



INTERNATIONAL SANCTIONS

imposed on Russian entities and individuals
with respect to the Ukraine crisis

as of 11 a.m. MSK
9 March 2022

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I. EUROPEAN UNION (EU)

Date, Act	Scope
<p>23 February 2022</p> <p>Council Decision (CFSP) 2022/264</p> <p>Council Decision (CFSP) 2022/265</p> <p>Council Decision (CFSP) 2022/266</p> <p>Council Decision (CFSP) 2022/267</p>	<p>The Council adopted restrictive measures in response to the Russian decision to recognize the non-government controlled areas of Donetsk and Luhansk oblasts in Ukraine as independent entities, and the ensuing decision to send Russian troops into these areas.</p> <p>The agreed package includes:</p> <ul style="list-style-type: none"> ▶ targeted sanctions against the 351 members of the Russian State Duma and an additional 27 high profile individuals and entities; ▶ restrictions on economic relations with the non-government controlled areas of Donetsk and Luhansk oblasts; ▶ restrictions on Russia's access the EU's capital and financial markets and services. <p>Restrictive measures include an asset freeze and a prohibition from making funds available to the listed individuals and entities. In addition, a travel ban applicable to the listed persons prevents these from entering or transiting through EU territory.</p> <p>The list of designated persons, entities and bodies was extended to 571 individuals and 55 entities.</p> <p>Effective until 24.02.2023.</p>
<p>25 February 2022</p> <p>Council Decision (CFSP) 2022/327</p> <p>Council Regulation (EU) 2022/328</p> <p>Council Decision (CFSP) 2022/329</p> <p>Council Regulation (EU) 2022/330</p> <p>Council Decision (CFSP) 2022/331</p> <p>Council Implementing Regulation (EU) 2022/332</p> <p>Council Decision (EU) 2022/333</p>	<p>The European Council has adopted a 2nd sanctions package in response to Russia's military operation against Ukraine. This second package builds on, and significantly expands, the first package of sanctions adopted on 23 February. These sanctions cover:</p> <ul style="list-style-type: none"> ▶ the financial sector; ▶ the energy and transport sectors; ▶ dual-use goods; ▶ export control and export financing; ▶ visa policy; ▶ additional listings of Russian individuals; ▶ new listing criteria. <p>Dual-use goods are items that have both a civilian and military application. They are identified in Regulation (EU) 2021/821 setting up a Union regime for the control of exports, brokering, technical assistance, transit and transfer of dual-use items. These prohibitions apply irrespective of whether the goods or technology originate in the EU or not.</p>

LIST OF SANCTIONS IMPOSED ON RUSSIA WITH RESPECT TO UKRAINE CRISIS

Date, Act	Scope
28 February 2022 Council Regulation (EU) 2022/334 Council Decision (CFSP) 2022/335 Council Decision (CFSP) 2022/337	<p>Decision prohibited any transactions with the Central Bank of Russia.</p> <p>It also imposed further restrictive measures prohibiting Russian air carriers, any Russian-registered aircraft, and any non-Russian-registered aircraft which is otherwise controlled by any Russian natural or legal person from landing in, taking off from, or overflying, the territory of the EU.</p> <p>The Council has also added 26 persons and one entity (Gas Industry Insurance Company SOGAZ) to the List. Total at 28.02.2022 680 individuals and 53 entities.</p>
2 March 2022 Council Regulation (EU) 2022/345 Council Decision (CFSP) 2022/346	<p>EU introduces a SWIFT ban for certain Russian banks:</p> <ul style="list-style-type: none">▶ Bank Otkritie;▶ Novikombank;▶ Promsvyazbank;▶ Rossiya Bank;▶ Sovcombank;▶ Vnesheconombank (VEB);▶ VTB Bank. <p>This prohibition will enter into force on the tenth day after the publication in the Official Journal of the EU, and will also apply to any legal person, entity or body established in Russia whose proprietary rights are directly or indirectly owned for more than 50% by the above-mentioned banks.</p> <p>Apart from that, the Council prohibits to invest, participate or otherwise contribute to future projects co-financed by the Russian Direct Investment Fund.</p> <p>Also the Council prohibits to sell, supply, transfer or export euro denominated banknotes to Russia or to any natural or legal person, entity or body in Russia, including the government and the Central Bank of Russia, or for use in Russia.</p>
2 March 2022 Council Regulation (EU) 2022/350 Council Decision (CFCP) 2022/351	<p>The Council decided to suspend the broadcasting activities in the EU of the Russian state-owned outlets Sputnik and Russia Today until the aggression against Ukraine is brought to an end and until the Russian Federation and its associated outlets cease conducting disinformation and information manipulation actions.</p>

To be updated.

