Yermak-McFaul Working Group on Russian Sanctions

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

New sanctions imposed from
4 November 2022 to 31 January 2023

Prepared by KSE Institute Sanctions Team

CONTENTS

SUMMARY 3

MONITORING TABLE 5

SANCTION ENFORCEMENT 11

SANCTION CIRCUMVENTION 14

DETAILED ANALYSIS 15

1. Expand Oil and Gas Sanctions 15

2. Increase Transportation and Insurance-Related Sanctions 22

3. Impose New Financial Sanctions 23

4. Designate the Russian Federation as a Sponsor of State Terrorism 27

5. Strengthen Individual Sanctions against these Categories of Individuals 28

6. Intensify Sanctions on State-Owned Enterprises 32

7. Expand Export Controls and Ban Imports 33

8. Impose Secondary Sanctions 38

9. Increase Transparency to Discourage Trade with and Investment in Russia 39

10. Deepen Coordination of Sanctions and Link Sanctions Relief to Peace and Reconstruction 40

FULL MONITORING TABLE *(Since 19 Apr, 2022)* 46

APPENDIX 61

SANCTIONS TARGETED AGAINST INDIVIDUALS 61

FIRM-SPECIFIC FINANCIAL RESTRICTIVE MEASURES 74

FIRM-SPECIFIC TRADE RESTRICTIVE MEASURES 82

SUMMARY

CORE UPDATES FROM 4 NOVEMBER 2022 TO 23 JANUARY 2023

#Oil/Energy In early November, G7 & EU adopted a price cap on Russian oil exported to 3rd countries at the level of $60 per barrel. Price cap was joined by Australia, Norway and Switzerland. Noticeably, Turkey unofficially joined price cap by banning oil tankers without insurance documents from passing through the Black Sea straits (#Transport). Later, on 20 January, Price Cap Coalition agreed to establish two distinct price caps on Russian refined products: one for products that generally trade at a premium to crude (diesel or gas oil), another one for products that trade at a discount to crude (fuel oil). So far, G7 & EU are discussing the level of price cap on Russian diesel – EU proposed a cap level of $100, while the G7 suggests a range of $100 to $110 per barrel. While the level of oil price cap is planned to be reviewed in March. In the same time Russian energy companies continue to lose assets located in EU and face new lawsuits: Poland withdrew Gazprom's stake in EuRoPol GAZ, Italy introduced temporary administration at the Isab-Lukoil oil refinery in Sicily (owned by Lukoil), Germany transferred Securing Energy for Europe GmbH into federal ownership. Moldova accused Gazprom of provoking an energy crisis and going to sue. German RWE and Uniper already initiated arbitration proceedings against Gazprom due to the lack of gas supplies.

#Financial Sanction Coalition countries continued to respond to Russia-Iran military cooperation – USA, UK, EU, Australia, New Zealand, Switzerland sanctioned Iranian (and several Russian) entities for production & delivery of UAVs to Russia. Among other financial sanctions, the USA sanctioned 18 entities related to Russia's financial services sector, inc. PJSC Rosbank & 17 subsidiaries of VTB Bank PJSC (Russia's 2nd largest bank), Russian Central Election Commission for holding referendums on occupied territories, as well as Wagner Group and 26 entities linked to it. The UK expanded financial sanctions by prohibiting services related to trusts, dealing with transferable security and new restrictions on loans and credit arrangements to a person connected with Russia. Under the 9th package, the EU sanctioned 49 entities, inc. Credit Bank of Moscow and Dalnevostochniy Bank, imposed transaction ban on Russian Regional Development Bank (SOE), prohibited new investments in the Russian mining sector and extended the prohibition regarding transferable securities. While Switzerland has adopted financial sanctions in line with 8th & 9th EU sanction packages (inc. crypto ban and ban on new investments in Russian mining sector)

#Trade During the reporting period USA, UK, EU, Switzerland, New Zealand and Taiwan adopted new and extended previous trade sanctions. Among updates worth highlighting – USA revoked Russia's status as a market economy and reclassified the country as a non-market economy in its antidumping proceedings; EU adopted new trade sanctions under 9th package (inc. restrictions affecting Russian MIC, service sector, aviation and space industry, iron and steel) and stopped applying autonomous trade preferences to goods from Belarus and Russia from 1 January 2023; Switzerland adopted trade sanctions under 8th and 9th EU packages (inc. complete armaments embargo on Russia, ban on import of Russian iron & steel products); Taiwan expanded the scope of export control on goods exported to Russia and Belarus; Japan prohibited exports of dual-use goods to Russia that could strengthen its military potential, effective from 3 February 2023. Besides, Serbia refused to supply goods to Russia in circumvention of sanctions.

#Terrorism During the reporting period Russia was recognised as a state sponsor of terrorism by the European Parliament, Netherlands, Poland (back in October Polish Senate passed a resolution to recognize the Russian authorities as a terrorist regime), NATO and Czech Republic. Previously Russia was recognised as SST by Lithuania, Latvia, Estonia and PACE.

#Reconstruction Canada became the 1st country who used new legislation to pursue seizure of sanctioned assets by starting the procces of seizure and forfeiture of $26 mln from Granite Capital Holdings (owned by Abramovich). White the USA became the 2nd country who adopted amendments allowing the confiscation and sale of frozen assets of Russian oligarchs for the benefit of Ukraine. Estonia in its turn took the initiative among EU members in transferring frozen Russian assets to Ukraine – 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.

#Individual In response to Russia-Iran cooperation, USA, UK, EU, Australia, New Zealand and Switzerland sanctioned Iranian (and some Russian) individuals for production & delivery of UAVs to Russia. Among other important updates, USA sanctioned V.Potanin, 5 Members of BoD of Russian Railways and two RF Deputy PMs - A.Belousov and D.Chernyshenko, plus introduced visa restrictions on 531 Russian military official; EU denied to accept Russian passports issued in TOT of Ukraine and Georgia and sanctioned 141 individuals under the 9th sanction package, as well as Switzerland.

#Secondary Threat of US secondary sanctions continues to affect companies' and countries' decisions. Chinese UnionPay limited the ability of Russians to withdraw cash abroad, Kyrgyz banks became the next ones who stopped servicing Russian Mir, while Sberbank was forced to close its subsidiary in UAE because of the threat of sanctions on Sheikh.

#SOEs Under the 9th package the EU prohibited EU nationals to hold any posts on the governing bodies of all Russian SOEs or controlled legal persons, entities and bodies located in Russia with a few exceptions. Switzerland adopted the same measure. Bulgaria rejected Rosatom's nuclear fuel from 2025 - agreements with Frasmatome (France) & Westinghouse (USA) for supplies were signed. The Czech Republic withdrew from United Institute of Nuclear Research (JINR), an international organization based in Russia which focuses on nuclear and particle physics research, on 31 December 2022.

Other important updates:

#SanctionEnforcement On 28 November 2022, the EC added the violation of EU sanctions to the list of 'EU crimes'. Later, on 2 December 2022, the EC made the next step by proposing a Directive to harmonize the criminal definitions and types and levels of penalties for violations of sanctions across all Member States. The proposal needs to be discussed and adopted by the EU Council and the EU Parliament, after which it will be implemented into the national laws of the Member States.

MONITORING TABLE

Sanctions adopted since 3 November 2022

Type & Progress	*Country & Details*	
1. Expand Oil and Gas Sanctions #Oil/Energy **Progress: Yes, but incomplete scope**		**G7 & EU** G7 & EU are working together to impose a price cap on exports of Russian diesel – EU proposed a cap level of $100, while the G7 suggests a range of $100 to $110 per barrel.
		**USA** Issued amended General License extending authorisation to conduct energy related transactions for Vnesheconombank, Bank Financial Corporation Otkritie, Sberbank, VTB Bank, Alfa-Bank, Rosbank, CBR 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 counties if purchased above the adopted level). *Guidance on types of services that are prohibited and exceptions to prohibition, as well as the recordkeeping and attestation requirements for service providers can be found here.* 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.
		**UK** Adopted G-7 price cap. Introduced new trade restrictions relating to oil and oil products. *Please, find details here.*
		**EU** Adopted price cap for Russian oil at $60 per barrel from 5 December 2022 (prohibits maritime transport, inc. through ship-to-ship transfers, and technical assistance, brokering services or financial assistance for Russia-origin crude oil exported to 3rd counties if purchased above cap). *Please, find details here.* EU energy ministers agreed to introduce the price of gas if prices at DTTF exceed €180 per MWh in a row. Cap may be adopted from 15 February 2023. EC approved the German government's takeover of the energy companies Uniper and Sefe (formerly Gazprom Germania). The 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.
		**Canada** Adopted G-7 price cap. *Please, find details here.* Revoked an exemption to sanctions that had allowed Siemens Canada to repair turbines for the Nord Stream pipeline operated by Russian state-owned energy company Gazprom.
		Switzerland Joined the price cap of $60 per barrel for Russian crude petroleum oils or oils from bituminous minerals: • extended the existing ban on the transport and transshipment of crude oil and petroleum products from or originating in Russia; • introduced a prohibition on providing technical assistance, brokering and financial services for ships that have transported crude oil and petroleum products; • introduces common exceptions for price cap. *Please, find details here.*
		**Norway** Joined G-7 price cap. *Please, find details here.*
		**Australia** Joined G-7 price cap. *Please, find details here.*
		**Poland** Withdrew Russian Gazprom's stake in EuRoPol GAZ and introduced a "temporary compulsory management" to guarantee the security of critical infrastructure used for gas transit.
		**Germany** Transferred Securing Energy for Europe GmbH (SEFE) into federal ownership (ex-subsidiary of Gazprom). German energy company RWE initiated arbitration against Gazprom due to the lack of has supplies.
		**Japan** Adopted G-7 price cap. 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.
		**Italy** Council of Ministers unanimously decided to introduce temporary administration at the Isab-Lukoil oil refinery in Sicily, owned by Russian Lukoil.
		**Moldova** Going to sue Gazprom - accused of provoking an energy crisis.
2. Increase Transportation and Insurance-Related Sanctions		**UK** Ship insurers announced that they will be canceling war-risk coverage across Russia, Ukraine, and Belarus, starting from 1 January 2023.

#Transport **Progress:** **Yes, but incomplete scope**		**Turkey** Banned flight of aircrafts (registered in Russia and Bermuda) with dual registration from 1 November 2022. Banned oil tankers without insurance documents from passing through the Black Sea straits.
		**Estonia** Banned own state railway company, Operail, from transporting Russian and Belarusian goods from 1 January 2023.
		**Jordan** 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.
		**Laos** Banned Russian airlines from flying through the country's airspace.
3. Impose New Financial Sanctions #Financial **Progress:** **Yes**		**USA** Sanctioned 27 entities, inc. transnational network procuring technology that supports the Russian MIC. Sanctioned PKK Milandr (Russian microelectronics company). Sanctioned 9 Iranian and Russian entities, inc. PMC “Wagner” for production & delivery of Iranian UAVs. Sanctioned Russian Central Election Commission for holding referendums. Sanctioned 18 entities related to Russia’s financial services sector, inc. PJSC Rosbank & 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. Sanctioned 14 entities linked to Wagner Group and producers of Russia’s weapons. Sanctioned 19 entities, inc. 5 linked to Wagner Group, 4 associated with V.Potanin, 9 linked to Russia’s military industrial complex.
		**UK** Designated Iranian Company which provided military components and engines for UAVs. Introduced new and expanded current financial sanctions on Russia (came into force on 16 Dec 2022): ● prohibition on providing services related to trusts or similar arrangements; ● prohibited to deal with transferable security or money-market instrument issued on or after 16 December 2022 by Russians; ● additional restrictions on loans and credit arrangements to a person connected with Russia.
		**EU** Sanctioned 6 Iranian entities involved in development & delivery of UAVs to Russia. Under the 9th package: ● sanctioned 49 entities (asset freeze targets) inc. Credit Bank of Moscow and Dalnevostochniy Bank; ● transaction ban on Russian Regional Development Bank (SOE); ● prohibited new investments in 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.
		**Canada** Sanctioned 16 Belarusian entities (military manufacturing, technology, engineering, banking and railway transportation). Sanctioned 6 Russian federal institutions involved in investigation, prosecution and detention of Russian citizens who oppose the regime. Sanctioned 4 Iranian entities for their military support to Russia and UAVs delivery.
		**Japan** Asset freeze measures JSC Irkut Corporation, MMZ Avangard and KAMAZ Publicly Traded Company.
		**Australia** Sanctioned Shahed Aviation Industries (Iran) for the supply of drones to Russia for use in its invasion of Ukraine.
		**New Zealand** Sanctioned 4 entities for providing material or strategic support for Russia's illegal invasion of Ukraine. Sanctioned Shahed Aviation Industries (Iran) for the supply of drones to Russia for use in its invasion of Ukraine.
		**Switzerland** Sanctioned 6 Iranian entities for development and supply of Iranian UAVs. Full ban on provision of services connected with crypto wallets, accounts or custody of crypto-based assets. Released funds of Russian National Settlement Depository, frozen under EU sanction on 3 June 2022. 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.
		**Poland** Sanctions one of the largest wholesale suppliers of automotive batteries on the Russian market.
		Luxembourg Released funds of the Russian National Settlement Depository, frozen under EU sanction on 3 June 2022.
		**Belgium** Released funds of the Russian National Settlement Depository, frozen under EU sanction.
4. Designate the Russia as a Sponsor of State Terrorism #Terorism **Progress:** **Yes**		**EU** The European Parliament recognized the Russian Federation as a state sponsor of terrorism.
		**USA** Designated PMC Wagner as a significant Transnational Criminal Organisation.
		**Netherlands** Recognized Russia as a state sponsor of terrorism.
		**Poland** Recognised Russia as a terrorist regime.
		**NATO** Recognised Russia as a terrorist state, called for creation of a special international tribunal.
		**Czech Republic** Recognized the Russian regime as terrorist in accordance with the resolution of the PACE
5. Strengthen Individual Sanctions against these Categories of Individuals #Individual **Progress:** **Yes**		**USA** Sanctioned 14 individuals, inc. persons related to entities from the Russian military procurement network. Sanctioned 2 individuals for facilitating PMC Wagner's acquisition of Iranian UAVs. Designated 21 Russian nationals for their alleged involvement in human rights abuses. Sanctioned 19 Russian officials and proxies. Sanctioned 2 Russian nationals who were implicated in human rights abuses against civilians in Ukraine. Sanctioned 46 individuals, inc. V. Potanin and 3 members of his family, 5 Members of BoD of Russian Railways, 2 Deputy PMs A. Belousov and D. Chernyshenko, 29 Russian heads of regions and governors connected to mobilization efforts. Sanctioned 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 involved in undermining democracy in Belarus. Sanctions 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. Sanctioned 10 individuals, inc. an individual linked to the Wagner Group and Deputy Prime Minister. Visa restrictions on 531 members of the Russian military.
		**UK** Sanctioned 4 oligarchs (subject to a travel ban, asset freeze and transport sanctions). Sanctioned 22 Russian who have promoted and enforced mobilisation & organised referendums. Sanctioned 5 individuals as alleged rights viators. Sanctioned 15 individuals (12 seniors of Russian military forces, & 3 Iranians for production and / or supply of UAVs).
		**EU** Approved decision not to accept Russian passports issued in TOT of Ukraine and Georgia. Sanctioned 6 Iranian individuals for involvement in development & delivery of UAVs to Russia. Under the 9th package: asset freeze for 141 individuals.
		**Canada** Sanctioned 23 individuals, who are members of the Russian justice and security sector. Sanctioned 22 senior Belarusian officials. Sanctioned 33 current or former senior Russian officials.
		**Japan** 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.
		**Australia** Sanctioned 3 Iranian military official individuals for involvement in supply of UAVs to Russia.
		**New Zealand** Sanctioned 22 individuals of the Russian and Belarusian elite.

		Sanctioned 23 individuals, responsible for disinformation campaigns in support of the Russian war effort. Sanctioned 3 Iranian military official individuals for involvement in supply of UAVs to Russia.
		**Switzerland** Impose financial sanctions and travel restrictions on 2 Iranian military officials. Sanctioned 4 Iran military individuals. Sanctioned 141 individuals, inc. members of the State Duma, ministers, propagandists and military officials. Approved decision not to accept Russian passports issued in TOT of Ukraine and Georgia.
		**Poland** Added 18 individuals (6 Russian & 12 Belarussian) to list of foreigners whose stay in Poland is undesirable. Sanctioned a Russian individual who violated Polish and international laws regulating trade.
		**Lithuania** Banned purchase and possession of weapons and ammunition for Russiansand Belarusians without Lithuanian citizenship.
	Tourist visa ban for ordinary Russians	
		**Turkey** Stopped giving Russian nationals preferential treatment when they apply for tourist residence permits.
		**Kazakhstan** Canceled for Russians' opportunity to extend a legal visa-free stay in the country by going abroad for a few days and then coming back.
6. Intensify Sanctions on State-Owned Enterprises #SOE **Progress:** **Yes**		**EU** Under the 9th package: 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 for 4 Russian media outlets - NTV/NTV Mir, Rossiya 1, REN TV and Pervyi Kanal - and prohibited broadcasting their content.
		**Switzerland** Russian Maritime Register of Shipping is included in the list of SOEs subject to a full ban on transactions. As the EU, Switzerland prohibited Swiss nationals to hold any posts on the governing bodies of all Russian SOEs or controlled legal persons, entities and bodies located in Russia.
		**Bulgaria** Rejected Russian fuel for its nuclear power plants from 2025 - agreements with Frasmatome (France) & Westinghouse (USA) for supplies were signed
		**Czech Republic** 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.
		**Moldova** Adopted a decision to suspend the broadcasting licenses of 6 TV channels for their pro-Russian propaganda in Moldova.
7. Expand Export Controls and Ban Imports #Trade **Progress:** **Yes**		**USA** Revoked Russia's status as a market economy and reclassified the country as a non-market economy in its antidumping proceedings (came into force from 1 November 2022). 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). Introduced export control measures against 9 Russian entities. Issued an order temporarily denying export privileges for a period of 180 days for 4 Russians & 2 entities. Announced a new rule imposing additional restrictions on Wagner. Renewed orders denying export privileges for 180 days to Pobeda Airlines, Nordwind Airlines, Siberian Airlines, Belavia Belarusian Airlines, Rossiya Airlines.
		**UK** Introduced new & expanded current trade sanctions which came into force on 16 December 2022: - extended the list of critical-industry goods subject to export ban; - extend 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.
		**EU** Stopped applying autonomous trade preferences to goods from Belarus & Russia from 1 January 2023. Under the 9th package adopted a number of trade restrictions: ● 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; ● 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;

		• extended existing prohibitions on the import or purchase of certain iron & steel products processed in a third country incorporating iron and steel products originating in Russia.
		**Switzerland** Adopted 8th EU sanction package: • 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 provision of architectural and engineering services, legal and IT consulting services; • 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; • prohibited import, transport and purchase of iron & steel products from Russia (includes ban on supportive services) + products that have been processed in a 3rd country from Russian iron and steel products (includes ban on supportive services); Adopted trade sanctions under the 9th EU package.
		**Japan** Ban on exports to 49 Russian entities (aerospace, military and shipbuilding industries) from Feb 3, 2023. Ban on exports of dual-use goods to Russia that could strengthen its military potential, from Feb 3, 2023.
		**New Zealand** Added perfumes and toilet waters and cosmetics, including beauty and make-up products, into the list of luxury goods subject to the export ban. Added a new exception to the export and import of luxury goods prohibition to allow for personal goods that are part of a passenger's baggage, or personal household effects.
		**Taiwan** 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.
		**Serbia** Refused to supply goods to Russia in circumvention of sanctions.
		**China** 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).
8. Impose Secondary Sanctions #Secondary **Progress:** **Yes, but slow**		**USA** The U.S. government is exerting pressure on Turkey to stop Russian airlines from flying American-made airplanes to and from the country.
		**China** Chinese UnionPay has limited the ability of Russians to withdraw cash abroad.
		**UAE** Sberbank is closing its subsidiary in the United Arab Emirates because of sanctions.
		**Kyrgyzstan** Banks stopped servicing Russian payment cards "Mir".
		**Kazakhstan** 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.
9. Increase Transparency to Discourage Trade with and Investment in Russia #Transparency **Progress:** **Yes, but slow**		
10. Deepen Coordination of Sanctions & Link Sanctions Relief to Peace & Reconstruction #Coordinations #Reconstruction **Progress:** **Yes**		**USA** 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.
		**Canada** Announced that it will seize and pursue the forfeiture of $26 mln from Granite Capital Holdings (owned by Abramovich) – 1st time Canada is using its new authority to pursue the seizure of assets belonging to sanctioned individuals.
		**UK** Adopted a resolution on the payment of reparations from the Russian Federation for damages.
		**EU**

		Adopted resolution calling for the creation of a special international tribunal for political and military leadership of Russia and its allies.
		**Estonia** 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.

SANCTION ENFORCEMENT

United States

On 20 October 2022, the US Department of State published a fact sheet which explains the various sanctions and export controls that have been imposed by the US government on Russia in response to Russia's invasion of Ukraine in February 2022. These measures are intended to restrict Russia's access to advanced technology and have had significant consequences on Russia's defense industrial base and restrict Russia's access to advanced technology.
As a result of these measures, Russia has experienced supply shortages and has been forced to turn to less technologically advanced countries for supplies and equipment. Russia has also struggled to import semiconductors and other key components, leading to a halt in the production of certain weapons systems. Domestic supply chains for Russia have been interrupted, resulting in a reliance on outdated defense stocks. A shutdown of mechanical plants, including those producing surface-to-air missiles, has occurred due to shortages of foreign-origin components.
A series of actions are targeted towards degrading Russia's military capabilities and imposing costs on Russia:

- Prohibitions on exports of certain goods and services to Russia, including dollar-denominated banknotes, accounting, management consulting, quantum computing, and trust and corporate formation services;
- Denials of exports, reexports, and transfers of items subject to the Export Administration Regulations for military end uses or end users in Russia and Belarus;
- The addition of Russian and Belarusian military end users to the Department of Commerce's Entity List, effectively cutting off these end users from nearly all items subject to the Export Administration Regulations;
- Denials of exports, reexports, and transfers of items needed for oil refining to Russia and Belarus, as well as the imposition of additional license requirements to further limit the Russian oil sector;
- Targeting of items useful for Russia's chemical and biological weapons production capabilities and other advanced manufacturing through export controls;
- License requirements and denials for the export and reexport of luxury goods to Russia in an effort to impose costs on Russian oligarchs who support the government;
- Use of foreign direct product rules to prevent exports of foreign-origin items produced with US advanced technologies, tools, and software to Russia in order to restrict their transfer to support Russia's military capabilities.

The United States has imposed sanctions on various entities and individuals in Russia, including Rostec, Mikron, Tactical Missiles Corporation, Russia's largest financial institutions, and Rosoboronexport, as well as individuals and entities located outside Russia that have procured goods and technology for the Russian military-industrial complex and intelligence services. Since February 2022, the United States has issued approximately 1,500 new and 750 amended sanctions listings.
The US has also formed a coalition of 37 countries that has implemented similar controls.

On 11 October 2022, OFAC and Financial Crimes Enforcement Network (FinCEN) announced enforcement actions against Bittrex, a digital asset trading platform based in Washington, for violations of anti-money laundering (AML) laws and multiple sanctions programs. OFAC alleged that Bittrex failed to prevent users in Cuba, Iran, Sudan, Syria, and the Crimea region of Ukraine from using its digital asset exchange platform to engage in transactions totaling over $260 million between 2014 and 2017. A settlement of $24 million was announced by OFAC and a $29 million fine was announced by FinCEN, with the fine being credited towards the settlement amount, meaning Bittrex will pay a total of $29 million. This is the first instance of parallel enforcement actions by OFAC and FinCEN in the digital asset sector.

As the Wall Street Journal reported, the Internal Revenue Service (IRS) has opened 20 criminal investigations as part of its crackdown on the evasion of sanctions imposed on Russia after its invasion of Ukraine. The IRS is a leading member of the multi-agency Task Force KleptoCapture, which was established in March to enforce the sanctions and export controls put in place by the US and its allies. As of 30 September 2022, the agency had identified nearly 50 possible individuals and entities for possible sanctions enforcement actions. The IRS's criminal investigation division also expects to significantly increase its number of special agents.

On 7 December 2022, Andrii Derkach, a Ukrainian national listed in the United States, was charged by the US District Court for the Eastern District of New York with conspiracy to violate the International Emergency Economic Powers Act (IEEPA), conspiracy to commit bank fraud, conspiracy to launder money, and four counts of money laundering in connection with the purchase and maintenance of property in California. Derkach, who is said to be an active Russian agent, is alleged to have engaged in a scheme to purchase and maintain two luxury condominiums in Beverly Hills. He is accused of misrepresenting his identity to a financial services professional who then falsely represented the ownership of funds and bank accounts to US financial institutions, deceiving those institutions into processing transactions on behalf of Derkach and his blocked property. The US Attorney's Office for the Eastern District of New York has also filed and announced a civil forfeiture suit naming the condominiums and two financial accounts as defendants in rem.

On 13 December 2022, 5 Russian nationals, Yevgeniy Grinin, Aleksey Ippolitov, Boris Livshits, Svetlana Skvortsova and Vadim Konoshchenok, and 2 U.S. nationals, Alexey Brayman and Vadim Yermolenko, have been charged by US federal

court with conspiring to obtain military-grade and dual-use technologies from U.S. companies for Russia's defense sector. The defendants were affiliated with Serniya Engineering and Sertal LLC, Moscow-based companies that operate under the direction of Russian intelligence services to procure advanced electronics and sophisticated testing equipment for Russia's military industrial complex and research and development sector. They were accused of operating a global procurement and money laundering network on behalf of the Russian government and unlawfully purchasing and exporting highly sensitive and heavily regulated electronic components, some of which can be used in the development of nuclear and hypersonic weapons, quantum computing and other military applications.

On 22 December 2022, the Financial Crimes Enforcement Network (FinCEN) released a report on the financial activity of Russian oligarchs, high-ranking officials, and sanctioned individuals. The report is based on Bank Secrecy Act (BSA) reports filed between March 2022 and October 2022, and highlights trends in the movement of funds and assets by Russian oligarchs. The report notes that several oligarchs transferred ownership of their companies, trusts, or accounts to family members or associates around the time of the Russian invasion of Ukraine in February 2022, and that some oligarchs purchased high-value goods or property, including jewelry, art, and real estate, in the lead-up to the invasion. The report also notes potential changes in financial flows linked to US properties and companies by Russian oligarchs, with several oligarchs moving funds from accounts in Russia to other countries, including the US, around the time of the invasion.

The information from the BSA reports is used by the Russian Elites, Proxies, and Oligarchs (REPO) Task Force, a joint effort by the US Departments of the Treasury and Justice, to target and disrupt the financial networks of Russian oligarchs and other high-ranking officials. The task force has successfully blocked or frozen more than $30 billion in assets, seized high-value goods, and restricted the access of sanctioned Russians to the financial system.

According to the information provided, since March 2022, FinCEN has issued several alerts urging US financial institutions to be vigilant against efforts to evade sanctions and other restrictions related to Russia's military invasion of Ukraine. These alerts provide red flags to help identify potential sanctions evasion activity and remind financial institutions of their obligations to file Bank Secrecy Act (BSA) reports, including with respect to convertible virtual currency. The Russia-related alerts were referenced in 284 of the 454 BSA reports analyzed in a financial trend analysis.

Russia is moving away from World Trade Organization (WTO) principles, but the US currently has little ability to address the issue, according to the Office of the US Trade Representative's annual report on Russia's compliance with its WTO accession commitments. Russia joined the WTO in 2012 after making significant changes to its trade and investment regulatory regime but has reversed course since then and its "trajectory showed no change in 2022".
Total U.S. imports from Russia saw only a slight increase in 2021 compared to 2012, while total U.S. exports to Russia declined. The decline in trade is thought to be due to both the COVID-19 pandemic and Russia's inward-looking industrial and trade policies. The U.S. imposed sanctions on Russia in 2022 in response to Russia's war against Ukraine, leading to a significant decline in two-way trade between the countries. Trade between the U.S. and Russia has declined significantly in 2022 due to U.S. sanctions in response to Russia's actions in Ukraine, as well as the risks of doing business in Russia. The increased geopolitical tensions and reputational risks have caused many US companies to withdraw or decrease their presence in Russia. The US has also ceased bilateral engagement on trade and investment issues with Russia, meaning it has had little opportunity to press Russia to comply with its WTO obligations.

The IRS has opened 20 criminal cases for evading sanctions against Russia. The IRS has identified almost 50 individuals and entities that could be prosecuted for sanctions evasion. Investigations are conducted within the framework of the KleptoCapture working group. It was created in March to enforce all sanctions and export controls that the United States and its allies have begun to impose in response to Russian aggression in Ukraine. The efficiency of the work is very high: about 91% of criminal cases initiated by the tax service and brought to court end in a guilty verdict. *More details here.*

On 23 December 2022, President Biden signed into law The James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 which includes some sanctions-related provisions:

- modification of the requirements for the Secretary of Defense to prepare a section on the impact of US sanctions on improvements to the Russian military and its proxies, in the Annual Report on Military and Security Developments Involving Russia;
- The Banking Transparency for Sanctioned Persons Act which would require the Secretary of the Treasury to issue an annual report detailing specific licenses issued by Treasury in the preceding year that authorize US financial institutions to provide financial services to the government of a state sponsor of terrorism, or persons sanctioned by the Office of Foreign Assets Control's under Global Magnitsky Sanctions;
- a semiannual assessment of the effects of sanctions imposed with respect to Russia's invasion of Ukraine, outlining Russia's efforts to circumvent sanctions through direct or indirect engagement from the regimes of Cuba, Nicaragua, Venezuela, China, Iran, and any other country;
- greater coordination on sanctions strategy, obligating the Secretary of the Treasury to submit a report on the steps taken by the Department of State's Office of Sanctions Coordination to coordinate its activities with the Department

of the Treasury and humanitarian aid programs, to ensure that sanctions do not impede the delivery of humanitarian aid.

On 29 December 2022, President Biden signed into law the Consolidated Appropriations Act of 2023, which establishes the Financial Integrity Fund within the Treasury Department. The fund will provide financial rewards to whistleblowers who report incidents of sanctions evasion or money laundering that lead to successful US enforcement actions. A minimum of 10% of the total amount of financial penalties levied against entities for their illegal actions will be awarded to the whistleblower. The fund will be replenished with a percentage of fines imposed on violators, similar to the Securities and Exchange Commission whistleblower program.

On 13 January 2023, OFAC issued a final rule increasing its maximum civil monetary penalties for inflation. This means that the penalties for violations of the Belarus Sanctions Regulations, the Cyber-Related Sanctions Regulations, the Ukraine/Russia-Related Sanctions Regulations, will be the greater of $356,579 or twice the amount of the underlying transaction.

On 23 January 2023, former FBI agent Charles McGonigal and US citizen and Russian translator Sergey Shestakov have been charged in a 5-count indictment by the US District Court for the Southern District of New York with conspiring to violate and evade US sanctions in violation of the International Emergency Economic Powers Act (IEEPA), violating the IEEPA, conspiring to commit money laundering and money laundering. They are accused of providing services to US-sanctioned Russian oligarch Oleg Deripaska in 2021, in return for concealed payments, and attempting to conceal Deripaska's involvement by using shell companies and a forged signature.

United Kingdom

On 10 November 2022, OFSI published its Annual Review 2021-22. Key points:

- It received 642 licence applications in the first 6 months of the invasion. OFSI will prioritise licence applications where there are “issues of personal basic needs or which are deemed to be of particular strategic, economic or administrative significance” and humanitarian assistance licenses.
- From 22 February to 22 October 2022 £18.39 billion in frozen funds were reported to OFSI as being held on behalf of people designated on the UK’s Russia sanctions.
- OFSI received 236 reports of sanctions breaches.
- 1,271 people and entities were designated on the Russia regime between February and August 2022.
- OFSI issued 2 monetary penalties, plus warning letters and “other enforcement action”.
- The number of OFSI staff will increase to 100 by the end of 2022

On 14 November 2022, HM Treasury established a new unit to help prepare for the UK’s restriction on the provision of services associated with the maritime transport of Russian oil and oil products, and the shipments themselves. The Unit, situated within HM Treasury’s Office of Financial Sanctions Implementation (OFSI), will be responsible for setting up the licensing and enforcement system for the Oil Price Cap, engaging with industry to ensure readiness for the cap, and monitoring the level and impact of the cap on an ongoing basis. The OFSI will use its existing powers and arrangements to enforce the Oil Price Cap and the new Unit will work across government and internationally to ensure the successful implementation and effective tracking of the Oil Price Cap.

It is being reported that some law firms in the UK are under investigation by the National Crime Agency (NCA) and the Office of Financial Sanctions Implementation (OFSI) over alleged involvement in breaches of UK sanctions. OFSI Director Giles Thomson is reported to have told the Solicitors Regulation Authority (SRA) Compliance Officers conference that a "very small minority" of firms are trying to help designated individuals and entities avoid sanctions, while a "larger majority" are acting negligently or otherwise have not implemented appropriate sanctions compliance measures.

On 6 December 2022, in answer to a Parliamentary question by Stephen Kinnock MP concerning specific licences granted under the UK’s Russia sanctions regime, HM Treasury has said that:

- in 2022 up to 6 December 2022, OFSI received 1031 specific licence applications and most recent records (as of 6 December) show that it issued 82 new or amended licences to allow an activity or transaction that would otherwise be prohibited by the Russia Regulations;
- the issuance of General Licences by OFSI has led to specific licence applications being withdrawn.

From February to June 2022, the Foreign, Commonwealth & Development Office received 37 requests from third parties (including NGOs, other entities or private individuals) to sanction a total of 1,002 people under regulations relating to Russia and Belarus after Russia's invasion of Ukraine. The FCDO declined to disclose how many of the submitted names were later sanctioned. This highlights the involvement of third parties in the unprecedented curbs on Russian money over the past year. However, some submissions have been criticized for being haphazard and relying on obscure media reports and social media posts as evidence. *More details here.*

European Union

On 28 November 2022, the European Council unanimously adopted a decision to add the violation of EU restrictive measures to the list of 'EU crimes', which would harmonize the definitions of such violations and penalties across the EU. However, this process will not happen immediately as the European Commission must first present a proposal for a directive containing minimum rules for defining criminal offenses and penalties for violating EU sanctions. This draft directive will then be discussed and adopted by the Council and the European Parliament. This decision will ensure a similar degree of sanctions enforcement throughout the EU and to dissuade attempts to circumvent or violate EU measures.

On 2 December 2022, the European Commission proposed a Directive on the violation of restrictive measures in order to harmonize the criminal definitions and types and levels of penalties for violations of sanctions across all Member States. The proposed measures aim to strengthen the enforcement of EU sanctions by closing existing legal loopholes and will make it easier to investigate, prosecute, and punish such violations in all Member States. The measures include criminalizing certain activities related to sanctions evasion, such as providing false information, altering documents, or using front companies.
The Directive include precise definitions of the criminal offences related to violations of EU restrictive measures, notably: making funds or economic resources available to a natural or legal person subject to restrictive measures; failing to freeze without undue delay funds or economic resources belonging to a natural or legal person subject to restrictive measures; enabling the entry of designated people into the territory of a Member State or their transit through the territory of a Member State; engaging in financial activities, which are prohibited or restricted by EU restrictive measures; and engaging in prohibited or restricted trade; providing prohibited or restricted financial activities or services such as legal, trust or tax consulting services, all of which would violate EU sanctions. Proposed measures would also criminalize actions taken to bypass or evade EU restrictive measures, such as hiding funds or concealing ownership of funds, in order to circumvent the measures put in place by the EU.
The proposal also includes penalties, including fines and prison sentences, for individuals and companies found to have violated these rules. Depending on the offense, individuals could face a maximum penalty of at least 5 years in prison, while companies could be liable to penalties of no less than 5% of their total worldwide turnover in the previous business year. These penalties aim to provide a strong deterrent effect for violating EU sanctions and ensure that such violations are met with appropriate consequences.
The proposal will now be discussed and adopted by the EU Council and the EU Parliament, after which it will be implemented into the national laws of the Member States.

On 13 December 2022, David O'Sullivan, a former Secretary-General of the European Commission and senior EU diplomat, was appointed as the International Special Envoy for the Implementation of EU Sanctions by the European Commission. His role will involve ensuring continuous high-level discussions with third countries to avoid evasion or circumvention of restrictive measures imposed on Russia. He will formally take up the role in the second half of January.

On 23 January 2023, the High Representative on behalf of the EU issued a statement announcing the alignment of certain 3rd countries, including candidate countries North Macedonia, Montenegro, Albania, Ukraine, and Bosnia and Herzegovina, as well as EFTA countries Iceland, Liechtenstein, and Norway, all members of the European Economic Area, with restrictive measures put in place by Decision (CFSP) 2022/15301 adopted by the Council on 14 September 2022. The decision extended existing restrictive measures until 15 March 2023 and amended the list of persons and entities subject to these measures.

Switzerland

On 4 October 2022, the Federal Criminal Court in Switzerland has ruled that the country's authorities should no longer provide legal assistance to Russia in an ongoing investigation into the embezzlement of money by a Russian banking oligarch. The court also ruled that assets frozen in Geneva that were linked to the case should be released. The court stated that due to Russia's increasing isolation from international institutions and its attack on Ukraine, "Russia no longer offers any guarantee that it could respect its contractual obligations under international law."

Netherlands

On 29 December 2022, the Amsterdam Court of Appeal decided that SBK Art, a Russian company sanctioned by the EU in December 2022, cannot exercise its voting rights or attend the meetings of Fortenova Group shareholders because of EU sanctions without a licence.

SBK Art is a subsidiary of Sberbank Russia formed in April 2022 to hold Sberbank's interests in Fortenova Group. Sberbank and SBK were subsequently EU-designated. The Court rejected SBK Art's request to allow attendance at meetings at the trust office of Fortenova Group. The Court said EU sanctions prohibit a listed person exercising voting rights which could lead to any change in relation to shares (e.g. in their volume, amount, location, ownership, possession, character, destination etc.) and that the voting rights could be an economic resource used to obtain funds, goods or services.

Lithuania

On 18 January 2023, the Lithuanian government canceled an agreement with Belarus on cross-border cooperation due to the "current geopolitical situation" in Belarus, including the country's involvement in the war with Ukraine and the regime's opposition to the EU. The decision was made in light of the political situation in Belarus since 2020, including the falsified elections of Lukashenko. Lithuania had also suspended payments to Belarus and its partners for ongoing projects in the cross-border cooperation program in October 2020 and stopped activities related to cooperation with Belarusian institutions and organizations since the start of the war in Ukraine.

