciences</b>, one of the oldest and largest research centers in Russia, specializing in various fields of physics; <b>Institute of Solid-State Physics of the Russian Academy of Sciences</b>, research institute conducting research in condensed matter physics and materials science; <b>Rzhanov Institute of Semiconductor Physics, Siberian Branch of Russian Academy of Sciences</b>, Russian research institute specializes in microsensoric technologies and semiconductors, actively engaging in military robotics activities for the benefit of the Russian Ministry of Defense;</p> <p>– 1 federal executive body, government agency – <b>Federal Technical Regulation and Metrology Agency</b>, federal executive body providing government services and managing state property in the field of technical regulation and ensuring uniformity of measurements;</p> <p>– 1 financial entity – <b>Ak Bars Holding</b>, managing company of a diversified conglomerate with operations in various sectors including industrial, oil and gas, construction, banking, agricultural, food, transport and retail enterprises of Tatarstan;</p> <p>– 1 illegal military entity – <b>Private Military Company “Wagner”</b>, private military company operating beyond and within Russia.</p>
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**Switzerland**

Date	Target country	Description
29 Mar 2023	Russia	<p>96 entities:</p> <p>– 26 defense and military-related entities – <b>Ural Optical-Mechanical Plant ES Yalamova JSC</b>, russian defense entity that develops instruments for specializes in the development and manufacturing of optronic instruments for civiland military application; <b>Ramenskoye Engineering Design Office JSC</b>, russian integrator and supplier of avionics for Russia’s aircraft, helicopters, and unmanned aerial vehicles, including manufacturing heads-up displays for Russia’s fighter aircraft; <b>Ulyanovsk Mechanical Plant</b>, producer of anti-aircraft defence systems, missiles, autocannons, and ammunition; <b>Concern Oceanpribor JSC</b>, leader in design and manufacture of hydroacoustic equipment for submarines and surface ships of the Russian Navy and exported ships; <b>JSC Concern Avtomatika</b>, manufacturer of products tied to public security, cyber warfare, information security, and unmanned aerial vehicles; <b>JSC Machine-Building Engineering Office Fakel Named After Akademika PD Grushina</b>, manufacturer of missiles for the Russian Federation military’s air defense systems; <b>JSC North Western Regional Center of Almaz Antey Concern Obukhovskiy Plant</b>, defense entity that designs and manufactures</p>



weapons systems and military equipment and is involved in producing Russia's S-400 air defense missile system; **JSC Production Association Sever**, producer of semiconductor electronics and microprocessors for the Russian government and military; **JSC Research Center ELINS**, electronics entity that designs and develops electronic equipment for Russia's Ministry of Defense; **JSC Research and Production Enterprise Radar MMS**, defense entity that has been involved in developing targeting complexes for Russia's Ministry of Defense combat aircraft; **JSC Research and Production Enterprise Sapfir**, research company related to semiconductor electronics and supplies microprocessors to Russian Federation, including producing products for computer systems that are used on missiles; **JSC Scientific Production Enterprise Topaz**, avionics company engaged in the development and production of hardware and software for the control of aircraft for ground-based and ship-based use; **JSC Special Design Bureau Turbina**, defense entity that produces engines for Russia's armored vehicles, missiles, and artillery systems; **JSC State Scientific Research Institute Kristall**, defense entity that produces ammunition and bombs; **JSC Tekhnodinamika**, aerospace and defense holding company within Rostec's structure, and is a designer and manufacturer of aircraft equipment; **OJSC Khabarovsk Radio Engineering Plant**, defense entity that specializes in activities related to Russia's anti-aircraft missile systems; **OJSC Mariyskiy Machine-Building Plant**, defense entity that manufactures Russia's air defense systems; **OJSC Scientific and Production Enterprise Pulsar**, scientific research and development company, a producer of various equipment and devices for military and civilian purposes; **PJSC Vypel Interstate Corporation**, Russian defense industry leader in the field of missile and space defence; **State Flight Testing Center Named After VP Chkalov**, aviation research and testing military institution that tests military aviation equipment and weapons before entering service; **Limited Liability Company Research and Production Association Radiovolna**, leading enterprise in the radio engineering industry, specializing in the protection of airborne radar equipment and manufactures high-strength caps and fairings for civil aircraft and aircraft of the Ministry of Defense, as well as any types of warheads mounted on various types of missiles and rocket torpedoes; **Concern Morinformsystem-Agat**, developer and producer of integrated structures for the military-industrial sector in the Russian Federation and internationally;

– 10 defense research organizations – **All-Russian Research Institute of Radio Engineering**, performer of scientific research and experimental design work on radars for both the strategic air defense forces and for the ground forces; **PJSC „Scientific and Production Association „Almaz“ named after Academician AA Raspletin“**, military R&D enterprise that develops and produces air defence missile systems and radars; **IT-Papillon OOO**, developer of software products for multibiometric and ballistic identification and for integrated security; **Federal Service for Military-Technical Cooperation**, regulator of military-technical cooperation between Russia and other countries; **JSC All-Russian Research Institute Signal**, defense entity that develops equipment for Russia's Armed Forces, including combat robots and unmanned ground vehicles; **JSC Center of Research and Technology Services Dinamika**, designer and manufacturer of flight simulators for Russia's military aircrews; **JSC Corporation Moscow Institute of Heat Technology**, researcher and developer of ballistic missiles and rockets for Russia's defense and space industry; **JSC Scientific Research Institute of Computer Engineering NII SVT**, producer of military and power supply systems;