II. UNITED KINGDOM (UK)



NB! Sanctions below cover the period from December 31, 2020 to date. Prior to this period, sectoral sanctions imposed by the UK were set out in EU regulations.

Latest version of the [UK Sanctions List](#).

Date, Act	Scope
<p>22 February 2022</p> <p>Financial Sanctions Notice 1 (deleted from the OFSI website)</p> <p>Financial Sanctions Notice 2 (deleted from the OFSI website)</p>	<p>The Foreign, Commonwealth and Development Office (FCDO) updated the UK Sanctions List. Individuals are subjected to asset freeze and travel ban; sanctions for Russian entities include asset freeze in the UK.</p> <p>New sanctioned entities:</p> <ul style="list-style-type: none">▶ Bank Rossiya▶ IS Bank▶ JSC GenBank▶ PJSC Promsvyazbank▶ Black Sea Bank for Development and Reconstruction <p>New sanctioned individuals:</p> <ul style="list-style-type: none">▶ Gennadiy Nikolayevich Timchenko▶ Boris Romanovich Rotenberg▶ Igor Arkadyevich Rotenberg <p>UK persons and entities are prohibited from making funds available, directly or indirectly, to or for the benefit of these individuals, and all UK individuals and entities will be prohibited from providing funds and/or economic resources to the sanctioned banks.</p>

Date, Act	Scope
<p>24 February 2022</p> <p>Financial Sanctions Notice</p> <p>General licence INT/2022/1272278 Wind Down of Positions Involving VTB</p> <p>General licence INT/2022/1272278 Publication Notice</p>	<p>The FCDO updated the UK Sanctions List. Individuals are subjected to asset freeze and travel ban; sanctions for Russian entities include asset freeze in the UK.</p> <p>New sanctioned entities:</p> <ul style="list-style-type: none">▶ Uralvagonzavod JSC▶ United Aircraft Corporation PJSC▶ United Shipbuilding Corporation PJSC▶ Rostec State Corporation▶ Tactical Missiles Corporation JSC▶ VTB Bank PJSC <p>New sanctioned individuals:</p> <ul style="list-style-type: none">▶ Denis Alexandrovich Bortnikov▶ Petr Mikhailovich Fradkov▶ Elena Alexandrovna Georgieva▶ Kirill Nikolaevich Shamalov▶ Yury Borisovich Slyusar <p>It has been announced that new sanctions have a purpose to:</p> <ul style="list-style-type: none">▶ exclude Russian banks from the UK financial system stopping them from accessing Sterling and clearing payments through the UK;▶ ban Russian state and private companies from raising funds in the UK, banning dealing with their securities and making loans to them;▶ limit the amount of money that Russian nationals will be able to deposit in their UK bank accounts;▶ impose asset freezes on over more 100 new entities and individuals;▶ ban Aeroflot from the UK;▶ impose new trade restrictions and stringent export controls;▶ ban the export of all dual-use items to Russia, including a range of high-end and critical technological equipment and components in sectors including electronics, telecommunications, and aerospace, etc. <p>The legislation has not been yet published.</p>