SANCTION CIRCUMVENTION

Russia

Russia is buying up old oil tankers to sell its crude around the world despite Western sanctions - FT. Russia has created a "shadow fleet" of more than a hundred old tankers: with the obvious goal of selling its oil more often than in the past, sending it to other regions of the world. Also, Russia turned to India with a request to establish a joint production of large-capacity tankers in order to circumvent sanctions and not depend on the insurance services of European and British companies. *More details here.*

Iran

Bloomberg reported that Russia and Iran are buildng new joint transcontinental trade route to circumvent sanctions. It is expected that Russia and Iran are investing as much as $25bn in the inland trade corridor. *More details here.*

Turkey & Hong Kong

Reuters published a joint investigation with the Royal United Services Institute (RUSI) that confirmed that Turkey, and Hong-Kong firms are assisting Russia with imports of microelectronics from the USA. *More details here.*

United States

The FBI has suspected Russian oligarchs of transferring technology to Russia through startups in the United States. The businessmen under suspicion were associated with Skolkovo, the Russian Venture Company and the Russian Quantum Center (RQC), WP points out. All of these organizations have fallen under sanctions. *More details here.*

Lukoil sends oil to the US through the sanctions loophole. An oil refinery in Sicily, owned by Lukoil, acts as a transshipment point for Russian oil, which ends up in the US in the form of gasoline and other refined products, according to the WSJ. The plant uses up to 93% of Russian oil, which, when it reaches Italy, is considered "Italian" and is not subject to sanctions. Further, tankers with fuel are freely sent to the United States, where it is sold by companies such as ExxonMobile. *More details here.*

China

Russia has exported a record amount of gold to China. Russia delivered 2.16 t of raw and semi-finished gold to China in Oct worth $124.6 mln - record since at least 2016 - RBC. At the same time, volumes that Russia exports to China remain insignificant compared to supplies from other countries. From Jan to Oct, Switzerland shipped $26.5 bn worth of gold to China, Canada $9.7 bn, South Africa $7.7 bn, Hong Kong $2.5 bn, Germany $775 mln.

On January 13, Reuters reported that at least four Chinese-owned supertankers were shipping Russian Urals crude to China, according to trading sources and tracking data, as Moscow seeks vessels for exports after a G7 oil price cap restricted the use of Western cargo services and insurance. *More details here.*

Singapore

On January 19, Bloomberg retorted that demand was soaring for oil storage tanks in Singapore, in a sign that a flood of Russian fuel is being blended and re-exported globally. Tank space in the city state is being snapped up due to a rise in interest and profits from mixing cheap fuel supplies from Russia with shipments from other sources, according to an executive from a tank operator and a consultant who advises traders on the matter. That process can help to obscure the cargoes' origins, they said. *More details here.*

DETAILED ANALYSIS

1. Expand Oil and Gas Sanctions

On 2 December 2022, the Price Cap Coalition, a group consisting of the G7, EU, and Australia, implemented a policy that generally prohibits service providers from providing certain services relating to the maritime transport of Russia-origin crude oil purchased above $60 per barrel starting on 5 December 2022. This policy, known as the Price Cap Policy, is intended to stabilize global oil prices and benefit emerging markets and low-income economies, while also reducing the revenues Russia earns from its oil sales. This measure is intended to maintain a reliable supply of oil to the global market while reducing Russia's revenue from oil exports.

The price cap works by allowing access to maritime services, such as insurance and trade finance, from providers in coalition countries for Russian oil only if it is purchased at or below the cap. The price cap creates an exception from upcoming restrictions on the use of maritime services and relies on the G7's dominant role in the industry. Any importer of Russian oil that pays a price above the cap will have to use services from non-coalition companies, which are limited in scale and often more expensive and less reliable. Russia can choose to sell its oil at or below the cap and retain access to high-quality services from G7 providers, or it can use non-G7 providers.

The cap will be subject to review and adjustment based on market conditions and the goals of the Price Cap Coalition.

On 20 January 2023, the Price Cap Coalition countries agreed to establish two distinct price caps on refined products from Russia: one cap for products that generally trade at a premium to crude, such as diesel or gasoil, and one for products that trade at a discount to crude, such as fuel oil. The approach aims to better calibrate the price cap policy for refined products, given the wide range of market prices at which these products trade. They also plan to review the level of the crude oil price cap in March to take into account developments in global markets and the results of an EU technical review.

G-7 and the EU are working together to impose a price cap on exports of Russian diesel in order to avoid market disruptions. The EU is planning to implement a ban on importing processed petroleum products from Russia on 5 February 2023 and is discussing a price cap level for third-country sales with the G-7. The European Commission has proposed a cap level of $100, while the G-7 suggests a range of $100 to $110 per barrel. The G-7's preference for a higher price range is driven by concerns that setting too low a level could cause price spikes or supply glitches in Europe. Discussions are ongoing, but both sides are optimistic about reaching a deal before the EU import ban takes effect. *More details here.*

United States

On 10 November 2022, OFAC issued amended General License No. 8, extending the authorization to conduct transactions related to energy involving Vnesheconombank, Bank Financial Corporation Otkritie, Sberbank, VTB Bank, Alfa-Bank, and the Central Bank of Russia that are related to energy until 15 May 2023. The original General License No. 8, issued on February 24, 2022, had previously been amended to expand the scope of Russian entities and was scheduled to expire on 5 December 2022.

Later, on 15 December 2022, OFAC again amended this General License to add Rosbank to the list of financial institutions with whom transactions “related to energy” are authorized and extended the validity of license until 16 May 2023,
The authorization covers activities related to the extraction, production, refinement, liquefaction, gasification, regasification, conversion, enrichment, fabrication, transport, or purchase of petroleum, natural gas, and other energy products, as well as the development, production, generation, transmission, or exchange of power through any means, including nuclear, thermal, and renewable energy sources.

On 21 November 2022, the Department of the Treasury issued a Determination that prohibits the exportation, reexportation, sale, or supply from the US, or by a US person, wherever located, to a person located in Russia of the following categories of services related to the maritime transport of crude oil of Russian origin: (i) trading/commodities brokering; (ii) financing; (iii) shipping; (iv) insurance, including reinsurance and protection and indemnity; (v) flagging; and (vi) customs brokering. The following activities are prohibited, unless licensed or authorized by OFAC. These services are authorized if the Russian oil is purchased at or below the price cap. The prohibitions on providing these services became effective on 5 December 2022.
However, the prohibition does not apply to services with respect to crude oil of Russian origin when such crude oil is loaded onto a vessel at the port of loading prior 5 December 2022 and unloaded at the port of destination prior to 19 January 2023.

On 22 November 2022, OFAC issued a guidance on the implementation of the price cap policy for Russian-origin crude oil. The guidance provides information on the types of services that are prohibited and the exceptions to the prohibition, as well as the recordkeeping and attestation requirements for service providers.

With respect to evasion, OFAC notes that shipping, freight, customs, and insurance costs are not included in the price cap and must be invoiced separately at “commercially reasonable rates.” OFAC would view commercially unreasonable shipping, freight, customs, or insurance costs as a sign of potential evasion of the price cap.
Guidance also explains when the price cap applies, stating that it starts when the crude oil is sold for maritime transport and ends when it is substantially transformed after a landed sale or clears customs without further maritime transport applies from the embarkment of maritime transport by a Russian entity of Russian oil through the first landed sale outside Russia through customs clearance. Once the oil has cleared customs in a place other than Russia, the price cap does not apply to any further onshore sale. However, if the Russian oil is reexported using maritime transport after clearing customs without being substantially transformed outside Russia, the price cap will still apply.
The Guidance also includes definitions for "substantial transformation," which is when a product is refined or undergoes other significant changes that result in it losing its original identity and becoming a new product with a different name, character, and use.
OFAC clarified that the blending of crude oil alone is not considered a substantial transformation. If crude oil is substantially transformed in a jurisdiction other than Russia, OFAC does not consider it to be of Russian origin, therefore the price cap will no longer apply, even if the substantially transformed oil is further exported using maritime transport.
OFAC has also established a "safe harbor" for US service providers that comply in good faith with a recordkeeping and attestation process and conduct standard due diligence related to sanctions risks. “Safe harbor” is designed to shield such service providers from strict liability for breach of sanctions in cases where service providers inadvertently deal in the purchase of Russian oil sold above the price cap owing to falsified or erroneous records provided by those who act in bad faith or make material misrepresentations. The safe harbor is divided into three “tiers” of actors throughout the oil supply chain with different due diligence requirements for each tier. The tiers operate on a sliding scale: the more direct access to price information a US person has, the greater the diligence requirements that apply to verify that the price is at or below the cap. Those who are directly involved in transactions and have access to pricing information (Tier 1) must retain invoices or contracts documenting commercial terms. Further removed actors (Tier 2 and 3), such as financial institutions and insurance brokers, are subject to lesser requirements. The safe harbor will protect US service providers from liability for breach of the services prohibition.
US service providers must retain documentation or customer attestations for 5 years showing that Russian oil was purchased at or below the Price Cap. If a counterparty refuses or is reluctant to provide this documentation or attestation, it should be treated as a potential red flag. US service providers must also continue to implement and perform standard due diligence practices customary for their industry and role in a particular transaction.

OFAC also issued 3 general licenses for certain transactions related to the maritime transport of Russia-origin crude oil even where the price cap has not been satisfied:

- the maritime transport of crude oil from the Sakhalin-2 project for import into Japan, if it is solely for importation into Japan, through 30 September 2023;
- the importation of Russian-origin crude oil into specific EU countries:
  - Bulgaria – from 5 December 2022 to 31 December 2024 parties may execute contracts (and ancillary agreements) concluded before 4 June 2022 for seaborne crude oil (CN 2709) and petroleum products from Russia (CN 2710) for import into Bulgaria,
  - Croatia – import into Croatia is allowed from 5 February 2023 to 31 December 2023 for vacuum gas oil (CN 2710 19 71) originating in or exported from Russia if no alternative for such oil exists and Croatia notifies and receives permission from the European Commission,
  - landlocked EU member states – if the supply by pipeline of oil from Russia is interrupted for reasons outside the country’s control, that country may import seaborne crude oil from Russia (CN 2709) until pipeline supply is resumed or the EU Council terminates the exemption;
- the handling of vessel emergencies related to the health or safety of the crew or environmental protection, including safe docking or anchoring, emergency repairs, and salvage operations involving offloading Russian-origin crude oil.

On 5 December 2022, the Department of the Treasury issued a Determination imposing a cap on the price of seaborne crude oil of Russian origin at $60 per barrel for the purposes of an exemption to a ban on the provision of services related to the maritime transport of Russian seaborne crude oil which came into effect on 5 December.

On 21 December 2022, OFAC issued a new frequently asked question addressing the service provision price cap on Russian oil. New FAQ 1109 explains that petroleum products of Russian origin that are loaded onto a vessel at the port of loading for maritime transport prior to 5 February 2023 are not subject to a price cap, as long as they are unloaded at the port of destination prior to 1 April 2023. U.S. service providers are allowed to provide services related to the maritime transport of such petroleum products, as long as they are purchased at a price below the price cap and the transportation meets the aforementioned timeline.

On 30 December 2022, OFAC 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. This policy will take effect on 5 February 2023 and will be implemented through a determination made by the Secretary of the Treasury, in consultation with the Secretary of

State, in accordance with Executive Order 14071. The price cap will apply to a broad range of services related to the maritime transport of crude oil and petroleum products of Russian origin and will cover the same categories of services as the crude oil determination, including trading/commodities brokering, financing, shipping, insurance (including reinsurance and protection and indemnity), flagging, and customs brokering. It will apply from the embarkment of maritime transport of Russian petroleum products (when they are sold by a Russian entity for maritime transport) through the first landed sale in a jurisdiction other than Russia (through customs clearance). Once the Russian-origin petroleum products have cleared customs in a jurisdiction other than Russia, the petroleum products price cap will no longer apply to any further onshore sales. However, if Russian-origin petroleum products are taken back out on the water after clearing customs without being "substantially transformed" outside of Russia, the price cap still applies.

The price cap applies to covered services provided by U.S. service providers. Substantial transformation includes refining processes such as distillation, thermal processes, catalytic cracking, catalytic reforming, catalytic hydrotreating, alkylation, isomerization, solvent extraction, de-waxing or other refinery processes involving chemical transformation, separation, conversion or treatment. Blending operations, including gasoline blending, distillate blending, crude blending, residual fuel oil blending, or other simple blending operations, are not considered to be substantial transformations.

U.S. service providers can provide covered services for Russian petroleum products purchased at any price, provided that the Russian petroleum products are loaded onto a vessel at the port of loading for maritime transport prior to 5 February 2023 and unloaded at the port of destination prior to 1 April 2023.

The coalition will also announce a price cap level for Russian-origin petroleum products before 5 February 2023, when a ban on services for these products goes into effect.

United Kingdom

On 3 November 2022, the UK introduced new legislation to give effect to the internationally agreed Russian oil price cap, by preventing UK services being used in relation to the transport of Russian oil above that cap. This legislation took effect from 5 December 2022 and provided:

- prohibition on the supply or delivery by ship of Russian origin oil and oil products from a place in Russia to a third country, or from one third country to another third country. The prohibition for products falling within commodity codes 2709 came into effect from 5 December 2022 and the prohibition for products falling within commodity codes 2710 will come into effect from 5 February 2023. However, in order to ensure that the prohibition does not affect products that are not connected with Russia there is an exclusion implemented that exempts products that originate from a country outside of Russia and are not owned by a person connected with Russia, from the prohibition as long as they are only being loaded in, departing from, or transiting through Russia;
- prohibition on providing of financial services, including insurance, funds and brokering services to facilitate the supply or delivery by ship of Russian origin oil and oil products from a place in Russia to a third country, or from one third country to another third country;
- expansion of existing reporting obligations to include a requirement to report breaches or suspected breaches of these prohibitions, and associated information, to Treasury;
- giving OFSI the authority to impose civil monetary penalties on individuals or entities that fail to comply with the trade sanctions relating to maritime transportation of oil and oil products. The defense that a person did not know or have reason to suspect they committed a violation will not be considered. The amount of the penalty may not exceed the permitted maximum which is: the greater of £1,000,000 or 50% of the estimated value of the breach where it is possible to estimate the value of the breach of the prohibitions; or £1,000,000 in any other case.
- bringing forward the introduction date for the prohibitions relating to imports of Russia oil and oil products into the UK. Those restrictions will now apply from 5 December 2022 (rather than 31 December 2022).

On 2 December 2022, the UK, in partnership with the G7 countries, Australia and the EU, agreed to set the price cap on Russian crude oil traded by firms shipping oil to third countries at $60. This price will be kept under review. The UK and its coalition partners will only provide services facilitating the maritime transport of Russian oil if firms trade at or beneath this cap.

On 4 December 2022, the UK issued 4 general licenses that became effective on 5 December 2022. The licenses have an indefinite duration and relate to the implementation of an oil price cap in the UK. These licenses effectively implement the oil price cap by:

- allowing the supply or delivery of Russian oil by ship from a place in Russia to third countries or from one third country to another third country at or below the price cap, and permitting service providers to provide associated services for the supply or delivery of Russian oil to third countries at or below the price cap. There are detailed attestation requirements for three tiers of providers based on the parties' access to price information, as well as appropriate due diligence requirements;

- implementing a wind down with respect to the oil price cap, permitting persons to supply or delivery of Russian oil by ship, service providers to provide associated services, and relevant institutions to process payments, where the Russian oil is loaded onto a ship at the port of loading prior to 5 December 2022, and offloaded at the port of destination prior 19 January 2023;
- permitting relevant institutions to process, clear or send payments notwithstanding the prohibitions regarding providing financial services and funds relating to maritime transportation of Russian oil and oil products. The relevant institution must be operating solely as an intermediary, and not have any direct relationship with the person providing services relating to the maritime transportation of the Russian oil;
- allowing the supply or delivery of Russian oil by ship from a place in Russia to a third country or from one third country to another third country, as well as the provision of associated services relating to the above, where it relates to a specified activity and specific dates, including the Sakhalin-2 Project, as well as in certain situations relating to Bulgaria, Croatia and a landlocked EU member state. The licence does not extend to the reselling of Russian oil to or in a third country.

European Union

On 10 November 2022, The EU Commission updated its FAQs on sanctions against Russia related to oil imports. The new FAQ clarifies that oil imports that are mixed with Russian oil during transportation are subject to the prohibition. However, due to technical reasons such as pipeline constraints, oil from a third country may be mixed with Russian oil. The Commission emphasizes that this should not increase or facilitate the production or marketing of Russian-origin oil, nor generate any avoidable financial flows or indirect benefits for Russian actors, with the exception of necessary transportation costs.

On 3 December 2022, the European Council established an oil price cap at $60 per barrel for the purposes of an exemption to the ban on the provision of maritime transport, including through ship-to-ship transfers, of seaborne oil (CN code 2709 00) that originate in or are exported from Russia to third countries and related services (technical assistance, brokering services or financing or financial assistance). The cap applies to all imports and exports of these oil products that are coming or going from Russia. The level of the cap was established in close cooperation with the Price Cap Coalition partners and became applicable as of 5 December 2022.
In addition to setting the price cap, the EU:

- extended the existing prohibition on the transport of these crude oil and petroleum products, which applies if they are sold at a price above the cap, to trade and brokering and extended the price cap exemption when such goods are traded at or below the price cap;
- extended the transition period applicable to the transport of crude oil and certain petroleum products after every subsequent change in the price cap for a period of 90 days to the provision of technical assistance, brokering services or financing or financial assistance, related to the transport of Russian seaborne oil, subject to conditions, to ensure consistent implementation of the price cap by all operators;
- introduced a transitional period of 45 days for vessels carrying crude oil originating in Russia, which was purchased and loaded onto the vessel prior to 5 December 2022 and unloaded at the final port of destination prior to 19 January 2023;
- clarified that the prohibition to provide services related to the transport of Russian crude oil or petroleum products by a third country flagged vessel applies in relation to vessels which in the past transported such goods purchased above the price cap, provided the operator responsible for that transport knew or had reasonable cause to suspect that this was the case;
- introduced an exemption from the prohibitions of providing maritime transport and technical assistance, brokering services or financing or financial assistance, related to the maritime transport to third countries where necessary for the urgent prevention or mitigation of an event likely to have a serious and significant impact on human health and safety or the environment, or as a response to natural disasters;
- introduced a regular review of the price cap mechanism beginning in mid-January 2023 and recurring every 2 months. The price cap will be set at least 5% below the average market price for Russian oil and petroleum products, calculated on the basis of data provided by the International Energy Agency.

On 16 December 2022, as part of the 9th package, EU prohibited Bulgaria from 5 February 2023 to transfer, transport or sell petroleum products falling under CN 2710 which are obtained from crude oil imported on the basis of Bulgaria-specific exemption to buyers located in other EU member states or third countries. The prohibition does not apply to the bunkering or refueling of a vehicle or aircraft within the EU member states.

On 16 December 2022, as part of the 9th package of sanctions against Russia, the EU introduced new derogations on previously established trade sanctions:

- new reporting obligation for the operators engaged in transactions related to the purchase, import, or transfer into the EU or a third country of natural gas condensate from LNG productions plants (CN 2709 00 10) originating in or

exported from Russia; such transactions must be notified to the relevant national competent authority within 2 weeks;
- excluded natural gas condensates (CN code 2709 00 10) produced in liquefied natural gas (LNG) production plants from the scope of the prohibition to purchase, import or transfer crude oil or petroleum products, in order to ensure the security of the LNG supply, accompanied by a declaration obligation for operators engaged in transactions concerning these natural gas condensates in order to avoid circumvention and ensure that restricted natural gas condensate products are not purchased, imported or transported into the EU or to third countries;
- allowed Bulgaria to export to third countries certain refined petroleum products obtained from Russian crude oil imported on the basis of the Bulgaria-specific exemption if this is necessary in order to mitigate environmental and safety risks since such products cannot be stored safely in Bulgaria. Annual exports should not exceed the average annual exports for such products over the past 5 years;
- allowed Hungary, Slovakia and Bulgaria to export to Ukraine certain refined petroleum products obtained from Russian crude oil imported into these countries on the basis of the Hungary/Slovakia/Bulgaria-specific exemptions, provided the products are for exclusive use in Ukraine, including, when necessary, by transiting through other Member States.

On 19 December 2022, the EU energy ministers agreed to a plan to cap the price of gas. The gas price cap will be triggered if prices on the main European gas exchange, the Dutch Title Transfer Facility, exceed €180 per MWh for three consecutive working days. This is far lower than the European Commission's original proposal of €275 per MWh. The cap will only be triggered when the TTF price is €35 higher than a global reference price for liquefied natural gas (LNG) for the same three successive working days. The cap can be triggered from 15 February 2023 and will apply for one year.

The EU is considering a plan to cap the price of Russian diesel at $100 a barrel as a way to mitigate the market effects of an upcoming fuel imports ban on Russia. The European Commission is discussing cap levels based on the existing cap on Russian crude oil, which was proposed by G-7. The $100-a-barrel cap would apply to products like diesel that trade at a premium to crude, while a lower $45 threshold would be set for discounted products like fuel oil. The figures could still change during talks between member states and the negotiations need to balance two competing goals: limiting Russian revenue while preventing price spikes or shortages in key products on the global market. The price caps are expected to take effect on 5 February 2023, the same day as the EU will ban almost all imports of refined Russian products.
It is expected that Russian diesel currently sold to Europe will likely find buyers in Latin America and Africa, while Europe will try to buy diesel from the Middle East and the US. However, this could lead to higher shipping costs since some shipments will be going over a longer distance. *More details here.*

Japan

On 5 December 2022, the Cabinet of Japan imposed a ban on the import of crude oil and petroleum products from Russia that are traded above a certain price ceiling. This prohibition applies to imports of crude oil made on or after 5 December 2022. As part of these measures, an import approval system for crude oil traded at prices above the specified ceiling price will be implemented, and prior approval from the Minister of Economy, Trade and Industry will be required for the import of crude oil traded at prices below that ceiling.

Additionally, the Cabinet of Japan introduced a 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. These services include financial loan agreements, debt guarantee agreements, debt offsetting, and services specified in notices from the Ministry of Finance and the Ministry of Economy, Trade and Industry. This measure was announced to be implemented under a licensing system. The ban applies to transactions in which obligations are fulfilled or benefits are provided after 5 December 2022.

However, the ban does not apply to purchases of crude oil originating from Russia made under contracts concluded before 5 December 2022, as long as the crude oil was loaded before that date and unloaded in Japan before 19 January 2023. Additionally, crude oil from the "Sakhalin 2" project is excluded from these measures in order to maintain Japan's energy security.

The measures for petroleum products originating from Russia are planned to be implemented starting 5 February 2023.

Canada

On 7 December 2022, Canada prohibited any person in Canada and any Canadian outside Canada the provision of 8 services (trading and commodities brokering, financing, financial assistance, shipping, insurance and reinsurance, protection and indemnity, flagging, customs brokering), in relation to the maritime transport, including ship-to-ship transfers, of Russian crude oil, unless the oil is purchased at or below $60.

The prohibition does not apply to services provided for goods loaded onto a ship before December 7, 2022 and unloaded within 45 days after that day, services provided in response to an emergency situation to ensure navigational safety or minimize danger to human life or damage to the environment, and goods imported into certain EU countries if importation is permitted under Council Regulation (EU) 2022/879.

From 5 February 2023 this prohibition will also apply to petroleum products.

On 14 December 2022, Canada revoked an exemption to sanctions that had allowed a Montreal company Siemens Canada to repair turbines for the Nord Stream pipeline operated by Russian state-owned energy company Gazprom. The decision came 3 months after explosions rendered the pipeline carrying natural gas beneath the Baltic Sea from Russia to Germany inoperable. Natural Resources Minister Jonathan Wilkinson and Foreign Affairs Minister Melanie Joly said in a joint statement that the decision was made because the circumstances around granting the waiver have changed and "it no longer serves its intended purpose." The intended purpose was to call the "bluff" made by Russian President Vladimir Putin when he blamed the turbines for causing maintenance issues that prevented Russia from flowing gas to Germany. The exemption affected 6 turbines but only 1 was shipped to Canada following the exemption. *More details here*.

Australia

On 2 December 2022, Australia joined the G7 countries in implementing a price cap of $60 per barrel on Russian-origin crude oil. Australia has already prohibited the import, purchase, or transport of Russian oil, gas, refined petroleum products, and coal since 25 April 2022. The provision of financial assistance or a financial service in relation to the import, purchase, or transport of Russian oil is prohibited unless it is authorized by a sanctions permit. Russian oil means petroleum oils and oils obtained from bituminous minerals, crude (Tariff Code 2709) that are exported from, or originate in, Russia or part of Russia. However, the Australian Minister for Foreign Affairs issued a general permit authorizing the provision of financial assistance and financial services if they assist with, or are provided in relation to, the import, purchase or transport of Russian oil, if that oil was purchased at or below the price cap ($60 per barrel). The permit applies only to the provision of these services and does not authorize the importation, purchase, or transport of Russian oil, which remains prohibited under Australian law.

Australia also intends to implement price caps for transactions involving the sale of refined petroleum products in February 2023 in conjunction with the G7 countries.

Switzerland

On 23 November 2022, the Federal Council adopted the substantive measures related to oil trade to align with the 8th EU sanctions package:

- prohibited the transport, including transshipment, of crude oil and petroleum products from or originating in Russia to countries outside of Switzerland and the EEA as well as related technical assistance, brokerage and financial services as well as the granting of finance;
  However, there are some exceptions to this prohibition. The prohibition does not apply to goods that are only transported through Russia and are not owned by Russia, goods whose purchase price does not exceed a certain cap, and crude oil from the Sakhalin-2 project that is transported to Japan from December 2022 to June 2023. Additionally, the prohibition does not apply to the provision of pilotage services necessary for maritime safety, and to the transport of crude oil and petroleum products during 90 days following a change in the price cap, if the transport takes place on the basis of a contract concluded before the change in price cap, and the purchase price at the time the contract was concluded did not exceed the upper price limit.
  Prohibition also does not apply for the provision of services of all kinds in connection with crude oil of customs tariff number 2709 and petroleum products of customs tariff number 2710 that were contractually agreed before 30 June 2022 and are fulfilled by 5 December 2022 and 5 February 2023, respectively, as well as for payments of insurance benefits based on insurance contracts concluded before 30 June 2022 for crude oil of customs tariff number 2709 made after 5 December 2022 and for petroleum products of customs tariff number 2710 made after 5 February 2023, provided that the insurance cover no longer exists at the time of payment
- introduced a price cap (yet to be determined) related to the maritime transport of crude oil and petroleum products to third countries;
- prohibited the provision of technical assistance, brokerage and financial services, as well as the granting of finance to ships that have carried crude oil and petroleum products, the purchase price of which at the time of the conclusion of the contract for such a purchase exceeded the upper price limit.

On 8 December 2022, the Federal Department of Economics, Education and Research (EAER) adopted the price cap of $60 per barrel for Russian crude petroleum oils or oils from bituminous minerals (CN code 2709 00).

On 16 December 2022, Swiss federal government made several amendments to the restrictive measures related to trade and transportation of crude oil and petroleum products:

- extended the existing ban on the transport and transshipment of crude oil and petroleum products from or originating in Russia with or to countries outside Switzerland and the European Economic Area (EEA) to trade and brokering of these goods as well;
- introduced a prohibition on providing technical assistance, brokering and financial services for ships that have transported crude oil and petroleum products, the purchase price of which at the time the contract was concluded exceeded the specified upper price limit ($60), for 90 days from the unloading of these goods, provided that the operator responsible for the carriage knew or had reason to believe that the purchase price at the time of the conclusion of the contract exceeded the price cap ($60);
- introduced exceptions to the ban on the transportation and transshipment of crude oil and petroleum products from or originating in Russia with or to countries outside Switzerland and the European Economic Area (EEA), which provides:
  - the allowance to transport of crude oil and petroleum products for 90 days following change in price cap and to provide technical assistance, brokering and financial services as well as finance related to such transportation, if said activities are carried out on the basis of a contract concluded before change in price cap, and the purchase price at the time the contract was concluded did not exceed the upper price limit;
  - the allowance to transport crude oil (CN code 2709) from Russia or originating in Russia, which is loaded onto a ship before 16 December 2022 at the port of loading and unloaded before 19 January 2023 at the port of final destination and whose purchase price does not exceed the upper price limit ($60).
- introduced exceptions to this ban, which provide that it does not apply to: a) goods that are only loaded in Russia, transported through Russia, or departing from Russia, do not originate in Russia and are not owned by Russia; b) goods the purchase price of which does not exceed the price cap; c) crude oil of CN code 2709 with condensate originating in the Sakhalin-2 project that is transported to Japan from 5 December 2022 to 5 June 2023; d) the urgent prevention or containment of an event that is likely to have serious and significant effects on the health and safety of people or the environment, or the management of natural disasters. Additionally, providing pilotage services for reasons of maritime safety is also exempt from the ban.

On 25 January 2023, Switzerland prohibited the sale, transportation and transit of petroleum products, derived from crude oil from or originating in Russia that were imported into Bulgaria after 5 December 2022.

Switzerland also introduced some exemptions from existing ban on Russian crude oil and oil products:
– excluded natural gas condensates from the import and transport restrictions and at the same time introduced the obligation to report purchased, imported or transported quantities;
– introduced an exemption from transport ban on crude oil from Russia or originating in Russia to countries outside of Switzerland and the European Economic Area, provided that the oil was loaded on a ship before 16 December 2022 at the port of loading and unloaded before 19 January 2023 at the port of final destination, and if oil purchase price exceeds the fixed price cap.

Norway

On 7 December 2022, Norway introduced a price cap of $60 per barrel for crude oil from Russia transported by sea as part of sanctions regulations aimed at reducing Russia's income from the sale of crude oil to third countries. This corresponds to the price cap adopted by the EU and the G7 countries.

With the introduction of the price cap, starting and including 5 December 2022 an exemption is granted from the ban on providing professional assistance, mediation services, financing and financial assistance, for the transport, trade and mediation of for crude oil falling under CN code 2709 00, which originates in Russia or has been exported from Russia with a purchase price below the fixed price cap and was loaded on a vessel in the port of loading before 5 December 2022 and unloaded at the port of destination before 19 January 2023.

Norway also extended its prohibition on the provision of professional assistance, mediation services, financing or financial assistance related to crude oil or petroleum products that originate in Russia or have been exported from Russia, as well as the prohibition on the transportation to third countries of crude oil and petroleum products that originate in Russia or have been exported from Russia, including when transshipment between ships. This prohibition now includes trade and mediation of such transactions with third countries.The prohibition on crude oil takes effect on 5 December 2022, and the prohibition on petroleum products takes effect on 5 February 2023.

Poland

On 14 November 2022, the Minister of Economic Development and Technology of Poland Valdemar Buda stated that Poland will take over the local assets of Russian company Gazprom for the sake of the country's energy security. He made

this decision at the request of the Internal Security Agency. This includes the 48% stake in company EuRoPol GAZ, owned by PAO Gazprom and Poland's energy giant PKN Orlen, and which owns the Polish section of the Yamal-Europe gas pipeline. Poland imposed sanctions on Gazprom in September 2022, after it imposed sanctions on 50 Russian oligarchs and companies, including Gazprom, to increase pressure on Moscow over its full-scale invasion of Ukraine. The Polish authorities have decided to withdraw Gazprom's stake in EuRoPol GAZ and introduced a "temporary compulsory management" for the Russian entity to guarantee the security of critical infrastructure used for gas transit. Radoslav Kwasnytskyi, a lawyer and expert on fuel and gas issues, has been appointed as the head of the temporary administration.

Germany

On 14 November 2022, the German federal government transferred the gas company Securing Energy for Europe GmbH (SEFE) into federal ownership in order to secure the country's gas supply. The Federal Ministry of Economics and Climate Protection ordered capital measures as part of the Energy Security Act, due to SEFE's financial troubles and the potential threat of insolvency. The move is aimed at stabilizing the company and maintaining its operational business. The decision to nationalize the former subsidiary of Russian state company Gazprom, which was previously called Gazprom Germania, was made by the German government months after it was put under the control of a government agency and after the European Commission agreed to provide the country with aid in the amount of 225,6 million euros for the acquisition of 100% of SEFE shares.

On 5 December 2022, the German energy company RWE, following Uniper, initiated arbitration proceedings against Russia's Gazprom due to the lack of gas supplies. RWE made the move after German energy giant Uniper launched an arbitration process to receive billions of euros in compensation from Gazprom for under-supplied gas volumes. The losses of the companies are estimated at 400 mln euros and 12.3 bn dollars, respectively. *More details here*.

On 16 December 2022, the European Commission approved the German government's takeover of the energy companies Uniper and Sefe (formerly Gazprom Germania).

On 17 January 2023, Wintershall Dea (largest oil and gas company in Europe) Supervisory Board approved a principle decision by the Management Board to exit Russia. Wintershall Dea to deconsolidate Russian segment from financial reporting and to record one-off non-cash charge of €5.3 bn in the fourth quarter relating to the deconsolidation as well as other Russia-related impairments.

Italy

On 1 December 2022, the Italian Council of Ministers unanimously decided to introduce temporary administration at the Isab-Lukoil oil refinery in Sicily, owned by the Russian Lukoil. The Italian government's decision is reportedly aimed at "protecting the national interest in strategic productive sectors" and is made up of two parts. The first part envisages government intervention in the hydrocarbon sector in order to ensure production continuity and security of supply" through temporary administration procedures. The second concerns compensatory measures that can be applied to support companies affected by the EU oil embargo.

Moldova

Moldova is going to sue Gazprom - accuses of provoking an energy crisis. The Moldovan infrastructure minister noted that Gazprom had become an unreliable partner. *More details here*.

Turkey

Turkey limited the export of Russian oil through the Bosporus. Beginning 1 December 2022, Turkey closed the Bosporus and Dardanelles straits to vessels carrying oil unless they have insurance coverage. As Bloomberg reports, such a circular was sent by the Turkish Ministry of Transport to ship owners. A Turkish official from the shipping control system confirmed to Bloomberg that the new rules are related to compliance with European sanctions, although Turkey has not formally joined them. *More details here*.

Estonia

The Prime Minister of Estonia, Kaia Kallas, believes that Western countries should strengthen sanctions against Russia and lower the price of Russian oil. Kallas stated that when reviewing the oil price cap agreed in December 2022, it should continue to be lowered to deprive Russia of the ability to wage war.

2. Increase Transportation and Insurance-Related Sanctions

United Kingdom

Ship insurers announced that they will be cancelling war-risk coverage across Russia, Ukraine, and Belarus, starting from 1 January 2023. The decision comes as reinsurers have decided to exit the region due to steep losses. At least 12 of the 13 Protection and Indemnity (P&I) clubs, which cover 90% of the world's ocean-going ships, including those from the UK and the US, have stated they will no longer be able to provide coverage to clients because reinsurers have exited the region due to financial losses.

Japan

On 24 December 2022 three major Japanese insurers, Tokio Marine & Nichido Fire Insurance, Sompo Japan Insurance, and Mitsui Sumitomo Insurance, started to inform shipowners of their decision to stop insuring ships for war damage in all Russian waters starting on 1 January 2023 - Nikkei. This decision comes as a result of overseas reinsurance companies refusing to take on Russia-related risks. Therefore, sailing in Russian waters will become too risky for most operators. The move could affect Japan's energy imports, particularly LNG from Russia's Sakhalin-2 project, because of the inability to secure coverage. The insurers' decision reflects the industry's widened view of risks from the war in Ukraine. *More details here*.

Turkey

From 1 November 2022 Turkish authorities banned the flight of aircrafts with dual registration (that is, registered in two jurisdictions) from using the country's airspace. Aircraft of Russian airlines fall under this definition, meaning aircraft that are registered in both Russia and Bermuda.

The Turkish General Directorate of Maritime Affairs banned oil tankers without insurance documents from passing through the Black Sea straits.

China

China Cosco Shipping, the largest operator of sea transportation in the PRC, after the introduction of the oil embargo on 5 December 2022 refused to transport Russian ESPO oil, which costs more than the established price cap of $60 per barrel. *More details here*.

In his speech at the Russia-China Energy Business Forum, Deputy Minister of Transport Alexander Poshivai said that Russian shipowners are faced with situations where China refuses to recognize insurance documents issued by Russian insurers and the Russian National Reinsurance Corporation (RNRC).

Greece

The shipping operator, Avin International, after the oil embargo took effect on 5 December 2022, refused to carry Russian Far Eastern ESPO oil, which is traded above the "price ceiling": it costs a little more than $60 per barrel. *More details here*.

On 21 December 2022, Greece prohibited aircraft operated by air carriers of Belarus from landing, taking off, or flying over Greek territory as well as Greek air carriers from flying to Minsk and flying into the airspace of Belarus. This is reported by Pentapostagma with reference to the official directive of the Greek Civil Aviation Authority. The move comes amid growing concerns of Belarus' involvement in the Ukraine war. The decision was prompted by the deployment of Russian troops in Belarus since October, part of a "regional formation," and plans to begin soon conducting its high schools. *More details here*.

Estonia

The Estonian authorities have banned the state railway company, Operail, from transporting Russian and Belarusian goods from 1 January 2023. The decision was made by the Minister of Economy and Infrastructure, Riina Sikut, and was based on a directive to "assess the ethicality of commercial relations" with Russia and Belarus, and to gradually replace them with new lines of business. The company had previously planned to engage in the transportation of Russian nickel in Finland, which was not sanctioned, but these plans were criticized by the Minister of Foreign Affairs, Urmas Reinsalu, for being morally unacceptable for a company owned by the taxpayers of Estonia.

Jordan

On 13 December 2022, the Jordanian aviation authorities restricted the use of their airspace for Russian airlines with dual registration starting from 15 December 2022, and also imposed a requirement for Russian carriers to provide third-party aviation insurance with reinsurance certificates issued in London.

Laos

On 14 December 2022, the Laotian authorities banned Russian airlines from flying through the country's airspace.

3. Impose New Financial Sanctions

United States

On 14 November 2022, OFAC sanctioned 27 entities, including transnational network procuring technology that supports the Russian military-industrial complex (Russian microchip developer Milandr and related legal entities from Armenia, Switzerland and Taiwan), companies related to the management of Suleiman Kerimov's assets, entities associated with Murat Aliev, a former executive at a Kerimov investment firm.

The Department of State also imposed sanctions against PKK Milandr, Russian microelectronics company that has been described as part of the Russian military research and development structure defense technology firm.

On 15 November 2022, OFAC designated as SDN 3 Iranian firms involved in the production or ongoing transfer to Russia of Iranian unmanned aerial vehicles (UAVs), which Russia has used in devastating attacks against civilian infrastructure in Ukraine.

The Department of State concurrently designated Russian Private Military Company “Wagner” and 2 Iranian entities manufacturing and delivering the UAVs supplied by Iran to Russia.

On 9 December 2022, OFAC sanctioned Central Election Commission of the Russian Federation (Russia’s CEC), federal body of executive power that is responsible for organizing and conducting elections in Russia, which in September 2022 helped oversee and monitor sham referendums held in areas of Russia-controlled Ukraine that were rife with incidents of clear voter coercion and intimidation. connected to abuse of human rights and directly involved in Russia’s filtration operations.

The Department of State imposed sanctions on 3 Russian military entities over their alleged involvement in a deal to supply Iranian unmanned aerial vehicles (UAVs) to the Russian military.

On 15 December, OFAC added 18 entities related to Russia’s financial services sector to its SDN list, including PJSC Rosbank, a Russian commercial bank that Potanin acquired earlier this year, and 17 subsidiaries of VTB Bank PJSC, Russia’s second largest bank.

The Department of State also designated 3 entities as SDN, including INTERROS, an investment holding company controlled by Vladimir Potanin, the entity owned by one of the family members of the sanctioned governor and the entity operating on behalf of the Kremlin in Ukraine.