– 4 entities in aerospace sector – **Special Technology Centre Limited Liability Company**, supplier of unmanned aerial vehicles (UAVs) such as Orlan-10 and radio direction finding systems such as Bars; **Technodinamika JSC**, producer of high-technology products for civil aviation markets; **JSC RT-Tekhpriemka**, provider of quality control and acceptance services for aerospace and defense products; **JSC Research and Production Association Named After SA Lavochkina“**, aerospace company that produces space-related items for Russia's Ministry of Defense and has been involved in the development of missile and space-defense projects for the Russian Federation;

– 36 entities in technology and dual-use goods sector – **Vologda Optical and Mechanical Plant JSC**, Russian producer of complex optical-electronic and thermal imaging products of special purpose, as well as optical-electronic devices of medical and civil designation; **Videoglaz Project**, developer of integrated security systems for industrial enterprises, implement video surveillance projects for warehouse complexes and shopping centers and much more; **Innovative Underwater Technologies LLC**, developer and distributor of innovative underwater technologies for commercial, recreational and sportive divers and dive organizations; **Concern OJSC - Kizlyar Electro-Mechanical Plant**, producer of electrical and mechanical products for the military and civilian sectors; **JSC Zelenogradsky Nanotechnology Center**, the first and only serial manufacturer of FIS for telecommunications and communications in the Russian Federation; **JSC „Urals Optical-Mechanical Plant named after Mr ES Yalamov“**, producer of optoelectronic systems for various purposes, medical products, geodetic instruments and measuring equipment; **Vest Ost Limited Liability**, leading supplier of electronic components; **Trade-Component LLC**, trader of electronic components, obsolete parts and custom solutions for Russian Federation;

**Radiant Electronic Components JSC**, supplier of optoelectronic systems for various purposes; **JSC ICC Milandr**, provider of microcontrollers, microcircuits, power meters and other electronic products; **SMT iLogic LLC**, producer of electronic equipment, contract manufacturing, providing technical support for any task; **Device Consulting**, integrator of digital solutions for various industries and domains, supplier and producer of electronics; **Concern Radio-Electronic Technologies**, holding company within the Russian state-owned Rostec group that develops and manufactures military and civil products; **OOO „Unitek“**, wholesaler of construction and mining machinery, automobiles, furniture, computers and software; **CJSC TPK Linkos** and its subsidiary **CJSC TPK Linkos, Subdivision in Astrakhan**, manufacturer of electronic computers; **AO Papilon**, manufacturer of special equipment and electrical components for biometric and forensic systems of national levels; **Papilon Systems LLC**, producer of special equipment and electrical components for software and hardware complexes; **Federal State Budgetary Scientific Institution Research and Production Complex Technology Center**, developer integrated circuits and other high-technology electronic components for Russia's semiconductor industry; **JSC Institute for Scientific Research Microelectronic Equipment Progress**, developer and manufacturer of microelectronic devices; **JSC Obninsk Research and Production Enterprise Technologiya Named After AG Romashin**, developer and manufacturer of products from polymer composite, ceramic and glass materials for aviation, rocket-and-space equipment, transport; **JSC Penza Electrotechnical Research Institute**, supplier of microprocessors to the Government of the Russian Federation, including producing products for computer systems that are used on Russian missiles; **JSC Research and Production Association of Measuring Equipment**, developer of measuring instruments and systems for various applications, including aerospace, defense, and energy; **JSC Russian Research Institute Elektronstandart**, research institute that offers a multipurpose approach to ensure the quality and reliability of electronic components; **JSC Ryazan Plant of Metal Ceramic Instruments**, manufacturer of reed switches, solar modules, and other products based in Ryazan, Russia; **JSC Scientific Production Enterprise Digital Solutions**, electronics entity that specializes in electronic engineering; **JSC Scientific Production Enterprise Kontakt**, leading manufacturer of vacuum electronic devices for radio and television broadcasting, remote space and satellite communications, radar, and boost machinery; **JSC Scientific Research Institute of Gas Discharge Devices Plasma**, developer and manufacturer of gas lasers, plasma display panels, gas discharge switching and protective devices, x-ray tubes, industrial ceramics, metal-ceramic units and other science-intensive and high-tech devices; **JSC Scientific Research Institute of Industrial Television Rastr**, designer and producer of electronic materials, equipment, semiconductor products and microwave technologies; **JSC Scientific Research Institute of Precision Mechanical Engineering**, developer and producer of complex, high-technology electronic and mechanical devices and electrical measuring devices; **JSC Special Design Bureau of Computer Engineering**, developer and manufacturer of radio-electronic equipment for military and civil purposes; **JSC Svetlana Semiconductors**, Semiconductors is a manufacturer and designer of integrated circuits and semiconductor devices based in Russia; **JSC Voronezh Semiconductor Devices Factory Assembly**, major manufacturer of semiconductor devices in Russia; **PJSC Megafon**, provider of telecommunication services in Russia; **PJSC Tutaev Motor Plant**, manufacturer and distributor of diesel engines for various vehicles and machinery; **RT-Inform LLC**, Russian entity engaged in the implementation of trade and procurement activities of holding companies and organizations of Rostec; **JSC Elektronstandart Pribor**, manufacturer of systems of fire and gas protection for oil and gas industry;