LIST OF SANCTIONS IMPOSED ON RUSSIA WITH RESPECT TO UKRAINE CRISIS

Date, Act	Scope
<p>25 February 2022</p> <p>Financial Sanctions Notice</p>	<p>The FCDO updated the UK Sanctions List and designated:</p> <ul style="list-style-type: none"> ▶ The President of Russia, Mr. Vladimir Putin ▶ Foreign Minister of the Russian Federation, Mr.Sergei Lavrov
<p>24-25 February 2022</p> <p>The Air Navigation (Restriction of Flying) (Russian Aircraft) Regulations 2022</p> <p>The Air Navigation (Restriction of Flying) (Russian Aircraft) (Amendment) Regulations 2022</p>	<p>These regulations impose restrictions of an emergency nature on the flying in United Kingdom airspace, including in the airspace above the United Kingdom’s territorial sea, by aircraft on scheduled services which are owned, chartered or operated by a person connected with Russia, or which are registered in Russia.</p>
<p>28 February 2022</p> <p>Financial Sanctions Notice</p>	<p>The FCDO updated the UK Sanctions List and froze the assets of:</p> <ul style="list-style-type: none"> ▶ VEB.RF ▶ Bank Otkritie Financial Corporation PJSC ▶ Sovcombank PJSC <p>Latest version of the UK Sanctions List.</p>
<p>28 February 2022</p> <p>The Russia (Sanctions) (EU Exit) (Amendment) (No. 2) Regulations 2022</p>	<p>The Regulations add new financial sanctions to Part 3 (Finance) of the 2019 Regulations. Existing restrictions on dealing with certain financial instruments and providing loans and credit are amended to extend the sanctions prohibitions to a broader range of transferable securities and money market instruments (regulation 16 of the 2019 Regulations); and loans and credit (regulation 17). Further restrictions on correspondent banking relationships and processing of sterling payments are also introduced (in new regulation 17A of the 2019 Regulations). The amendments also introduce a power for the Secretary of State to designate persons for the purposes of that provision.</p> <p>These Regulations provide for exceptions to, and for licensing powers in relation to, those prohibitions. In particular, there is provision to make clear that a licence may authorise acts which would otherwise be prohibited by any of regulations 11 to 17A for a particular period beginning with the coming into force of the prohibition, or the date of any designation made for the purposes of those provision. This would allow a period for persons affected to arrange their affairs to comply.</p>

LIST OF SANCTIONS IMPOSED ON RUSSIA WITH RESPECT TO UKRAINE CRISIS

Date, Act	Scope
<p>28 February 2022</p> <p>The Russia (Sanctions) (EU Exit) (Amendment) (No. 3) Regulations 2022</p>	<p>These Regulations provide for new trade sanctions measures in relation to Russia:</p> <ul style="list-style-type: none">▶ Prohibitions on the export, supply and delivery and making available of military goods are extended to include dual-use goods and critical-industry goods.▶ Prohibitions on the making available and transfer of military technology are extended to include dual-use technology and critical-industry technology.▶ Related prohibitions on the provision of technical assistance, financial services, funds and brokering services are also extended in relation to dual-use goods and technology and critical-industry goods and technology.▶ These new prohibitions replace prohibitions relating to dual-use goods and dual-use technology for named persons, and for military use.▶ Transitional provision is made in relation to licences issued to authorise trade within the scope of the replaced prohibitions.▶ A number of exceptions from the trade prohibitions on critical-industry goods and technology are provided for, in relation to personal items and diplomatic missions, consular posts and international organisations, the movement of aircraft and vessels, consumer communication devices and software updates, and emergencies.
<p>1 March 2022</p> <p>Financial Sanctions Notice</p> <p>Financial Sanctions Notice 2</p> <p>Financial Sanctions Notice 3</p>	<p>Sberbank PJSC was added to the list of persons named in relation to financial and investment restrictions. It causes restrictions on a wide variety of financial markets and services:</p> <ul style="list-style-type: none">▶ investment bans;▶ restrictions on access to capital markets;▶ directions to cease banking relationships and activities;▶ requirements to notify or seek authorisation prior to certain payments being made or received;▶ restrictions on the provision of financial, insurance, brokering or advisory services or other financial services. <p>Entries have been added to the UK Sanctions List – 5 individuals and 3 legal entities (inter alia, the Russian Direct Investment Fund and its CEO Mr. Kirill Dmitriev).</p> <p>Also, according to the official press-release sanctions were imposed on the Russian Central Bank. Legislation has not been published.</p>