On 22 December 2022, the Department of State imposed sanctions on 10 Russian naval entities. These entities were designated for operating in both the defense and related materiel sector and the marine sector of the Russian economy. 6 entities were designated for operating in both sectors, and 4 entities were designated for operating only in the marine sector. The move is a response to Russia's actions and an effort to restrict Russia's access to the US economy and technologies.

On 23 December 2022, President Biden signed into law The James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 which includes provisions relating to sanctions against trade in Russian gold. Specifically, Section 5590(a) requires the President, not later than 90 days after enactment, to submit a periodic report to Congress identifying non-US persons who have knowingly participated in significant transactions involving the sale, supply, or transfer (including transportation) of gold from Russia or in which the government of Russia has an interest, including from reserves of the Central Bank of Russia held outside Russia. The President is then required, subject to certain waiver authority and exceptions, to impose blocking and visa sanctions against those persons identified in the report.

On 26 January 2023, OFAC imposed sanctions on 14 entities in several countries targeting entities providing material support to Russia's state-sponsored private military company Wagner Group or being owned or controlled by the Wagner Group as well as producers of Russia’s weapons.

The Department of State concurrently designated as SDN 19 entities, including 5 entities linked to the Wagner Group (aviation firm used by Wagner, a Wagner propaganda organization, and Wagner front companies, entities based in CAR, China, Luxembourg, and the UAE that are connected to Wagner’s operations worldwide), 4 entities associated with Russian oligarch Vladimir Potanin, as well as 9 entities linked to Russia’s military industrial complex.

United Kingdom

On 13 December 2022, in response to Russia's continued strikes on civilian infrastructure in Ukraine the UK designated an Iranian entity Oje Parvaz Mado Nafar Company "Mado Company" which provided the Russian military components and engines for Unmanned Aerial Vehicles (UAVs).

On 15 December 2022, the UK introduced new and expanded current financial sanctions on Russia which came into force on 16 December 2022:

- prohibition on providing services related to trusts or similar arrangements to, or for the benefit of, a designated person, and on providing new services related to trusts or similar arrangements to, or for the benefit of, a person connected with Russia;
- amendment to the existing restrictions on dealing with securities or money market instruments – addition of a new category of transferable security or money-market instrument to the existing prohibitions; it is prohibited to deal, directly or indirectly, with a transferable security or money-market instrument issued on or after 16 December 2022 by a person, other than an individual, which is not a person connected with Russia, and for the purposes of certain activities in respect of investments in Russia;
- amendment to the existing restrictions on loans and credit arrangements to a person connected with Russia to close certain loopholes: a) introduction of a new prohibition for a person from making funds or economic resources available to a "relevant entity" where the purposes of making those funds or economic resources available is to enable such entity to grant a relevant loan on or after 16 December 2022; b) addition of a new category of loan ("Category 6 loan") to those which are subject to existing restrictions on the granting of loans/credit; "Category 6 loan" is a loan or credit made or granted to a relevant entity, which is for the purposes of a certain activities in respect of investments in Russia, which is first made or granted at any time on or after 16 December 2022;
- suspension of the Bank of England's duty under the Banking Act 2009 to make a decision in respect of a notification of third-country resolution action in respect of a designated person, or entities owned or controlled by a designated person.

European Union

On 14 November 2022, the Council of the EU imposed sanctions on 2 Iranian entities involved in the development and delivery of Unmanned Aerial Vehicles (UAVs) to Russia.

On 12 December 2022, the EU added to its Russia sanctions list 4 Iranian entities involved in the development and delivery of Unmanned Aerial Vehicles (UAVs) to Russia.

On 16 December 2022, as part of the 9th package of sanctions against Russia, the EU:

- added 49 entities to the list of persons subject to asset freeze, including 2 Russian banks (Credit Bank of Moscow and Dalnevostochniy Bank), Russian military and special forces, defence industrial companies, political parties, among others;
- added of the Russian Regional Development Bank to the list of Russian state-owned or controlled entities that are subject to a full transaction ban;
- prohibited new investments in the Russian mining and quarrying sector. It is prohibited to: acquire new, or extend existing, participation in any Russian entity or any third-country entity operating in the mining and quarrying sector in Russia; grant new loans or credit or other financing, including equity capital, to any Russian entity or any third-country entity operating in the mining and quarrying sector in Russia, or for the purpose of financing such an entity; create a new joint venture with any Russian entity or any third-country entity operating in the mining and quarrying sector in Russia. Associated investment services are also banned. This prohibition does not apply to mining and quarrying activities which predominantly relate certain critical raw materials including aluminium (including bauxite), chromium, cobalt, copper, iron ore, mineral fertilisers (including potash and phosphate rock), molybdenum, nickel, palladium, rhodium, scandium, titanium, vanadium, heavy rare earths (dysprosium, erbium, europium, gadolinium, holmium, lutetium, terbium, thulium, ytterbium, yttrium) and light rare earths (cerium, lanthanum, neodymium, praseodymium and samarium);
- extended the prohibition regarding transferable securities of any legal person, entity or body established in Russia and with over 50% public ownership - in addition to the prohibition on listing and providing services as of 12 April 2022 on trading venues registered or recognised in the EU, the EU also prohibited the admission to trading of these securities on such trading venues as of 29 January 2023;
- aligned the Member States' reporting obligation on deposits exceeding €100,000 from legal persons, entities or bodies established in third countries and majority-owned by Russian nationals or natural persons residing in Russia, with the similar obligations that already exist for the other types of deposits – EU credit institutions must supply to their national competent authority (or the EU Commission) by no later than 27 May 2023 a list of deposits exceeding €100,000 held by non-Russian entities that are 50%+ owned by Russian nationals; such figures must be updated every 12 months.

At the same time, the EU introduced new derogations on previously established financial restrictions:

- introduced a new deadline - 28 February 2023 instead of 31 December 2022 - for the derogation allowing the competent authorities of the EU member state authorize the release of certain frozen funds or economic resources, or the making available of certain funds or economic resources, to a natural or legal person, entity or body if this is necessary for the sale and transfer of proprietary rights in a legal person, entity or body established in the EU;
- extended to the 2 newly listed entities (Credit Bank of Moscow and JSC Dalnevostochniy Bank) the derogation from the asset freeze and from the prohibition to make funds and economic resources available, if it is necessary for the purchase, import or transport of agricultural and food products, including wheat and fertilisers, as well as the derogation from the asset freeze and from the prohibition to make funds and economic resources available, in order to allow the termination by 17 June 2023 of operations, contracts, or other agreements, concluded with those entities before 16 December 2022 ;
- introduced a new deadline (17 June 2023 instead 31 October 2022) for the derogation allowing the divestments by Sberbank with a view to winding down its operations. That new deadline does not retroactively validate divestments not compliant with the necessary requirements under Regulation (EU) No 269/2014, such as unauthorised divestments after the entity was listed;
- introduced a wind-down period until 18 March 2023 for the execution of contracts concluded with Russian Regional Development Bank before 17 December 2022, or of ancillary contracts necessary for the execution of such contracts and allowed Russian Regional Development Bank to receive payments due pursuant to contracts performed before 18 March 2023;
- extended until 30 June 2023 (instead 31 December 2022) the duration of the exemption from the prohibition to enter 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. It also introduces the possibility for national competent authorities to authorise transactions, which are necessary for the divestment and withdrawal of those Russian state-owned entities from EU companies;
- introduced a new derogation aiming to address food security concerns in third countries by allowing member states, on a specific and case-by-case assessment for each relevant transaction separately, to unfreeze assets of, and to make funds and economic resources available to, certain individuals playing a significant role in international trade in agricultural and food products, including wheat and fertilisers, prior to their listing, as well as make available certain funds or economic resources to those persons, if such funds or resources are necessary for the sale, supply, transfer or export of agricultural and food products, including wheat and fertilisers, to third countries. National competent authorities are entrusted with authorizing such operations and should act in close cooperation with the European Commission to ensure a uniform implementation across the EU to avoid circumvention.

Canada

On 17 November 2022, in response to the Belarusian regime's role in "facilitating and enabling Russia's illegal invasion and attempted annexation of Ukrainian territory" the Canadian government imposed sanctions on 16 entities. The entities are military manufacturing, technology and engineering companies, state and privately owned banks and the national railway company.

On 29 November 2022, Canada imposed sanctions on 4 Iranian entities for its supply of drones to Russia, specifically targeting a company that helped develop the "Shahed" drones and the aviation company "Safiran" which coordinated the delivery of the drones by aircraft.

On 7 December 2022, Canada imposed sanctions against 6 entities that are Russian federal institutions involved in the investigation, prosecution and detention of Russian citizens who oppose or criticize Russia's policies in Ukraine.

Japan

On 27 January 2023, the Government of Japan introduced asset freeze measures (restrictions on payments and capital transactions such as deposit contracts, trusts, and money loans) for 3 Russian entities – JSC Irkut Corporation, MMZ Avangard and KAMAZ Publicly Traded Company.

Australia

On 8 December 2022, Australia imposed targeted financial sanctions on Shahed Aviation Industries, Iranian entity responsible for the design and development of the Shahed series of Iranian Unmanned Aerial Vehicles (UAVs) which were supplied to Russia.

New Zealand

On 21 November 2022, New Zealand added 4 entities of economic or strategic significance to Russia to its sanctions list for providing material or strategic support for Russia's illegal invasion of Ukraine.

On 14 December 2022, New Zealand added Shahed Aviation Industries, Iranian Aerospace Company, to its sanctions list, for the supply of drones to Russia for use in its invasion of Ukraine.

On 15 December 2022, New Zealand Designation Secretary of Foreign Affairs and Trade issued notices, entering into force on 20 December, that provide details on associates of sanctioned defence entities - Kamaz, United Aircraft Corporation, Irkut Corporation, Concern Avtomatika, Ruselectronics, Rostec.

Switzerland

On 8 December 2022, the Federal Department of Economic Affairs (EAER) imposed financial sanctions on 2 Iranian entities. These entities had already been designated by the EU on 14 November 2022 for their role in the development and supply of unmanned aerial vehicles to Russia.

On 23 November 2022, the Federal Council adopted a full ban of the provision of services in connection with crypto wallets, crypto accounts or the custody of crypto-based assets. Previously such services were allowed if the total value of crypto-based assets did not exceed 10,000 francs.

The Federal Council also implemented new derogations to earlier imposed financial sanctions allowing the release of certain blocked funds or economic resources owned by two entities or the provision of certain funds or economic resources to those entities:

- *PJSC KAMAZ,* the Russian developer and manufacturer of vehicles and military equipment, when such funds or economic resources are required to complete transactions, including sales, necessary for the completion of a joint venture or similar entity entered into prior to 16 March 2022 and in which certain sanctioned Russian state-owned or state-controlled entities listed in Annex 15 are involved, to be completed by 31 December 2022 at the latest;
- *National Settlement Depository (NSD)*, Russia's central securities depository, when such funds or economic resources are necessary to terminate no later than 7 January 2023 any operation, contract or other arrangement entered into with, or otherwise involved in, this organization prior to 3 June 2022.

The Federal Council also included carve-outs for citizens and temporary or permanent residents of the UK under certain financial restrictions and the services prohibition - prohibition on taking deposits and crypto-based assets, prohibition on the provision of certain services for Central Securities Depositories, prohibition on the sale of securities, prohibition in relation to trusts as well as prohibition on services.

The Federal Department of Economic Affairs (EAER) issued an interpretation clarifying that the prohibition on accepting deposits from Russian individuals and legal entities, Russian banks, if the deposit exceeds 100,000 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.

On 20 December 2022, the Federal Department of Economic Affairs (EAER) adopted the adjustments to the list of sanctions relating to Russia made by the EU on 12 and 16 December 2022. The new listings include 4 organizations from Iran for their military support to Russia and the delivery of drones to Russia as well as 49 companies involved in attacks on the civilian population and infrastructure and the illegal annexation of Ukraine's Donetsk, Luhansk, Zaporizhia and Kherson regions, companies responsible for propaganda, and various branches of the Russian armed forces. The measures came into force on 21 December 2022.

On 25 January 2023, the Federal Council decided to implement additional financial sanctions against Russia by adopting the latest measures introduced by the EU under the 9th package of sanctions:
– prohibited new investments in the Russian mining sector. The following activities related to any legal person, company or organization established or registered under the laws of a country outside of Switzerland and the EEA and active in the mining sectors of Russia are prohibited: (a) the acquisition of new or the expansion of existing interests in such enterprises; (b) the provision of or participation in loans, credits or other funds, including equity, for or for the financing of such enterprises; (c) the establishment of joint ventures with such enterprises; (d) the provision of securities services that are directly or indirectly related to the activities specified above;
This prohibition does not apply to mining and quarrying activities that primarily involve certain critical raw materials, including aluminium (including bauxite), chromium, cobalt, copper, iron ore, mineral fertilisers (including potash and phosphate rock), molybdenum, nickel, palladium, rhodium, scandium, titanium, vanadium, heavy rare earths (dysprosium, erbium, europium, gadolinium, holmium, lutetium, terbium, thulium, ytterbium, yttrium) and light rare earths (cerium, lanthanum, neodymium, praseodymium and samarium).
The State Secretariat for Economic Affairs (SECO) may authorize exceptions to the ban in the energy sector if the activities are necessary to ensure energy supply in case of serious shortage and are beneficial to a company in the energy sector in Russia owned by a Swiss or EEA company.

– prohibited trading, recording, and related services for securities of banks, companies, or organizations established in Russia that are controlled by a state body or in which a state body holds a stake of more than 50% on trading venues starting March 17, 2023;
added Russian Regional Development Bank to the list of Russian state-owned or controlled entities that are subject to a full transaction ban.

Simultaneously, the EU introduced new derogations on previously established financial restrictions:

- extended until 30 June 2023 (instead 31 December 2022) the duration of the exemption from the prohibition to enter 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 form that was founded before 26 March 2022;
- introduced a wind-down period until 26 April 2023 for the execution of contracts concluded with Russian Regional Development Bank before 25 January 2023, and allowed Russian Regional Development Bank to receive payments due pursuant to contracts performed before 26 April 2023;
- introduced a new deadline - 8 March 2023 instead of 31 December 2022 - for the derogation allowing SECO authorize the release of certain blocked funds or economic resources, or the making available of certain funds or economic resources, to a natural or legal person, company or organization if this is necessary for the sale and transfer of proprietary rights in legal entities established in Switzerland or in the EEA Member States;
- introduced a new deadline (26 July 2023 instead 13 November 2022) for the derogation allowing the divestments by Sberbank with a view to winding down its operations;
- extended to the 2 newly listed entities (Credit Bank of Moscow and JSC Dalnevostochniy Bank) the derogation from the asset freeze and from the prohibition to make funds and economic resources available, if it is necessary for the purchase, import or transport of agricultural and food products, including wheat and fertilisers, as well as the derogation from the asset freeze and from the prohibition to make funds and economic resources available, in order to allow the termination by 26 July 2023 of operations, contracts, or other agreements, including the relevant banking relationships, concluded with those entities before 24 January 2023;
- introduced a new derogation allowing the release of certain blocked funds or economic resources owned by individuals playing a significant role in international trade in agricultural and food products, including wheat and fertilisers, prior to their listing, as well as authorization of the provision of specific funds or economic resources to such persons, if such funds or economic resources are necessary for the purchase, supply, transport or export of agricultural and food products, including wheat and fertilisers, to third countries.

Poland

On 4 January 2023, Poland imposed financial sanctions on OOO Piervaja Akkumuliatornaja Kompania, one of the largest wholesale suppliers of automotive batteries on the Russian market.

On 11 January 2023, Poland imposed financial sanctions on 4 entities.

Luxembourg

On 16 December 2022, the Luxembourg Finance Ministry issued a general authorisation, allowing the release of funds of the Russian National Settlement Depository (NSD), frozen under EU sanction on 3 June 2022, on condition that the funds are “necessary for the termination, by 7 January 2023, of operations, contracts or other agreements concluded with, or otherwise involving, that entity before 3 June 2022”. The authorization is valid until 7 January 2023 included.

Belgium

Following the decision of the Luxembourg Finance Ministry in June to allow the release of funds of the Russian National Settlement Depository (NSD) frozen by EU sanctions, the Belgium General Administration of the Treasury has set out the conditions to apply for a licence (by 7 January 2023) for the sale of positions (cash or securities) deposited with NSD and frozen in the accounts of Belgian financial institutions. These include the commitment of an European operator, a priori and ex-post reporting, and compliance with European legislation on financial restrictive measures. The last date for submitting applications is 7 January 2023. Failure to comply with the aforementioned conditions will be considered as a violation of the financial sanctions.

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

European Union

On 23 November 2022, the European Parliament adopted a resolution recognizing the Russian Federation as a state sponsor of terrorism. MEPs emphasized that deliberate attacks and atrocities committed by Russian troops and their proxies against civilians in Ukraine, destruction of civilian infrastructure and other serious violations of international and humanitarian law are acts of terrorism and war crimes. In light of this, they recognize Russia as a state sponsor of terrorism and a state that uses the means of terrorism. The European Parliament called on the EU and its member states to introduce an appropriate legal framework for identifying states as sponsors of terrorism and to consider the possibility of adding Russia Federation to such a list. This will lead to a series of significant restrictive measures against Moscow and will have serious restrictive consequences for the EU's relations with Russia.

MEPs also called on the EU Council to include the "Wagner Group", the 141st Special Motorized Regiment, also known as the "Kadyrovites", and other Russian-funded armed groups and proxies on the relevant terrorist list.
The European Parliament also called on the European Union to further isolate Russia internationally, including Russia's membership in international organizations and bodies such as the UN Security Council.

United States

On 26 January 2023, OFAC redesignated PMC Wagner, also known as the Wagner Group, a Russian private military company led by Yevgeniy Prigozhin, as a significant Transnational Criminal Organisation under Executive Order 13581 due to its pattern of serious criminal activity, including mass executions, rape, child abductions, and physical abuse. The group has been involved in Kremlin-backed combat operations in support of Putin's war on Ukraine, and has also been accused of committing human rights abuses and extorting resources in African countries.

Netherlands

On 24 November 2022, the Dutch parliament recognized Russia as a state sponsor of terrorism due to the country's actions in Ukraine. The recognition was supported by the majority of parties including the VVD (People's Party for Freedom and Democracy), D66 (Progressive Democrats), PvdA (Labour Party), CDA (Christian Democratic Party). This recognition comes a day after the European Parliament also recognized Russia as a state sponsor of terrorism.

Poland

On October 26, the Polish Senate recognized the Russian Federation as a terrorist regime. On December 15, the Polish Sejm also joined this resolution.

NATO

On November 21, the NATO Parliamentary Assembly recognized Russia as a terrorist state and called for the creation of a special international tribunal to punish Russian criminals.

Czech Republic

On 16 November 2022, the Parliament of the Czech Republic recognized the Russian regime as terrorist in accordance with the resolution of the Parliamentary Assembly of the Council of Europe.

5. Strengthen Individual Sanctions against these Categories of Individuals

United States

On 14 November 2022, OFAC sanctioned 14 individuals, including persons related to entities from the Russian military procurement network, several Suleiman Kerimov's family members, as well as businessmen who were related to the management of his assets, Swiss national Alexander-Walter Studhalter who has been managing Kerimov's companies and Murat Magomedovich Aliev, a former executive at a Kerimov investment firm.

On 15 November 2022, OFAC designated as SDN two individuals for facilitating PMC Wagner's acquisition of Unmanned Aerial Vehicles (UAVs) from Iran to support combat operations in Ukraine.

On 9 December 2022, the US designated 21 Russian nationals for their alleged involvement in human rights abuses. OFAC sanctioned 19 Russian officials and proxies who have perpetuated Russia's illegal and deadly war in Ukraine through abhorrent filtration operations and forcible deportations of Ukraine's citizens, including a growing number of children. The Department of State sanctioned 2 Russian nationals who were reportedly implicated in human rights abuses against civilians in Ukraine.

On 15 December 2022, the Department of State imposed sanctions on 46 individuals, inc. a prominent oligarch in Russia, Vladimir Potanin, and 3 members of his family, as well as 5 individuals serving on the Board of Directors of Russian Railways, including 2 Deputy Prime Ministers of Russia, Andrey Belousov and Dmitriy Chernyshenko, officials helping to advance Russia's invasion and control of Ukrainian territory, including 29 Russian heads of regions and governors connected to mobilization efforts, 2 of their family members, 6 proxy authorities operating on behalf of the Kremlin in Ukraine.

On 6 January 2023, OFAC in response to the targeting of Ukraine's civilian infrastructure imposed new sanctions on individuals linked to an Iranian maker of drones used in the war in Ukraine. The sanctions target 6 individuals who hold senior positions at Qods Aviation Industries (QAI), a key Iranian defense manufacturer of unmanned aerial vehicles (UAVs), and the director of the Iran Aerospace Industries Organization which is responsible for overseeing Iran's development programs for ballistic missiles.

On 17 January 2023, the US State Department announced a new round of visa restrictions on 25 individuals who are involved in undermining democracy in Belarus. These restrictions are in response to the continued repression by the Lukashenka regime, including the politically motivated trial of democratic opposition leader Svyatlana Tsikhanouskaya and other pro-democracy activists on baseless charges. The visa restrictions are also targeting members of the National Assembly of Belarus for their role in passing legislation to authorize the death penalty for persons convicted of supposed "attempted acts of terrorism", a charge used to repress and intimidate the democratic opposition and civil society. Additionally, some of the individuals targeted have supported legislation revoking citizenship from those outside the country charged with "extremism" and confiscating property for taking "unfriendly actions towards Belarus."

On 26 January 2023, OFAC imposed sanctions on 8 individuals, including 3 persons that support Russian defense-related entities, 2 officials of the Administration of the President of Russia administering Russian-occupied areas of Ukraine, 2 individuals who supported the Wagner Group's military operations.

The Department of State concurrently imposed sanctions on 10 individual, including 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 who also serves as the Minister of Industry and Trade, the Chairman of the Election Commission of the Rostov Region, an individual associated with Russian oligarch Vladimir Potanin, a financier of Russian President Putin and his family members.

Additionally, the Department of State imposed visa restrictions on 531 members of the Russian military for actions that threaten or violate the sovereignty, territorial integrity, or political independence of Ukraine.

United Kingdom

On 2 November 2022, the UK sanctioned 4 oligarchs who have enabled Putin to mobilize Russian industries to support his military effort. All four oligarchs are subject to a travel ban, asset freeze and transport sanctions.

On 30 November 2022, the UK government sanctioned 22 Russian officials who promoted and enforced mobilization of citizens to fight in Russia's war on Ukraine and those who organised the sham referendums in the four temporarily occupied areas of Ukraine. This includes the Deputy Prime Minister, governors and regional heads, officials of the penitentiary entities, which supported mobilization of and criminal mercenaries for the Wagner Group, military commissars.

On 9 December 2022, to mark International Human Rights Day, the UK Foreign, Commonwealth and Development Office designated 4 Russian people as alleged human rights violators. On the same day, Colonel Ramil Rakhmatulovich Ibatullin was also designated for his role as the commander of the 90th Tank Division.

On 13 December 2022, in response to Russia's continued strikes on civilian infrastructure in Ukraine the UK added 15 individuals to Russia sanctions list – 12 senior commanders of Russian military forces, including commanders of military units implicated in missile strikes on Ukrainian cities, for their roles in the Russian military and its inhumane, unprovoked invasion of Ukraine, as well as 3 Iranian businessmen / officials alleged to be involved in the production and / or supply of drones to the Russian government.

European Union

On 10 November 2022, the European Council and the European Parliament reached a provisional agreement to not accept Russian travel documents issued in Ukraine or Georgia. The agreed text is subject to approval by the Council and the European Parliament before it can be formally adopted. Russian travel documents issued in or to residents of occupied regions in Ukraine or breakaway territories in Georgia will not be accepted as valid for obtaining a visa or crossing the borders of the Schengen area. This decision is in response to Russia's military aggression against Ukraine and its practice of issuing Russian international passports to residents of occupied regions in Ukraine. It also follows Russia's recognition of the independence of the Georgian territories of Abkhazia and South Ossetia in 2008.

On 24 November 2022, the European Parliament approved the decision not to accept Russia passports and other travel documents issued in the temporarily occupied territories of Ukraine and Georgia. Now the European Commission must consult with EU member states and draw up a list of Russian travel documents, including passports, which should not be accepted. At the same time, those fleeing the war in Ukraine will still be able to enter the EU for humanitarian reasons.

On 14 November 2022, the Council of the EU imposed additional restrictive measures on 8 individuals linked to the poisoning of Alexei Navalny with a Novichok-type nerve agent on 20 August 2020. The listings include operatives and high-ranking officials of the Russian Federal Security Service (FSB) and Russian chemical weapons experts.

On 14 November 2022, the Council of the EU imposed sanctions on 2 Iranian individuals for their involvement in the development and delivery of Unmanned Aerial Vehicles to Russia.

On 12 December 2022, the EU added 4 Iranian nationals to its Russia sanctions list for their role in the development and delivery of Unmanned Aerial Vehicles (UAVs) used by Russia in its war against Ukraine.

On 16 December 2022, the EU under the 9th package of sanctions added 141 individuals to its list of asset freeze targets, including individual officers, members of the State Duma and Federation Council, ministers, heads of Russian regions, family members of Russian oligarchs, daughters of the head of Chechnya, Russian proxy authorities in occupied areas of Ukraine, key figures involved in in Russia's missile strikes against civilians, in the kidnapping of Ukrainian children to Russia, and in the theft of Ukrainian agricultural products.

Canada

On 10 November 2022, the Canadian government imposed sanctions on 23 individuals who are members of the Russian justice and security sector, including police officers and investigators, prosecutors, judges and prison officials, involved in gross and systematic human rights violations against Russian opposition leaders.

On 17 November 2022, the Canadian government imposed sanctions on 22 Belarusian officials including those determined to be complicit in stationing and transporting Russian military personnel and equipment involved in the invasion of Ukraine and the attempted annexation of Ukrainian territory. These individuals are senior Belarusian officials in the military, border agency, and political and civil administration.

On 7 December 2022, Canada imposed sanctions against individuals that are believed to be complicit in human rights violations in Russia. These measures target 33 current or former senior officials linked to the systematic suppression of protest and opposition to Russia's illegal war in Ukraine, forced mobilization and anti-democratic decisions of the Russian government. These measures are part of a larger effort by Canada to target those who are believed to be involved in human rights violations around the world, with a total of 67 individuals and 9 entities being targeted under these measures.

Japan

On 27 January 2023, the Government of Japan imposed asset freeze measures (restrictions on payments and capital transactions such as deposit contracts, trusts, and money loans) on 22 Russian individuals, as well as 14 individuals directly involved in the annexation of Crimea or the destabilization of eastern part of Ukraine, and those directly involved in in the purported “incorporation” of eastern and southern regions of Ukraine by Russia.

Australia

On 8 December 2022, Australia imposed targeted financial sanctions and travel bans on 3 Iranian military officials involved in the supply of Iranian Unmanned Aerial Vehicles (‘UAVs’) to Russia for use in its war against Ukraine.

New Zealand

On 21 November 2022, New Zealand added 22 individuals of the Russian and Belarusian elite to its sanctions list for providing material or strategic support for Russia's illegal invasion of Ukraine, including the daughters of Vladimir Putin, wife and children of Putin’s press secretary Dmitry Peskov, the head of the Central Bank of Russia, the wife and one of the sons of Alexander Lukashenko as well as other members of the Russian and Belarussian elite.

On 12 December 2022, New Zealand added 23 individuals to its sanctions list (effective as of 13 December 2022) who are responsible for disinformation campaigns in support of the Russian war effort.

On 14 December 2022, New Zealand added 3 Iranian individuals to its sanctions list for the supply of drones to Russia for use in its unjustified and illegal invasion of Ukraine.

Switzerland

On 8 December 2022, the Federal Department of Economic Affairs (EAER) imposed financial sanctions and travel restrictions on 2 Iranian military officials. These individuals had already been designated by the EU on 14 November 2022 for their role in the development and supply of unmanned aerial vehicles to Russia.

On 20 December 2022, the Federal Department of Economic Affairs (EAER) adopted the adjustments to the list of sanctions relating to Russia made by the EU on 12 and 16 December 2022. The new listings include 4 individuals from Iran for their military support to Russia and the delivery of drones to Russia as well as 141 individuals involved in attacks on the civilian population and infrastructure and the illegal annexation of Ukraine's Donetsk, Luhansk, Zaporizhia and Kherson regions, including members of the State Duma, ministers, persons responsible for propaganda, members of the military.

On 11 January 2023, the Federal Council adopted the EU's decision to not accept 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. This decision was made on 8 December 2022 in response to Russia's new naturalization practice in these regions, which the EU views as a violation of international law and the territorial integrity, sovereignty, and independence of Ukraine and Georgia.

Poland

On 22 November 2022, Poland added 18 individuals (6 Russian and 12 Belarussian) to the list of foreigners whose stay on the territory of the Republic of Poland is undesirable. The listed persons are representatives of Russia in and members of the Russian delegation to the OSCE Parliamentary Assembly and Belarussian politicians.

On 11 January 2023, Poland added to the list of foreigners, whose stay on the territory of the Republic of Poland is undesirable, a Russian citizen Igor PETROV, who violated Polish and international laws regulating trade with foreign countries in goods, technologies, and services of strategic importance for the security of the Republic of Poland and the maintenance of international peace and security, and provided dual-use goods to individuals from Russia.

Tourist visa ban for ordinary Russians

Kazakhstan

The Kazakh government is considering changes to the law "On Citizenship of the Republic of Kazakhstan" that would make lack of knowledge of the state language, history, and basic laws an additional reason for denying citizenship or for refusing to restore citizenship. The proposed changes are intended to prevent dual citizenship.

According to the currently applicable law in Kazakhstan, there are several categories of individuals who can obtain citizenship with easier requirements. These categories include: relatives who are living in Kazakhstan on a legal basis,

regardless of their period of residence; individuals who have been acquitted as victims of mass political persecution and their descendants who live permanently in Kazakhstan and were deprived of their citizenship against their will; ethnic Kazakhs studying in higher education institutions in the country. Applications for citizenship from these individuals must be considered within 3 months of submission. There are currently 14 grounds for denying or revoking citizenship in Kazakhstan, most of which relate to violations of the law.

The proposed changes to the citizenship law in Kazakhstan are being considered in response to an influx of migrants from Russia who have sought to migrate to Kazakhstan due to mobilization in Russia.

On December 31, the government of Kazakhstan adopted a resolution (entered into force on January 16) canceling so-called "visaran" - the opportunity to extend a legal visa-free stay in the country by going abroad for a few days and then coming back.
Now for those who want to live in Kazakhstan longer, there are two ways: to get a visa (usually for one year, then it is extended), or a residence permit (residence permit). But according to the order of the Minister of Internal Affairs of Kazakhstan from January 6 - it is allowed to issue a residence permit only with a foreign passport. *More details here*.

Spain

Spain has tripled the issuance of visas to Russians, despite the sanctions. The Spanish Foreign Ministry recorded a multiple increase in the issuance of short-term Schengen visas to Russians - Bloomberg. In 2022, the country issued 108.8K visas - 3x more than previous year. *More details here*

Norway

Norway unofficially started to refuse to issue visas to Russians. Norwegian authorities do not issue visas to Russians, even if they are invited to the country by Norwegian organizations, according to Russian media.

Turkey

Turkey has unofficially stopped issuing tourist residence permits to Russians. From December 26, in different parts of Turkey, Russians who have applied for or applied for a so-called tourist residence permit that gives the right to stay in the country for at least a year, encountered problems. Interviews or residence permits were rejected.

As of January 2023, the Migration Directorate will no longer give Russian nationals preferential treatment when they apply for tourist residence permits, which had resulted in a higher number of permits than usual being granted. As a result, Russian nationals should now anticipate a higher rate of denials for these permits.

Finland

Finland has abandoned a complete ban on the sale of real estate to Russians. An Interdepartmental study commission appointed by the Ministry of Defense recommended not to ban the Russians from owning real estate. Such a measure was called ineffective by the commission. However, they warned that the situation could change if the purchase of real estate by Russians would threaten the security of Finland. *More details here*.

Kyrgyzstan

On January 16, the Cabinet of Ministers of Kyrgyzstan introduced a temporary restriction on the export of foreign currency cash from the country. According to the official communications, non-residents and foreign citizens (inc. Russians) are allowed to take no more than $5,000 out of the Republic in cash, and for residents and citizens of Kyrgyzstan - no more than $10,000. If the amount exceeds, a fee of 10% of the amount exceeding the established limit will be charged.

Lithuania

On 15 December 2022, the Seimas, the parliament of Lithuania, approved amendments to the Arms and Ammunition Control Law that would ban the purchase and possession of weapons, weapon accessories, ammunition, and their parts for citizens of Russia and Belarus who do not have Lithuanian citizenship. At the same time, private arms dealers in Lithuania have been given the right to sell category A weapons that are allowed for civilian use.

6. Intensify Sanctions on State-Owned Enterprises

European Union

On 11 November 2022, the EU Commission updated its FAQs on SOEs, adding new FAQs 7 and 8 which relate to the Russian Maritime Registry of Shipping (RMRS). FAQ 7 explains that on 7 October 2022 the EU council decided to impose a transaction ban on the RMRS, which prohibits any type of transaction, including provision of any economically valuable benefit, by EU vessels or companies incorporated under the laws of a EU member state. FAQ 8 states that while EU sanctions do not prohibit the recognition of an RMRS certificate for entering EU territorial waters, from 8 April 2023 all vessels with an RMRS certification will be prohibited access to EU ports, except for the purchase, import or transport of certain products including pharmaceuticals, medical, agricultural and food items, including wheat and fertilizers, subject to authorization by national competent authorities.

On 16 December 2022, as part of the 9th package of sanctions against Russia, the EU prohibited the EU nationals from holding from 16 January 2023 any posts on the governing bodies of all Russian state-owned or controlled legal persons, entities and bodies located in Russia, subject to certain derogations.

The EU also introduced new exemptions for sanctions measures against Russian state-owned enterprises, allowing for the possibility for competent authorities to grant an authorization to their nationals to hold positions within these organizations in the following cases:

- existing joint ventures or similar legal arrangements (concluded by a legal person, entity or body which is incorporated or constituted under the law of a Member State before 17 December 2022);
- EU subsidiaries established in Russia before 17 December 2022;
- when the holding of such a post is necessary for ensuring critical energy supply;
- when the legal person, entity or body is involved in the transit through Russia of oil originating in a third country and the holding of such a post is intended for operations which are not otherwise prohibited.

In order to address Russia's systematic, international campaign of disinformation and information manipulation intended to destabilise its neighbouring countries, the EU initiated the process for suspending the broadcasting licences of 4 additional media outlets – NTV/NTV Mir, Rossiya 1, REN TV and Pervyi Kanal – which are under the permanent direct or indirect control of the leadership of the state and have been used by Russia for its continuous and concerted disinformation and war propaganda actions, which legitimise Russia’s aggression and undermine support for Ukraine. However, these measures will not prevent those media outlets and their staff from carrying out activities in the EU other than broadcasting, e.g. research and interviews.

Switzerland

On 23 November 2022, Switzerland added the Russian Maritime Register of Shipping (RMRS), State Institution for Technical Supervision and Classification of Sea Vessels, which is subordinated to the Ministry of transport of Russia, to the list of state-owned companies that are subject to a full ban on transactions. This prohibition applies to any transaction, including the provision of any form of economically valuable benefits, with RMRS by any Swiss company or vessel.

On 23 November 2022, the Federal Council prohibited from 9 December 2022 to hold any posts in the governing bodies of certain listed Russian state-owned or controlled legal persons, entities or bodies (OPK Oboronprom, United Aircraft Corporation, Uralvagonzavod, Rosneft, Transneft, Gazprom Neft, Almaz-Antey, Kamaz, Rostec (Russian Technologies State Corporation), JSC PO Sevmash, Sovcomflot, United Shipbuilding Corporation, Russian Maritime Register of Shipping) and certain of their affiliates.

On 25 January 2023, Switzerland prohibited its nationals from holding from 24 February 2023 any posts on the governing bodies of all Russian state-owned or controlled legal persons, entities and bodies located in Russia, subject to certain derogations.

Switzerland also introduced new exemptions for sanctions measures against Russian state-owned enterprises, allowing for the possibility for competent authorities to grant an authorization to their nationals to hold positions within these organizations in the following cases:

- existing joint ventures or similar legal form (concluded by a legal person, entity or body and which was established or registered under Swiss law or the law of an EEA member state before 25 January 2023);
- subsidiary of legal person, entity or body established or registered under the laws of Switzerland or an EEA member state that was established in Russia before 25 January 2023;
- when the holding of such a post is necessary for ensuring critical energy supply;
- when the legal person, entity or body is involved in the transit through Russia of oil originating in a third country and the holding of such a post is intended for operations which are not otherwise prohibited.

Bulgaria

Bulgaria rejected Russian fuel for its nuclear power plants. Bulgaria's only nuclear power plant signed a nuclear fuel supply agreement with Framatome (French) to end its dependence on Russian supplies amid the war in Ukraine. The current contract with Rosatom's company TVEL expires at the end of 2025. Then the nuclear fuel for one of the reactors will be supplied by Framatome, a subsidiary of the French energy giant EDF. The agreement is for 10 years. Earlier Kozloduy NPP signed a similar contract with the American Westinghouse Electric for another operating reactor from 2024. *More details here*.

According to Reuters, Bulgaria plans to take control of the oil refinery of the Russian company Lukoil, Neftochim Burgas, for a year. This decision was made by the Bulgarian Parliament in order to protect critical infrastructure and ensure the supply of fuel to the Balkans. Bulgaria holds an exemption from the EU's ban on the import of Russian oil due to the invasion of Ukraine, and therefore the oil refinery, which has a capacity of 196,000 barrels per day, switched to processing only Russian oil. However, due to the new decision, the refinery will not be able to export fuel and oil products from 5 February 2023, with the exception of supplies to Ukraine. The plant may also export by-products that cannot be safely stored in Bulgaria and may pose a risk to the environment.

Czech Republic

The Czech Republic has withdrawn from the United Institute of Nuclear Research (JINR), an international organization based in Russia which focuses on nuclear and particle physics research, on 31 December 2022, after 66 years of membership, due to the Russian military invasion of Ukraine and the attack on the Zaporizhzhia Nuclear Power Plant in February of 2022. The Czech Republic has had an important position in JINR and has made significant contributions to its scientific pursuits, but the decision to withdraw was made due to the aggressive rhetoric and actions of the Russian government against the Czech Republic and other member countries. The Czech Republic's decision to terminate its membership in JINR follows similar decisions by Ukraine and Poland and the suspension of cooperation with JINR by Slovakia, Bulgaria, and others. The decision was made by the Minister of Education, Youth and Sports on 4 March 2022 and approved by the government on 1 June 2022 and both chambers of the parliament. It was signed by the President of the Czech Republic on 16 August of 2022 and co-signed by the Prime Minister.

Propaganda

Moldova

On 16 December 2022, the Committee for Emergency Situations (CSE) of Moldova adopted a decision to suspend the broadcasting licenses of 6 TV channels during the state of emergency to protect the national information space and prevent the risk of disinformation. The channels affected include Primul în Moldova, RTR Moldova, Accent TV, NTV Moldova, TV6, and Orhei TV. The decision was based on a list of individuals and entities subject to international sanctions and the conclusions of the Council on Television and Radio regarding the channels' lack of reliable information in coverage of national events, including the war in Ukraine. Some of the channels are owned by opposition leader Ilan Shor, who is on US and UK anti-Russian sanctions lists, and some of them rebroadcast Russian TV channels.