- 1 financial entity – **Advanced Research Foundation**, government fund that supports research and development in the fields of defense and state security, involving high-risk and high-reward projects;
- 2 machinery industry entities – **OOO Adis**, wholesaler of operational materials and accessories of machinery and equipment; **KAMAZ Publicly Traded Company**, largest manufacturer of heavy trucks in Russia;
- 1 military forces entity – **Limited Liability Company RSBGroup**, private military company with close ties to Russia's intelligence services;
- 14 research and education-related entities – **Ramenskoye Instrument-Making Design Bureau JSC**, designer of on-board equipment for aerial vehicles and products for space objects, sea and land vehicles; **Federal State Institution Federal Scientific Center Scientific Research Institute for System Analysis of the Russian Academy of Sciences**, research institute that conducts fundamental and applied research in the fields of nanotechnology, information and telecommunication technologies, computing systems, mathematics, physics and informatics; **JSC Design Center Soyuz**, developer of semiconductors and integrated circuits for various applications; **JSC Design Technology Center Elektronika**, leading developer of electronic products, including for Russian government clients; **JSC Moscow Institute of Electromechanics and Automatics**, developer of navigation and control systems for main passenger aircrafts and

heavy military aircrafts; **JSC Scientific Research Institute Giricond**, developer and producer of electronic components, such as capacitors, varistors, thermistors, and filters; **JSC Scientific Research Institute of Electrical Carbon Products**, research institute of electric and coal products based in Russia; **JSC Scientific Research Institute of Electronic and Mechanical Devices**, leading developer of microprocessors, computing systems, and nanotechnology; **JSC Scientific Research Institute of Electronic Engineering Materials**, developer and producer of electronic equipment materials; **JSC Special Design Bureau of Control Means**, provider of services of software development, implementation, and maintenance; **Keldysh Institute of Applied Mathematics of the Russian Academy of Sciences**, research institute involved in solving complex mathematical problems related to national projects of space exploration, nuclear and fusion energy, robotics, computational biology; **Mitshinskiy Scientific Research Institute of Radio Measuring Instruments**, leader of Russia's radio-electronic industry that has conducted research regarding components for electronics systems and has been involved in developing regulations for Russia related to specialized electronic components; **Skolkovo Foundation**, non-profit state company whose purpose is to support the development and commercialization of innovative technologies in Russia and abroad; **Skolkovo Institute of Science and Technology**, private research university located in Moscow, Russia;

– 6 Iranian entities involved in the elaboration, production and supply of drones to Russia – **Islamic Revolutionary Guard Corps Aerospace Force**, strategic missile, air, and space force within the Islamic Revolutionary Guard Corps (IRGC) of Iran which helped facilitate Iran's supply of military UAVs to Russia; **Oje Parvaz Mado Nafar Company (Mado)**, manufacturer of unmanned aerial vehicle (UAV) components; **Paravar Pars Company**, Iranian entity closely associated with Imam Hossein University, which is controlled by the Islamic Revolutionary Guard Corps (IRGC), and involved in manufacture of Unmanned Aerial Vehicles (UAVs) for the IRGC Aerospace Force (IRGC AF) and testing of UAVs for the IRGC Navy; **Shahed Aviation Industries**, Iranian company affiliated with the Islamic Revolutionary Guard Corps Aerospace Force responsible for the design and advancement of the Shahed series of Unmanned Aerial Vehicles (UAVs), which have been provided to Russia and employed in the war against Ukraine; **Design and Manufacturing of Aircraft Engines (DAMA)**, Iranian company involved in the research, development and production of the Iranian Shahed-171 Unmanned Aerial Vehicles (UAVs) programme, which is owned by the Islamic Revolutionary Guard Corps Aerospace Force (IRGC AF), as well as carries out covert procurement activities for Iran's Aircraft Manufacturing Industries (HESA), an entity affiliated with Iran's Ministry of Defence and Armed Forces Logistics (MODAFL); **Islamic Revolutionary Guard Corps Research and Self-Sufficiency Jihad Organization (IRGC SSJO)**, R&D unit of the Islamic Revolutionary Guard Corps (IRGC) that develops and manufactures ground penetrating radar, communication systems, weaponry, combat vehicles and electronic cyberwarfare equipment.