LIST OF SANCTIONS IMPOSED ON RUSSIA WITH RESPECT TO UKRAINE CRISIS

Date, Act	Scope
<p>1 March 2022</p> <p>The Russia (Sanctions) (EU Exit) (Amendment) (No. 4) Regulations 2022</p>	<p>The Regulations prohibit Russian ships, and other ships specified by the Secretary of State, from entering ports in the United Kingdom. There is a notification and publicity requirement where the specification power is used.</p> <p>An exception from the prohibition on port entry is provided for where access or entry is needed by the ship in case of emergency. The Regulations make it a criminal offence to contravene any of the prohibitions in these Regulations.</p>
<p>1 March 2022</p> <p>The Russia (Sanctions) (EU Exit) (Amendment) (No. 5) Regulations 2022</p>	<p>This document prohibits a UK individual or entity from providing financial services for the purpose of foreign exchange reserve and asset management to:</p> <ul style="list-style-type: none"> ▶ the Central Bank of the Russian Federation; ▶ the National Wealth Fund of the Russian Federation; ▶ the Ministry of Finance of the Russian Federation; ▶ a person owned or controlled directly or indirectly by any of the persons above; ▶ a person acting on behalf of or at the direction of any of the persons above.
<p>3 March 2022</p> <p>Financial Sanctions Notice</p>	<p>The government has announced that a full asset freeze and travel ban has been imposed against Alisher Usmanov and Igor Shuvalov. According to British Government, they are 2 of Russia's leading oligarchs with significant interests in the UK and close links to the Kremlin.</p>
<p><i>New!</i> 9 March 2022</p> <p>Corrigendum to Council Regulation (EU) 2021/1030 of 24 June 2021</p>	<p>These amendments adopt <u>restrictive measures</u> concerning dual-use goods and investment services towards Belarus.</p> <p>It has been also <u>announced</u> in media that EU to sanction more Russian oligarchs, Belarus banks. The draft package will ban three Belarusian banks from the SWIFT banking system and add several more oligarchs and Russian lawmakers to the EU blacklist.</p> <p>The package also bans exports from the EU of naval equipment and software to Russia and provides guidance on the monitoring of cryptocurrencies to avoid their use to circumvent EU sanctions.</p>

To be updated.

III. UNITED STATES OF AMERICA (USA)



Date, Act	Scope
<p>21 February 2022</p> <p>US President's Executive Order 14065</p> <p>General Licenses No. 17-22</p>	<p>Asset freeze and prohibition of transactions with Donetsk and Luhansk.</p>
<p>22 February 2022</p> <p>Directive 1A under Executive Order 14024</p> <p>General License 2</p> <p>General License 3</p>	<p>The Department of the Treasury's Office of Foreign Assets Control (OFAC) has published new Russia-related designations:</p> <ul style="list-style-type: none"> ▶ Property blocking sanctions on Vnesheconombank (VEB) and Promsvyazbank PJSC, along with 42 of their subsidiaries, as well as on 5 Russian oligarchs. ▶ All assets of the designated persons in the USA or within the possession or control of a U.S. person must be frozen, and U.S. persons are prohibited from transacting with the designated persons unless otherwise authorized by OFAC. ▶ Additionally, all entities owned 50 percent or more, directly or indirectly, by VEB, PSB or of the listed subsidiaries and other designated persons are also subject to blocking sanctions, even if not identified as blocked. ▶ Further sovereign debt restrictions imposed: existing prohibitions on bonds were extended to secondary market after 1 March 2022.
<p>23 February 2022</p> <p>General License 4</p>	<p>New designations under the PEESA – Nord Stream 2 AG and its Managing Director, Matthias Warnig, were added to OFAC's SDN List.</p>