7. Expand Export Controls and Ban Imports

United States

On 10 November 2022, the International Trade Administration (ITA) announced that it would be revoking Russia's status as a market economy and reclassifying the country as a non-market economy (NME) in its antidumping proceedings. ITA found that extensive government involvement in the Russian economy had resulted in distorted prices and costs that did not accurately reflect the fair pricing of Russian imports into the US. This decision will likely result in higher anti-dumping duties on Russian imports into the US. In future antidumping cases involving imports from Russia, the ITA will use an alternative methodology to calculate duties using market-based prices and costs from a country with a comparable level of economic development that produces comparable merchandise.

The effective date of implementation for this decision is 1 November 2022. This means that from this date forward, ITA will use its NME methodology to calculate anti-dumping rates for new segments of anti-dumping proceedings with a period of investigation or review starting after 1 November 2022.

On 24 November 2022, BIS renewed the temporary denial order (TDO) issued against Rossiya Airlines in May 2022 for 180 days. Rossiya Airlines continued to operate aircraft subject to the Export Administration Regulations (EAR), which were flown into Russia as well as within Russia in violation of the EAR and original TDO.

On 8 December 2022, the Bureau of Industry and Security (BIS) added 24 technological companies located in several countries to the Entity List. 12 of these entities were added to the Entity List due to their contributions to Russia's military and/or defense industrial base. These entities received a Footnote 3 designation, which means that they are considered military end-users and are subject to restrictions on their access to certain foreign-produced items under the Russia/Belarus-Military End User Foreign Direct Product Rule. These entities are added with a license requirement for all items subject to the Export Administration Regulations (EAR). The license review for these entities will be reviewed based on 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.

Effective 16 December 2022, BIS removed 9 Russian entities from the Unverified List (UVL)[1] and added them to the Entity List because BIS was unable to verify their bona fides due to the foreign government’s prevention of timely end-use checks. BIS added them to the Entity List with a license requirement for all items subject to the EAR and will review license applications pertaining to these entities under a policy of denial. No license exceptions are available for exports, reexports, or transfers (in-country) to these entities.

On 13 December 2022, the Bureau of Industry and Security (BIS) renewed the temporary denial order (TDO) for an additional 180 days for Belavia Belarusian Airlines, Belarus' state-owned national airline. BIS submitted evidence that Belavia continues to operate in violation of the TDO issued on 16 June 2022 and the Export Administration Regulations (EAR) by operating aircraft subject to the EAR. Specifically, after the issuance of the TDO, Belavia continued to fly aircraft into Belarus in violation of the EAR, including flights from St. Petersburg and Moscow in Russia, Istanbul in Turkey, and Sharjah in the United Arab Emirates.

On 15 December 2022, BIS issued an order temporarily denying export privileges under the Export Administration Regulations (EAR) for a period of 180 days for 4 Russian nationals, Boris Livshits, Svetlana Skvortsova, Aleksey Ippolitov, as well as 2 entities, Advanced Web Services and Strandway LLC, which are located in New York and owned or controlled by Boris Livshits. These individuals and entities are prohibited from directly or indirectly participating in any transactions involving any item exported or to be exported from the US that is subject to the EAR, or any other activity subject to the EAR. The reason for this order is that these parties were involved in unlawfully procuring and shipping military and sensitive dual-use technologies from US manufacturers to Russian end-users, including the Serniya Network, which is a procurement network operating under the direction of Russia's intelligence services, in violation of US export control laws. These items include advanced electronics and sophisticated testing equipment, some of which can be used in military applications. BIS states that the misconduct occurred between January 2017 and October 2022, and that the individuals and companies were aware of US export control laws and took active steps to conceal their activities in order to evade detection by law enforcement.

[1] The UVL contains the names and addresses of foreign entities that are or have been parties to a transaction involving the export, reexport, or transfer (in-country) of items subject to the EAR whose bona fides (i.e., legitimacy and reliability relating to the end-use and end-user of items subject to the EAR) BIS has been unable to verify through an end-use check; e.g., the check could not be completed satisfactorily for reasons outside the U.S. government’s control, or during a check a recipient of items subject to the EAR was unable to produce them for visual inspection or provide sufficient documentation or other evidence to confirm their disposition. BIS may place entities on the UVL when there is insufficient evidence to place them on the Entity List.

On 20 December 2022, BIS renewed for an additional 180 days the temporary denial orders (TDO) that was issued on 24 June 2022, against Pobeda Airlines, Nordwind Airlines and Siberian Airlines. The airlines are alleged to have continued to operate in violation of the original TDOs and the Export Administration Regulations (EAR) by flying aircraft subject to the EAR into Russia and / or Belarus from various international destinations without the required authorization.

The restriction prohibits these airlines and its successors, assigns, agents, and employees from participating in any transaction involving commodities, software, or technology exported or to be exported from the US that are subject to the Export Administration Regulations (EAR), or in any other activities subject to the EAR. This includes applying for, obtaining, or using any licenses or license exceptions related to such transactions, negotiating or ordering such transactions, transporting or financing such transactions, or benefiting from such transactions in any way. The restriction does not apply to activities that are directly related to the safety of flight. Additionally, anyone, including individuals and entities, is restricted from exporting, reexporting, or transferring (in-country) to or on behalf of these airlines any item subject to the EAR; from taking any action that facilitates the acquisition or attempted acquisition by these airlines of the ownership, possession, or control of any item subject to the EAR that has been or will be exported from the US; from taking any action to acquire from or to facilitate the acquisition or attempted acquisition from these airlines of any item subject to the EAR that has been exported from the US.

On 21 December 2022, BIS announced a new rule imposing additional restrictions on the Russia-based Private Military Company Wagner (also known as the "Wagner Group"), one of the most notorious mercenary organizations in the world which has been subject to US government sanctions since 2017 for its involvement in Russia's invasion of Ukraine and is actively committing atrocities and human rights abuses in Ukraine. The new restrictions modify the current Entity List listing for the Wagner Group by adding one address, two additional aliases, and designating it as a Russian or Belarusian 'military end user.' This designation goes further than the restrictions already in place on Wagner Group by applying two significant new restrictions: the Russia/Belarus ‘Military End User’ Foreign Direct Product (FDP) Rule and imposing these restrictions on the Wagner Group wherever located worldwide. The FDP rule restricts Wagner Group's access to certain foreign-produced items and requires exporters to seek a license from the BIS for any transaction where the entity is a party or that the exporter has knowledge may ultimately be acquired by Wagner Group. The license will be reviewed under a policy of denial, with case-by-case consideration only provided for certain food and medicine. The new restrictions will make it more difficult for the group to acquire any technology developed with US equipment to support the Russian government's war in Ukraine.

United Kingdom

On 9 November 2022, the Export Control Joint Unit published “General trade licence Russia sanctions – financial services and funds related to fertilisers”, which permits the provision of financial services and making funds available to a person connected with Russia for the supply or delivery of specified fertiliser goods either from Russia to a third country, or from Russia to a person in a third country, where they are intended for agricultural use only. The specified fertilizers include ammonium nitrate, including ammonium nitrate-based fertilizers and fertilizer blends, and ammonia in aqueous solution.
This license for the export of fertiliser goods has exclusions for non-agricultural use, prohibited activities, and actions that are contrary to export or import laws or regulations. It also has exclusions if the Provider has been served with a notice suspending or revoking their ability to use the license.

On 15 December 2022, the UK introduced new and expanded current trade sanctions on Russia which came into force on 16 December 2022:

- addition of goods to the list of critical-industry goods and critical-industry technology subject to export bans, including camouflage and oil production and mining equipment;
- addition of 5 chemicals to the list of defence and security goods and technology subject to export bans, including calcium carbide, carbon monoxide, monoethyleneglycol, sulphur, and sulphur dioxide;
- ban on the direct and indirect provision of the additional **professional and business services** to a person connected with Russia: auditing, advertising, architectural, engineering and IT consultancy and design.

European Union

On 19 November 2022, the EU decided to stop applying autonomous trade preferences[2] to goods from Belarus and Russia starting 1 January 2023.

On 16 December 2022, as part of the 9th package of sanctions against Russia, the EU adopted several trade restrictions:

[2] EU autonomous trade preferences are trade preferences given by the EU to certain third countries that are not part of any trade agreement between the EU and that country. These preferences are given on a temporary basis and are intended to provide uninterrupted supply of certain goods to the EU market. The preferences are reviewed every 6 months and can be applied or removed based on the needs of the EU market.

- extended the list of restricted items which might contribute to Russia's military and technological enhancement or the development of its defence and security sector, by adding drone engines, camouflage gear, additional chemical and biological equipment, riot control agents and electronic components;
- imposed tighter export controls and restrictions regarding dual-use goods and technology as well as goods and technology that may contribute to the technological enhancement of Russia's defence and security sector for an additional 168 Russian entities closely connected to the Russian military-industrial complex (including Russian-controlled entities based in illegally annexed Crimea and Sevastopol to avoid circumvention). This decision includes military end-users working in various sectors such as aeronautics. The designation imposes a presumption of denial for licence requests for exports of certain controlled goods;
- extended the list of goods which are subject to export bans and could contribute to the enhancement of Russian industrial capacities by including such items as generators, toy drones, laptops, hard drives, IT components, night-vision and radio-navigation equipment, cameras and lenses;
- prohibited the 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.

According to the definitions included in the relevant EU Decision these services cover:

Service type	Description
Market research and public opinion polling services'	market research services and public opinion polling services
Technical testing and analysis services	composition and purity testing and analysis services, testing and analysis services of physical properties, testing and analysis services of integrated mechanical and electrical systems, technical inspection services, as well as other technical testing and analysis services
Advertising services	the sale or leasing services of advertising space or time and the planning, creating and placement services of advertising, as well as other advertising services

- extended the existing export ban on goods and technology suited for use in aviation and the space industry to cover piston engines and their parts (CN 8407 10 and 8409 10);
- extended the 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 to include other alloy steel in ingots or other primary forms (CN code 7224 90) starting from 1 October 2024, and also introduced quotas that exempt the following quantities of goods falling under CN code 7224 90 from this prohibition: 147 007 metric tonnes between 17 December 2022 and 31 December 2023, and 110 255 metric tonnes between 1 January 2024 and 30 September 2024.

At the same time, the EU introduced new derogations on previously established trade sanctions:
- extended for additional 6 months until 18 June 2023 the exemption applicable to the imports of methanol originating in or exported from Russia for contracts concluded before 7 October 2022 or of ancillary contracts necessary for the execution of such contracts;
- allowed the provision of technical assistance related to the use of goods and technology suited for use in aviation or the space industry, when this is necessary to avoid collision between satellites, or their unintended re-entry into the atmosphere;
- the possibility for the national competent authorities to allow the sale, supply, transfer or export of certain aviation goods which are also widely used in the medical field – aerials and aerial reflectors of all kinds; parts suitable for use therewith (CN code 8517 71 00), other parts related to aerials (CN code 8517 79 00) and instruments and apparatus for measuring or checking the flow, level, pressure or other variables of liquids or gases (CN code 9026 00 00) – or related technical assistance, brokering services, financing or financial assistance, if it is necessary for medical or pharmaceutical purposes, or for humanitarian purposes, such as delivering or facilitating the delivery of assistance, including medical supplies, food, or the transfer of humanitarian workers and related assistance or for evacuations;
- allowed a temporary exemption from import and export prohibitions to facilitate an expeditious exit from the Russian market by enabling the sale, supply, or transfer of restricted goods, or their import into the EU until 30 September 2023, if this is strictly necessary for the divestment from Russia or the wind-down of business activities in Russia, and only applies to those goods that were already physically located in Russia at the time when the relevant prohibitions were implemented. Additionally, national authorities should ensure that the prohibited goods remaining in Russia as a result of divestment do not benefit military end-users or have a military-end use.

Japan

On 27 January 2023, the Government of Japan imposed a ban on exports to 49 Russian entities, effective from February 3, 2023. These entities specialize in aerospace, military and shipbuilding industries.

On 27 January 2023, the Government of Japan prohibited exports of dual-use goods to Russia that could strengthen its military potential, effective from 3 February 2023. The ban includes a range of goods:

- nuclear materials, nuclear facilities, nuclear devices and other items – water gun systems, police batons, restraint devices, oil and natural gas exploration equipment, ring magnets, radioactive material handling equipment, etc.;
- materials, chemicals, microorganisms and toxic substances – tear gas, fingerprint powder, dosimeters, electrolytic tanks, cooling equipment, composite material manufacturing equipment, vaccines, medical products, diagnostic and test kits, commercial explosives and explosive materials, etc.;
- items related to material processing – explosives and detonators detection equipment, X-ray inspection equipment, bearings, portable generators, robots, laser welding machines, large-scale boring machines, equipment for electroplating, etc.;
- substances used as raw materials for military chemical preparations and substances that have the same toxicity as military chemical preparations – substances used as raw materials for military-use chemical preparations and substances with toxicity equivalent to military-use chemical preparations – such as nuclear material, water cannon systems, batons, restraint equipment, oil and natural gas exploration equipment, ring magnets, radioactive material handling equipment, tear gas, fingerprint powder, dosimeters, electrolytic cells, cooling equipment, composite material manufacturing equipment, vaccines, medical products, diagnostic and test kits, commercial explosives, explosives detection equipment, X-ray inspection equipment, bearings, portable generators, robots, laser welding machines, large boring machines, equipment for electroplating and substances used as raw materials for military-use chemical preparations and substances with toxicity equivalent to military-use chemical preparations. Service transactions related to the above export ban will also be subject to regulation.

New Zealand

On 21 November, New Zealand replaced the list of luxury goods in Schedule 1A of the principal regulations to provide for the formatting of the Harmonised System codes to match the style in the Working Tariff Document and insert an additional class of assets (Harmonised System code 33.04 Perfumes and toilet waters and cosmetics, including beauty and make-up products) into the list of luxury goods.

New Zealand also replaced the list of prohibited exports in Schedule 3 of the principal regulations to provide for the formatting of the HS codes to match the style in the Working Tariff Document, insert a class of assets (HS code 87.04 Motor vehicles for the transport of goods) and remove HS codes 8704.10.01, 8704.22, and 8704.32 so as to avoid overlap; and replace 8707.90 with Harmonised System codes 8707.90.01–8707.90.39.

On 12 December, New Zealand added a new exception to the export and import of luxury goods prohibition to allow for personal goods that are part of a passenger's baggage, or personal household effects.

Switzerland

On 23 November 2022, the Federal Council adopted the substantive trade measures to align with the 8th EU sanctions package:

- implemented a complete armaments embargo on Russia, lifting previous restrictions on the import of firearms, ammunition, explosives, pyrotechnic articles, and gunpowder from Russia and Ukraine, as well as lifting restrictions on the sale, supply, export, transit, and transport of special military items to or for use in Russia or Ukraine. However, this embargo has been partially extended to Ukraine in order to comply with Switzerland's neutrality under public international law. The provision of all types of supporting services is also prohibited.
  However, exceptions are allowed for the maintenance and repair of existing military capabilities in Switzerland or a member state of the European Economic Area, the temporary export of protective clothing for personal use by certain personnel and organizations, assistance requested by the Organization for the Prohibition of Chemical Weapons, and exceptions may be granted for substances used in European space programs or for refueling satellites by European manufacturers;
- extended the list of goods which may contribute to Russia's military and technological enhancement or the development of its defense and security sector and are subject to export ban;
- extended the list of goods for use in the aerospace industry which are subject to export ban;
- extended the list of iron and steel products which are subject to export ban;
- extended the list of economically important goods which are subject to export ban;
- extended the list of goods which can strengthen Russian industry and are subject to export ban;
- prohibited the import, transport and purchase of iron and steel products from Russia or originating in Russia. The ban also includes a prohibition on technical assistance, brokering services, financing or financial support, including financial derivatives, as well as insurance and reinsurance related to these activities;

However, prohibition does not apply to the purchase of goods that are part of the import quotas set by the EU, and to the import, transit and transport of these goods into and through Switzerland. Additionally, exceptions are allowed for transactions relating to the import, transport or purchase of certain iron and steel products, that were contractually agreed before 24 November 2022 and are fulfilled by 4 February 2023.

- prohibited starting from 30 September 2023 the import, transport and purchase of iron and steel products that have been processed in a third country using iron and steel products from or originating in Russia. The ban also includes a prohibition on technical assistance, brokering services, financing or financial support, including financial derivatives, as well as insurance and reinsurance related to these activities;
  However, prohibition does not apply to the purchase of goods that are part of the import quotas set by the EU, and to the import, transit and transport of these goods into and through Switzerland. Additionally, SECO may authorize exceptions to the prohibition if it is necessary for certain activities related to civil nuclear capacities. The prohibition also does not apply to transactions relating to the import, transport or purchase of certain iron and steel products that were contractually agreed before 24 November 2022 and are fulfilled by 4 February 2023.
- prohibited the provision of architectural and engineering services, legal and IT consulting services to the Government of Russia or any legal person, enterprise or organization established in Russia.

On 23 November 2022, the Federal Council also introduced an exclusion from the prohibition on sale, supply, export, transit and transport of goods for the strengthening of the industry to or for use in Russia for transactions relating to the sale, delivery, export, transit or transport of coal; briquettes, ovoids and similar solid fuels manufactured from coal (CN code 2701), lignite, whether or not agglomerated, excluding jet (CN code 2702), peat (including peat litter), whether or not agglomerated (CN code 2703), coke and semi-coke of coal, of lignite or of peat, whether or not agglomerated; retort carbon) (CN code 2704) that were agreed before 24 November 2022 and fulfilled by 4 February 2023.

On 25 January 2023, the Federal Council decided to implement additional trade sanctions against Russia by adopting the latest measures introduced by the EU under the 9th package of sanctions:

- prohibition on providing of services in the field of market and opinion research, technical physical and chemical research, as well as advertising for the Government of Russia or legal persons, companies or organizations established in Russia;
- imposed 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 on 167 additional Russian entities closely connected to the Russian military-industrial complex. This decision includes military end-users working in various sectors such as aeronautics;
- extended the export ban covering goods for the aerospace industry to include aircraft engines and their parts for aircraft and drones;
- extended the list of restricted items which might contribute to Russia's military and technological enhancement or the development of its defence and security sector, by adding drone engines, camouflage gear, additional chemical and biological equipment, riot control agents and electronic components;
- extended the list of goods which are subject to export bans and could contribute to the enhancement of Russian industrial capacities by including such items as generators, toy drones, complex generator devices, laptop computers and computing components, printed circuits, hard drives, IT components, night-vision and radio-navigation equipment, radio remote control apparatus, aircraft engines and parts of engines, cameras and lenses.

Simultaneously, Switzerland introduced new derogations on previously established trade sanctions:

- extended for additional 6 months until 18 June 2023 the exemption applicable to the imports of methanol originating in or exported from Russia;
- new exclusion from the arms embargo which allows for exceptions to be granted by the State Secretariat for Economic Affairs (SECO) after consultation with the responsible offices of the Federal Department of Foreign Affairs (FDFA) on demining equipment and material for use in demining operations intended solely for humanitarian purposes;
- possibility for the national competent authorities to grant derogations to allow for certain aviation goods (aerials and aerial reflectors of all kinds; parts suitable for use therewith; other parts related to antennas; instruments and apparatus for measuring or checking the flow, level, pressure or other variables of liquids or gases), which are also widely used in the medical field, to be exported for medical, pharmaceutical and humanitarian purposes;
- the exemption allowing the provision of technical assistance related to the use of goods and technology suited for use in aviation or the space industry, when this is necessary to avoid collision between satellites, or their unintended re-entry into the atmosphere;
- allowed a possibility to grant exemption from import and export prohibitions to facilitate an exit from the Russian market by enabling the sale, supply, or transfer of restricted goods, or their import into Switzerland until 30 September 2023, if this is strictly necessary for withdrawing investments from Russia or conducting business activities in Russia, and only applies to those goods and technology that were already physically located in Russia at the time when the relevant prohibitions were implemented. Additionally, national authorities should ensure that

the prohibited goods remaining in Russia as a result of divestment do not benefit military end-users or have a military-end use. SECO will reject the application for exemption from export bans if there are reasonable grounds to believe that the goods could be intended for military end users or a military end use in Russia.

Taiwan

On 4 January 2022, the Ministry of Economic Affairs expanded the scope of export control on goods exported to Russia and Belarus. The expansion includes 52 items such as nuclear energy materials (law enforcement strike weapons (batons etc.), law enforcement restraint tools (shackles, handcuffs etc.), straitjackets, electric shock handcuff belts, torture tools etc.), materials and chemicals (high-strength fibers and filamentous materials, ricin, saxitoxin sea snail toxin (conotoxin), botulinum toxin, nitrogen trifluoride (NF3), ammonium nitrate, including Fertilizer and mixed fertilizer, 304 and 316 stainless steel plate, tributyl phosphate, nitric acid, etc.) and machine tools (computer numerical control lathes, comprehensive processing machines, computer numerical control grinding machines, electric discharge processing machines, compound rotary tables for five-axis processing, swing spindles, and controllers). Applications for export licenses for these strategic high-tech products will be strictly reviewed and will not be approved in principle.

Serbia

On December 2, Serbia refused to supply goods to Russia in circumvention of sanctions. Foreign companies will not be able to export goods through Serbia, all attempts to re-export will be stopped. *More details here.*

China

On 13 December 2022, the media reported that the Chinese government has banned the export of Loongson processors, which utilize proprietary LoongArch architecture, to Russia. The reason for the ban is that the technology is deemed strategically important by Chinese authorities as it is used in the defense industry. Russian electronics manufacturers had previously tested these Chinese processors as a potential alternative in case shipments of American Intel and AMD processors were blocked. Now, it is officially impossible to import these chips.

8. Impose Secondary Sanctions

Action of countries in fear of the US secondary sanctions

United States

The U.S. government is exerting pressure on Turkey to stop Russian airlines from flying American-made airplanes to and from the country, as a part of a new push to persuade countries to enforce sanctions imposed on Russia after its invasion of Ukraine last year. Senior American officials warned last month that Turkish individuals are at risk of jail time, fines, loss of export privileges and other measures if they provide services like refueling and spare parts to U.S.-made planes flying to and from Russia and Belarus in violation of export controls imposed last year. *More details here.*

China

Chinese UnionPay has limited the ability of Russians to withdraw cash abroad. Russians will be able to receive no more than 500K RUB a day (in some banks - 50K RUB), a month - 5.1 mln RUB (in some banks up to 300K RUB, some - 1 mln RUB). *More details here.*

Chinese banks do not cooperate with Russian credit institutions that have fallen under sanctions and fully comply with all sanctions restrictions established by the US Treasury. Now there are already seven Russian systemically important banks on this list, which is more than half. Among them are Sberbank, VTB, Otkritie Alfa-Bank and others. *More details here.*

United Arab Emirates

Sberbank was chased out of the UAE after the threat of sanctions against the Sheikh. Bank is closing its subsidiary in the United Arab Emirates because of sanctions. Sberinvest Middle East Limited, headquartered in Abu Dhabi, which Sber presented in 2020, promising to create a licensed Islamic window and work with exporters, fell under the blocking measures of the US and EU. It is almost impossible for a bank disconnected from SWIFT to operate in the region. *More details here.*

Kyrgyzstan

Kyrgyz banks stopped servicing Russian payment cards "Mir" due to fears of falling under the sanctions of US financial institutions. *More details here.*

Kazakhstan

The Agency of the Republic of Kazakhstan for Regulation and Development of the Financial Market announced that on December 8, 2022, regulators received a letter from the Office of Foreign Assets Control (OFAC), in which the US agency clarified that it did not object to 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. However, the letter also notes that operations with this payment system will remain under special control to prevent its use for circumventing sanctions imposed against Russia. Kazakhstani banks have the right to accept payments and transfers on "MIR" cards, as well as give money to individuals from ATMs. However, it is up to the individual banks to decide to connect to the "MIR" system based on their own development strategies and internal risk assessment systems. *More details here*

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

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

United States

On 29 December 2022, President Biden signed into law the Consolidated Appropriations Act of 2023 which authorizes the Attorney General to transfer proceeds from the sale of forfeited assets from persons subject to sanctions for Russia's invasion of Ukraine and related crimes to the State Department in order to provide foreign assistance to Ukraine. This transfer is subject to oversight and reporting requirements to Congress.

United Kingdom

The UK government has offered qualified support for the creation of a special tribunal to hold the Russian civilian and military leadership, including Vladimir Putin, accountable for war crimes in Ukraine. The British government has been invited by Ukraine to join a group of international partners pursuing a mechanism for accountability and encouraged other G7 countries to also take part. The UK had previously resisted the tribunal proposal because legal advisers feared it would undermine the existing International Criminal Court (ICC) and its chief prosecutor, Karim Khan KC, who is a British citizen. However, the UK's support for the special tribunal is qualified in that it would only support a hybrid court that does not duplicate the ICC's work and should be based on Ukrainian national justice but contain international elements. *More details here*.

European Union

On 30 November 2022, Ursula von der Leyen (President of European Commission) announced that the EU will develop a plan to confiscate frozen Russian assets and then hand them over to the rebuilding of Ukraine to compensate for the damage caused by the war. In the short term, the EU could, together with its partners, create a structure to manage and invest these funds. Funds received from investments would be transferred to Ukraine. And after the lifting of sanctions, these funds should be used to ensure that Russia pays full compensation for the damage caused to Ukraine. Also, the EU plans to confiscate the assets of Russian sanctions evaders and transfer them to Ukraine - European Commissioner for Justice. *More details here.*

On 19 January 2023, the European Parliament adopted a resolution calling for the creation of a special international tribunal to prosecute the crime of aggression against Ukraine perpetrated by the political and military leadership of Russia and its allies. The resolution argues that a tribunal would fill a vacuum in international criminal justice and complement the investigative efforts of the International Criminal Court, which currently cannot investigate the crime of aggression in relation to Ukraine. It emphasizes that the exact composition and methods of operation of the tribunal remain to be determined, but that it must have jurisdiction to investigate not only Vladimir Putin and the political and military leadership of Russia, but also Aliaksandr Lukashenka and the political and military leadership in Belarus. The resolution also calls for the EU to begin preparatory work on the special tribunal in cooperation with Ukraine and for Ukrainian and international authorities to be supported in securing evidence to be used in the future.

EU member states have been informed that the EU has the legal authority to temporarily leverage at least €33.8 billion of Russian central bank assets to help pay for the reconstruction of Ukraine. The EU's Council Legal Service has told diplomats that such a plan is legally feasible, as long as the assets aren't expropriated and certain conditions are met, including a termination date, a focus on liquid assets, and clarity that the principal and interest would be returned to Russia at some point. The proposal is controversial and discussions are at a very preliminary stage. EU officials and some member states have been worried about the legal justifications for such a move and the precedent that could be set, particularly for the use of frozen Russian central bank assets. *More details here.*

Canada

On 19 December 2022, Canada announced that it will seize and pursue the forfeiture of $26 million from Granite Capital Holdings, a company owned by Russian oligarch Roman Abramovich, who has been sanctioned under the Special Economic Measures (Russia) Regulations. This marks the first time that Canada is using its new authority to pursue the seizure of assets belonging to sanctioned individuals. If the asset is forfeited, the proceeds will be used for the reconstruction of Ukraine and compensation for victims of Russia's invasion. Canada is the first G7 country to implement such measures.

Switzerland

As Bloomberg reported on 20 January 2023, Switzerland's Foreign Minister, Ignazio Cassis, has expressed support for the idea of using frozen Russian assets to fund the reconstruction of Ukraine. Cassis said that authorities in multiple countries

are discussing this step, but it must be done correctly under the rule of law. Currently, 7.5 billion francs in assets Switzerland has frozen from sanctioned Russians cannot be confiscated. Changing this law would likely require a referendum. Swiss banks have been critical of the proposal, stating it would undermine Switzerland's position as a financial center.

United Nations

The UN General Assembly on 14 November 2022 adopted a resolution on the payment of reparations from the Russian Federation for damages caused as a result of full-scale aggression against Ukraine. The UN states that supported the document recognize that "the Russian Federation should be held accountable for any violations of international law in Ukraine or against Ukraine, including its aggression in violation of the Charter of the United Nations, as well as any violations of international humanitarian law and international human rights law. The Russian Federation must bear the legal consequences of all its internationally illegal actions, including compensation for damage, in particular, any damage caused by such actions." The document also recognizes the need to create, in cooperation with Ukraine, an international mechanism for compensation for damages, losses or damage that are the consequences of the actions of the Russian Federation in Ukraine or against Ukraine. The resolution recommends that the members of the UN create, in cooperation with Ukraine, an international register of damages to record evidence.

Germany

As Bloomberg reported, Germany is open to using frozen Russian assets to help Ukraine rebuild, but legal issues must be resolved and allies must follow suit. Germany's government supports Ukraine's demand for war reparations, but hasn't yet taken an official position on seizing assets from the Russian state. Some officials suggest targeting assets of individuals who have been proven to be involved in Russian war crimes, but this could take years. *More details here*.

Estonia

Estonia is taking the initiative to transfer frozen Russian assets to Ukraine and plans to develop a legal framework for this process. According to the Estonian Minister of Foreign Affairs, Urmas Reinsalu, the government decided to start this mechanism because they believe that the European Commission is not making progress in making a decision on the use of these assets. According to the estimates of the Estonian anti-money laundering authority, the frozen funds in the accounts belonging to Russians in the country amount to almost €20 mln. *More details here*.

On 12 January 2023, 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. The spokesman for the European Commission, Christian Wiegand stated that the move is in line with the general policy of the EU and criminalizing sanctions evasion will help to confiscate frozen assets that people try to hide or remove to circumvent the restrictive measures, which will help make these resources available for the reconstruction of Ukraine. *More details here*.

FULL MONITORING TABLE *(Since 19 Apr, 22)*

Total cumulative progress: ~80% (34 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 New for reporting period (4 Nov 22 to 31 Jan 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**	**EU. Banned purchase, import or transfer seaborne crude oil or petroleum products originated in RF** (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. **Switzerland.** Banned RF crude oil and petroleum products. **Poland.** Refused from RF gas in response to RF cut off. Poland terminated the agreement on the supply of Russian gas. **Lithuania**. Completely cut the import of Russian energy, incl. oil, natural gas and electricity (Nord Pool, a pan-European power exchange, has decided to stop trading Russian electricity). Ban on transit of RF gas to Kaliningrad region. **Latvia.** Ban on natural gas supplies from RF from Jan 1, 2023, Latvijas Gaze resumed purchase of Russian gas via an unnamed intermediate entity. **UK.** Ban on import of RF oil and oil products from 31 Dec, ban on import of RF coal came into force on August 10) + ban on import of LNG from Russia from 1 Jan, 23. **Bulgaria, Finland, Netherland and Denmark.** RF cut off supplies due to refusal to pay in rubles. **Norway**. Ban on purchase, import or transfer of oil transported by sea and supporting services. **Estonia.** Banned import and purchase of natural gas from Russia as well as providing associated transmission services from 31 Dec 2022 + also plans to stop oil business with Russia from December 5 (earlier than EU embargo) + ban on the purchase, import and transfer of petroleum oils from Russia from Dec 5 (comes into force prior EU ban). **New Zealand.** 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.
1.2.	Commit to ending all EU trade with Russia and Belarus in petroleum products	**Yes**	**EU.** The 6th package envisions the elimination of around 90% of RF oil from the European market by the end of 2022.
1.3.	Set a special and significant import duty, tariff, or tax for Russian crude oil	**Yes, but incomplete scope**	Poland. The country is going to propose to set a special tax on importing Russian crude oil and other raw materials at the Summit at Brussels. **USA.** 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 counties if purchased above the adopted level). **EU.** EC proposed to limit the price of Russian gas by setting it at 50 euros/MWh. **Under the 8th package EU laid the basis for the required legal framework to implement the oil price cap)**. 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 counties if purchased above the adopted level). EU energy ministers agreed to introduce the price of gas if prices at DTTF exceed €180 per MWh in a row. Cap may be adopted from 15 February 2023. **UK.** Adopted G-7 price cap and introduced new trade restrictions relating to

			certain oil and oil products. **India.** India says it is ready to give up Russian oil and buy Iranian one. As Economic Times reported on September 6, India is ready to consider joining the price ceiling on Russian oil if supplies from alternative countries - Iran or Venezuela - are secured **G7.** Agreed to introduce a price cap on Russian oil – from December 2022 for oil, and from February 2023 - for refined products. Discussion on the level of price cap is still not finished. As Reuters, the US and Western officials are finalising the details on price cap for Russian oil – the cap might be determined at the historical avg of $63-64 a barrel. **Canada.** Adopted G-7 price cap. **Japan.** Adopted G-7 price cap. 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. **Norway.** Adopted a legal basis for the future price cap on Russian oil. Joined G-7 price cap. **Australia.** Joined G-7 price cap. **Switzerland.** Joined the price cap of $60 per barrel for Russian crude petroleum oils or oils from bituminous minerals.
1.4.	Make payments into escrow accounts	**No**	-
1.5.	Decreasing imports of Russian petroleum	**Yes, but incomplete scope**	REPowerEU plan adopted on May 18, stipulates steps to rapidly reduce dependence on Russian fossil fuels and fast forward the green transition. **USA.** 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.
1.6.	Apply these embargos and limits to all blends	**No**	**Shell.** Company announced it would no longer accept refined products with any Russian content, including blended fuels. **BP.** On Apr 27**,** during trading stipulated a condition "that the goods shall not be, in whole or in part, produced" in Russia.
2. Increase Transportation and Insurance-Related Sanctions			
2.1.	Prohibition of shipping, land, and rail transport from Russia to the democratic world	**Yes**	**USA.** Ban RF vessels from US ports. On 8 May, the Department of State also took action against 69 vessels by adding them to the SDN List. **Norway.** Close its borders and ports to Russian trucks and ships from 7 May. Russian fishing vessels, which often land their catch at ports in northern Norway, will receive exemptions from sanctions + extended existing port access ban + allowed the exchange of information within the framework of the ICAO. Tightened restrictions on Russian fishing vessels (allowed access to only 3 Norwegian ports of were vessels will be inspected by customs officers to avoid illegal transport of goods to Russia) + extended the port ban to apply to vessels certified by the Russian Maritime Ship Register). **UK.** Aeroflot, Ural Airlines and Rossiya Airlines unable to sell their landing slots in UK airports. **Lithuania** (applied transit restrictions on goods subject to EU sanctions between Russia and Kaliningrad region). **EU + Lithuania**. EU released guidance for transportation from RF to Kaliningrad – road transit is not allowed, railway – allowed in pre-invasion volumes, transportation of sanctioned military and dual-use goods and related technologies are entirely prohibited, regardless of the mode of transport. **EU**. Extended existing port access ban, allowed the exchange of information within the framework of the ICAO. prohibition on provision of maritime transport, inc. through ship-to-ship transfers, technical assistance, brokering services or financing or financial assistance, related to the maritime transport to 3rd countries of crude oil (as of 5 Dec 2022) or petroleum products (as of 5 Feb 2023) which originate /exported from RF, or which have been exported from RF to 3rd countries (purchases at or below a pre-established price cap were allowed) + ban on Russian-flagged vessels accessing EU ports and locks now also applies to vessels certified by the Russian Maritime Register of Shipping) **UK.** Allowed necessary technical assistance for temporarily detained aircraft. **Switzerland.** Allowed the exchange of information within the framework of the ICAO. **Turkey.** 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. **Estonia.** Banned own state railway company, Operail, from transporting Russian and Belarusian goods from 1 January 2023. **Jordan.** 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. **Laos.** Banned Russian airlines from flying through the country's airspace.