LIST OF SANCTIONS IMPOSED ON RUSSIA WITH RESPECT TO UKRAINE CRISIS

Date, Act	Scope
<p>24 February 2022</p> <p>Directive 2 and Directive 3 under Executive Order 14024</p> <p>General License 5</p> <p>General License 6</p> <p>General License 7</p> <p>General License 8 (substituted by GL 8A)</p> <p>General License 9 (substituted by GL 9A)</p> <p>General License 10 (substituted by GL 10A)</p> <p>General License 11</p> <p>General License 12</p>	<p>The Department of the Treasury's Office of OFAC has published new Russia-related designations:</p> <ul style="list-style-type: none"> ▶ OFAC issued a variety of sanctions on Russian banks, including blocking sanctions and sanctions on correspondent and payable-through accounts. ▶ VTB, Novikom, Sovcombank and Otkritie were included into the SDN list with their respective subsidiaries: 20 entities of VTB, 12 of Otkritie and 22 of Sovcombank. All entities owned by them under the 50 percent rule are also fully blocked. ▶ U.S. financial entities are prohibited from interacting with Sberbank, its 25 subsidiaries and foreign companies owned by Sberbank by 50 percent or more, with respect to opening and maintaining correspondent and transitional bank accounts starting from March 26, 2022. ▶ All transactions in, provision of financing for, and other dealings in new debt of greater than 14 days maturity and new equity issued by Russian largest critical financial organizations such as Alfa bank, Gazprombank and eleven others are prohibited. ▶ Full blocking sanctions were imposed on 7 individuals of Russian elite and their family members (Sergei Sergeevich Ivanov, Andrey Patrushev, Ivan Igorevich Sechin, Alexander Aleksandrovich Vedyakhin, Andrey Sergeevich Puchkov and Yuriy Alekseyevich Soloviev, Galina Olegovna Ulyutina). <p>Also see press-release for more information.</p>
<p>24 February 2022</p> <p>Final rule of the Bureau of Industry and Security, Department of Commerce</p>	<p>The U.S. Commerce Department, through its Bureau of Industry and Security (BIS) adopted restrictions on import of U.S. items and foreign items using U.S.-origin software, technology, or equipment to 49 Russian military end users, as well as on import of sensitive technology, imposing a policy of denial for licenses, targeting the Russian defense, aviation, and maritime sectors. A substantial part of such equipment and technology was not previously under scrutinized control for Russia.</p>
<p>25 February 2022</p> <p>Russia-related Designations</p>	<p>The OFAC has added new individuals to the SDN List:</p> <ul style="list-style-type: none"> ▶ Mr. Vladimir Putin ▶ Mr. Sergei Lavrov ▶ Mr. Sergey Shoigu ▶ Mr. Valery Gerasimov <p>Also see press-release for more information.</p>

LIST OF SANCTIONS IMPOSED ON RUSSIA WITH RESPECT TO UKRAINE CRISIS

Date, Act	Scope
<p>28 February 2022</p> <p>Directive 4 under Executive Order 14024</p> <p>General License 8A</p>	<p>Any transaction involving</p> <ul style="list-style-type: none"> ▶ the Central Bank; ▶ the National Wealth Fund of the Russian Federation; or ▶ the Ministry of Finance of the Russian Federation, <p>including any transfer of assets to such entities or any foreign exchange transaction for or on behalf of such entities, are prohibited, except to the extent provided by law, or unless licensed or otherwise authorized by the OFAC.</p> <p>Energy*-related transactions involving entities below are authorized until June 24, 2022:</p> <ul style="list-style-type: none"> ▶ Vnesheconombank; ▶ Otkritie Bank Financial Corporation PJSC; ▶ Sovcombank OJSC; ▶ Sberbank; ▶ VTB; ▶ Any entity in which one or more of the above persons own, directly or indirectly, individually or in the aggregate, a 50 percent or greater interest; or ▶ the Central Bank. <p><i>* the term "related to energy" means the extraction, production, refinement, liquefaction, gasification, regasification, conversion, enrichment, fabrication, transport, or purchase of petroleum, including crude oil, lease condensates, unfinished oils, natural gas liquids, petroleum products, natural gas, or other products capable of producing energy, such as coal, wood, or agricultural products used to manufacture biofuels, or uranium in any form, as well as the development, production, generation, transmission, or exchange of power, through any means, including nuclear, thermal, and renewable energy sources.</i></p>
<p>1-2 March 2022</p> <p>Information from U.S. Department of Transportation "U.S. Will Block Russian Aircraft from Using All Domestic Airspace"</p> <p>U.S. Department of Transportation office of the secretary Washington, D.C Order 2022-3-2</p>	<p>The Notice to Air Missions (NOTAM) and regulatory orders will suspend operations of all aircraft owned, certified, operated, registered, chartered, leased, or controlled by, for, or for the benefit of, a person who is a citizen of Russia. This includes passenger and cargo flights, and scheduled as well as charter flights, effectively closing U.S. air space to all Russian commercial air carriers and other Russian civil aircraft.</p> <p>Restrictions are imposed on several companies:</p> <ul style="list-style-type: none"> ▶ PJSC AEROFLOT RUSSIAN AIRLINES; ▶ AIRBRIDGEARGO AIRLINES LIMITED; ▶ JOINT STOCK COMPANY AIRCOMPANY YAKUTIA; ▶ LLC NORD WIND; ▶ AZUR AIR, L.L.C.

LIST OF SANCTIONS IMPOSED ON RUSSIA WITH RESPECT TO UKRAINE CRISIS

Date, Act	Scope
<p>3 March 2022</p> <p>General License 9A</p> <p>General License 10A</p> <p>General License 13</p> <p>General License 14</p>	<p>Issued some clarifications as to the general licenses:</p> <ul style="list-style-type: none"> ▶ GL 9A authorizes all transactions prohibited by the Russia-related Sovereign Transactions Directive that are ordinarily incident and necessary to the receipt of interest, dividend, or maturity payments in connection with debt or equity of the Central Bank of the Russian Federation, the National Wealth Fund of the Russian Federation, or the Ministry of Finance of the Russian Federation (collectively, "Directive 4 entities"). ▶ GL 10A authorizes all transactions prohibited by the Russia-related Sovereign Transactions Directive that are ordinarily incident and necessary to the wind down of derivative contracts, repurchase agreements, or reverse repurchase agreements entered into prior to 12:01 a.m. eastern standard time, March 1, 2022, that include a Directive 4 entity as a counterparty. ▶ OFAC issued GL 13 to authorize U.S. persons to pay taxes, fees, or import duties and purchase or receive permits, licenses, registrations, or certifications, to the extent such transactions are prohibited by the Russia-related Sovereign Transactions Directive, provided such transactions are ordinarily incident and necessary to such persons' day-to-day operations in the Russian Federation. GLs 8A and 13 expire at 12:01am eastern daylight time, June 24, 2022. ▶ OFAC also issued GL 14 authorizing certain transactions involving any Directive 4 entity where the Directive 4 entity's sole function in the transaction is to act as an operator of a clearing and settlement system.
<p><i>New!</i> 3 March 2022</p> <p>The U.S. Department of State Press Release</p>	<p>Targeting Russian Elites:</p> <p>On 03 March the Department additionally designated:</p> <ul style="list-style-type: none"> ▶ Dmitry Peskov ▶ Boris Rotenberg and SMP Bank ▶ Arkady Rotenberg ▶ Sergei Chemezov ▶ Igor Shuvalov ▶ + their family members. <p>Companies owned or controlled by the above individuals:</p> <ul style="list-style-type: none"> ▶ Otkrytye Aktivы OOO ▶ Sova Nedvizhimost ▶ Avanfort OOO ▶ Firma Veardon OOO ▶ Zareche-4 OOO ▶ Limited Liability Company Nemchinovo Investments OOO ▶ Altitude X3 Ltd + LX-MOW.