2.2.	Blocking sanctions on the state shipping companies	**Yes**	**USA.** Oboronlogistika OOO, SC South LLC (a subsidiary of Oboronlogistika OOO) as well as private maritime shipping companies - JSC Northern Shipping Company, Transmorflot LLC, M Leasing LLC, Marine Trans Shipping LLC, Nord Project LLC Transport Company. Russian maritime engineering company (OOO Fertoing).
2.3.	Crewing companies and engine producers	**Yes**	**UK.** Zvezda PJSC (manufacture, sales, and service of diesel engines) **Canada**. UEC Klimov JSC (manufactures gas turbine engines, main gearboxes and accessory drive gearboxes for transport aircraft)
2.4.	Prohibit international insurance	**Yes**	Western ship insurers are terminating cover for Russia's leading shipping company Sovcomflot. Such insurers are West and North P&I, UK Club, Norway's Gard, **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.** **Switzerland.** Ban on services, including insurance or reinsurance, for transportation of RF oil and certain petroleum products to any destination. **EU & UK** a plan to shut Moscow out of the vital Lloyd's of London maritime insurance market is delayed in the EU, UK has not adopted agreed restrictions. **UK**. Prohibited insurance relating to import of RF oil and oil products into the UK after 31 December 2022 + adopted amendment to the General Trade Licence that enabled the provision of insurance and reinsurance to individuals who are resident in Russia or are located in Russia as well as entities which are incorporated or constituted under the law of Russia or domiciled in Russia in relation to sea vessels and aircraft, their component parts, as well as aero gas turbine engines + ship insurers announced that they will be canceling war-risk coverage across Russia, Ukraine, and Belarus, starting from 1 January 2023.
3. Impose New Financial Sanctions			
3.1.	Cut off all Russian financial institutions from the global financial system	**Yes**	**USA.** SDN on Transkapitalbank, Investtradebank; virtual currency mining company Bitriver AG + 10 RF subsidiaries. Joint Stock Company Moscow Industrial Bank (MIB) (SOE) and 10 of its subsidiaries. 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 & 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 & delivery of Iranian UAVs + Russian Central Election Commission for holding referendums + 18 entities related to Russia's financial services sector, inc. PJSC Rosbank & 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. **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. **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. **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. **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. **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. **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. **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.
3.2.	Full SDN sanctions would ban transactions, freeze assets, and forbid business: top 30 banks and financial institutions, including but not limited to Gazprombank	**No**	-
3.3.	Discourage European banks such as Raiffeisen Bank and Unicredit, from operating in Russia	**No**	-
4. Designate the Russian Federation as a sponsor of terrorism.			
4.1.	Designate the Russian Federation as a sponsor of terrorism	**Yes, but incomplete scope**	**Lithuania.** Officially recognized RF as a state sponsor and perpetrator of terrorism. **USA.** US Senate approved a resolution calling to recognizing RF as a sponsor of terrorism + a similar bill on recognizing Russia as a state sponsor of terrorism was presented at the US House of Representatives (the lower house of the US Congress + Blinken said that he is not ready to make such a decision + US State Department called RF a "human trafficking" state, a draft Resolution on recognizing Russia's actions in Ukraine as a genocide was registered in the US Senate. On Sep 14, the US senators Richard Blumenthal (Democratic) and Lindsey Graham (Republican) introduced a law according to which Russia can be recognized as a SST. **NATO.** 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. **Latvia.** Recognized Russia as a sponsor of terrorism. **Estonia.** Estonian Parliament declared Russia a "state sponsor of terrorism, condemned the annexation of the occupied regions of Ukraine and qualified Russia as "the main threat to peace in Europe". **Poland.** The Polish Senate recognized the authorities of the Russian Federation as a terrorist regime). Recognised Russia as a terrorist regime. **EU.** PACE adopted a resolution calling RF a terrorist regime. The European Parliament recognized the Russian Federation as a state sponsor of terrorism. **Netherlands.** Recognized Russia as a state sponsor of terrorism. **Czech Republic.** Recognized the Russian regime as terrorist in accordance with the resolution of the Parliamentary Assembly of the Council of Europe.
4.2.	Designate the Armed Forces of the Russian Federation as a Foreign Terrorist Organization	**No**	**USA.** Designated PMC Wagner as a significant Transnational Criminal Organisation.
4.3.	Place Russia on the FATF's blacklist	**Slow progress**	Russia was banned from participating in current and future FATF projects + from participation in meetings of FATF regional bodies.
4.4.	Recognize political parties as	**No**	-

	terrorist-supporting organizations		
5. Strengthen Individual Sanctions against these Categories of Individuals			
5.1.	Individuals who hold senior governmental positions	**Yes**	**USA.** 29 individuals (Deputy Governors of the CBR, Board members of Bank Otkritie, individuals linked to Bank Otkritie, military personnel, a network of individuals that support Malofeyev's activities, including those related to sanctions evasion and misinformation campaigns + 18, including A.Mordashov and his family + 58 + visa restrictions for 529 officers of the Russian military and Russian nationals + 2 + **13 inc. Kabaeva** + visa restrictions on 893 Russian officials + **45, inc. R. Kadyrov and his family members, M.Oreshkin (assistant to Putin), V.Komlev (head of NSPK/Mir** + 303 individuals, inc. E.Nabiullina, O.Skorobogatova, A.Novak + visa restrictions for 910 persons, inc. members of the Russian military, Belarusian military officials and Russian proxies in Ukraine + designation for Ochur-Suge Mongush for his alleged involvement & 2 daughters of S.Sobyanin + 1 Russian national and procurement agent (Y. Orekhov) + an indictment charging 5 Russian nationals in connection with a sanctions evasion and money laundering scheme was unsealed in US federal court 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. **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. **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). **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 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. **Australia**. 147 individuals, including Russian senators, and daughters of Vladimir Putin and Sergei Lavrov. 76 members of the State Duma of the Federal Assembly of the Russian Federation**.** 34 senior members of the Russian-led movements in Ukrainian regions Donetsk and Luhansk. 4 individuals for supporting the invasion - Aleksandr Chupriyan, Sergei Korolyov, Nikolay Bogdanovsky and Illia Kyva +16, **incl. Kabaeva** + 28 individuals + 3 Iranian military official individuals for involvement in supply of UAVs to Russia. **New Zealand.** 170 members of the upper house of RF Federation Council + 5 persons for disinformation and cyber attacks (media/defense). President of Belarus Alexander Lukashenko and 22 military officials of Belarus + 48 Russian officials operating in LDPR) + sanctioned 19 members of President Putin's inner circle and other representatives of the Russian political elite + broad economic sanctions and travel ban against 74 individuals, 24 so-called 'officials' in illegally annexed regions of Ukraine) and extended further sanctions on 15 individuals with strategic or economic relevance who were previously only travel banned + travel ban against A.Abramov (Former Chair and significant shareholder of Evraz plc) and 4 his family members + 15 (inc. 12 military officials) + 22 individuals of the Russian and Belarusian elite + 3 Iranian military official individuals for involvement in supply of UAVs to Russia. **Japan.** 8 RF officials + 133 individuals from self-proclaimed "DPR/LPR" + 62 + 58 individuals + 23 individuals directly responsible for the unilateral annexation of Donet, sk, Luhansk, Kherson and Zaporizhzhia + 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. **EU. Switzerland. Liechtenstein.** 2 oligarchs (Kurchenko, Prigozhin) + V.Yanukovych and his son O.Yanukovych. **EU.** 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) + 47 individuals, inc. Sobyanin (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 & delivery of UAVs to Russia + asset freeze for 141 individuals. **Switzerland.** 65 RF +12 Belarus + 54 + 3 - 3 + assets freeze and travel ban 30 individuals + financial sanctions and entry and transit ban on 3 Iranian military officials) + 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. **Norway.** 65 + 54 RF individuals + 30 (inc. actors involved in the so-called referendums). **Lithuania**. Ban on entering the country for P.Kirill.
5.2.	Family members	**Yes**	**EU.** Sanctioned Kabayeva, excluded Patriarch Kirill. **UK**. **Alina KABAEVA**, Viktor KHMARIN, Vladimir KOLBIN, Lyudmila OCHERETNAYA (ex-wife of Putin), Aleksandr Grigorevich PLEKHOV, PUTIN Igor Alexandrovich, PUTIN Mikhail Evgenievich, PUTIN Roman Igorevich, SHAMALOV Yuri Nikolayevich, SHELOMOV Mikhail Lvovich, ZATSEPILINA Anna Yakovlena. **Canada**. The GoV has introduced a Bill to allow for the imposition of travel bans on family members of sanctioned people + A.Kabaeva **USA.** Sanctioned Kabayeva. **Switzerland.** Sanctioned Kabayeva.
5.3.	Members of governing bodies of Russian state-owned and state-controlled enterprises	**Yes**	**UK**. Mikhail KLISHIN (an Executive in Bank Rossiya, and a member of the Board of Directors at SOGAZ). **EU.** Gerhard Schroeder, Matthias Waring and Karin Kneissl left the BoD of Rosneft threatened by sanctions **Canada.** 35 individuals - senior executives of energy entities (inc. Gazprom) and government officials.
5.4.	Key executives and board members of companies that are subject to US or EU sanctions	**Yes**	**USA.** 8 members of the Executive Board of Sberbank and 27 members of Gazprombank Board of Directors. **UK.** + 2 top-managers of Rosneft were re-listed in sanction lists - Olga Ayziman has been de-listed + 4 individuals (inc. 2 ex-top officials of Evraz).
5.5.	Propagandists	**Yes**	**New Zealand.** 5 persons in media and propaganda sphere + 23 individuals, who are responsible for disinformation campaigns in support of the Russian war effort. **Australia**. 11 individuals in the Russian media industry who promote the Russian

			Government's false narratives. **Canada**. 30 disinformation and propaganda figures + 34 agents of Russian propaganda and their family members, and influential individuals spreading disinformation.
5.6.	Senior members of the governing bodies of Russian political parties and every member of Putin's political party, United Russia	**Yes**	
6. Intensify Sanctions on State-Owned Enterprises			
6.1.	Key state-owned enterprises in the energy industry	**Slow progress**	**Poland.** sanctioned Gazprom Export. **Canada.** sanctioned 3 entities in the energy sector.
6.2.	Key channels of Russian propaganda	**Yes**	**UK.** VGTRK, All-Russian public organization society for the promotion of Russian historical development Tsargrad, Analiticheskii tsentr Katekhon OOO, Inforos, Southfront, Strategic culture foundation, Tsargrad OOO **USA.** JSC Channel One Russia, Television Station Russia-1, and JSC NTV Broadcasting Company. **New Zealand.** 85th Main Special Service Centre (GTsSS) (SOE), Internet Research Agency, Main Centre for Special Technologies (GTsST). **Australia**. 12 RF (Internet Research Agency LLC, New Eastern Outlook, Oriental Review, Strategic Culture Foundation, SouthFront, NewsFront, OOO Inforos, United World International, Geopolitica, Odna Rodyna, Journal Kamerton, Analiticheskiv Tsentr Katekhon OOO). **EU**. 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 Pervy 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. **Latvia.** Ban on distribution of 80 audio and audiovisual programs registered in RF. **Switzerland**. Prohibition of advertisement of content produced or broadcast by certain RF SOE media + 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. **Canada.** 15 entities involved in disinformation activities (inc. 12 SOEs). + 1 channel of Russian propaganda - Zvezda. **Moldova.** 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**	**UK.** Added 13 SOEs & 4 subsidiaries. Machine building: KAMAZ. Defense: Avangard JS, JSC Kalashnikov concern (SOE 25+1), Rocket and space center progress JSC. Shipbuilding: The Dalzavod ship repair centre JSC. Electronics: CROCUS NANO ELECTRONICS (14,32% SOE), JSC MIKRON (6.5% SOE). Leasing: JSC GTLK. Science: 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. Logistics: RF Railways Evraz plc (steel manufacturing and mining company) **New Zealand.** Added 42 SOEs. Defence: 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. Shipbuilding: United Shipbuilding Corporation. **USA**. State-supported private weapons manufacturer LLC Promtekhnologiya + 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 **Canada**. 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 **Australia**. PMC Wagner, Industrial-Commercial Private Unitary Enterprise Minotor-Service and OJSC KB Radar-Managing Company of Radar Systems Holding **New Zealand.** Sanctions on 44 entities that are funding or fuelling the war, including 32 RF SOEs and 3 Belarus SOEs) + JSC Goznak + 2 entities that operate in the Russian defense and related material sector. **EU. Switzerland.** 6 SOEs + 4 owned by SOE on 27% and 3 Belarus SOEs. **Norway**. 6 RF SOE + 4 owned by SOE on 27% + ban on holding managerial

			positions in certain companies that are owned or controlled by the Russian state. **EU**. 7 SOEs + 7 entities, inc. Central Election Commission of Russia and Goznak + ban on EU nationals to hold any posts on the governing bodies of certain Russian state-owned or controlled legal persons, entities or bodies **Switzerland.** 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. **Japan**. Added 9 entities, inc. Rostec and Kalashnikov Concern.
6.4.	Sanctions on any new project of RosAtom	**No**	**Finland.** Finland's Fennovoima has terminated its contract with Rosatom to build a nuclear power plant due to significant delays by RAOS (a subsidiary of Rosatom) and its inability to complete the project. Finnish MinEcon approves the decision. **Bulgaria.** Rejected Russian fuel for its nuclear power plants from 2025 - agreements with Frasmatome (France) & Westinghouse (USA) for supplies were signed. **Czech Republic.** 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**	**UK.** Ban on services exports, including management consulting, accounting and PR services. ICAEW (incl. KPMG, EY, Deloitte and PwC) is asking UK GoV for exceptions to the ban on providing services to Russian companies. Export ban on maritime goods&technology and related services. Extended the list of oil refining goods&technology and the list of energy-related goods banned to export. Export restrictions for Belarus on goods and technology relating to critical industry, quantum computing, oil refining, luxury goods including dual-use good and technology (will block trade of ~£60 mln of goods with Belarus. 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. **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.

			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 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. **Canada. Imposed an export ban on 28 services** vital for the operation of the oil, gas and chemical industries, including technical, management, accounting and advertising services. Luxury goods (incl. alcohol, tobacco, luxury clothing and accessories, jewelry, kitchenware, and art), export ban on Belarus on luxury goods. Expanded existing measures on the oil, gas and chemical sectors to include industrial manufacturing + withdrew MFN for Russia - a 35% tariff applicable to virtually all goods. **Norway**. Expansion of list of goods subject to export controls / bans that could help increase RF military and technological capabilities + ban of accounting, pr, consulting services + exclusions to export ban on luxury goods, allowing for personal use of persons travelling from the EU + expansion of list of goods and technologies banned for export that can contribute to Russia's military and technological enhancement + expanded the list of goods&technology for use in oil refining + **e**xport 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. **Switzerland**. Ban on audit, business and pr consultancy services + export ban for 4 entities (inc. 3 SOEs), extension of lists of goods banned for sale, supply, export, transit and transport to or for use in RF + exclusions to export ban on luxury goods, allowing for personal use of persons travelling from the EU + exclusions to the ban on transactions with SOEs related to the import from or through Russia of petroleum, incl. refined petroleum products,and the import of pharmaceuticals, medical devices and agricultural and foodstuffs, incl. wheat and fertilizers + prohibitions to award public contracts to Russian individuals and entities + amended the list of goods that could help to strengthen the industry prohibited for sale, supply, export, transit and transport to or for use in Russia + ban on Architectural & 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. **Japan.** Ban on trust, accounting / audit, and management consulting services + ban on export of goods to 65 RF and 25 Belarus entities in defence + ban on exports to 21 Russian organisations designated as specific organisations + export ban on chemical weapons-related goods to Russia (came into force on the 7 Oct). **New Zealand.** Extension of the 35% tariff on Russian imports till Mar 2025 + significant expansion of the list of prohibited exports to Russia and Belarus + ban of the export of luxury goods (inc. gold) to Russia (for example, wine, seafood) + ban of the export of oil exploration and oil production products to Russia (came into force on 4 Nov) + added perfumes and toilet waters and cosmetics, including beauty and make-up products, into the list of luxury goods subject to the export ban. **Taiwan.** 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.
7.2.	Ban on the export and supply to Russia of catalysts used for oil production, the telecom industry, and agriculture	**Slow progress**	**UK.** Internet services and online media services.
7.3.	Tighten the sanctions on technologies and equipment (microchips, semiconductors)	**Yes**	**Switzerland**. Industrial robots **USA.** License requirement on exports of hundreds of common industrial and commercial items, including "wood products, industrial engines, boilers, motors, fans, and ventilation equipment, bulldozers, and many other items with industrial

			and commercial applications." Added new license requirement for exports of sophisticated computer chips to China (incl. Hong Kong) and Russia. **Japan.** Export ban of cutting-edge goods (quantum computers, 3D printers, etc). **UK.** Export bans targeted on Russia's manufacturing and heavy machinery sectors announced. **Taiwan.** Imposed controls on exports of strategic high-tech products in 57 categories to Belarus + **ban on export of modern chips to Belarus and RF**. **China.** 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**	**UK.** Announced an export ban on products used to repress the Ukrainian people (announced but not yet implemented). Products targeted could include interception and monitoring equipment (dual-use products). 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. **Canada**. Ban on export of goods that could be used by RF production and manufacture of weapons. Ban on export for Belarus on products that could be used in the production and manufacturing of weapons. **EU.** Expansion of export restrictions for dual-use goods and technology, goods & technologies that can be used in defense and security. Reinforced export controls of dual use goods and advanced technology + added 4 Russian entities to the list of entities subject to export restrictions regarding dual-use goods&technology + extension of the list of restricted goods and technology which might contribute to Russia's military and technological enhancement or to the development of its defence and security sector, including in that list + 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. **USA.** 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). **Switzerland**. Extended the list of **dual-use goods banned for export** by 91 RF entities and 24 Belarus entities + 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. **Norway.** Added 4 Russian entities to the export ban list regarding dual-use goods&technology. **Japan.** Prohibited exports of dual-use goods to Russia that could strengthen its military potential, effective from 3 February 2023.
7.5.	Prohibit the export of metals, minerals, and ores	**Slow progress**	**Switzerland**. Certain chemical products. **UK.** Ban on services relating to iron and steel goods.
7.6.	Ban on the export of semi-finished metals, industrial software, shipbuilding technology, and oil storage	**No**	-
7.7.	Introduce a full embargo on the import from Russia and Belarus of metals, minerals, related manufactured goods, chemical products, plastic and rubber, wood and timber, and precious stones	**Yes**	**UK.** Silver, wood, high-end; additional 35% import duty, including on palladium, platinum and chemicals is to be imposed + import ban on: revenue generating goods RF origin. **Switzerland**. Lignite and coal, timber, cement, seafood, caviar + extended the list of prohibited for import from RF goods. **Canada**. Luxury goods, incl. alcoholic beverages, seafood, fish and non-industrial diamonds + import ban on Belarus on luxury goods. **USA.** 35% import tariff for 570 categories of RF products worth approximately $2.3 bn). **EU.** Extended the exemption from the prohibition to engage in transactions with certain SOEs as regards transactions for agro products and the transport of oil to 3rd countries + introduced the ability for EU Member States to authorise the operation with titanium goods required in the aeronautic industry, for which no

			alternative supply is available + ban to import into the EU of iron and steel products processed in third countries inc. from Russia (from September 30, 2023) + extension of the ban to import into the EU of iron and steel products processed in third countries inc. from Russia (from September 30, 2023) + introduction of the prohibition on importing or purchasing, as from 30 September 2023, the listed iron and steel products when processed in a third country incorporating listed iron and steel products originating in Russia + ban on the import of Russian finished and semi-finished steel products (come into force due three months). 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. **Japan.** Banned exports to 21 scientific organizations in Russia, banned export of goods related to chemical weapons to Russia. **New Zealand.** Ban of the import of luxury goods of Russian origin into New Zealand (vodka and caviar) + prohibition of the import of energy products of Russian origin (coal, oil, or gas products) into New Zealand. **Norway.** 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. **Switzerland.** 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 & steel products from Russia + from 3rd country from Russian iron and steel products (includes ban on supportive services).
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**	**USA.** On 16 August, BIS issued an interim rule imposing new export controls on four emerging and foundational technologies. The new rules control two substrates of ultra-wide gap semiconductors; Electric Computer-Aided Design (ECAD) software specially designed for the development of integrated circuits with Gate-All-Around Field-Effect Transistor (GAAFET) structure; and **Pressure Gain Combustion (PGC) technology** for national security and antiterrorism reasons, which means that exports of the items to most countries will require an export license or the use of a license exception. Release of controlled technology to most foreign nationals will similarly require authorization under U.S. export control rules.
7.9.	Stop the implementation of long-term contracts and issuance of licenses defense industries	**Yes**	**USA.** On July 14, the U.S. House of Representatives passed the NDAA for Fiscal Year 2023. One of the proposed amendments is to prohibit the federal government from entering into, extending, or renewing contracts with contractors that conduct business operations in RF during its war against Ukraine, with certain exceptions and exemptions. 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. **BIS will review license applications under a policy of denial, and no license exceptions are available for these entities being added.** Such measures will effectively cut them off from obtaining U.S.-origin items or foreign-made products derived from certain U.S. technology or software thus further restricting the Russian military's capacity.
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**	**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**. **China.** UnionPay backs away from Russian banks on secondary sanctions fears. China's state-owned refineries are reluctant to sign new deals to buy Russian oil. Under the pressure of US sanctions and suppliers, Chinese technology companies are closing down business in Russia without making official statements. According to the Chinese government, China's exports to Russia in

			Mar fell by a total of 27% compared to Feb. Exports of technological products fell particularly sharply. Thus, the supply of laptops decreased by more than 40%, smartphones - by two thirds, base stations - by 98%. Chinese tech giants such as Lenovo and Xiaomi are publicly refusing to do business with Russia - WSJ. **Due to the potential consequences of financial sanctions, fewer shipowners are willing to let their tankers load in RF.** Supply of Russian oil to China becomes more and more congested at sea, despite the short distance between countries, Bloomberg. **UK.** Revolut cannot obtain a banking license in UK due to links with RF: father of co-founder of Revolut Mykola Storonskiy is the top manager of Gazprom's structure. **Western lawyers start to refuse working with Russians, while RF itself closes its market for them.** According to FT, British lawyers began to refuse to work with the Russians against the background of sanctions. **Germany.** German Deutsche Bank has stopped working with a number of large Russian banks, which have opened correspondent accounts in euros, writes RBC. Such a decision, in particular, is associated with the risk of secondary sanctions. **USA.** Plans to include secondary sanctions in its financial crime strategy. They are also considering sanctions against unscrupulous banks that help circumvent sanctions. USA sanctioned 7 RF entities and 6 non-RF entities for evading newly imposed export controls on Russia, these companies provided support to Russia's military and/or defense industrial base. A draft bill on sanctioning China's purchases of oil and other energy supplies from RF was introduced to the Senate. The US Treasury has sent a letter to a number of business associations in Turkey warning them of the risk of being sanctioned if they cooperate with Russians who have already been subject to restrictions -WSJ. After the US warning, banks in Turkey, Kazakhstan, Vietnam, Armenia, Kyrgyz Republic, Sri Lanks 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. 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. On Sep 19, Turkish Airlines refused to train Russian pilots. The U.S. government is exerting pressure on Turkey to stop Russian airlines from flying American-made airplanes to and from the country. **EU.** Discussion on sanctioning Turkey for assisting RF trade is being born. **EU. Norway.** The EU broadened the listing criteria on which specific designations can be based – Sanctions could now be imposed on natural or legal persons who facilitate the circumvention of EU sanctions. **China.** Chinese UnionPay has limited the ability of Russians to withdraw cash abroad. **Kyrgyzstan.** Banks stopped servicing Russian payment cards "Mir". **Kazakhstan.** 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. **UAE.** Sberbank is closing its subsidiary in the United Arab Emirates because of sanctions.
9. Increase Transparency to Discourage Trade with and Investment in Russia			
9.1.	A registry of all international companies still operating in Russia and Belarus	**Slow progress**	Here can be found a registry of both companies still operating and ones who have already left Russia. The registry is created and administered by Yale School of Management. **The EU created** a special online mechanism through which whistleblowers can report violations of anti-Russian sanction.
9.2.	Obligate legal entities and organizations to disclose information regarding existing business relations with enterprises and their subsidiaries inside and outside of Russia and Belarus	**Yes**	**USA.** A bill to oblige public companies to disclose their ties to Russia and other aggressor countries was registered. Corp Fin has posted a sample comment letter to companies about potential disclosure obligations arising out of the Russian invasion of Ukraine. Released warning of increased export control evasion attempts by entities targeted under RF related programs (includes 16 items with a higher risk of evasion attempts. Strengthened enforcement of export controls + established an outbound investment review mechanism to protect U.S. technologies (e.g. semiconductors, batteries, AI etc.) against adversaries like China and RF – notification to the federal government 45 days prior to deal

			closing is required if the investment involves specified sectors) was proposed, draft has not passed either house of Congress yet. **Germany.** The Bundestag obliged those who fell under anti-Russian sanctions to report assets in Germany under the threat of imprisonment, DPA reports + is to create a national registry of assets that are subject to sanctions. **EU**. The European Council has requested the European Parliament's consent to add the violation of sanctions to the list of 'EU crimes'. The European Parliament gave its consent to the draft of the European Council Decision which identifies the violation of EU sanctions as an EU crime. Strengthened reporting requirements - sanctioned people and entities were obliged to declare assets in EU before 1 Sep 2022 or within 6 weeks from the date of listing. Share of information on property of sanctioned persons, entities and bodies between EU Member States and the European Commission. **UK.** Register of Foreign Legal Entities began to operate from August – now anonymous foreign companies must disclose their ultimate owners if they seek to purchase real estate in the UK or already own it. **Switzerland.** Federal Council instructed to draft a bill on increased transparency and easier identification of the beneficial owners of legal entities which will include a register for identifying beneficial owners and new obligations the risk-based updating of information on effective ownership.
10. Deepen Coordination of Sanctions and Link Sanctions Relief to Peace and Reconstruction			
10.1	Continue to coordinate sanctions across the EU, United States, and other allied countries and partners to ensure that, if an individual or entity is sanctioned in one jurisdiction, then they should be sanctioned in all jurisdictions.	**Yes**	**UK.** Fast-tracked on 19 individuals and entities in alignment with G7 and the EU to target Russia's military and defense capabilities. **UK and EU.** Reached an agreement to enact a co-ordinated ban on insuring ships carrying Russian oil. **UK.** Introduced an urgent procedure for designations of a person/entity on the basis that they have been sanctioned by the US, the EU, Australia or Canada. **Switzerland.** Adopts new EU sanctions and replicates the EU lists of sanctioned individuals and entities. **Norway** adopted the 6th EU sanction package. **USA-UK.** OFSI and OFAC announced enhanced co-operation on sanctions. **REPO** is going to accelerate oligarch asset forfeiture efforts in response to Russia's illegal war in Ukraine. **Czech Republic.** Approved a legislative proposal to freeze foreign assets in case of human rights violations, support of terrorism or participation in cyber-attacks (needs to pass Senate and then office of the President).
10.2	Maintain all sanctions until Russia has ended its invasion of Ukraine.	**Yes**	**So far such consensus exists.** **USA.** Merely stopping the invasion of Ukraine may not be enough for RF to gain relief from Western economic sanctions. The U.S. also wants an assurance that there will never be another such invasion. USA won't lift sanctions on Russia until the special operation is stopped, State Department spokesman Ned Price. **Germany.** The lifting of anti-Russian sanctions is possible only if the withdrawal of Russian troops from the territory of Ukraine. **UK.** Sanctions against Russia will be lifted only after "complete ceasefire and withdrawal of troops"
10.3	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)**	**USA** and **Canada.** The countries are preparing legislative acts to use sanctioned assets for compensation to Ukraine. **USA.** The USA doesn't have legal authority to seize CBR assets frozen due to its invasion of Ukraine, but talks with partners over ways to make Russia foot the bill for Ukraine's post-war reconstruction are starting. The Baltic countries and Slovakia called on the EU to transfer Russian assets to Ukraine. **USA.** 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. **Canada.** 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 its new authority to pursue the seizure of assets belonging to sanctioned individuals. **UK.** Adopted a resolution on the payment of reparations from the Russian Federation for damages. **EU.** EU countries should consider using frozen Russian foreign exchange reserves to pay for Ukraine's recovery after the war, Borrell said. EU working on the possibility of using the frozen Russian assets to help Ukraine. 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. **Germany.** Consider the possibility. The Finance Minister does not support the idea of confiscating the personal assets of Russians for Ukraine.

			Estonia. 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.

APPENDIX

SANCTIONS TARGETED AGAINST INDIVIDUALS

United States

Date	Target country		Description
14 Nov 2022	Russia	OFAC	114 individuals, including persons related to entities from the Russian military procurement network, several Suleiman Kerimov's family members, as well as businessmen who were related to the management of his assets: − *3 persons related to entities from Russian military procurement network* – Holger LENG, Estonian and Swiss national, Milur SA employee involved in the scheme to establish Milur Electronics; Jacques PASCHE, Swiss national, Milur SA employee involved in the scheme to establish Milur Electronics; Mikhail Ilyich PAVLYUK, Russian national, General Director of two companies – Milandr and Milur Electronics, which working with Milur SA initiated the registration process in Armenia for Milur Electronics and worked to transfer funds from Milur SA to Milur Electronics, as part of which he siphoned a substantial amount into his personal bank account; − *6 individuals of Suleiman Kerimov's network and family* – Said Suleymanovich KERIMOV, son of Suleiman Kerimov, former member of the Board of Directors of Polyus; Amina Suleymanovna KERIMOVA, daughter of Suleiman Kerimov; Firuza Nazimovna KERIMOVA, wife of Suleiman Kerimov, founder of FC-Capital CJSC; Gulnara Suleymanovna KERIMOVA, daughter of Suleiman Kerimov, founder of Service Immobiliere Antibes SAS, Service Immobiliere et Gestion SAS, VH Antibes SAS, Villa Lexa Estates SAS; Nariman Gadzhievich GADZHIEV, Kerimov's nephew, Russian national residing in Switzerland, primary financial facilitator for Suleiman Kerimov, owner of Constellation Advisors Ltd; Laurin KATZ, president of all four of France-based companies owned by Gulnara Suleymanovna KERIMOVA, daughter of Suleiman Kerimov *(*Service Immobiliere Antibes SAS, Service Immobiliere et Gestion SAS, VH Antibes SAS and Villa Lexa Estates SAS); − *3 individuals of Alexander-Walter Studhalter network and family* – Alexander-Walter STUDHALTER, key player in Kerimov's financial network, including managing Kerimov's companies, owner of MG International AG, Studhalter International Group AG, Swiss International Advisory Group AG (SwissIAG), Papa Oscar Ventures GmbH, Eurimo Holding SA, Papa Oscar Ventures SE SL, Swiss International Real Estate Portfolio AG, SCI AAA Properties; Hugo Ange Christophe STUDHALTER, son of Alexander-Walter STUDHALTER, SwissIAG employee; Jeremy Eric Camille STUDHALTER, son of Alexander-Walter STUDHALTER, SwissIAG employee; − *2 individuals of Murat Aliev Network* – Murat Magomedovich ALIEV, Russian businessman and investor, owner and chairman of the board of directors of the Cyprus-based holding investment firm LLC Bonum Capital, former head of Suleiman Kerimov's investment firm Nafta-Moskva*;* Inga RETTICH, Director of Bonum Capital Cyprus Ltd, Cyprus-based holding company owned by Murat Aliev.
15 Nov 2022	Russia	OFAC	2 individuals for facilitating PMC Wagner's acquisition of Unmanned Aerial Vehicles (UAVs) from Iran to support combat operations in Ukraine – Abbas DJUMA, journalist, freelance correspondent for Pravda.RU; Tigran Khristoforovich SRABIONOV.
9 Dec 2022	Russia	OFAC	19 Russian officials and proxies who have perpetuated Russia's illegal and deadly war in Ukraine though abhorrent filtration operations and forcible deportations of Ukraine's citizens, including a growing number of children: − *2 Russian Presidential administration officials* - Yevgeniy Radionovich KIM and Oleg Yuryevich NESTEROV – which were directly involved in the planning for and implementation of filtration points in Russia-occupied Ukraine, oversaw the filtration of city government officials and other civilians from Mariupol, Ukraine, including through the filtration center in Manhush, Ukraine. Oleg Yuryevich Nesterov also helped coordinate the sham "accession referendum" held in Ukraine's Zaporizhzhyia Oblast in late September 2022;

			− *2 so-called officials in areas of Ukraine illegally occupied by Russian forces or controlled by Russian-backed proxies* - 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 of Ukraine; Aleksey Valentinovich MURATOV[3], official of the so-called DNR which coordinated filtration point operations with so-called DNR leader Denis Pushilin, in particular, Muratov spearheaded the procurement of necessary equipment and technology to support filtration points in Russia-occupied Donetsk Oblast of Ukraine; − *15 members of the Central Election Commission of the Russian Federation* - Pavel Viktorovich ANDREEV, member; Igor Borisovich BORISOV, member; Nataliya Alekseevna BUDARINA, Secretary; Nikolay Ivanovich BULAEV, Deputy Chairperson; 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; Ella Aleksandrovna PAMFILOVA, Chairperson; Yevgeny Aleksandrovich SHEVCHENKO, member; Andrey Yurievich SHUTOV, member.
9 Dec 2022	Russia	Department of State	2 Russian nationals which were reportedly implicated in human rights abuses against civilians in Ukraine – Ochur-Suge Terimovich MONGUSH, which was engaged in torture; Lyudmila Nikolaevna ZAITSEVA, which was involved in the kidnapping and forced relocation of children from Ukraine.
15 Dec 2022	Russia	Department of State	46 individuals, including Vladimir Potanin, one of Russia's wealthiest oligarchs and a close associate of President Putin, and 3 members of his immediate family, as well as officials helping to advance Russia's invasion and control of Ukrainian territory, including 29 Russian heads of regions and governors connected to mobilization efforts, 2 of their family members, 6 proxy authorities operating on behalf of the Kremlin in Ukraine. − *1 oligarch* – Vladimir Olegovich POTANIN, one of the wealthiest oligarchs in Russia, formerly served as a Deputy Prime Minister for Russia, and has direct ties to Vladimir Putin; − *5 members of the Board of Directors of Russian Railways, a major Russian State-owned enterprise* – Andrey Removich BELOUSOV, First Deputy Prime Minister of Russia; Dmitriy Nikolaevich CHERNYSHENKO, Deputy Prime Minister of Russia; Sergey Ottovich FRANK; Oleg Valentinovich BELOZYOROV; Aleksey Valerevich SAZANOV; − *29 Governors or Heads of the regions,* which oversee and enforce the conscription of citizens in response to Russia's recent mobilization order: o 24 Governors – Andrey Yuryevich VOROBYEV (Moscow region); Alexander Viktorovich GUSEV (Voronezh region); Alexey Vladimirovich OSTROVSKIY (Smolensk region); Vyacheslav Vladimirovich GLADKOV (Belgorod region); Roman Vladimirovich STAROVOYT (Kursk region); Vasiliy Yuryevich GOLUBEV (Rostov region); Aleksandr Aleksandrovich AVDEYEV (Vladimir region); Andrey Ivanovich BOCHAROV (Volgograd region); Aleksandr Yuryevich DROZDENKO (Leningrad region); Oleg Aleksandrovich KUVSHINNIKOV (Vologda region); Andrey Sergeyevich NIKITIN (Novgorod region); Andrey Aleksandrovich TRAVNIKOV (Novosibirsk region); Denis Vladimirovich PASLER (Orenburg region); Maxim Borisovich EGOROV (Kaliningrad region); Dmitriy Igorevich AZAROV (Samara region); Evgeniy Vladimirovich KUYVASHEV (Sverdlovsk region); Igor Georgiyevich ARTAMONOV (Lipetsk region); Alexander Viktorovich USS (Krasnoyarsk region); Aleksandr Viktorovich MOOR (Tyumen region); Aleksey Leonidovich TEKSLER (Chelyabinsk region); Viktor Petrovich TOMENKO (Altai territory); Vladimir Vladimirovich VLADIMIROV (Stavropol territory); Aleksandr Vasilyevich BOGOMAZ (Bryansk region); o 5 Heads of the regions – Radiy Faritovich KHABIROV (Bashkortostan Republic); Vladimir Viktorovich UYBA (Komi Republic(; Aysen Sergeyevich NIKOLAYEV (Republic of Sakha (Yakutia)); Oleg Alekseyevich NIKOLAYEV (Chuvash Republic); Dmitriy Andreevich ARTYUKHOV (Yamalo-Nenets Autonomous Area); − *5 family members of previously sanctioned persons* – Ekaterina Viktorovna POTANINA, wife of Vladimir Olegovich POTANIN; Ivan Vladimirovich POTANIN, son of Vladimir Olegovich POTANIN; Anastasia Vladimirovna POTANINA,

[3] Muratov was previously designated on 20 June 2017 for being responsible or complicit in, or having engaged in, directly or indirectly, actions or policies that threaten the peace, security, stability, sovereignty, or territorial integrity of Ukraine and having acted or purported to act for or on behalf of, directly or indirectly, the DNR.

			daughter of Vladimir Olegovich POTANIN; Maxim Yuryevich VOROBYEV, brother of the Andrey Vorobyev; Artem Alexandrovich USS, son of Alexander Viktorovich Uss; − *6 representatives of Russia-appointed proxy authorities in Ukraine* – Andrey Anatolevich ALEKSEENKO, former Russia-appointed Chairman of the Council of Ministers of the military-civilian administration in the Kharkiv Region of Ukraine and recently appointed as the new so-called "head" of the Russia-appointed authorities in the Kherson region; Gennadiy Oleksandrovych GARKUSHA, Russia-appointed commander of the Berkut police battalion in the Kherson region of Ukraine, which was recreated by Russia-installed authorities as part of the police force in then-Russia-controlled Kherson city and was tasked with repressing resistance to Russia's forces and intimidating residents of Russia-controlled regions in southern Ukraine; Volodymyr Vitalyovych LIPANDIN, Russia-appointed chief of police of the city of Kherson while it was still under Russia's control; Oleksii Oleksandrovych DYKIY, so-called "Minister of Internal Affairs" of the self-proclaimed Donetsk People's Republic, who led a battalion known as the "Operational Combat Tactical Formation" that fought in Mariupol and oversees the operations of filtration camps that facilitate the forced relocation of Ukraine's citizens to Russia; Volodymyr Mykhailovych BOBRYSHEV, Russia-appointed Head of the Human Resources Department of the so-called Kherson Region Ministry of Internal Affairs during Russia's control of the city of Kherson; Kateryna Yuriivna GUBAREVA, Russia-appointed deputy head and chief of staff for Russia's military-civilian administration in the Kherson region of Ukraine.
6 Jan 2023	Iran	OFAC	7 executives and board members of Iranian entities: − 6 executives and board members of Qods Aviation Industries (QAI), a key Iranian defense manufacturer responsible for the design and production of unmanned aerial vehicles (UAVs) – Seyed Hojatollah GHOREISHI, Chairman of the Board of Directors of QAI, head of the Supply, Research, and Industry Affairs section of the Ministry of Defense and Armed Forces Logistics (MODAFL), and Deputy Minister of Defense, which led Iran's military R&D efforts and was responsible for negotiating Iran's agreement with Russia for the supply of Iranian UAVs for Russia's war in Ukraine; Ghassem DAMAVANDIAN, Managing Director and a member of the board of QAI, which facilitated QAI's supply of UAVs to Iranian military services and training of Russian personnel on the use of QAI-manufactured UAVs; Hamidreza SHARIFI-TEHRANI, primary member of the Board of Directors of QAI, which was involved in the supply of UAVs and related equipment to Iranian military services; Vali ARLANIZADEH, member of the Board of Directors for QAI; Reza KHAK, member of the Board of Directors for QAI; Majid Reza NIYAZI-ANGILI, member of the Board of Directors for QAI. − Nader Khoon SIAVASH, Director of Iran's Aerospace Industries Organization (AIO), which oversees AIO's ballistic missile production and testing and deals with international suppliers
26 Jan 2023	Russia	OFAC	8 individuals: − *3 businesspersons* - Alan Valeryevich LUSHNIKOV, the largest shareholder and president of the U.S.-designated Kalashnikov Concern; Rustam Nurgaliyevich MINNIKHANOV, Chairman of the board of U.S.-designated Tupolev PJSC, which produces strategic bombers for Russia's armed forces; Yan Valentinovich NOVIKOV, Director General and CEO of Almaz-Antey; − *1 family member of previously sanctioned person* - Gulsina Akhatovna MINNIKHANOVA, wife of Rustam Minnikhanov; − *2 individuals who supported the Wagner Group's military operations* - Aleksandr Aleksandrovich IVANOV, director of the Officer's Union for International Security; Valery Nikolayevich ZAKHAROV, Wagner Group employee, who served as the National Security Advisor to the President of Central African Republic; − *2 officials of the Administration of the President of Russia* - Aleksandr Dmitrievich KHARICHEV, Head of the Division of Operation of the State Council in the Administration of the President of Russia, which was tasked with hiring personnel to administer Russia-occupied areas of Ukraine's Donbas region; Boris Yakovlevich RAPOPORT, Deputy head of the Division of Operation of the State Council in the Administration of the President of Russia which was engaged in nefarious activity on behalf of the Kremlin, including supporting electoral campaigns of Kremlin-backed candidates and implementing Kremlin policy related to self-proclaimed breakaway republics in Ukraine and Georgia, preparing the sham annexation referendums in the Donetsk, Kherson, Luhansk, and Zaporizhzhia oblasts of Ukraine.
26 Jan 2023	Russia	Department of State	10 individuals:

			− *2 businesspersons* - Sergei Nikolaevich ADONEV, Russian businessman who acts as a financier to Russian President Vladimir Putin and Rostec State Corporation head Sergei Chemezov; Sergey Leonidovich BATEKHIN, CEO of Interros; − *2 family members of previously sanctioned person* - Filipp Sergeevich ADONYEV, son of Sergei Adonev; Luka Sergeevich ADONYEV, son of Sergei Adonev; − *3 officials of the Russian Federal Penitentiary Service involvee in the recruitment of Russian prisoners to the Wagner Group* – Dmitriy Nikolaevich BEZRUKIKH, Head of the Office of the Federal Penitentiary Service for the Rostov Region; Arkadiy Aleksandrovich GOSTEV, Director of the Federal Penitentiary Service; Ivan Pavlovitch PROKOPENKO, Head of the Tula Federal Penitentiary Service; − *1 Russian government official* – Andrey Vladimirovich BUROV, Chairperson of Rostov Regional Election Commission, responsible for facilitating illegitimate referendums in the occupied regions of Ukraine; − *1 member of the GoR* – Denis Valentinovich, MANTUROV, Deputy Prime Minister and Minister of Industry and Trade which oversees Russia's defense industry and the production of war materiel for Russia's use in Ukraine; − *1 member of Wagner group* - Aleksei Alekseevich MALYAREVICH, the founder and CEO of Charter Green Light.