LIST OF SANCTIONS IMPOSED ON RUSSIA WITH RESPECT TO UKRAINE CRISIS

Date, Act	Scope
-//-	<p>Targeting Russia’s defense enterprises:</p> <p>The Department of State will impose sweeping sanctions that target Russia’s defense sector. This action will impose significant costs on Russian weapon development and production companies. In total, 22 Russian defense-related entities will be designated, including firms that make combat aircraft, infantry fighting vehicles, electronic warfare systems, missiles, and unmanned aerial vehicles for Russia’s military.</p> <p>Specifically, the following 21 entities are being designated pursuant to E.O. 14024 Section 1(a)(i) because they are persons who operate or have operated in the defense and related materiel sector of the Russian Federation economy:</p> <ul style="list-style-type: none"> ▶ Izhevsk Unmanned Systems Research and Production Associated Limited Liability Company is a Russian defense company that makes unmanned aerial vehicles (UAVs) for Russia’s military. Russian-backed forces involved in the destabilization of Ukraine have used these UAVs in their military operations. ▶ JSC Research and Production Association Kvant is a Russian defense company that produces electronic warfare systems whose electronic warfare systems have been used by Russian-backed forces involved in the destabilization of Ukraine. ▶ Kurganmashzavod is a Russian defense company that develops and produces infantry fighting vehicles. Kurganmashzavod infantry fighting vehicles have been used by Russian-backed forces involved in the destabilization of Ukraine. ▶ Joint Stock Company Research and Production Corporation Konstruktorskoye Byuro Mashynostroyeniya; ▶ Joint Stock Company Federal Scientific and Production Center Titan Barrikady; ▶ Komsomolsk-on-amur Aviation Plant; ▶ Makeyev State Missile Center; ▶ JSC Central Research Institute of Automation and Hydraulics; ▶ UEC-Saturn; ▶ Design Bureau of Special Machine Building; ▶ Joint Stock Company Salavat Chemical Plant; ▶ Joint Stock Company Avangard; ▶ Radioavtomatika; ▶ JSC Novosibirsk Aircraft Production Association Plant Named After V.P. Chkalov; ▶ Irkutsk Aviation Plant; ▶ ODK-UMPO Engine Building Enterprise; ▶ Nizhny Novgorod Aviation Plant Sokol; ▶ All-Russian Scientific Research Institute of Aviation Materials; ▶ Aviastar-SP Aircraft Manufacturing Enterprise; ▶ Public Joint-Stock Company ODK-Kuznetsov; ▶ Joint Stock Company ODK-Klimov; ▶ The Planar Company.

LIST OF SANCTIONS IMPOSED ON RUSSIA WITH RESPECT TO UKRAINE CRISIS

Date, Act	Scope
-//-	<p>Sanctions implications:</p> <ul style="list-style-type: none"> ▶ All property and interests in property of the individuals and entities above that are in the United States or in the possession or control of U.S. persons are blocked and must be reported to OFAC. ▶ In addition, any entities that are owned, directly or indirectly, 50 percent or more by one or more blocked persons are also blocked. ▶ All transactions by U.S. persons or within (or transiting) the United States that involve any property or interests in property of designated or otherwise blocked persons are prohibited unless authorized by a general or specific license issued by OFAC, or exempt.
<p>3 March 2022</p> <p>The White House Press Release</p> <p>The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) Press Release</p> <p>General License 15</p>	<p>The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) and the U.S. Department of State sanctioned numerous Russian elites and their family members, identifying certain property of these persons as blocked and sanctioning Russian intelligence-directed disinformation outlets.</p> <p>Full blocking sanctions on an expansive new list of Russian elites and their family members:</p> <ul style="list-style-type: none"> ▪ Nikolai Tokarev (his wife Galina, daughter Mayya, and his two luxury real estate companies) ▪ Boris Rotenberg (his wife Karina, and his sons Roman and Boris) ▪ Arkady Rotenberg (His sons Pavel and Igor and daughter Liliya) ▪ Sergei Chemezov (His wife Yekaterina, his son Stanislav, and stepdaughter Anastasiya) ▪ Igor Shuvalov (His five companies, his wife Olga, his son Evgeny and his company and jet, and his daughter Maria and her company) ▪ Yevgeniy Prigozhin (His three companies, his wife, Polina, his daughter Lyubov, and his son Pavel), ▪ Dmitry Peskov, President Putin's press secretary ▪ Alisher Usmanov (His yacht, one of the world's largest, and his private jet, one of Russia's largest privately-owned aircraft). Particular transactions are permitted by General License 15 ▪ Imposing Visa Restrictions on 19 Russian Oligarchs, their 47 Family Members and Close Associates; <p>Full list of new designated persons are contained on official website of The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC).</p>