United Kingdom

Date	Target country	Description
2 Nov 2022	Russia	4 oligarchs who have enabled Putin to mobilise Russian industries to support his military effort – Alexander Grigoryevich ABRAMOV**,** former non-executive director of Evraz PLC, an entity carrying on business in the extractive sector, the transport sector, and the construction sector; Alexander Vladimirovich FROLOV**,** former director and former CEO of Evraz PLC, an entity carrying on business in the extractive sector, the transport sector, and the construction sector; Airat Mintimerovich SHAIMIEV, CEO and a member of the board of directors of OAO Tatavtodor, a state-owned transport and construction company which is engaged in the construction and servicing of public highways in Russia; Albert Kashafovich SHIGABUTDINOV, General Director and CEO of the AO TAIF Group of companies, which comprises companies operating in the Russian energy, financial services and information, communications and digital technologies sectors.
30 Nov 2022	Russia	22 Russian officials who have promoted and enforced mobilisation of citizens to fight in Russia's war on Ukraine and those who organised the sham referendums in the four temporarily occupied areas of Ukraine: − 1 member of the GoR – Denis Valentinovich MANTUROV, Deputy Prime Minister and Minister of Industry and Trade who is responsible for overseeing the Russian weapons industry and responsible for equipping mobilised troops; − 10 governors and regional heads: ○ 8 governors – Alexander Leonidovich BURKOV (Omsk Region); Andrei Vladimirovich CHIBIS (Murmansk region); Vyacheslav Vladimirovich GLADKOV (Belgorod); Vasily Yuryevich GOLUBEV (Rostov region); Veniamin Ivanovich KONDRATYEV, Governor of Krasnodar Territory; Alexander Vitalyevich TSYBULSKY (Arkhangelsk Region); Sergey Alimovich MELIKOV (Dagestan); Sergey Konstantinovich NOSOV (Magadan); ○ 2 heads of regions – Mahmud-Ali Maksharipovich KALIMATOV (Republic of Ingushetia); Batu Sergeyevich KHASIKOV (Republic Kalmykia); − 3 officials of the penitentiary entities, which worked closely with oligarch Yevgeny Prigozhin, head of the Wagner Group, to fill the ranks of the mercenary gang that is supporting Russia's army in Ukraine – Dmitry Nikolaevich BEZRUKIKH, Head of the Russian Federal Penitentiary Service for the Rostov Region; Arkady Alexandrovich GOSTEV, Director of the Russian Federal Penitentiary Service, which also supported the recruitment of prisoners into Wagner Group; Ivan Pavlovich PROKOPENKO, Head of the Tula Federal Penitentiary Service; − 5 military officials (military commissars) – Maxim Alexandrovich LOKTEV, Military Commissar of Moscow; Marat Khamitovich USMANOV, Military Commissar of Altai Territory; Igor Anatolievich YEGOROV, Military Commissar of Rostov Region; Oleg Mikhailovich DENISENKO, Military Commissar of the Republic of Altai; Yuriy BOYCHENKO, Military Commissar of Kaliningrad region; − other individual facilitating mobilization – Jahongir Orifovich JALOLOV, Chairperson of Central Asian Society of Uzbeks of the Perm Territory; − *2 representatives of election commissions* who were responsible for organising the sham referendums in the four temporarily occupied areas of Ukraine – Andrey Vladimirovich BUROV, Chairperson of Rostov Regional Election Commission; Ella Aleksandrovna PAMFILOVA, Chairperson of the Central Election Committee.

9 Dec 2022	Russia	5 Russian individuals: − *4 Russian people as alleged human rights violators* – Artur Rinatovich SHAMBAZOV, FSB officer which tortured Ukrainian political prisoner Oleksandr Kostenko; Andrey Vyacheslavovich TISHENIN, major, operational authorized officer of the 1st Directorate of the Service for the Protection of the Constitutional Order and Combating Terrorism of the Directorate of the Federal Security Service (FSB) of Russia for the Republic of Crimea and Sevastopol, involved in the torture of Oleksandr Kostenko following the Maidan protests in 2014; Valentin Aleksandrovich OPARIN, Investigator, Deputy Head of the 534th Military Investigation Department of the Armed Forces of the Black Sea Fleet of Russia involved in torture or cruel, inhuman or degrading treatment of Oleg Senstov and Oleksandr Kolchenko whilst in custody in 2014 and 2015 respectively; Oleg Vladimirovich TKACHENKO, Head of the Department for Public Prosecutors for the Rostov region which recklessly failed to use his powers to investigate or prosecute credible claims of torture. − *1 military official* – Ramil Rakhmatulovich Ibatullin, Colonel, commander of the 90th Tank Division.
13 Dec 2022	Russia / Iran	15 individuals in response to Russia's continued strikes on civilian infrastructure in Ukraine: − *12 Russian military officials* – Sergey Viktorovich KARAKAEV, Colonel General, Commander of Strategic Missile Forces; Mikhail Yuryevich TEPLINSKIY, Colonel General, Commander of Airborne Forces of the Armed Forces of Russia; Mikhail Mikhaylovich MATVEEVSKY, Lieutenant General, Commander of Missile Troops and Artillery; Nikolay Mikhaylovich PARSHIN, Lieutenant General, Head of the Main Rocket and Artillery Directorate of the Ministry of Defence of Russia; Alexander Semyonovich SANCHIK, Lieutenant General, Commander of the 35th Combined Arms Army; Mikhail Stepanovich ZUSKO, Lieutenant General, Chief of Staff of the Russian Forces (West) in Ukraine; Alexey Vyacheslavovich AVDEEV, Major General, Commander of the 3rd Motorized Rifle Division since Jan 2019; Robert BARANOV, Major General, Director of the Main Computation Centre of the Armed Forces of Russia (identified by a Bellingcat investigation as the commander of a unit responsible for programming and targeting Russian cruise missiles); Aleksandr Vladimirovich NOVIKOV, Major General, Head of the Department for Construction and Management of Unmanned Aerial Vehicles of the Armed Forces of Russia; Oleg Yurievich TSOKOV, Major General, Commander, 144th Motorised Rifle Division; Georgy Ivanovich SHUVAEV, Colonel, Head of Missile Troops and Artillery of the 1st Tank Army; Evgeny Nikolaevich ZHURAVLEV, Colonel, Commander of the 4th Tank Division; − *1 Iranian businessperson* – Yousef ABOUTALEBI, Managing Director/CEO of Oje Parvaz Mado Nafar Company (Mado Company), the company responsible for manufacturing engines for the drones which have been used by Russia in Ukraine; − *2 Iranian military officials* – Abdollah MEHRABI, Brigadier General of the Islamic Revolutionary Guard Corps (IRGC) – Chief of IRGC ASF Research and Self-Sufficiency Jihad Organisation (SSJO), co-owner/chairman of Oje Parvaz Mado Nafar Company (Mado Company), the company responsible for manufacturing engines for the drones which have been used by Russia in Ukraine; Professor Afshin Khajeh FARD, Lieutenant Brigadier General and Head of Iran Aviation Industries Organisation (IAIO).

European Union

Date	Target country	Description
14 Nov 2022	Russia	8 individuals linked to the poisoning of Alexei Navalny with a Novichok-type nerve agent on 20 August 2020. The listings include operatives and high-ranking officials of the Russian Federal Security Service (FSB) and Russian chemical weapons experts – Alexey Alexandrovich ALEXANDROV, agent of the Russian Federal Security Service (FSB) working as a Criminalistics Institute operative; Vladimir Alexandrovich PANYAEV, agent of the Russian Federal Security Service (FSB) working as a Criminalistics Institute operative; Ivan Vladimirovich OSIPOV, an agent of the Russian Federal Security Service (FSB) working as a Criminalistics Institute operative; Artur Aleksandrovich ZHIROV, chemical weapons expert and Director of SC Signal, a research institute that has been linked to Russia's chemical weapons program; Kirill Yurievich VASILIEV, Director of the Criminalistics Institute of the Russian Federal Security Service (FSB); Konstantin Borisovich KUDRYAVTSEV, chemical weapons expert and an agent of the Russian Federal Security Service (FSB) working as a Criminalistics Institute operative; Stanislav Valentinovich MAKSHAKOV, military scientist and Deputy Director of the Criminalistics Institute of the Russian Federal Security Service (FSB); Vladimir Mikhaylovich BOGDANOV, the Head of Special Technology Centre of the Russian Federal Security Service (FSB).
14 Nov 2022	Iran	2 Iranian individuals for their involvement in the development and delivery of Unmanned Aerial Vehicles to Russia – Hossein SALAMI, Major-General, Commander of the Islamic Revolutionary Guard Corps, which supervises the development of Iran's Unmanned Aerial Vehicle (UAV) programme as well as the transfer of UAVs abroad, and Amir Ali HAJIZADEH, Brigadier-General, Commander of the Islamic

		Revolutionary Guard Corps - Aerospace Force, which supervises the development of Iran's Unmanned Aerial Vehicle (UAV) programme as well as the transfer of UAVs abroad.
12 Dec 2022	Iran	4 Iranian nationals for their role in the development and delivery of Unmanned Aerial Vehicles (UAVs) used by Russia in its war against Ukraine: − *1 businessperson* – Yousef ABOUTALEBI, Managing Director of Oje Parvaz Mado Nafar Company (Mado), Iran-based company specialised in manufacturing Unmanned Aerial Vehicle (UAV) components and in importing and exporting commercial goods; − *3 military officials* – Ali Reza BALALI, Brigadier General, Officer and counsellor to the chief of the Islamic Revolutionary Guard Corps Aerospace Force (IRGC AF), Amir Ali Hajizadeh; Abdollah MEHRABI, Brigadier General, Head of the Islamic Revolutionary Guard Corps Aerospace Force (IRGC AF) Research and Self-Sufficiency Jihad Organization, former co-owner of Oje Parvaz Mado Nafar Company; Hamid VAHEDI, Brigadier General, Commander-in-Chief of the Iranian Air Force.
16 Dec 2022	Russia	141 individuals: − *8 so-called leaders and government officials in areas of Ukraine illegally occupied by Russian forces or controlled by Russian-backed proxies* – Vasiliy Viktorovich NOSKOV, deputy Minister of Culture, Sports and Youth of the so-called 'Luhansk People's Republic' (LPR) in Ukraine; Denis Sergeevich KURASHOV, Deputy Minister of Communications of the so-called People's Republic of Donetsk (DPR) appointed by the Russian government; Dmitriy Vladimirovich SHMELEV, Minister of Revenue of the so-called People's Republic of Donetsk (DPR) appointed by the Russian government; Timur SAMATOV, Minister of Industry and Trade of the so-called People's Republic of Luhansk appointed by the Russian government; Konstantin Vladimirovich ZAVIZENOV, Minister of Energy of the so-called People's Republic of Luhansk appointed by the Russian government; Andrey Leonidovich SIGUTA, Russian-appointed acting head of the military-civilian administration of the Melitopol district; Valeriy Mikhailovich PAKHNITS, Russian-appointed acting head of the administration of the Starobelsky district; Eleonora Mikhailovna FEDORENKO, Advisor on Childrens' Rights to the head of the so-called 'Donetsk People's Republic'; − *62 representatives of Russian national and regional political elite:* − *20 members of the State Duma (who on 3 October 2022 voted in favour of the illegal annexation of the regions of Donetsk, Luhansk, Kherson and Zaporizhzhia)* – Larisa Nikolayevna BURANOVA; Aleksey Anatolyevich VOLOTSKOV; Anatoly Nikolayevich GRESHNEVIKOV; Maxim Alexeyevich GULIN; Vladimir Vladimirovich GUTENEV; Elena Grigoryevna DRAPEKO; Pavel Nikolayevich ZAVALNY; Viktor Mikhailovich ZAVARZIN; Olga Nikolayevna ZANKO; Dmitry Nikolaevich KOBYLKIN; Eduard Anatolyevich KUZNETSOV; Vladimir Mikhailovich NOVIKOV; Marat Abdulkhaevich NURIEV; Dmitry Vadimovich SABLIN; Tatyana Vasilievna SOLOMATINA; Andrey Nikolayevich SVINTSOV; Valentina Vladimirovna TERESHKOVA; Alexander Romanovich TOLMACHEV; Anastasia Olegovna UDALTSOVA; Saygidpasha Darbishevich UMAKHANOV.; − *22 members of the Federation Council (who on 4 October 2022 ratified the four treaties between the Russian Federation and the Donetsk People's Republic, the Luhansk People's Republic, the Zaporizhzhia region, and the Kherson region, and their admission to Russia)* – Elena Osipovna AVDEEVA; Sergey Fateyevich BRILKA; Dmitry Yuryevich VASILENKO; Maxim Gennadyevich KAVDZHARADZE; Arsen Bashirovich KANOKOV; Viktor Melkhiorovich KRESS; Sergey Nikolayevich LUKIN; Vitaliy Viktorovich NAZARENKO; Iliyas Magomed-Salamovich UMAKHANOV; Andrey Ivanovich DENISOV; Alexander Arkadyevich ZHUKOV; Alexander Nikolayevich NEKRASOV; Igor Vladimirovich PANCHENKO; Viktor Anatolyevich SHEPTIY; Andrey Stanislavovich SHOKHIN; Nikolay Viktorovich LYUBIMOV; Vladimir Alexeyevich CHIZHOV; Alexander Vladimirovich SHENDERYUK-ZHIDKOV; Valery Vasilyevich RADAYEV; Alexander Ilyich RUSAKOV; Alexander Mikhailovich TERENTYEV; Sergey Pavlovich IVANOV. − *13 members of the GoR* – Viktoria Valerievna ABRAMCHENKO, Deputy Prime Minister of Russia, responsible for Agro-Industrial Complex, Natural Resources and Ecology; Tatyana Alexeyevna GOLIKOVA, Deputy Prime Minister of Russia responsible for social policy, labour, health and pension provision; Viktor Petrovich GOREMIYKIN, Deputy Minister of Defence of Russia and Head of the Main Military-Political Directorate of the Armed Forces of Russia, which is the central military-political management body carrying out military-patriotic work in the Armed Forces of Russia; Alexey Logvinovich OVERCHUK, Deputy Prime Minister of Russia, responsible for Eurasian integration, cooperation with the Commonwealth of Independent States, BRICS, G20, and international events; Alexander Vyacheslavovich KURENKOV, Minister for Civil Defence, Emergency Situations and Elimination of Consequences of Natural Disasters; Olga Borisovna LYUBIMOVA, Minister of Culture of Russia; Sergey Sergeyevich KRAVTSOV, Minister of Education of Russia; Valery Nikolayevich FALKOV, Minister of Science and Higher Education of Russia; Alexey Olegovich CHEKUNKOV, Minister for the Development of the Far East and the Arctic of Russia; Alexander Alexandrovich KOZLOV, Minister of Natural Resources and Ecology

		of Russia; Maksut Igoryevich SHADAYEV, Minister of Digital Development, Communications and Mass Communications of Russia; Anton Olegovich KOTYAKOV, Minister of Labour and Social Protection of Russia; Konstantin Anatolyevich CHUYCHENKO, Minister of Justice of Russia; − *7 governors* – Igor Yuryevich BABUSHKIN, Astrakhan Oblast; Andrey Vladimirovich CHIBIS, Murmansk Oblast; Gleb Sergeevich NIKITIN, Nizhny Novgorod Oblast; Igor Mikhaylovich RUDENYA, Tver Oblast; Vladislav Valerievich SHAPSHA, Kaluga Oblast; Andrey Alexandrovich TRAVNIKOV, Novosibirsk Oblast; Andrey Yuryevich VOROBYOV, Moscow Oblast; − *35 military/defense officials* – 4 member of the 'Coordination Council under the Government of the Russian Federation to meet the needs of the Armed Forces of the Russian Federation, other troops, military formations and bodies' – Daniil Vyacheslavovich EGOROV; Viktor Vasilevich ZOLOTOV; Aleksandr Leonidovich LINETS; Maksim Stanislavovich ORESHKIN; 31 members and Commanders of the Missile Pre-Planning unit at the Main Computing Centre of the General Staff (GVC) of Russia's Armed Forces General Staff – Georgiy STAROSTIN, Captain; Sergey ILIN, Captain; Yuriy NIKONOV, Captain; Ekaterina CHUGUNOVA, Lieutenant; Igor GROZA, Lieutenant; Ivan POPOV, Major; Matvey Andreevich LIYBAVIN, Major; Roman KUROCHKIN, Major; Dmitri TIKHONOV, Senior Lieutenant; Nikolay TARASOV, Senior Lieutenant; Anton SHATUN, Captain; Alexey BETEKHTIN, Captain; Anton CHULIKOV, Captain; Artyom CHERNOV, Captain; Stanislav MINKOV, Captain; Alexey VOLKOV, Lieutenant; Andrey IVANYUTIN, Major; Olga PISMENSKAYA, Senior Lieutenant; Pavel VASILYEV, Senior Lieutenant; Alexey MIKHAYLOV, Captain; Elvira OBUKHOVA, Captain; Pavel OBUKHOV, Captain; Vitaly YASKELAYNEN, Captain; Alexandr GREGORYAN, Lieutenant; Artyom VEDENOV, Lieutenant; Nikita POPLAVSKIY, Lieutenant; Vladimir PETROV, Lieutenant; Evgeniy KAPSHUK, Colonel, Commander of the Centre; Anton TIMOSHINOV, Lieutenant Colonel, Commander of the Centre; Igor BAGNYUK, Lieutenant Colonel, Commander of the Centre; Robert Petrovich BARANOV, Major General, Director of the Centre; − *11 disinformation and propaganda figures* – Svetlana Evgenievna BALANOVA, head of National Media Group (NMG); Mikhail Evgenievich FROLOV, editor-in-chief of REN TV; Marina Evgenievna KIM, TV presenter and politician, member of the Presidium of the Central Council of the pro-Kremlin party 'A Just Russia - Patriots - For Truth'; Boris Vyacheslavovich KORCHEVNIKOV, Russian TV presenter on the state TV channel 'Russia-1', and the general director of the ultraconservative TV channel 'Spas', which belongs to the Russian Orthodox Church; Grigoriy Viktorovich LEPSVERIDZE, Russian singer, musician, composer and music producer; Nikita Sergeyevich MIKHALKOV, Russian filmmaker, actor and public figure; Sergey Aleksandrovich MIKHEEV, political scientist and politician, member of the Central Council of the Just Russia – Patriots – For Truth party; Alexey Lvovich NIKOLOV, General Director of the Russian government-linked media organisation TV-Novosti, and of its subordinate RT news television network; Dmitriy Yuryevich PUCHKOV, propagandist and former member of the Public Council under the Ministry of Culture of the Russia; Mikhail Alexandrovich TUKMACHOV, deputy CEO of REN TV; Vladimir Vladimirovich TYULIN, CEO of ACCEPT LLC and REN TV; − *10 judges of Constitutional Court of Russia, that recognised as constitutional the 'agreements' on the admission of the Kherson and Zaporizhzhia regions, the so-called Luhansk People's Republic and the self-proclaimed Donetsk People's Republic to the Russian Federation* – Valeriy Dmitrovich ZORKIN, Chairman of the Constitutional Court of Russia; Gadis Abdullaevich GADZHIEV, Judge of the Constitutional Court of Russia; Sergey Mikhailovich KAZANTSEV, Judge of the Constitutional Court of Russia; Sergey Dmitrievich KNYAZEV, Judge of the Constitutional Court of Russia; Aleksandr Nikolaevich KOKOTOV, Judge of the Constitutional Court of Russia; Larisa Oktiabrievna KRASAVCHIKOVA, Judge of the Constitutional Court of Russia; Sergey Petrovich MAVRIN, Judge of the Constitutional Court of Russia; Nikolay Vasilievich MELNIKOV, Judge of the Constitutional Court of Russia; Lyudmila Mikhailovna ZHARKOVA, Judge of the Constitutional Court of Russia; Andrey Yurevich BUSHEV, Judge of the Constitutional Court of Russia; − *6 family members of previously sanctioned persons* – Ayshat Ramzanovna KADYROVA, the eldest daughter of Ramzan Kadyrov; Karina Ramzanovna KADYROVA, daughter of Ramzan Kadyrov; Turpal-Ali Vakhayevich IBRAGIMOV, cousin of Ramzan Kadyrov; Stepan Kirillovich KOVALCHUK, great-nephew of Yuriy Kovalchuk, Senior Vice President for Media Strategy and Service Development at VK; Tatyana Alexandrovna KOVALCHUK, wife of Yuriy Kovalchuk, co-owner of Russia's largest insurer Sogaz through the Russian investment firm Aquila Capital Group; Kirill Mikhailovich KOVALCHUK, nephew of Yuriy Kovalchuk, and President of the National Media Group (NMG); − *2 businesspeople* – Boris Yurievich KOVALCHUK, General Director and Chairman of the Management Board of PJSC Inter RAO; Igor Yurievich CHURBANOV, General Director of the Votkinsk Plant, which manufactures missiles and ammunitions for the Iskander and Tochka-U complexes;

		− *3 government officials* – Aleksey Aleksandrovich PETROV, Advisor to the Office of the Commissioner for Childrens' Rights of the Russia; Anton Vladimirovich SOLOVYOV, member of the legislative assembly in St. Petersburg and a member of the 'United Russia' party; Larisa Pavlovna FALKOVSKAYA, director of the Department of State Policy for the Protection of Childrens' Rights of the Ministry of Education of Russia; − *4 members of paramilitary organisations* – Denis Valiullovich GARIYEV, head of the 'Russian Imperial Legion', a paramilitary wing of the Russian Imperial Movement (RIM); Viktor Yuryevich ANOSOV, board member of the 'Union of Donbas Volunteers', a paramilitary organisation; Yan Igorovich PETROVSKIY, leader and commander of the Russian paramilitary group 'Task Force 'Rusich'; Stanislav Anatolyevich VOROBYOV, head of the Russian Imperial Movement, a white supremacist paramilitary organisation.

Canada

Date	Target country	Description
10 Nov 2022	Russia	23 individuals who are members of the Russian justice and security sector, including police officers and investigators, prosecutors, judges and prison officials, involved in gross and systematic human rights violations against Russian opposition leaders: − *2 members of the Russian justice and security sectors* - Vera Nikolaevna CHERVONOVA, Junior Counselor of Justice (Major) of Moscow; Mikhail Alekseevich SMIRNOV, Head of the Department of the Ministry of Internal Affairs of Russia for the Tverskaya district of Moscow; − *5 police officers and investigators* - Andrei Andreevich ZADACHIN, Senior Investigator of the Second Investigation Department (Investigation of Tax Crimes) of the Second Department for the Investigation of Particularly Important Cases (On Crimes Against State Power and in the Sphere of the Economy); Alexander Georgievich FEDORINOV, Head of the Department of the Ministry of Internal Affairs of Russia for the Brateevo District of Moscow Police, Lieutenant Colonel; Alexey ALEXANDROV, Acting Head of the Eastern Interregional Investigation Directorate on Transport of the Investigative Committee of the Russian Federation, Major General of Justice; Leonid Alekseevich SAGALAKOV, Head of the Department of the Main Directorate of the Federal Penitentiary Service of Russia for the Irkutsk region; Danila Yurievich MIKHEEV, Director of ANO "Independent Expert", Member of the Union "Interregional Association of Forensic Experts"; − *1 prosecutor* - Oleg Viktorovich ALYPOV, Golovinsky Interdistrict Prosecutor of Moscow; − *4 judges* - Elena Anatolievna LENSKAYA, Judge, Acting Chairman of the Basmanny District Court of Moscow; Diana Igorevna MISHCHENKO, Judge of the Khamovnichesky District Court of Moscow; Ilya Pavlovich KOZLOV, Judge of the Moscow City Court; Andrei Gennadievich SEDYSHEV, Judge at the Izmailovsky District Court; − *11 prison officials* - Alexander SAMOFAL, Employee of the FSB of Russia; Roman Mikhailovich MEZENTSEV, Employee of the Federal Security Service (FSB) of Russia; Konstantin Borisovich KUDRYAVTSEV, the Federal Security Service (FSB) of Russia officer, military chemist from the Institute of Criminalistics of the FSB; Valery SUKHAREV, Employee of the Federal Security Service (FSB) of Russia; Roman Saakovich SAAKYAN, Head of the Fku Ik-5 institution of the UFSIN of Russia for the Ivanovo region; Vladimir Mikhailovich BOGDANOV, Major General of the Federal Security Service (FSB) of Russia, head of the Center of special equipment - Deputy Director of the Scientific and Technical Service of the Federal Security Service (FSB) of Russia, former director of the Institute of Forensics; Stanislav Valentinovich MAKSHAKOV, Colonel, Deputy Director of the Institute of Forensics of the Federal Security Service (FSB) of Russia; Vladimir Alexandrovich PANYAEV, Employee of the Institute of Forensics of the Federal Security Service (FSB) of Russia (unit 34435); Ivan Vladimirovich OSIPOV, Operational officer of the Institute of Criminology of the Federal Security Service (FSB) of Russia (unit 34435); Aleksei Semyonovich SEDOV, Head of the 2nd Service of the Federal Security Service (FSB) of Russia (Service for the Protection of the Constitutional Order and the Fight against Terrorism); Kirill Yuryevich VASILIEV, Major General of the Federal Security Service (FSB) of Russia, director of the Institute of Forensics of the FSB.
17 Nov 2022	Belarus	22 Belarusian officials including those determined to be complicit in stationing and transporting Russian military personnel and equipment involved in the invasion of Ukraine and the attempted annexation of Ukrainian territory: − *7 representatives of Belarussian national and regional political elite* - Petr Alekseevich KIRICHENKO, Chairman of the Gomel City Executive Committee; Natalia Ivanovna KOCHANOVA, Belarusian state and political figure, Chairman of the Council of the Republic of the National Assembly of the Republic of Belarus; Nikolay Mikhailovich ROGASHCHUK, Assistant to the President of the Republic of Belarus - Inspector for the Gomel Region; Yuri Vitoldovich SHULEYKO, Chairman of the Brest Regional Executive Committee; Ivan Ivanovich KRUPKO, Chairman of the Gomel Regional Executive Committee; Oleg Alekseevich BELOKONEV, Chairman of the

		Standing Committee on National Security of the House of Representatives, former head of the General Staff of the Armed Forces of the Republic of Belarus; Vladimir Pavlovich ANDREICHENKO, Chairman of the House of Representatives of the National Assembly of Belarus. − *1 head of Belorussian SOE* - Vladimir Mikhailovich MOROZOV, Head of the Belarusian Railway; − *11 Belarusian military officials* - Vladislav Leonidovich BRUEV, Head of the Belarussian Gomel border group; Igor Viktorovich DEMIDENKO, Commander of the Western Operational Command of the Republic of Belarus; Vadim Ivanovich DENISENKO, Commander of the Special Operations Forces of the Armed Forces of the Republic of Belarus; Oleg Anatolyevich EIBATOV, Head of the Mozyr border detachment; Dmitry Yurevich GORA, Vladimir Nikolaevich KUPRIYANYUK, Chief of Staff - First Deputy Commander of the Western Operational Command of the Armed Forces of the Republic of Belarus; Chairman of the Investigative Committee of Belarus; Aleksandr Vitalyevich LOZITSKY, Commander of military unit 65408 (Luninets airfield); Andrey Yulianovych LUKYANOVICH, Colonel, Deputy Commander of the Air Force and Air Defense Forces of the Armed Forces - Head 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; Dmitry Alexandrovich VINNIKOV, Head of the Pinsk border detachment; Aleksandr Nikolaevich PASHKEVICH, Chief of staff of military unit 65408 (Luninets airfield); Yuri Nikolaevich PYZHIK, Commander of the 61st Fighter Air Base, military unit 54804, head of the Baranovichi garrison; − *1 military government officials* - Viktor Vladimirovich GULEVICH, Chief of the General Staff of the Belarussian Armed Forces - First Deputy Defence Minister of the Republic of Belarus; − *1 government official* - Aleksei Alekseevich LYAKHNOVICH, First Deputy Minister of Transport and Communications.
7 Dec 2022	Russia / Ukrainian TOT	33 current or former senior officials linked to the systematic suppression of protest and opposition to Russia's illegal war in Ukraine, forced mobilization and anti-democratic decisions of the Russian government: − *25 military/security government officials* – Oleg Pavlovich AGARKOV, Head of the Main Directorate of the Ministry of Internal Affairs of Russia for the Rostov Region; Ruslan Shakhaevich ALKHANOV, Minister of the Interior for the Chechen Republic; Vladimir Leonidovich ANDREEV, Head of the Main Directorate of the Ministry of Internal Affairs of Russia for the Krasnodar Territory, police lieutenant general; Sergey Viktorovich BACHURIN, Head of the Main Directorate of the Ministry of Internal Affairs of Russia for the North Caucasian Federal District; Oleg Anatolievich BARANOV, Head of the Main Directorate of the Ministry of Internal Affairs of Russia for Moscow; Oleg Vladimirovich BEZSMELNITSYN, Minister of Internal Affairs for the Republic of Adygea; Mikhail Anatolievich BORODIN, Head of the Directorate of the Ministry of Internal Affairs of Russia for the Voronezh region, General - Police lieutenant; Alexander Vladimirovich DEDOV, Head of the Directorate of the Ministry of Internal Affairs of Russia for the Kaluga Region, Police Major General; Pavel Ivanovich GISHCHENKO, Head of the Directorate of the Ministry of Internal Affairs of Russia for the city of Sevastopol; Mikhail Vladimirovich KOROBKIN, Minister of Internal Affairs of the Republic of Ingushetia; Viktor Anatolievich KOSAREV, Head of the Directorate of the Ministry of Internal Affairs of Russia for the Kursk region; Oleg Filippovich KUDINOV, Minister of the Interior for the Republic of Buryatia, Police Major General; Abdurashid Magomedovich MAGOMEDOV, Minister of Internal Affairs for the Republic of Dagestan, Police lieutenant general; Alexey Viktorovich OVSYANNIKOV, Head of the Directorate of the Ministry of Internal Affairs of Russia for the Pskov Region; Viktor Kuzmich PAUKOV, Head of the Main Directorate of the Ministry of Internal Affairs of Russia for the Moscow Region; Roman Yurievich PLUGIN, Head of the Main Directorate of the Ministry of Internal Affairs of Russia for St. Petersburg and the Leningrad Region; Vladimir Nikolaevich PROKOPENKO, Minister of the Interior for the Republic of Sakha (Yakutia), Police Major General; Igor Konstantinovich ROMASHKIN, Head of the Directorate of the Ministry of Internal Affairs of Russia for the Astrakhan Region; Valery Alexandrovich SARZHIN, Head of the Directorate of the Ministry of Internal Affairs of Russia for the Smolensk Region; Yury Nikolaevich SAVENKOV, Head of the Directorate of the Ministry of Internal Affairs of Russia for the Orel Region; Andrey Fyodorovich SERGEEV, Minister of Internal Affairs for the Republic of North Ossetia – Alania; Alexander Nikolaevich SOKRUTENKO, Head of the Directorate of the Ministry of Internal Affairs of Russia for the Kaliningrad region; Vladislav Alexandrovich TOLKUNOV, Head of the Directorate of the Ministry of Internal Affairs of Russia for the Bryansk Region; Vasily Petrovich UMNOV, Head of the Directorate of the Ministry of Internal Affairs of Russia for the Belgorod Region; Dmitry Yurievich VELMOZHKO, Head of the Main Directorate of the Ministry of Internal Affairs of Russia for the Volgograd Region; − *1 government official* – Igor Vyacheslavovich BARINOV, Head of the Federal Agency for Ethnic Affairs (FAEA of Russia); − *5 members of Federal Penitentiary Service* - Arkady Alexandrovich GOSTEV, Director of the Federal Penitentiary Service; Valeriy Gennadyevich BOYARINEV, Deputy Director of the Federal Penitentiary Service of Russia; Aleksandr Vladimirovich KHABAROV,

		Deputy Director of the Federal Penitentiary Service of Russia; Rustam Alievich STEPANENKO, Deputy Director of the Federal Penitentiary Service of Russia; Aleksandr Nikolayevich ROZIN, Deputy Director of the Federal Penitentiary Service (FSIN), former Chief Inspector of the Ministry of Internal Affairs; − *2 so-called leaders in areas of Ukraine illegally occupied by Russian forces or controlled by Russian-backed proxies* - Pavel Leonidovich KARANDA, "Deputy Minister of Internal Affairs of the Republic of Crimea - Chief of Police, Major General of Police"; Sergei Nikolayevich DUBINSKY, Head of the Intelligence Directorate of the General Staff of the Ministry of Defense of the so-called "DPR", a member of the "Union of Donbass Volunteers". These measures are part of a larger effort by Canada to target those who are believed to be involved in human rights *violations* around the world, with a total of 67 individuals and 9 entities being targeted under these measures.

Japan

Date	Target country	Description
27 Jan 2023	Russia / Ukrainian TOT	36 individuals: ● 22 individuals: – 1 government official – Maria LVOVA-BELOVA, Presidential Commissioner for Children's Rights of Russia; – 2 military officials – Mikhail MIZINTSEV, Deputy Minister of Defence of Russia, Colonel General; Sergey RYZHKOV, Lieutenant General of the Russian armed forces and Commander of the 41st combined Arms Army; – 2 propagandists – Aleksandr DUGIN, Political philosopher; Alexander MALKEVICH, First Deputy Chairman of the Commission of the Civic Chamber of Russia for the Development of the Information Society, Mass Media and Mass Communications; – 5 family members of previously sanctioned person – Nariman GADZHIEV, nephew of Suleiman Kerimov; Said KERIMOV, son of Suleiman Kerimov; Amina KERIMOVA, daughter of Suleiman Kerimov; Firuza KERIMOVA, wife of Suleiman Kerimov; Gulnara KERIMOVA, daughter of Suleiman Kerimov; – 6 businesspersons – Murat ALIEV, Chairman of the Board of Directors LLC "Bonum Capital"; Mikhail PAVLYUK, CEO of AO PKK Milandr; Sergei KOGOGIN, KAMAZ's General Director and Chairman of the Management Board; Andrey GURYEV, Former CEO and Chairman of the Management Board of PJSC PhosAgro; Alexander PONOMARENKO, Former Chairman of the Board of Sheremetyevo International Airport; Andrey MELNICHENKO, Former director of JSC SUEK; – 3 members of the GoR – Andrey BELOUSOV, First Deputy Prime Minister of Russia; Dmitry CHERNYSHENKO, Deputy Prime Minister of Russia for Tourism, Sport, Culture and Communications and member of the Board of Directors of the Russian Railways; Konstantin CHUYCHENKO, Deputy Prime Minister of Russia and Presidential Plenipotentiary Envoy to the Far Eastern Federal District; – 3 members of the Russian Central Election Commission – Ella PAMFILOVA, Chairperson of the Central Election Commission (CEC) of Russia; Nikolay BULAEV, Deputy chairman of the Central Election Commission (CEC) of Russia; Nikolay LEVICHEV, Member of the Central Election Commission (CEC) of Russia; ● 14 individuals directly involved in the annexation of Crimea or the destabilization of Eastern Part of Ukraine, and those directly involved in in the purported "incorporation" of Eastern and Southern regions of Ukraine by Russia: – 12 so-called leaders in areas of Ukraine illegally occupied by Russian forces or controlled by Russian-backed proxies – Volodymyr BESPALOV, self-proclaimed "Minister of Domestic Policy of the Kherson military-civilian Administration"; Victor YEMELYANENKO, self-proclaimed "Deputy head of the Zaporozhye military-civilian administration"; Pavlo FILIPCHUK, self-proclaimed "Head of the Kakhovka administration"; Valery PAKHNYTS, self-proclaimed "Acting head, first deputy head of the Starobilsk administration"; Ihor SEMENCHEV, member of the "Rescue Committee for Peace and Order"; Hennadiy SHELESTENKO, journalist, self-proclaimed "Member of the Kherson military-civilian administration"; Andriy TROFIMOV, self-proclaimed "Deputy head of the Zaporozhye military-civilian administration"; Tetyana TOMILINA, self-proclaimed "Rector of Kherson State University"; Vladyslav KUZNETSOV, self-proclaimed "First Deputy Chairman of the Government of the Luhansk People's Republic"; Yevhen SOLNTSEV, self-proclaimed "First Deputy Chairman of the Government of the Donetsk People's Republic"; Oleksandr KOSTOMAROV, self-proclaimed "First Deputy Head of the Administration of the Head of the Donetsk People's Republic"; Andriy PINCHUK, self-proclaimed Former "State Security Minister of the Donetsk People's Republic"; – 2 Ukrainian traitor businesspersons – Oleksandr YANUKOVYCH, owner of JSC Mako Holding; Serhiy KURCHENKO, owner of Gaz-Alliance.

Australia

Date	Target country	Description
8 Dec 2022	Iran	3 Iranian military officials involved in the supply of Iranian Unmanned Aerial Vehicles ('UAVs') to Russia for use in its war against Ukraine – Mohammad Hossein BAGHERI, Major-General, Chief of Staff of Iran's Armed Forces; Saeed AGHAJANI, Brigadier-General, Commander of the Islamic Revolutionary Guard Corps - Aerospace Force (IRGC ASF) UAV Command; Amir Ali HAJIZADEH, Brigadier-General, Commander of the Islamic Revolutionary Guard Corps - Aerospace Force.