LIST OF SANCTIONS IMPOSED ON RUSSIA WITH RESPECT TO UKRAINE CRISIS

Date, Act	Scope
-//-	<p>Apart from that, Full blocking sanctions on disinformation targets: Treasury will designate seven Russian entities, SDN Strategic Culture Foundation and associated outlets Odn Rodyna, Rhythm of Eurasia, and Journal Kamerton; SouthFront; SDN InfoRos; New Eastern Outlook; Oriental Review; United World International; and Geopolitical.</p> <p>In addition, Treasury will designate 26 Russia and Ukraine-based individuals who play central roles in these organizations, enabling the Government of the Russian Federation's efforts to spread disinformation.</p>
<p>New! 8 March 2022</p> <p>Executive Order on Prohibiting Certain Imports and New Investments With Respect to Continued Russian Federation Efforts to Undermine the Sovereignty and Territorial Integrity of Ukraine</p> <p>General license 16</p>	<p>This Executive Order bans:</p> <ul style="list-style-type: none"> • The importation into the United States of Russian crude oil and certain petroleum products, liquefied natural gas, and coal; • New U.S. investment in Russia's energy sector; • financing or enabling foreign companies that are making investment to produce energy in Russia. <p>At the same time, through 12:01 eastern daylight time, April 22, 2022, Russia-related General License (GL) 16 authorizes all transactions prohibited by E.O. of March 8, 2022 that are ordinarily incident and necessary to the importation of crude oil; petroleum; petroleum fuels, oils, and products of their distillation; liquefied natural gas; coal; and coal products of Russian Federation origin pursuant to written contracts or written agreements entered prior to March 8, 2022.</p> <p>GL 16 does not authorize entry into new contracts.</p>

To be updated.

IV. SWITZERLAND



Date, Act	Scope
<p>28 February 2022</p> <p>Press release: Switzerland adopts EU sanctions against Russia Order Imposing Measures in Connection with the situation in Ukraine dated 27.08.2014 (as amended on 28.02.2022) (<i>unavailable in English</i>) Amendments to the Swiss sanctions list</p>	<p>The Federal Council decided to adopt packages of sanctions imposed by the EU on 23 and 25 February.</p> <p>Personal sanctions</p> <ul style="list-style-type: none"> ▶ The assets of the persons and companies listed in the Schedule to the ordinance are frozen with immediate effect; ▶ The ban on entering into new business relationships remains in place; ▶ Switzerland is also implementing the financial sanctions imposed by the EU with immediate effect on Messrs. Vladimir Putin, Mikhail Mishustin and Sergey Lavrov. <p>Swiss sanctions List (with respect to military intervention in Ukraine), last updated 28.02.2022.</p> <p>Entry rules and airspace closure</p> <ul style="list-style-type: none"> ▶ The Federal Council has decided to partially suspend the 2009 agreement on visa facilitation for Russian nationals. ▶ A number of individuals who have a connection to Switzerland and are close to the Russian president were subjected to entry bans. ▶ Swiss airspace will be closed to all flights from Russia and to all movements of aircraft with Russian markings with the exception of flights for humanitarian, medical or diplomatic purposes.
<p>4 March 2022</p> <p>Order Imposing Measures in Connection with the situation in Ukraine dated 27.08.2014 (as amended on 04.03.2022) (<i>unavailable in English</i>)</p>	<p>The newly adopted measures concern in particular certain goods and financial services. Switzerland's list of sanctions has been extended accordingly. Due consideration is being given to humanitarian activities.</p> <p>The export of all dual-use items to Russia is now prohibited, regardless of their end-use or end-user. In addition, the export of goods that could contribute to Russia's military and technological enhancement or the development of the defence and security sector is prohibited.</p> <p>The export to Russia of certain goods and services in the oil sector is no longer permitted. Furthermore, the export of certain goods and technology that can be used in aviation and the space industry is prohibited.</p>

LIST OF SANCTIONS IMPOSED ON RUSSIA WITH RESPECT TO UKRAINE CRISIS

Date, Act	Scope
-//-	The provision of public financing or financial assistance for trade with or investment in Russia is prohibited. Other restrictive measures in the financial sector concern securities, loans and the acceptance of deposits. Transactions with the Russian Central Bank are also no longer permitted. Furthermore, the Federal Council has decided to impose the sanctions in the financial sector that the EU adopted on 1 March, with the same exemptions. In particular, this concerns SWIFT, the international messaging system for financial transactions.

To be updated.

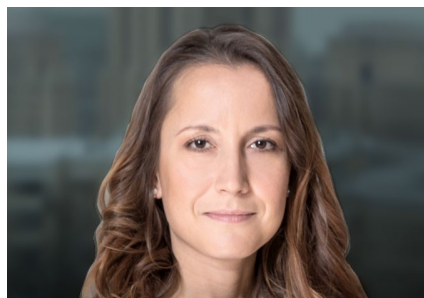
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