New Zealand

Date	Target country	Description
21 Nov 2022	Russia	22 individuals of the Russian and Belarusian elite for providing material or strategic support for Russia's illegal invasion of Ukraine: Russian: − *1 Central Bank of Russia official* – Elvira Sakhipzadovna NABIULLINA, the Governor of the Central Bank of Russia; − *3 members of the GoR* – Dmitry Nikolaevich CHERNYSHENKO, Deputy Prime Minister of Russia, Member of the Board of Directors of Russian Railways; Anton Germanovich SILUANOV, Minister of Finance of Russia; Alexander Valentinovich NOVAK, Deputy Prime Minister of Russia; − Dmitry Nikolayevich KOZAK, Deputy Chief of Staff to the President of Russia; − *3 military officials* – Alexey Yurevich AVDEEV, Deputy Commander Southern Military District; Sergei Mikhailovich PINCHUK, Chief of Staff and First Deputy Commander Black Sea Fleet; Arkady Yurievich ROMANOV, Deputy Commander of the Black Sea Fleet; − *4 businesspeople* – Alexander Vladimirovich FROLOV, Shareholder of Evraz plc, former CEO of Evraz plc; Iskandar Kahramonovich MAKHMUDOV, President of Ural Mining and Metallurgical Company (UMMC); Airat Mintimerovich SHAIMIEV, Co-owner of the AO TAIF Group, CEO of state-owned transport and construction company OAO Tatavtodor; Albert Kashafovich SHIGABUTDINOV, General Director and CEO of the AO TAIF Group; − *5 family members of previously sanctioned persons* – daughters of President Putin (Maria Vladimirovna VORONTSOVA and Katerina Vladimirovna TIKHONOVA), wife and children of Putin's press secretary Dmitry Peskov (Tatiana Aleksandrovna NAVKA, Nikolay Dmitrievich PESKOV, Elizaveta Dmitriyevna PESKOVA); Belarusian: − Natalia Nikolayevna EISMONT, Press Secretary to the President of the Republic of Belarus; − *2 military officials* – Vladislav Leonidovich BRUEV, head of Belarusian Gomel Border Group; Vadim Ivanovich DENISENKO, Commander of the Special Operations Forces of the Armed Forces of the Republic of Belarus; − *2 family members of previously sanctioned persons* – Halina Rodionovna LUKASHENKO, wife of Belarusian President Alexander Lukashenko; Viktor Aliaksandravich LUKASHENKO, the eldest son of Belarusian President Alexander Lukashenko.
12 Dec 2022	Russia	23 individuals who are responsible for disinformation campaigns in support of the Russian war effort – Aleksandr Aleksandrovich ZHAROV, CEO and Member of the Board of Directors of Gazprom-Media Holding; Aleksandra Aleksandrovna KAMYSHANOVA, Editor of InfoRos; Alexander Gelyevich DUGIN, Russian political philosopher; Aleyona Anatolyevna CHUGULEVA, SouthFront Employee who has as gathered donations to maintain their operations; Anastasiya Sergeyevna KIRILLOVA, Founder and CEO of InfoRos; Andrey Grigoryevich ARESHEV, The Strategic Culture Foundation Deputy General Director; Andrey Yurevich LIPOV, Head of the Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor) of Russia; Anton Sergeyevich BESPALOV, The Strategic Culture Foundation Employee working in editing and social media operations; Denis Sergeyevich TATARCHENKO, Editor of InfoRos; Denis Yakovlevich GAFNER, SouthFront Website Manager; Igor Yurievich KOROTCHENKO, Chair of the Public Council at the Ministry of Defence of the Russian Federation, Editor-in-chief of Russia's National Defence Magazine; Irina Sergeyevna BUBNOVA, The Strategic Culture Foundation Employee working in editing and social media operations; Konstantin Lvovich ERNST, CEO of Channel One Russia; Maksim Iosifovich KRANS, InfoRos Project Director; Maksut Igorevich SHADAYEV, Minister of Digital Development, Communications and Mass Media of Russia; Nina Viktorovna DOROKHOVA, General Director of Inforos; Sergei Ivanovich SAENKO, The Strategic Culture Foundation Editor and Social Media Operator; Svetlana Georgiyevna ZAMLELOVA, Chief Editor of Journal "Kamerton"; Valeriy Ivanovich POGREBENKOV, InfoRos Employee; Valeriya KALABAYEVA, SouthFront Content Producer; Vladimir Ilich

		MAKSIMENKO, The Strategic Culture Foundation Director; Yevgeniy Eduardovich GLOTOV, Deputy Director of NewsFront; Yevgeniya Vitalyevna NEZHDANOVA, InfoRos Web Master.
14 Dec 2022	Iran	3 Iranian individuals for the supply of drones to Russia for use in its unjustified and illegal invasion of Ukraine – Saeed AGHAJANI, Brigadier-General, Commander of the Islamic Revolutionary Guard Corps - Aerospace Force UAV Command; Mohammad Hossein BAGHERI, Major-General, Chair of the Armed Forces General Staff; Amir Ali HAJIZADEH, Brigadier-General, Commander of the Islamic Revolutionary Guard Corps - Aerospace Force.
15 Dec 2022	Russia	New Zealand Designation Secretary of Foreign Affairs and Trade issued notices, entering into force on 20 December, that provide details on associates of sanctioned defence entities: − Kamaz – AO Torgovo-Finansovaya Kompaniya KAMAZ, Chelnyvodokanal OOO, JSC Begishevo Airport, JSC Krasnodarskiy Avtocentr KAMAZ, Leasing Company KAMAZ Incorporated, Mikam Holdings Limited, Nefaz Publicly Traded Company, Non-State Pension Fund First Industrial Alliance, PJSC Tutaev Motor Plant; − United Aircraft Corporation – JSC Flight Research Institute N.A. M.M. Gromov, JSC Ilyushin Finance Company, OJSC Ilyushin Aviation Complex; − Irkut Corporation – Energotsentr Irkut, Irkut-Avtotrans, Irkut-Remstroi, Irkut-Stanko Service, Sportivno-Ozdorovitelnyi Tsentr Irkut-Zenit, LLC Networking Company Irkut, Tipografiya Irkut; − Concern Avtomatika – JSC BPO Progress, JSC Kalugapribor, JSC KEMZ, JSC NPP Signal, JSC PNIEI, JSC PO Elektropribor, JSC Research and Development centre Atlas, JSC SIP RS, JSC VNII Veha, LLC Bulat, LLC National Technologies, LLC RGT, OJSC MTU Altair, OJSC SZR, PJSC I.S. Brooke INEUM, PJSC NIPS, Research Institute Masshtab; − Ruselectronics – AO Elektron Optronik, AO NauchnoIssledovatelskii Institut Promyshlennogo Televideniya Rastr, AO NauchnoIssledovatelskii Institut Sredstv Vychislitelnoi Tekhniki, AO Nauchno Proizvodstvennoe Predpriyatie Svya, AO Ryazanskii Zavod Metallokeramicheskikh Priborov, AO Spetsialnoe Konstruktorskoe Byuro Vychislitelnoi Tekhniki, AO Spetsialnoe Proektno Konstruktorskoe Byuro Sredstv Upravleniya, AO NPP Tsiklon Test, JSC Central Research Institute Cyclone, JSC Meteor Plant, JSC Plasma, JSC Russian Research Institute Electronstandart, Scientific and Research Institute Ferrit Domen, JSC Scientific and Research Institute of Electronic Engineering Materials, JSC Scientific Production Enterprise Kontakt, JSC Scientific Research Institute Giricond, JSC Scientific Research Institute Platan With Plant, JSC Scientific Research Institute of Electrical Carbon Products, JSC Special Relay System Design and Engineering Bureau, JSC Trading House Rosel; − Rostec – AO Moskovski Mashinostroitelny Eksperimentalny Zavod Kompozitsionnye Tekhnologii, AO Nauchno-Proizvodstvennoe Obedinenie Optika, AO Novosibirski Zavod Poluprovodnikovykh Priborov S OKB, AO RT-AVTO, AO RT-Biotekhprom, AO RT-Khimicheskie Tekhnologii i Kompozitsionnye Materialy, AO RT- Okhrana, AO RT-Stroitelnye Tekhnologii, AO Tsentralnoe Konstruktorskoe Byuro Spetsialnykh Radiomaterialov, JSC Information Security Reform, JSC RT-Tekhpriemka, Kontsern Aviapriborostroenie OAO, Kontsern Orion OAO, Kontsern Sirius OA, OOO Prominvest, MZ Mayak OAO, RT-Energy Efficiency LLC, OAO Kalinovski Khimicheski Zavod, OAO Kontsern Aviatsionnoe Oborudovanie, OAO Novo-Vyatka, OAO Novovyatski Mekhanicheski Zavod, OAO Tekhnologii Bezopasnosti, OAO RT-Stankoinstrument, OAO Vneshneekonomicheskoe Obedinenie Stankoimport, OAO Vneshneekonomicheskoe Obedinenie Tekhnopromeksport, RT-Business Development, RT-Capital LLC, RT-Inform LLC, RT - Globalnye Resursy OOO, RT-Metallurgiya OAO, RT - Project Technology OJSC, Tekhnodinamika Holding, United Instrument Manufacturing Corporation, Concern Radio-Electronic Technologies, VSMPO-Avisma, Uralvagonzavod, 90 Eksperimentalny Zavod OAO.

Switzerland

Date	Target country	Description
8 Dec 2022	Iran	2 Iranian military officials which had already been designated by the EU on 14 November 2022 for their role in the development and supply of unmanned aerial vehicles to Russia –Hossein SALAMI, Major-General, Commander of the Islamic Revolutionary Guard Corps, which supervises the development of Iran's Unmanned Aerial Vehicle (UAV) programme as well as the transfer of UAVs abroad; Amir Ali HAJIZADEH, Brigadier-General, Commander of the Islamic Revolutionary Guard Corps - Aerospace Force, which supervises the development of Iran's Unmanned Aerial Vehicle (UAV) programme as well as the transfer of UAVs abroad.
20 Dec	Russia /	145 individuals, who are Iranian military officials that support the delivery of drones to Russia as well as individuals involved in attacks on

2022 (effective of 21 Dec 2022)	Ukrainian TOT / Iran	the civilian population and infrastructure and the illegal annexation of Ukraine's Donetsk, Luhansk, Zaporizhia and Kherson regions: − *1 Iranian businessperson* – Yousef ABOUTALEBI, Managing Director of Oje Parvaz Mado Nafar Company (Mado), Iran-based company specialised in manufacturing Unmanned Aerial Vehicle (UAV) components and in importing and exporting commercial goods; − *3 Iranian military officials* – Ali Reza BALALI, Brigadier General, Officer and counsellor to the chief of the Islamic Revolutionary Guard Corps Aerospace Force (IRGC AF), Amir Ali Hajizadeh; Abdollah MEHRABI, Brigadier General, Head of the Islamic Revolutionary Guard Corps Aerospace Force (IRGC AF) Research and Self-Sufficiency Jihad Organization, former co-owner of Oje Parvaz Mado Nafar Company; Hamid VAHEDI, Brigadier General, Commander-in-Chief of the Iranian Air Force. − *8 so-called leaders and government officials in areas of Ukraine illegally occupied by Russian forces or controlled by Russian-backed proxies* – Vasiliy Viktorovich NOSKOV, Deputy Minister of Culture, Sports and Youth of the so-called 'Luhansk People's Republic' (LPR) in Ukraine; Denis Sergeevich KURASHOV, Deputy Minister of Communications of the so-called People's Republic of Donetsk (DPR) appointed by the Russian government; Dmitriy Vladimirovich SHMELEV, Minister of Revenue of the so-called People's Republic of Donetsk (DPR) appointed by the Russian government; Timur SAMATOV, Minister of Industry and Trade of the so-called People's Republic of Luhansk appointed by the Russian government; Konstantin Vladimirovich ZAVIZENOV, Minister of Energy of the so-called People's Republic of Luhansk appointed by the Russian government; Andrey Leonidovich SIGUTA, Russian-appointed acting head of the military-civilian administration of the Melitopol district; Valeriy Mikhailovich PAKHNITS, Russian-appointed acting head of the administration of the Starobelsky district; Eleonora Mikhailovna FEDORENKO, Advisor on Childrens' Rights to the head of the so-called 'Donetsk People's Republic'; − *62 representatives of Russian national and regional political elite:* − *20 members of the State Duma (who on 3 October 2022 voted in favour of the illegal annexation of the regions of Donetsk, Luhansk, Kherson and Zaporizhzhia)* – Larisa Nikolayevna BURANOVA; Aleksey Anatolyevich VOLOTSKOV; Anatoly Nikolayevich GRESHNEVIKOV; Maxim Alexeyevich GULIN; Vladimir Vladimirovich GUTENEV; Elena Grigoryevna DRAPEKO; Pavel Nikolayevich ZAVALNY; Viktor Mikhailovich ZAVARZIN; Olga Nikolayevna ZANKO; Dmitry Nikolaevich KOBYLKIN; Eduard Anatolyevich KUZNETSOV; Vladimir Mikhailovich NOVIKOV; Marat Abdulkhaevich NURIEV; Dmitry Vadimovich SABLIN; Tatyana Vasilievna SOLOMATINA; Andrey Nikolayevich SVINTSOV; Valentina Vladimirovna TERESHKOVA; Alexander Romanovich TOLMACHEV; Anastasia Olegovna UDALTSOVA; Saygidpasha Darbishevich UMAKHANOV.; − *22 members of the Federation Council (who on 4 October 2022 ratified the four treaties between the Russian Federation and the Donetsk People's Republic, the Luhansk People's Republic, the Zaporizhzhia region, and the Kherson region, and their admission to Russia)* – Elena Osipovna AVDEEVA; Sergey Fateyevich BRILKA; Dmitry Yuryevich VASILENKO; Maxim Gennadyevich KAVDZHARADZE; Arsen Bashirovich KANOKOV; Viktor Melkhiorovich KRESS; Sergey Nikolayevich LUKIN; Vitaliy Viktorovich NAZARENKO; Iliyas Magomed-Salamovich UMAKHANOV; Andrey Ivanovich DENISOV; Alexander Arkadyevich ZHUKOV; Alexander Nikolayevich NEKRASOV; Igor Vladimirovich PANCHENKO; Viktor Anatolyevich SHEPTIY; Andrey Stanislavovich SHOKHIN; Nikolay Viktorovich LYUBIMOV; Vladimir Alexeyevich CHIZHOV; Alexander Vladimirovich SHENDERYUK-ZHIDKOV; Valery Vasilyevich RADAYEV; Alexander Ilyich RUSAKOV; Alexander Mikhailovich TERENTYEV; Sergey Pavlovich IVANOV. − *13 members of the GoR* – Viktoria Valerievna ABRAMCHENKO, Deputy Prime Minister of Russia, responsible for Agro-Industrial Complex, Natural Resources and Ecology; Tatyana Alexeyevna GOLIKOVA, Deputy Prime Minister of Russia responsible for social policy, labour, health and pension provision; Viktor Petrovich GOREMIYKIN, Deputy Minister of Defence of Russia and Head of the Main Military-Political Directorate of the Armed Forces of Russia, which is the central military-political management body carrying out military-patriotic work in the Armed Forces of Russia; Alexey Logvinovich OVERCHUK, Deputy Prime Minister of Russia, responsible for Eurasian integration, cooperation with the Commonwealth of Independent States, BRICS, G20, and international events; Alexander Vyacheslavovich KURENKOV, Minister for Civil Defence, Emergency Situations and Elimination of Consequences of Natural Disasters; Olga Borisovna LYUBIMOVA, Minister of Culture of Russia; Sergey Sergeyevich KRAVTSOV, Minister of Education of Russia; Valery Nikolayevich FALKOV, Minister of Science and Higher Education of Russia; Alexey Olegovich CHEKUNKOV, Minister for the Development of the Far East and the Arctic of Russia; Alexander Alexandrovich KOZLOV, Minister of Natural Resources and Ecology of Russia; Maksut Igoryevich SHADAYEV, Minister of Digital Development, Communications and Mass Communications of Russia; Anton Olegovich KOTYAKOV, Minister of Labour and Social Protection of Russia; Konstantin Anatolyevich CHUYCHENKO, Minister of Justice of Russia;

		− *7 governors* – Igor Yuryevich BABUSHKIN, Astrakhan Oblast; Andrey Vladimirovich CHIBIS, Murmansk Oblast; Gleb Sergeevich NIKITIN, Nizhny Novgorod Oblast; Igor Mikhaylovich RUDENYA, Tver Oblast; Vladislav Valerievich SHAPSHA, Kaluga Oblast; Andrey Alexandrovich TRAVNIKOV, Novosibirsk Oblast; Andrey Yuryevich VOROBYOV, Moscow Oblast; − *35 military/defense officials* – 4 member of the 'Coordination Council under the Government of the Russian Federation to meet the needs of the Armed Forces of the Russian Federation, other troops, military formations and bodies' – Daniil Vyacheslavovich EGOROV; Viktor Vasilevich ZOLOTOV; Aleksandr Leonidovich LINETS; Maksim Stanislavovich ORESHKIN; 31 members and Commanders of the Missile Pre-Planning unit at the Main Computing Centre of the General Staff (GVC) of Russia's Armed Forces General Staff – Georgiy STAROSTIN, Captain; Sergey ILIN, Captain; Yuriy NIKONOV, Captain; Ekaterina CHUGUNOVA, Lieutenant; Igor GROZA, Lieutenant; Ivan POPOV, Major; Matvey Andreevich LIYBAVIN, Major; Roman KUROCHKIN, Major; Dmitri TIKHONOV, Senior Lieutenant; Nikolay TARASOV, Senior Lieutenant; Anton SHATUN, Captain; Alexey BETEKHTIN, Captain; Anton CHULIKOV, Captain; Artyom CHERNOV, Captain; Stanislav MINKOV, Captain; Alexey VOLKOV, Lieutenant; Andrey IVANYUTIN, Major; Olga PISMENSKAYA, Senior Lieutenant; Pavel VASILYEV, Senior Lieutenant; Alexey MIKHAYLOV, Captain; Elvira OBUKHOVA, Captain; Pavel OBUKHOV, Captain; Vitaly YASKELAYNEN, Captain; Alexandr GREGORYAN, Lieutenant; Artyom VEDENOV, Lieutenant; Nikita POPLAVSKIY, Lieutenant; Vladimir PETROV, Lieutenant; Evgeniy KAPSHUK, Colonel, Commander of the Centre; Anton TIMOSHINOV, Lieutenant Colonel, Commander of the Centre; Igor BAGNYUK, Lieutenant Colonel, Commander of the Centre; Robert Petrovich BARANOV, Major General, Director of the Centre; − *11 disinformation and propaganda figures* – Svetlana Evgenievna BALANOVA, head of National Media Group (NMG); Mikhail Evgenievich FROLOV, editor-in-chief of REN TV; Marina Evgenievna KIM, TV presenter and politician, member of the Presidium of the Central Council of the pro-Kremlin party 'A Just Russia - Patriots - For Truth'; Boris Vyacheslavovich KORCHEVNIKOV, Russian TV presenter on the state TV channel 'Russia-1', and the general director of the ultraconservative TV channel 'Spas', which belongs to the Russian Orthodox Church; Grigoriy Viktorovich LEPSVERIDZE, Russian singer, musician, composer and music producer; Nikita Sergeyevich MIKHALKOV, Russian filmmaker, actor and public figure; Sergey Aleksandrovich MIKHEEV, political scientist and politician, member of the Central Council of the Just Russia – Patriots – For Truth party; Alexey Lvovich NIKOLOV, General Director of the Russian government-linked media organisation TV-Novosti, and of its subordinate RT news television network; Dmitriy Yuryevich PUCHKOV, propagandist and former member of the Public Council under the Ministry of Culture of the Russia; Mikhail Alexandrovich TUKMACHOV, deputy CEO of REN TV; Vladimir Vladimirovich TYULIN, CEO of ACCEPT LLC and REN TV; − *10 judges of Constitutional Court of Russia, that recognised as constitutional the 'agreements' on the admission of the Kherson and Zaporizhzhia regions, the so-called Luhansk People's Republic and the self-proclaimed Donetsk People's Republic to the Russian Federation* – Valeriy Dmitrovich ZORKIN, Chairman of the Constitutional Court of Russia; Gadis Abdullaevich GADZHIEV, Judge of the Constitutional Court of Russia; Sergey Mikhailovich KAZANTSEV, Judge of the Constitutional Court of Russia; Sergey Dmitrievich KNYAZEV, Judge of the Constitutional Court of Russia; Aleksandr Nikolaevich KOKOTOV, Judge of the Constitutional Court of Russia; Larisa Oktiabrievna KRASAVCHIKOVA, Judge of the Constitutional Court of Russia; Sergey Petrovich MAVRIN, Judge of the Constitutional Court of Russia; Nikolay Vasilievich MELNIKOV, Judge of the Constitutional Court of Russia; Lyudmila Mikhailovna ZHARKOVA, Judge of the Constitutional Court of Russia; Andrey Yurevich BUSHEV, Judge of the Constitutional Court of Russia; − *6 family members of previously sanctioned persons* – Ayshat Ramzanovna KADYROVA, the eldest daughter of Ramzan Kadyrov; Karina Ramzanovna KADYROVA, daughter of Ramzan Kadyrov; Turpal-Ali Vakhayevich IBRAGIMOV, cousin of Ramzan Kadyrov; Stepan Kirillovich KOVALCHUK, great-nephew of Yuriy Kovalchuk, Senior Vice President for Media Strategy and Service Development at VK; Tatyana Alexandrovna KOVALCHUK, wife of Yuriy Kovalchuk, co-owner of Russia's largest insurer Sogaz through the Russian investment firm Aquila Capital Group; Kirill Mikhailovich KOVALCHUK, nephew of Yuriy Kovalchuk, and President of the National Media Group (NMG); − *2 businesspeople* – Boris Yurievich KOVALCHUK, General Director and Chairman of the Management Board of PJSC Inter RAO; Igor Yurievich CHURBANOV, General Director of the Votkinsk Plant, which manufactures missiles and ammunitions for the Iskander and Tochka-U complexes; − *3 government officials* – Aleksey Aleksandrovich PETROV, Advisor to the Office of the Commissioner for Childrens' Rights of the Russia; Anton Vladimirovich SOLOVYOV, member of the legislative assembly in St. Petersburg and a member of the 'United Russia' party; Larisa Pavlovna FALKOVSKAYA, director of the Department of State Policy for the Protection of Childrens' Rights of the Ministry of Education of Russia;

		− *4 members of paramilitary organisations* – Denis Valiullovich GARIYEV, head of the 'Russian Imperial Legion', a paramilitary wing of the Russian Imperial Movement (RIM), which is actively fighting in the war of aggression against Ukraine on behalf of Russia; Viktor Yuryevich ANOSOV, board member of the 'Union of Donbas Volunteers', a paramilitary organisation that actively fights alongside the Russian armed forces in Russia's war of aggression against Ukraine; Yan Igorovich PETROVSKIY, leader and commander of the Russian paramilitary group 'Task Force 'Rusich', which maintains links to Russian private military company Wagner Group; Stanislav Anatolyevich VOROBYOV, head of the Russian Imperial Movement, a white supremacist paramilitary organisation that is actively fighting in Ukraine on behalf of the Russian government.

Poland

Date	Target country	Description
22 Nov 2022	Russia / Belarus	18 individuals (6 Russian and 12 Belarussian) to the list of foreigners whose stay on the territory of the Republic of Poland is undesirable: − *6 Russian individuals who are representatives of Russia in and members of Russian delegation to the OSCE Parliamentary Assembly* – Daria BOYARSKAYA, representative of Russia in the Secretariat of the OSCE Parliamentary Assembly; Ellada FROLOVA, member of the Russian delegation to the OSCE Parliamentary Assembly, employee of the Chancellery of the Federation Council, the upper house of the Russian parliament; Elizaveta GROMOGLASOVA, member of the Russian delegation to the OSCE Parliamentary Assembly, employee of the Institute of Latin American Studies of the Russian Academy of Sciences; Anzhelika IVANISHCHEVA, employee of the OSCE Parliamentary Assembly Secretariat delegated by the Russian Federation; Sergey KARSEKA, secretary of the OSCE delegation, head of the Department for Cooperation with International Parliamentary Organizations of the State Duma of the Russian Federation; Maria ZHOLOBOVA, member of the Russian delegation to the OSCE Parliamentary Assembly; − *12 Belarussian politicians* – Konstantin DROZDOVSKY, member of the Council of the Republic of the National Assembly of the Republic of Belarus, member of the Committee on Education, Science, Culture and Social Development; Svetlana GORVAL, member of the House of the National Assembly of the Republic of Belarus, member of the Economic Policy Committee; Denis KARAS, member of the House of Representatives of the Republic of Belarus, member of the Standing Committee for Industry, Fuels, Energy, Transport and Communications; Ivan MAMAIKO, member of the House of Representatives of the Republic of Belarus, member of the National Security Committee, militia colonel; Sergei RACHKOV, member of the National Assembly of the Republic of Belarus, chairman of the Standing Committee on International Affairs and National Security; Oleg RUMMO, member of the House of Representatives of the National Assembly of the Republic of Belarus, member of the National Security Committee; Andrei SAVINYKH, member of the House of Representatives of Belarus, chairman of the Standing Committee for international affairs, head of the parliamentary group of Polish-Belarusian friendship; Anna SEMENYUK, Secretary of the Belarusian delegation to the OSCE Parliamentary Assembly, deputy head of the Board of International Cooperation of the Secretariat of the House of Representatives of the National Assembly of the Republic of Belarus; Sergei STELMASHOK, member of the House of the National Assembly of the Republic of Belarus, member of the Budget and Finance Committee; Igor TAVTYN, member of the House of the National Assembly of the Republic of Belarus, member of the Committee on Health Protection, Physical Culture, Family Policy and Youth; Valery VORONETSKY, diplomat and member of the House of Representatives of the National Assembly of the Republic of Belarus, former ambassador to the Slovak Republic, in 2006-2011 deputy minister of foreign affairs; Dmitry VORONYUK, member of the Council of the Republic of the National Assembly of the Republic of Belarus, former first secretary of the Belarusian Republican Youth Union.
11 Jan 2023	Russia	Russian citizen Igor PETROV, who violated Polish and international laws regulating trade with foreign countries in goods, technologies, and services of strategic importance for the security of the Republic of Poland and the maintenance of international peace and security, and provided dual-use goods to individuals from Russia.

FIRM-SPECIFIC FINANCIAL RESTRICTIVE MEASURES

United States			
Date	Target country		Description
14 Nov 2022	Russia	OFAC	27 entities, including transnational network procuring technology that supports the Russian military-industrial complex (entities from Armenia, Switzerland and Taiwan related to Russian microchip developer Milandr), companies related to the management of Suleiman Kerimov's assets, entities associated with Murat Aliev, a former executive at a Kerimov investment firm: − *3 entities from Russian military procurement network* – **Milur Electronics LLC**, Armenia-based affiliate of Milandr, wholesale firm which was initiated for the purpose of placing orders from foreign factories, producing integrated microchips, and conducting overseas sales, this entity has been used as a Milandr front company as a means to conduct Milandr's business with foreign partners; **Milur SA,** Switzerland-based primary shareholder of Milur Electronics which has been utilized by employees and business associates of Milandr to coordinate financial transfers to Milur Electronics; **Sharp Edge Engineering Inc.**, Taiwan-based front company used to purchase microelectronic components from Asian companies, its employees have utilized a Sharp Edge account to procure equipment; − *Suleiman Kerimov's network of relatives, advisers, and opaque legal entities used to invest in the United States and to obscure his interest in Heritage Trust* – **Alstone Investment AG**, Switzerland-based firm formerly known as Swiru Holding AG, which is owned by Laurin KATZ; **Service Immobiliere Antibes SAS,** France-based real estate company belonging to Gulnara Kerimova; **Service Immobiliere et Gestion SAS,** France-based real estate company belonging to Gulnara Kerimova; **VH Antibes SAS,** France-based real estate company belonging to Gulnara Kerimova; **Villa Lexa Estates SAS,** France-based real estate company belonging to Gulnara Kerimova **Constellation Advisors Ltd,** United Arab Emirates-based holding company which is owned by Nariman Gadzhievich GADZHIEV; **Emperor Aviation Ltd**, Malta- and Russia-based aircraft management company, which coordinated luxury travel for Kerimov's immediate family, including Gulnara Kerimova − *8 entities across 6 countries associated with Alexander-Walter Studhalter* – **MG International AG**, Studhalter-owned, Switzerland- and Russia-based management consultancy firm of which Suleiman Kerimov used to be a shareholder and where Gulnara Kerimova was previously employed; **Studhalter International Group AG**, Switzerland-based financial company; **Swiss International Advisory Group AG** (SwissIAG), Switzerland-based accounting and tax consultancy firm; **Papa Oscar Ventures GmbH** (Papa Oscar Germany), Germany-based holding company; **Eurimo Holding SA**, Luxembourg-based holding company; **Papa Oscar Ventures SE SL** (Papa Oscar Spain), Spain-based holding company; **Swiss International Real Estate Portfolio AG** (SwiREP), Switzerland-based real estate firm; **SCI AAA Properties**, France-based real estate firm. − *7 companies associated with Murat Aliev Network* – **Bonum Capital Investors Corp** (Bonum BVI), British Virgin Islands-based holding company; **LLC Bonum Management,** Russia-based financial services company; **LLC Bonum Investments,** Russia-based financial services company; **LLC RB-Esteit,** Russia-based real estate firm; **LLC Aviakompaniya Dalnevostochnaya KSM,** Russia-based air freight company; **Bonum Capital Cyprus LTD,** Cyprus-based holding company owned by Murat Aliev; **LLC Bonum Capital,** Moscow-based investment firm owned by Murat Aliev. − *2 Swiss holding companies that hold assets for trusts that benefit A.G. Guryev and his family* – **Adorabella AG**; **Chlodwig Enterprises AG**.
14 Nov 2022	Russia	Department of State	**PKK Milandr**, Russian microelectronics company that has been described as part of the Russian military research and development structure defense technology firm.
15 Nov 2022	Iran	OFAC	3 Iranian firms involved in the production or ongoing transfer to Russia of Iranian unmanned aerial vehicles (UAVs), which Russia has used in devastating attacks against civilian infrastructure in Ukraine - **Shahed Aviation Industries Research Center**, firm subordinate to the Iran's Islamic Revolutionary Guard Corps Aerospace Force (IRGC ASF), responsible for the design and production of several Shahed-series UAVs variants that Russian forces used in Ukraine; two UAE-based air

			transportation firms **Success Aviation Services FZC** and **I Jet Global DMCC,** involved in the transfer of Iranian UAVs to Russia for use in Ukraine.
15 Nov 2022	Iran	Department of State	– **PMC Wagner**[4], Russian private military company that has been linked to the GoR and has been used in conflicts on the GoR's behalf around the world; – 2 Iranian entities manufacturing and delivering the UAVs supplied by Iran to Russia. **Private Military Company** and Iran's **Islamic Revolutionary Guard Corps Aerospace Force (IRGC ASF)**, which helped facilitate Iran's supply of military UAVs to Russia, and **Qods Aviation Industries**, Iranian company which produces the Mohajer-6.
9 Dec 2022	Russia	OFAC	**Central Election Commission of the Russian Federation (Russia's CEC)**, federal body of executive power that is responsible for organizing and conducting elections in Russia, which in September 2022 helped oversee and monitor sham referendums held in areas of Russia-controlled Ukraine that were rife with incidents of clear voter coercion and intimidation. connected to abuse of human rights and directly involved in Russia's filtration operations.
9 Dec 2022	Russia	Department of State	3 Russian military entities over their alleged involvement in a deal to supply Iranian unmanned aerial vehicles (UAVs) to the Russian military – **Russian Aerospace Forces (VKS)**, aerial and space forces of the Russian Armed Forces, that were the intended beneficiary of the Russia-Iran agreement on transferring UAVs; **924th State Centre for Unmanned Aviation**, Russian government agency responsible for the development, testing, and implementation of unmanned aviation technology, which sent personnel to Iran for training on operating Iranian UAVs; **Command of the Military Transport Aviation (VTA)**, branch of the Russian Aerospace Forces responsible for the operation of military transport aircraft, that was involved in the transfer of UAVs from Iran to Russia.
15 Dec 2022	Russia	OFAC	18 entities related to Russia's financial services sector: – including PJSC Rosbank, a Russian commercial bank that Potanin acquired earlier this year, and 17 subsidiaries of VTB Bank PJSC, Russia's second largest bank; – 17 entities of VTB Bank are: **AO SG-Development**, a Russia-based entity engaged in real estate activities; **Embassy Development Limited**, a UK-based entity engaged in financial activities; **Estate Management Company Limited**, a Russia-based entity engaged in real estate activities; **ITC Consultants Cyprus Limited**, a Cyprus-based entity engaged in management consulting services; **JSC Citybike**, a Russia-based travel and personal leisure company that rents consumer goods; **JSC VTB Development**, a Russia-based entity engaged in business and management consulting services; **Kordex JSC**, a Russia-based entity engaged in business and management consultancy activities; **LLC VTB Commercial Finance**, a Russia-based financial institution; **LLC VTB Infrastructure Investments**, a Russia-based entity engaged in business support service activities; **Megacom LLC**, a Russia-based entity engaged in the construction of buildings; **OOO Dolgovoi Tsentr**, a Russia-based entity engaged in business support service activities; **OOO Proekt**, a Russia-based entity engaged in real estate activities; **OOO VTB Syryevye Tovary Kholding**, a Russia-based entity engaged in non-specialized wholesale trade; **Ryabinovaya OOO**, a Russia-based entity engaged in real estate activities; **VB-Service Company Limited**, a Russia-based entity engaged in real estate activities; **VTB Leasing JSC**, a Russia-based entity engaged in financial leasing; **VTB Real Estate LLC**, a Russia-based entity engaged in real estate activities.
15 Dec 2022	Russia	Department of State	3 entities – **Kholdingovaya Kompaniya INTERROS OOO**, an investment holding company controlled by Vladimir Potanin with business across nearly all sectors of Russia's economy, **AMEREUS GROUP PTE LTD**, Singapore-based company owned by Maxim Yuryevich Vorobyev, son of Yuriy Leonidovich Vorobyev who is member of the Federation Council of the Federal Assembly of Russia; **Ministry of emergency situations of the Donetsk People's Republic**, entity that is not recognized by the Ukrainian government and operates in the self-proclaimed Donetsk People's which is involved in the forced filtration of civilians at multiple sites in the Donetsk region of Ukraine.
22 Dec 2022	Russia	Department of State	10 Russian naval entities. − 6 entities for operating in both the defense and related materiel sector and the marine sector of the Russian economy:

[4] PMC Wagner was previously designated by the Treasury in 2017 pursuant to E.O. 13660 for recruiting and sending soldiers to fight alongside separatists in eastern Ukraine.

			● **JSC Battery Company Rigel,** manufacturer of nickel-metal hydride and silver-zinc batteries and supplier to the Russian navy for more than 15 years; ● **JSC Concern Central Institute for Scientific Research Elektropribor,** developer and manufacturer of high-precision navigation, gyroscopy, gravimetry, optical electronic systems of submarines, and marine communication systems; it produces a navigation system for Russian combat ships – including navigation, periscope, sonar systems, and radio communication for naval navigation, ship control, radio communication, and surveillance. It works to ensure high operational availability of Moscow's naval submarine forces; ● **JSC Concern Avrora Scientific and Production Association,** leading Russian enterprise in the fields of development, production, and supply of automated control systems for surface ships and submarines for Russian military vessels; specifically, it develops, manufactures supplies, and ensures warranty maintenance and servicing of on-board hardware automated control systems for submarines and naval surface ships; ● **Concern Morinformsystem AGAT JSC,** leading company in the Russian shipbuilding industry specializing 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, sonar systems; ● **Central Research Institute of Structural Materials Prometey,** the largest materials research center in Russia and one of the leading Russian companies involved in military naval shipbuilding and development of military technology; ● **JSC Central Research Institute of Marine Engineering,** one of the major Russian enterprises engaged in development and supply of ship machinery installed on Russian merchant and naval vessels; − 4 entities for operating in the marine sector of the Russian economy: ● **P.P. Shirshov Institute of Oceanology of The Russian Academy of Sciences,** research center that specializes in oceanology, utilizing advanced technology and equipment for fundamental and applied research, and also develops remotely operated and autonomous robotic tools for search and reconnaissance missions and network-centric systems for the Russian navy and other government agencies; ● **Technopole Company,** entity involved in system integration, engineering, consultancy, development, manufacturing and delivery of equipment for the following applications: ocean exploration, oceanology, oceanography, hydrography, seabed data imagery, navigation and positioning at sea and under water, dredging, inspection of underwater objects, hydrology and water quality; ● **JSC Obukhovskoye,** one of the leading Russian developers and manufacturers of marine equipment, with a wide range of customers in military and civil shipbuilding; ● **Marine Bridge and Navigation Systems LTD,** developer and manufacturer of marine equipment and automation systems for the maritime industry – including navigation equipment, including integrated bridge systems and navigation simulators, oceanographic equipment, integrated monitoring and control systems, fire alarm and firefighting systems, and deck and auxiliary machinery.
26 Jan 2023	Russia	OFAC	14 entities supporting the Wagner Group, a Russian state-sponsored private military company, as well as related to Russia's defense industrial complex and to Putin's cronies and their family members: – *1 private military company* - **PMC Wagner (Wagner Group)**, Russian private military company led by Yevgeniy Prigozhin (designated as a significant transnational criminal organisation); – 5 entities related to the Wagner Group: ● *4 technology firms* - **JSC Terra Tech,** Russia-based 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; **Changsha Tianyi Space Science and Technology Research Institute Co. LTD,** China-based entity that has provided Terra Tech synthetic aperture radar satellite imagery orders over locations in Ukraine; **Spacety Luxembourg S.A.,** Luxembourg-based subsidiary of Spacety China; ● *1 aerospace entities* - **Kratol Aviation,** UAE-based aviation firm, used by Wagner Group to move personnel and equipment between the CAR, Libya, and Mali;

			– 7 entities related to Russia's defense industrial complex, including those supporting previously sanctioned Russian defense-related entities: ● *1 air transport company* - **JSC Aviacon Zitotrans**, Russian cargo airline that handled cargo shipments for sanctioned Russian defense entities; ● *3 aerospace entities* - **AO Ural Civil Aviation Factory**, subsidiary of the United Aircraft Corporation (UAC), aircraft manufacturer which specializes in the production of regional and short-haul aircraft for both civilian and military use, developer of the Altius unmanned aerial vehicle (UAV) for Russia's Ministry of Defense; **JSC National Aviation Service Company**, Russian state-owned enterprise providing comprehensive maintenance of aircraft and aviation equipment; **LLC Research and Production Enterprise Prima,** Russia-based entity that develops and produces communication equipment for Russian-manufactured helicopters and airplanes; ● *1 defence entity* - **JSC Concern Almaz-Antey**, Russia-based state-owned enterprise that designs, develops and manufactures anti-aircraft, anti-missile, and non-strategic missile defense systems; ● *1 technology company* - **Federal State Unitary Enterprise Scientific and Production Enterprise GAMMA**, Russian state-owned technology enterprise that specializes in information security and carries out work in the interest of the U.S.-designated Federal Security Service (FSB) and the Ministry of Defense of Russia; ● *1 financial institution* - **LLC TKKH-Invest,** the financial vehicle through which Alan Lushnikov, the largest shareholder and president of the U.S.-designated Kalashnikov Concern, owns shares in Kalashnikov Concern; – 1 entity related to Putin's cronies and their family members - **OOO LUCHANO,** hotel and spa complex in Kazan which is formally registered in the name of Gulsina Akhatovna Minnikhanova, a wife of Rustam Nurgaliyevich Minnikhanov who is chairman of the board of U.S.-designated Tupolev Public JSC.
26 Jan 2023	Russia	Department of State	19 entities: – *5 entities linked to the Wagner Group:* ● *3 private military companies* - **Prime Security and Development,** the Wagner Group's front company; **Sewa Security Services,** the Wagner Group's front company in the Central African Republic (CAR); **Officer's Union for International Security,** the Wagner Group's front company operating in the Central African Republic (CAR) used to obfuscate the identity of Wagner personnel; ● *1 air transport company* - **LLC Charter Green Light Moscow,** aircraft charter company that offers VIP, group, cargo, and helicopter charters, and is the preferred company of the Wagner Group for transporting personnel and equipment; ● *1 entity in propaganda sector* - **Africa Politology,** company that develops strategies and mechanisms to induce Western countries to withdraw their presence in Africa and is involved in a series of Russian influence tasks in the Central African Republic, to include undermining Western influence, discrediting the UN, and carrying out lawsuits against Western press outlets; – *1 financial institution* related to a businessman Sergei Adonev who acts as a financier to Russian President Vladimir Putin and Rostec State Corporation head Sergei Chemezov - **LLC Kaleidoskop**, investment company; – *4 financial institutions linked to Vladimir Potanin* - **MK Interros Invest,** holding company used by Potanin to control his minority stake in Norilsk Nickel; **Whiteleave Holdings Limited,** Cyprus-based holding company and an affiliate of Potanin's Interros Group that holds shares in Norilsk Nickel; **Saltcliff Trading Limited,** Cyprus-based holding company that manages Potanin's investments; **International Limited Liability Company Interros Capital,** company used by Potanin to control Rosbank; – *9 entities supporting Russia's military industrial complex:* ● *1 shipbuilding company* - **AO Dalnevostochnyy Tsentr Sudostroyeniya i Sudoremonta (AO DTSSS),** shipbuilding and repair company that supports Russia's military forces; ● *8* subsidiaries *of AO DTSSS* – **AO Tsentr Sudoremonta Dalzavod,** company that specializes in the repair and maintenance of marine vessels and offshore platforms; **AO Severo-Vostochnyy Remontnyy Tsentr,** company that specializes in repair and maintenance of nuclear, diesel-electric submarines, surface ships, auxiliary vessels, the disposal of weapons and equipment of the Navy; **AO Dalnevostochnyy Zavod Zvezda,** shipbuilding and ship repair company; **AO 179 Sudoremontnyy Zavod,** company that specializes in the overhaul of high-speed diesel engines for the needs of the

			Pacific Fleet of Russia; **AO 30 Sudoremontnyy Zavod,** company that specializes in the repair, maintenance and disposal of ships and boats, nuclear and diesel submarines; **OOO Dalnevostochnyy Proektnyy Institut Vostokproektverf,** basic territorial design organization for the construction of ship repair, shipbuilding and mechanical engineering enterprises; **AO Vladivostokskoye Predpriyatie Elektroradioavtimatika,** company that specializes in the design, manufacture and maintenance of radio and electrical equipment, electrical distribution devices on ships and boats; **AO Tsentralnoye Konstruktorskoye Byuro Lazurit,** design and production company that specializes in the development of combat and special purpose submarines, as well as underwater structures and facilities.

United Kingdom

Date	Target country	Description
13 Dec 2022	Iran	**Oje Parvaz Mado Nafar Company (Mado Company)** which provided the Russian military components and engines for Unmanned Aerial Vehicles (UAVs).

European Union

Date	Target country	Description
14 Nov 2022	Iran	2 Iranian entities involved in the development and delivery of Unmanned Aerial Vehicles (UAVs) to Russia – **Air Force of the Islamic Revolutionary Guard Corps**, the Islamic Revolutionary Guard Corps - Aerospace Force (IRGC ASF, which is responsible for the development of Iran's Unmanned Aerial Vehicles (UAVs) programme; **Qods Aviation Industries**, Iranian company that designs and manufactures Unmanned Aerial Vehicles (UAVs).
12 Dec 2022	Iran	4 Iranian entities involved in the development and delivery of Unmanned Aerial Vehicles (UAVs) to Russia – **Design and Manufacturing of Aircraft Engines (DAMA)**, Iranian front 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); **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; **Oje Parvaz Mado Nafar Company (Mado)**, Iran-based company specialised in manufacturing unmanned aerial vehicle (UAV) components for entities linked to the Islamic Revolutionary Guard Corps (IRGC), including engines used in Shahed-136 UAVs that are being used by Russia in the war of aggression against Ukraine, under the name Geran-2; **Paravar Pars Company**, entity closely associated with the Imam Hossein University, which is controlled by the Islamic Revolutionary Guard Corps (IRGC), and produced Unmanned Aerial Vehicles (UAVs) for the IRGC Aerospace Force (IRGC AF) and has tested UAVs for the IRGC Navy.
16 Dec 2022	Russia	49 entities, including Russian military and special forces and defence industrial companies, political parties: − *2 banks* - **Credit Bank of Moscow,** Russia's largest non-state public bank and Russia's sixth-largest financial institution; **JSC 'Dalnevostochniy Bank' (JSC 'Far Eastern Bank'),** one of the largest banks in the Far East of Russia and an important financial institution for the GoR; − *1 financial institution* - **SBK ART LLC,** company in Russia associated with Sberbank; − *5 political parties* - **United Russia, New People, Liberal Democratic Party of Russia, Just Russia – Patriots – For Truth, Communist Party of the Russian Federation;** − *5 propaganda and disinformation entities* - **Federal Service for Supervision of Communications, Information Technologies and Mass Media (Roskomnadzor),** Russian state agency responsible for communications, information technology and mass media; **All-Russia State Television and Radio Broadcasting Company (VGTRK)**, media holding company, which controls TV channels such as Rossiya 1, Rossiya 24, RTR Planeta, radio station Vesti FM and others; **National Media Group,** media holding, controlling 28 media enterprises in Russia, including Channel One, Channel 5, REN TV and STS, 78.ru, the national newspaper Izvestia, Delovoy Peterburg and other outlets; **Strategic Culture Foundation,** organisation financed by the Russian Federation, closely associated with Russian special services, including the SVR; **ANO TV-Novosti,** Russian-government-linked media organization; − *17 entities in military/defense sector* - **JSC Central Research Institute 'Burevestnik',** Russian arms industry company; **LLC 'Volgograd Machine-building Company "VGTZ"',** Russian developer and manufacturer of landing combat vehicles; **JSC Bryansk**

		Automobile Plant, the only Russian manufacturer that produces special wheeled chassis and tractors (SKST) of high cross-country ability; **JSC Machine Building Company 'VITYAZ',** Russian company engaged in the development, production, operation and repair of armoured military vehicles; **JSC ENIKS,** 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; **JSC Izhevsk Electromechanical Plant 'Kupol',** 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; **JSC A.E. Nudelman Design Bureau of Precision Machine Building (KB Tochmash),** part of the Russian state-owned company Almaz-Antey Concern and Russian weapons developer that manufactures a broad array of anti-aircraft defence systems, MANPADS, missiles, including weapons of increased accuracy; **JSC Automobile Plant URAL,** Russian manufacturer of trucks and one of the main suppliers of armored trucks for the Russian armed forces; **Technodinamika,** manufacturer of weapons, ammunition, chemistry aviation products, and military provider of the Armed Forces of Russia; **JSC 'Ulan-Ude Aviation Plant',** contracted supplier of the Armed Forces of Russia; **JSC 'Nizhny Novgorod Plant of the 70th Anniversary of Victory',** factory within the Russian defence industry; **JSC Votkinsk Machine Building Plant,** factory within the Russian defence industry which manufactures weapons of strategic importance to Russia; **PJSC 'Motovilikhinskiye Zavody',** Russian public weapons and ammunition manufacturer; ***PJSC '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; ***LLC 'holding Company "EGO-Holding"',*** Group of several enterprises of the military-industrial complex, which are the leaders in the Russian Federation in their areas of the defence industry for the development and manufacture of means and complexes of radio communication and electronic warfare; ***Research Design Byuro 'Novator',*** Russian company engaged in the development, production, operation and repair of long-range anti-aircraft missiles, cruise missiles, anti-ballistic missiles and other warfare equipment; **PJSC 'Zavod Tula',** main developer and serial supplier of mobile means of radiation, chemical and non-specific biological reconnaissance for the Unit of the Ministry of Defence of Russia in charge of radiation, chemical and biological protection; – *9 military forces of Russia* - **Armed Forces of Russia,** military forces of Russia; **National Guard of Russia,** internal armed force of Russia; **Russian Aerospace Forces,** air and space branch of the Armed Forces of Russia; **Russian Airborne Forces,** airborne forces branch of the Armed Forces of Russia; **Russian Ground Forces,** land forces of the Armed Forces of Russia; **Russian Navy,** maritime force of the Armed Forces of Russia; **Special Operations Forces,** special forces of the Armed Forces of Russia; **Main Computing Center of the General Staff (GVC),** key entity in Russia's missile strikes on Ukraine, including on civilian targets; **Main Intelligence Directorate of the General Staff of the Armed Forces of Russia,** Russia's military intelligence agency; – *4 entities in technology sector* - **JSC Kazan Optical and Mechanical Plant (JSC Komz),** Russian diversified enterprise specialising in the development and production of optical devices and electronic warfare equipment (including radars, binoculars); **JSC Concern Radio-Electronic Technologies (KRET),** Russia's major developer and manufacturer of military radio- electronic products; **JSC Nauchno-Proizvodstvennoe Obedinenie Russkie Bazovye Informacionnye Tehnologii (JSC RPA Rusbitech),** Russian technology company specialising in the production of high technology solutions for Russian enforcement structures, mainly for Russian Armed Forces; **OJSC 'Radioavionika',** Russian technology sector company and arms supplier of the Armed Forces of Russia; – *4 paramilitary entities* - **Russian Imperial Legion,** paramilitary wing of the Russian Imperial Movement (RIM); **Task Force 'Rusich',** Russian paramilitary group which maintains links to Russian private military company Wagner Group, possibly operating as a sub-unit of Wagner; **Union of Donbas Volunteers,** paramilitary organisation that is actively fighting in the war of aggression against Ukraine on behalf of Russia; **Russian Imperial Movement (RIM),** white-supremacist group founded by Stanislav Vorobyov in 2002,which promotes ethnic Russian nationalism and seeks to fuel white supremacy extremism in the West; – *2 entities in the industry sector* - **JSC Vostochnaia Verf,** Russian shipbuilding company; **JSC 'Zavolzhsky plant of caterpillar tractors',** machine-building enterprise, which produces and supplies all-terrain tracked GAZ-3344-20 vehicles.
16 Dec 2022	Russia	Addition of the **Russian Regional Development Bank**, state-owned development bank in Russia, to the list of Russian state-owned or controlled entities that are subject to the transaction ban.

Canada

Date	Target country	Description
17 Nov	Belarus	16 entities involved in military manufacturing, technology and engineering, banking and railway transportation in response to the

2022		Belarusian regime's role in "facilitating and enabling Russia's illegal invasion and attempted annexation of Ukrainian territory": − *4 entities in technology and dual-use goods sector* - **ALEVKURP OJSC**, company included into the system of the State Military Industrial Committee of the Republic of Belarus, developer of new radar systems, digital signal processing and information in real time, and technology of microwave and intermediate frequency; **LLC Aktualnye Resheniya Bezopasnosti**, developer and manufacturer of technical means of information protection; **Gomel Design Bureau Luch OJSC**, developer and manufacturer of a wide range of transmitting antennas for radio broadcasting and television, transmitting antennas for radio communications; **AGAT-CONTROL SYSTEMS OJSC**, one of the leading enterprises of Belarus in the creation of automated control systems for production and technical purposes, hardware and software systems and technical means; − *5 military/defence enterprises* - **AGAT-SYSTEM OJSC**, Belarusian leading producer of special radio and wire communications equipment; **KB Radar JSC**, managing company of the Radar Systems holding, one of the leading enterprises of the military-industrial complex of Belarus in the field of radar, radio monitoring and electronic warfare; **Multidisciplinary scientific and production private unitary plant Tetraedr**, developer and manufacturer of radio-electronic weapons systems, software and hardware used in control systems for radar and radio-electronic systems, as well as for the modernization of anti-aircraft missile systems; **VOLATAVTO OJSC**, research and production enterprise whose main activity is R&D in the field of creating mobile rapidly deployable platforms equipped with mast-lifting devices and designed to accommodate weapons and military equipment, as well as multiple launch rocket systems; **UE Precision Electromechanics Plant**, manufacturer of military products, the leading enterprise for the development and production of missile weapons, including the V-200 Polonez multiple launch rocket system and the V-300RK Polonez-M missile system; − *1 entity in machinery industry sector* - **Minsk Wheel Tractor Plant JSC (VOLAT)**, Belarusian enterprise specializing in the production of on-road and off-road vehicles with a large capacity, trailers, special wheeled chassis under the installation of equipment for enterprises of construction, oil and gas and machine-building complexes; − *5 banks* - **Development Bank of the Republic of Belarus OJSC**, specialized financial institution whose main goal is to develop a system for financing state programs and implement socially significant investment projects; **Alfa-Bank ZAO (Belarus)**, Belarusian commercial bank, part of the international financial consortium Alfa Group; **MTBank CJSC**, commercial Belarusian bank providing a full range of services to corporate and private clients; **Paritetbank OJSC**, commercial Belarusian bank; **Belarusky Narodny Bank**, Belarusian commercial bank, the issuer and acquirer of Belkart - the Belarusian domestic payment system; − *1 entity in the transport sector* - **Belarusian Railway**, operator of the Belarusian railway network, state association subordinate to the Ministry of Transport and Communications of the Republic of Belarus.
29 Nov 2022	Iran	4 Iranian entities for its supply of drones to Russia - **Safiran Airport Services**, an Iranian cargo and commercial airline that has coordinated Russian military flights between Iran and Russia, through which the Iranian regime transferred lethal Iranian-made Unmanned Aerial Vehicles (UAVs) to Russia; **Paravar Pars Aerospace Engineering Services and Research Company**, entity closely associated with the Imam Hossein University, which is controlled by the Islamic Revolutionary Guard Corps (IRGC), and produced Unmanned Aerial Vehicles (UAVs) for the IRGC Aerospace Force (IRGC AF) and has tested UAVs for the IRGC Navy; **Design and Manufacturing of Aircraft Engines Company (DAMA)**, Iranian front 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); **Baharestan Kish Company**, a subsidiary firm of the IRGC Cooperative Foundation that has entered into agreements with the Basij Resistance Forces and the IRGC, to render research services in the technology sector, including the development of Shahed-series UAV components.
7 Dec 2022	Russia	6 entities that are Russian federal institutions involved in the investigation, prosecution and detention of Russian citizens who oppose or criticize Russia's policies in Ukraine – **The Central Election Commission of the Russian Federation**, body of executive power that is responsible for organizing and conducting elections in Russia; **Ministry of Internal Affairs of the Russian Federation**, federal ministry of the GoR that is responsible for maintaining public order and safety, as well as overseeing the activities of law enforcement agencies in the country; **Federal Penitentiary Service of the Russian Federation**, government agency responsible for the administration of the penal system in Russia; **The Investigative Committee of the Russian Federation**, federal agency of the GoR responsible for conducting criminal investigations; **The Ministry of Justice of the Russian Federation**, government body responsible for overseeing the justice system in Russia; **The Federal Agency for Ethnic Affairs of the Russian Federation**, government agency responsible for policies related to ethnic and national issues in the country.
Australia		

Date	Target country	Description
8 Dec 2022	Iran	Shahed Aviation Industries, Iranian entity responsible for the design and development of the Shahed series of Iranian Unmanned Aerial Vehicles (UAVs) which were supplied to Russia and used in its war against Ukraine

New Zealand

Date	Target country	Description
21 Nov 2022	Russia	4 entities of economic or strategic significance to Russia for providing material or strategic support for Russia's illegal invasion of Ukraine – **PJSC Lukoil Oil Company**, Russian multinational energy company that engages in the exploration, extraction, refining, and marketing of oil and gas; **PJSC Severstal**, Russian steel and mining company; **JSC GTLK State Transport Leasing Company**, Russian state-owned enterprise involved in the leasing of transport and industrial equipment; **OJSC KB Radar-Managing Company Holding Radar System**, manufacturer of radar and electronic equipment systems.
14 Dec 2022	Iran	**Shahed Aviation Industries**, Iranian company involved in the development and production of Unmanned Aerial Vehicles (UAVs) for the Islamic Revolutionary Guard Corps Aerospace Force (IRGC AF), for the supply of drones to Russia for use in its invasion of Ukraine.

Switzerland

Date	Target country	Description
23 Nov 2022	Russia	Addition of the **Russian Maritime Register of Shipping (RMRS)**, State Institution for Technical Supervision and Classification of Sea Vessels, which is subordinated to the Ministry of transport of Russia, to the list of SOEs that are subject to a full ban on transactions. This prohibition applies to any transaction, including the provision of any form of economically valuable benefits, with RMRS by any Swiss company or vessel.
8 Dec 2022	Iran	2 Iranian entities which had already been designated by the EU on 14 November 2022 for their role in the development and supply of unmanned aerial vehicles to Russia – **Islamic Revolutionary Guard Corps - Aerospace Force (IRGC ASF)**, responsible for the development of Iran's Unmanned Aerial Vehicles (UAVs) programme, including the Shahed-136 and Mohajer-6, which are used by Russia in the war of aggression against Ukraine; **Qods Aviation Industries**, Iranian company that designs and manufactures Unmanned Aerial Vehicles (UAVs), in particular it produces Mohajer-6 drones, which were supplied to the Russian Federation and used in the war of aggression against Ukraine; it is a subsidiary of the Iran Aviation Industries Organization (IAIO), a SOE subordinate to the Iranian Ministry of Defense and Armed Forces Logistics (MODAFL).
20 Dec 2022 (effective of 21 Dec 2022)	Russia / Iran	53 Entities: − *4 Iranian defense/military enterprises* – Design and Manufacturing of Aircraft Engines (DAMA), Iranian front company, which is 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 that develops and manufactures ground penetrating radar, communication systems, weaponry, combat vehicles and electronic cyberwarfare equipment, also it is involved in research and development and procurement activities linked to the development of Iranian Unmanned Aerial Vehicles (UAVs), some of which are being used by the Russian Federation in the war of aggression against Ukraine; Oje Parvaz Mado Nafar Company (Mado), Iran-based company specialised in manufacturing unmanned aerial vehicle (UAV) components, manufacture of UAV engines for entities linked to the Islamic Revolutionary Guard Corps (IRGC), including engines used in Shahed-136 UAVs which are used by Russia in the war of aggression against Ukraine, under the name Geran-2; Paravar Pars Company, Iranian entity closely associated with the Imam Hossein University, which is controlled by the Islamic Revolutionary Guard Corps (IRGC), manufacturer of Unmanned Aerial Vehicles (UAVs) for the IRGC Aerospace Force (IRGC AF) and provider of test of UAVs for the IRGC Navy, it is also involved in the research, development and production of the Iranian Shahed- 171 UAV which are used by Russia in the war of aggression against Ukraine;

		− *2 banks* - **Credit Bank of Moscow,** Russia's largest non-state public bank and Russia's sixth-largest financial institution; **JSC 'Dalnevostochniy Bank' (JSC 'Far Eastern Bank'),** one of the largest banks in the Far East of Russia and an important financial institution for the GoR; – *1 financial institution* - **SBK ART LLC,** company in Russia associated with Sberbank; − *5 propaganda and disinformation entities* – **All-Russia State Television and Radio Broadcasting Company (VGTRK),** media holding company, which controls TV channels such as Rossiya 1, Rossiya 24, RTR Planeta, radio station Vesti FM and others; **National Media Group**, media holding, controlling 28 media enterprises in Russia, including Channel One, Channel 5, REN TV and STS, 78.ru, the national newspaper Izvestia, Delovoy Peterburg and other outlets; **Strategic Culture Foundation**, organisation financed by the Russian Federation, closely associated with Russian special services, including the SVR; **ANO TV-Novosti,** Russian-government-linked media organization; **Federal Service for Supervision of Communications, Information Technologies and Mass Media (Roskomnadzor),** Russian state agency responsible for communications, information technology and mass media; − *17 entities in military/defense sector* - **JSC Central Research Institute 'Burevestnik',** Russian arms industry company; **LLC 'Volgograd Machine-building Company "VGTZ"',** Russian developer and manufacturer of landing combat vehicles; **JSC Bryansk Automobile Plant**, 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; **JSC Machine Building Company 'Vityaz',** Russian company engaged in the development, production, operation and repair of armoured military vehicles; **JSC Eniks,** 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; **JSC Izhevsk Electromechanical Plant 'Kupol',** 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; **JSC A.E. Nudelman Design Bureau of Precision Machine Building (KB Tochmash),** part of the Russian state-owned company Almaz-Antey Concern and Russian weapons developer that manufactures a broad array of anti-aircraft defence systems, MANPADS, missiles, including weapons of increased accuracy; **JSC Automobile Plant URAL,** Russian manufacturer of trucks and one of the main suppliers of armored trucks for the Russian armed forces; **Technodinamika,** manufacturer of weapons, ammunition, chemistry aviation products, and military provider of the Armed Forces of Russia; **JSC 'Ulan-Ude Aviation Plant',** contracted supplier of the Armed Forces of Russia; **JSC 'Nizhny Novgorod Plant of the 70th Anniversary of Victory',** factory within the Russian defence industry; **JSC Votkinsk Machine Building Plant,** factory within the Russian defence industry which manufactures weapons of strategic importance to Russia; **PJSC 'Motovilikhinskiye Zavody',** Russian public weapons and ammunition manufacturer; **PJSC '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; **LLC 'Holding Company "EGO-Holding"',** group of several enterprises of the military-industrial complex, which are the leaders in the Russian Federation in their areas of the defence industry for the development and manufacture of means and complexes of radio communication and electronic warfare; **Research Design Byuro 'Novator',** Russian company engaged in the development, production, operation and repair of long-range anti-aircraft missiles, cruise missiles, antiballistic missiles and other warfare equipment; **PJSC 'Zavod Tula',** main developer and serial supplier of mobile means of radiation, chemical and non-specific biological reconnaissance for the Unit of the Ministry of Defence of Russia in charge of radiation, chemical and biological protection; − *5 Russian political parties* - **United Russia**, **New People**, **Liberal Democratic Party of Russia**, **Just Russia – Patriots – For Truth**, **Communist Party of the Russian Federation**; − *9 military forces of Russia* - **Armed Forces of Russia,** military forces of Russia; **National Guard of Russia,** internal armed force of Russia; **Russian Aerospace Forces,** air and space branch of the Armed Forces of Russia; **Russian Airborne Forces,** airborne forces branch of the Armed Forces of Russia; **Russian Ground Forces,** land forces of the Armed Forces of Russia; **Russian Navy,** maritime force of the Armed Forces of Russia; **Special Operations Forces,** special forces of the Armed Forces of Russia; **Main Computing Center of the General Staff (GVC),** key entity in Russia's missile strikes on Ukraine, including on civilian targets; **Main Intelligence Directorate of the General Staff of the Armed Forces of Russia,** Russia's military intelligence agency; − *4 paramilitary entities* - **Russian Imperial Legion,** paramilitary wing of the Russian Imperial Movement (RIM); **Task Force 'Rusich',** Russian paramilitary group which maintains links to Russian private military company Wagner Group, possibly operating as a sub-unit of Wagner; **Union of Donbas Volunteers,** paramilitary organisation that is actively fighting in the war of aggression against Ukraine on

		behalf of Russia; **Russian Imperial Movement**, white-supremacist group founded by Stanislav Vorobyov in 2002, which promotes ethnic Russian nationalism and seeks to fuel white supremacy extremism in the West; − *4 entities in technology sector* - **JSC Kazan Optical and Mechanical Plant (JSC Komz),** Russian diversified enterprise specialising in the development and production of optical devices and electronic warfare equipment (including radars, binoculars); **JSC Concern Radio-Electronic Technologies (KRET),** Russia's major developer and manufacturer of military radio- electronic products, Rostec subsidiary; **JSC Nauchno-Proizvodstvennoe Obedinenie Russkie Bazovye Informacionnye Tehnologii (JSC RPA Rusbitech),** Russian technology company specialising in the production of high technology solutions for Russian enforcement structures, mainly for Russian Armed Forces; **OJSC 'Radioavionika',** Russian technology sector company and arms supplier of the Armed Forces of Russia; − *2 entities in the industry sector* - **JSC Vostochnaia Verf,** Russian shipbuilding company; **JSC 'Zavolzhsky plant of caterpillar tractors',** machine-building enterprise, which produces and supplies all-terrain tracked GAZ-3344-20 vehicles.

Poland

Date	Target country	Description
4 Jan 2023	Russia	**OOO Piervaja Akkumuliatornaja Kompania**, one of the largest wholesale suppliers of automotive batteries on the Russian market.
11 Jan 2023	Russia	4 entities owned or controlled by Igor Petrov, a citizen of Russia - **ARENA Sp. z o.o.,** company owned by Igor Petrov and engaged in international transportation business on EU-FR-EU routes; **OOO ATM**, Kaliningrad-based company owned by Igor Petrovand engaged in shipping business; **BALTIC SPORT TRADE Sp. z o.o.**, company owned by VAN BERG Sp. z o.o. and where Igor Petrov holds the position of CEO; **VAN BERG Sp. z o.o.**, company owned by Igor Petrov.

FIRM-SPECIFIC TRADE RESTRICTIVE MEASURES

United States			
Date	Target country		Description
8 Dec 2022	Russia	Bureau of Industry and Security (BIS)	Addition of 12 technological companies located in several countries to the Entity List due to their contributions to Russia's military and/or defense industrial base – **Fiber Optic Solutions**, vertically integrated company located in Latvia that specializes in the production of high precision Fiber Optic Gyroscopes (FOGs); **AO Kraftway Corporation PSC**, 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 to the military-industrial complex of Russia; **AO PKK Milandr**, electronics and semiconductor manufacturer that designs, produces, and sells computer equipment, including personal computers, servers, and telecommunications equipment, microcontrollers, digital signal processors, and power management integrated circuits; **AO Scientific Research Center for Electronic Computing**, Russian company specializing in the development and production of computing equipment and electronic modules, as well as providing research, project, production, repair, and educational services; **LLC Fibersense**, one of the leading technological companies in the field of fiber-optic sensors in Russia; **Milandr EK OOO**, wholesale company that deals in the distribution of industrial electrical equipment, machinery, equipment, and materials; **Milandr ICC JSC**, Russian company that specializes in the design and manufacture of semiconductors, integrated circuits, electronic modules, and flexible M2M systems; **Milur IS OOO**, Russian company specializing in the development and production of a wide range of intelligent single and three-phase energy meters, built on domestic electronic component base; **OOO Microelectronic Production Complex (MPK) Milandr**, 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; **Ruselectronics JSC,** Russian state-owned holding company, which unites enterprises-manufacturers of electronic products, it 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; **Scientific Production Company Optolink**, Russian company that specializes in the development and production of optoelectronic devices and equipment, as well as integrated optical and fiber-optic elements; and **Milur SA,** Switzerland-based primary shareholder of Milur Electronics which has been utilized by employees and business associates of Milandr to coordinate financial transfers to Milur Electronics.
16 Dec 2022	Russia	Bureau of Industry and Security (BIS)	Addition of 9 Russian entities to the Entity List, which imposes a license requirement for all items subject to the Export Administration Regulations (EAR) and a policy of denial for any license applications involving these entities. These entities were previously on the Unverified List (UVL), but were moved to the Entity List because BIS was unable to verify their bona fides due to the prevention of timely end-use checks by the Russian government. The entities added to the Entity List are: **Alliance EG Ltd.**, Russian company which specializes in active components, passive components, power supplies and voltage converters, and industrial automation and offers a wide range of electronic components including diodes, microcontrollers, resistors, processors, transistors, LEDs, optrons, microchips of any complexity; **FSUE Rosmorport Far Eastern Basin Branch**, Russian state-owned enterprise responsible for providing various services vessel traffic services, pilotage, towage, crew boat services, geodesic and hydrographic services, ecological services, information services and hotel services) in the seaports of Vladivostok, Vostochny, Zarubino, Nakhodka, Olga, and Posyet, as well as on the approaches to these ports; **Intercom Ltd.**; **Nasosy Ampika**, company selling pumps and industrial equipment; **Nuclin LLC,** company engaged in wholesale of other machinery, equipment and accessories;; **SDB IRE RAS** (The Federal State Unitary Enterprise "Special Design Bureau of the Institute of Radio Engineering and Electronics of the Russian Academy of Sciences"), engineering design bureau that provides services for the development, design and integration of radio electronic equipment and systems; **Security 2 Business Academy**, organization that provides training and education in the field of business security, offers courses or certification programs in areas such as cybersecurity, risk management, and emergency preparedness and also provides consulting services; **Tavrida Microelectronics**, Russian company that specializes in the

			development and production of microelectronic components and systems, including high-voltage microelectronic switches, microelectronic relays, microelectronic power supply systems, and microelectronic measuring instruments; **VIP Technology Ltd**, company that specializes in industrial machinery & equipment. No license exceptions are available for exports, reexports, or transfers to these entities. This change took effect on December 16, 2022.
21 Dec 2022	Russia	Bureau of Industry and Security (BIS)	New rule imposed additional restrictions on the Russia-based **Private Military Company Wagner** (also known as the "Wagner Group"), a mercenary organization which is actively committing atrocities and human rights abuses in Ukraine. The new restrictions modify the current Entity List listing for the Wagner Group by adding one address, two additional aliases, and designating it as a Russian or Belarusian 'military end user.' This designation goes further than the restrictions already in place on Wagner Group by applying two significant new restrictions: the Russia/Belarus 'Military End User' Foreign Direct Product (FDP) Rule and imposing these restrictions on the Wagner Group wherever located worldwide. The FDP rule restricts Wagner Group's access to certain foreign-produced items and requires exporters to seek a license from the BIS for any transaction where the entity is a party or that the exporter has knowledge may ultimately be acquired by Wagner Group. The license will be reviewed under a policy of denial, with case-by-case consideration only provided for certain food and medicine.

Japan

Date	Target country	Description
27 Jan 2023 (effective of 3 Feb 2022)	Russia	49 Russian entities in aerospace, military and shipbuilding industries: − *19 entities in the aerospace industry* – **A. Lyulki Experimental-Design Bureau**, Russian aerospace engineering company that designs and develops aircraft turbojet engines, power plants for aircraft; **AO Aviaagregat**, Russian aerospace manufacturing company that specializes in the design and production of landing gear for aircraft, hydraulic systems for ground equipment, and absorbers for railway cars; **JSC 121 Aviation Repair Plant**, enterprise involved in repair, modernization and servicing of airframes, engines and accessories; **JSC 123 Aviation Repair Plant**, Russian enterprise that specializes in the maintenance and repair of transport planes for military and civil aviation; **JSC 218 Aviation Repair Plant**, Russian enterprise that specializes in the overhaul of aircraft engines; **JSC 360 Aviation Repair Plant**, Russian aircraft repair and maintenance company which specializes in servicing long-range aviation aircraft including the Tu-22M3, Tu-95MS, Il-78, and Il-78M, and is a major player in the maintenance of Russian military transport aviation; **JSC 514 Aviation Repair Plant**, enterprise that specializes in repairing and modernizing military aircraft, currently focusing on the MiG-31, Su-24, and MiG-29 aircraft of the Russian Air Force as part of the state defense order; **JSC Aramil Aviation Repair Plant**, aviation industry enterprise engaged in the repair and maintenance of aircraft engines; **JSC Aviaremont**, enterprise that specializes in the overhaul of aircraft engines and manages several other companies involved in repairing and maintaining weapons and military equipment, construction, and production of building materials, food production; subsidiary of Oboronservis; **OJSC 20 Aviation Repair Plant**, Russian enterprise specializing in repairing and upgrading aircraft and their components, including IL-18, SU-24, SU-27, KA-32, KA-27 helicopters, and RS-60 steering systems, serving both the Ministry of Defense and civil aviation; **OJSC 32 Repair Plant of Flight Support Equipment**, enterprise specializing in servicing and maintaining flight support equipment, firefighting equipment, and engineering equipment; **OJSC 170 Flight Support Equipment Repair Plant**, enterprise specializing in overhaul and maintenance of general-purpose flight support equipment, including gas production and gas charging stations, aircraft air conditioning systems, and hydraulic system installation and testing; **OJSC 275 Aviation Repair Plant**, enterprise specializing in repairing combat and combat training fighter jets including Su-27, MiG-29, L39, MiG-23, and MiG-21 of various modifications for the Russian Air Force and other foreign countries; **OJSC 308 Aviation Repair Plant**, specialized aircraft repair enterprise that repairs over 10 types and modifications of aircraft and the only one in Russia that repairs An-22, An-30, An-32 aircraft; **OJSC 322 Aviation Repair Plant**, enterprise that specializes in repairing aircraft and helicopters in the Far East, including 3rd and 4th generation aircraft like Su-24 (MR), Su-17 (Su-22), Su-25 (UB), Su-27 (UB), Mi-8, Ka-27PS (PL), Ka-29, Ka-32, and An-2, Yak-52 light aircraft; **OJSC 325 Aviation Repair Plant**, enterprise that specializes in major repairs of AN aircraft and propellers, serving both military and civil aviation; **OJSC 680 Aircraft Repair Plant,** enterprise that provides service maintenance for ground communication and radio-technical equipment; **OJSC 720 Special Flight Support Equipment Repair Plant**, enterprise that specializes in repairing and maintaining special-purpose aircraft, vehicles, and engines; **OJSC Volgograd Radio-Technical Equipment Plant,** enterprise that specializes in repairing of ground communications and radio equipment for Air Force units;

		– *9 scientific research entities in the aerospace sector* – **A. Lyulki Science and Technology Center**, research and development facility that focuses on designing military aircraft engines; **Central Aerohydrodynamic Institute**, leading state research center in the aviation and space-rocket industry in Russia with a focus on aero- and hydrodynamics, aeroacoustics, flight dynamics and aircraft structures; **Federal Autonomous Institution Central Institute of Engine-Building N.A. P.I. Baranov**, research institute that focuses on the development of aircraft engines and gas turbine plants based on them; **Federal State Budgetary Institution National Research Center Institute n.a. N.E. Zhukovsky**, research center that focuses on the development of advanced technologies for aerospace systems; **Federal State Unitary Enterprise State Scientific-Research Institute for Aviation Systems**, Russian state-owned research institute that conducts scientific research and software development in the field of on-board equipment and aviation systems, including using artificial intelligence, simulation and mathematical modeling, as well as certification and development of standards; **JSC Flight Research Institute N.A. M.M. Gromov**, state scientific center that conducts flight research and testing of aircraft, their power plants and onboard equipment, and offers facilities for ground and flight testing; subsidiary of the United Aircraft Corporation; **Moscow Aviation Institute**, leading technical university that focuses on aerospace engineering education and research; **Moscow Institute of Thermal Technology**, Russian defense research institute that specializes in developing advanced solid-fuel strategic nuclear missile systems and nuclear intercontinental systems, both for land-based and sea-based applications, as well as several civilian projects, including designing space launch vehicles, aircraft-based satellite technology, monorail transport systems, wind power generators, and water purification plants; **Siberian Scientific-Research Institute of Aviation N.A. S.A. Chaplygin,** Leading aviation research and testing centers in Russia with experimental base for research and practical testing in areas of aerodynamics, static and dynamic strength, flight tests of aircraft; – *3 shipbuilding entities* – **CJSC Turborus**, Russian enterprise engaged in the design and manufacture of marine gas turbine engines and ship power plants based on them for military and civilian use, the main contractor for the manufacture, supply, installation on the ship, commissioning, delivery of the M55R diesel-gas turbine unit; **LLC Center for Specialized Production OSK Propulsion**, company that offers a variety of services for marine and river equipment, including development, design, production, supply, warranty and maintenance, modernization, and repair of propulsion systems for sea and river vessels for both military and civilian purposes; **Scientific-Production Association Vint of Zvezdochka Shipyard**, scientific-production enterprise that specialized in creating and experimentally developing various types of ship propulsion systems for both the Navy and civil economy, including fixed and adjustable pitch propellers, vane propellers, water jets, propulsion and steering columns, thrusters, propulsors for deep-sea equipment, propulsors for engineering troops, air propulsors, and superchargers for hovercraft; – *6 military/defence enterprises* – **JSC 766 UPTK**, Russian manufacturer of robotic systems, specializing in the development and production of weapons, military and special equipment (autonomous mobile systems, remote-controlled combat modules, stabilization systems, machine vision, neural network technologies, and control systems); **JSC Special Industrial and Technical Base Zvezdochka**, Russian enterprise that specializes in providing services such as repair, maintenance, modernization, installation, and commissioning of weapons and military equipment for the Russian Navy, both on ships and coastal facilities; **JSC Votkinsk Machine Building Plant**, Russian machine and missile production company, specializing in the production of RS-24 Yars intercontinental ballistic missiles, Topol-M intercontinental strategic missiles, Bulava SLBMs and a number of other military products, as well as civil and consumer goods; JSC Yaroslavl Radio Factory, Russian company that produces communication equipment for military and civilian use, including radio sets for air-to-air, air-to-ground, and ground-to-air communication; **JSC Zlatoustovsky Machine Building Plant**, leading manufacturer of naval strategic missile systems, produces the Sineva high-precision complex and also develops civilian products; subsidiary of the Makeev GRC and part of the state corporation Roscosmos; **Tula Arms Plant**, one of the largest enterprises for the manufacture of military and civilian weapons; – *8machine-building entities* – **JSC Metallist Samara**, engine-building plant specializing in aviation, rocket and space production as well as ground-based gas turbine units and refueling equipment, with a focus on producing elements of rocket and aircraft engines, including those for Energia, Proton, and Zenit launch vehicles; **JSC Moscow Machinebuilding Enterprise named after V. V. Chernyshev**, leading company in the Russian military-industrial complex that specializes in aircraft engine production, as well as precision casting, high speed directional solidification, plasma and vacuum spraying, heat treatment of titanium alloys, and heat-resistant and special alloys and steels; **JSC Remdizel**, leading Russian company specializing in the production of marine diesel engines and generators, as well as wheeled and tracked vehicles, including the Typhoon K-63968 Mine-Resistant Ambush Protected vehicles used by the Armed Forces of Russia; **JSC STAR**, scientific-production company specializing in the development and

		production of automated control systems for gas turbine engines, including digital electronic governors, hydromechanical units, and control systems for aircraft engines, power plants, gas pumping units, and sea vessels; **Lytkarino Machine-Building Plant**, **Russian** manufacturing company that specializes in the production, assembly and testing of aircraft engines and components, gas turbine engines and gas turbine compressors, and components; **Omsk Motor-Manufacturing Design Bureau**, Russian engineering company, subsidiary of PJSC UEC-Saturn, that specializes in the development, production, and after-sales support of small-sized gas-turbine engines, auxiliary power units, ground-based power generating units, and other equipment; **OJSC Agregat,** machine-building enterprise producing hydraulic and pneumatic systems used in Russian aircraft, as well as fuel-regulating aggregates for gas-turbine engines of MiG-29, SU-27 aircraft, as well as industrial hydraulics for cars and special machinery; **Salute Gas Turbine Research and Production Center**, leading aircraft engine building enterprise in Russia, full-cycle enterprise that includes both a design office and production facilities; − *1 military/defence research organization* – **JSC NII Steel**, Russian research institute that specializes in developing advanced materials and structures for the protection of weapons and personal armor protection equipment, including high-strength steels, ceramic-based composites, and materials that protect against radiation and flames; − *3 research organizations* – **Russian Institute of Radio Navigation and Time**, leading Russian research institute focused on developing and creating high-precision common time systems, long-range radio navigation, quantum electronics based on atomic and molecular frequency standards, and consumer navigation equipment; the main creator of ground-based radio navigation systems, the State System of Common Time and Reference Frequencies, and the global navigation satellite system GLONASS; **Scientific Research Institute of Applied Acoustics**, scientific research institute conducting research in the field of acoustics and hydroacoustics, developing technical means for modeling acoustic fields and measuring their parameters, and creating acoustic stands to study acoustic vibrations in the atmosphere and test the effects of acoustic vibrations on rocket equipment; **Software Research Institute**, leading enterprise in the development and maintenance of information systems and their components for regional government bodies and the military-industrial complex, specializing in the creation of automated information systems, including intelligent and adaptive information systems and technologies, and software for computing systems and automated data processing systems.