

# A Guide to US, UK and EU Sanctions and Export Controls on Russia and Belarus

**November 20, 2025**

In response to Russia's February 24, 2022, invasion of Ukraine and the ongoing conflict, the United States ("US"), the United Kingdom ("UK") and the European Union ("EU"), along with other countries (e.g., Australia, Canada, Japan and Switzerland), have imposed various sanctions and export controls targeting Russia and Belarus.

The future of the conflict remains uncertain, and UK and EU sanctions and export control measures continue to expand, with the purpose of eroding the Russian economy's ability to support the war. In addition, certain leaders of the Group of Seven ("G7") have emphasized their continued focus on preventing and responding to sanctions evasion, including through facilitators and third-country providers that may help Russia evade Western sanctions or replenish military supplies. We are continuing to monitor US, UK and EU sanctions developments, including the implications of potential divergence between the US, UK and EU sanctions regimes.

Below is an overview of the sanctions and export controls imposed by the US, UK and EU as of 9:00 a.m. EDT November 20, 2025. **Updates since the September 19, 2025, publication are indicated in red.**

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## US Sanctions

Since February 2022, the United States has implemented an extensive array of sanctions and export controls in response to the war.<sup>1</sup> Although these measures were developed primarily under the Biden Administration, the second Trump Administration took its first major action targeting Russia on October 22, 2025, with the sanctions designation of Open Joint Stock Company Rosneft Oil Company (“Rosneft”) and Public Joint-Stock Company Oil Company Lukoil (“Lukoil”). Treasury framed the step as a response to Russian President Vladimir Putin’s refusal to end the war and signaled the possibility of further action if necessary to support President Donald Trump’s effort to end the war.

Current sanctions measures can be broadly categorized as follows:

- **Investment prohibition:** prohibition on making new investments in Russia, including purchases of debt or equity securities issued by any entity in the Russian Federation.
- **Services prohibition:** prohibition on providing various services to persons located in Russia, including accounting, trust and corporate formation and management consulting services, quantum computing services, certain services related to the maritime transportation of Russian oil and petroleum products, architecture and engineering services, services for the acquisition of aluminum, copper or nickel of Russian Federation origin and information technology (“IT”) and software services.
- **Import and export restrictions:** prohibition on import into the United States of certain products of Russian origin (including Russian energy products, gold, certain other metals and diamonds) or export, reexport, sale or supply from the United States or by a US person of certain luxury goods to any person in Russia.
- **Blocking sanctions:** sanctions targeting Russian President Putin and other Russian political figures, prominent Russian businessmen, Russian financial institutions, Russian securities registrars, Russia’s financial infrastructure, Russian state-owned institutions and their management and third-country actors facilitating Russia’s evasion of sanctions and export controls. Blocking sanctions have also been imposed on certain Belarusian persons related to Belarus’s support for and facilitation of the Russian invasion of Ukraine, as

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<sup>1</sup> On February 23, 2024, the US Departments of Commerce, the Treasury and State released an official business advisory, titled *Risks and Considerations for Doing Business in the Russian Federation and Russia-Occupied Territories of Ukraine*, to provide a high-level overview of these measures and some of the legal, financial and reputational risks associated with doing business in Russia. The advisory is available [here](#).

well as prominent Belarusian businessmen with close ties to Belarusian President Alyaksandr Lukashenka.

- **Secondary sanctions:** authorizing the US government to target non-US persons determined to have provided material assistance or support for persons blocked pursuant to Executive Order (“E.O.”) 14024, issued in April 2021,<sup>2</sup> or certain activities for or on behalf of, or for the benefit of, the Russian government, as well as non-US financial institutions determined to engage in certain activities involving Russia’s military-industrial base. In addition, mandatory secondary sanctions apply to non-US persons, including foreign (non-US) financial institutions (“FFIs”), determined to knowingly facilitate certain significant transactions for or on behalf of Russian individuals or entities designated under E.O. 13662, and to certain transactions related to trade in Russian gold.
- **Financial sanctions:** including prohibitions pursuant to E.O. 14024 on transactions involving the Central Bank of the Russian Federation and related entities and correspondent and payable-through account sanctions on one Russian bank and various of its subsidiaries.
- **Transport restrictions:** prohibition on Russian-affiliated vessels from entering into US ports.
- **Comprehensive sanctions:** on the so-called Donetsk People’s Republic and Luhansk People’s Republic regions of Ukraine.
- **Export controls:** restrictions on access by Russia and Belarus, and blocked persons designated under one of seven sanctions program identifiers maintained by the US Treasury Department’s Office of Foreign Assets Control (“OFAC”) related to Russia’s invasion of Ukraine, to certain US goods, software and technologies.

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<sup>2</sup> 86 Fed. Reg. 20249 (Apr. 19, 2021). On March 1, 2022, OFAC published the Russian Harmful Foreign Activities Sanctions Regulations (“RuHSR”) to implement E.O. 14024. 31 CFR part 587, *available* [here](#).

## Russia

### Prohibition on New Investment in and Provision of Certain Services to Russia

On April 6, 2022, then-President Joe Biden signed E.O. 14071 prohibiting:

- All new investment in Russia by US persons.<sup>3</sup>
- The exportation, reexportation, sale or supply, directly or indirectly, from the United States, or by a US person, to any “person located in the Russian Federation”<sup>4</sup> of any category of services the Secretary of the US Treasury Department (“Treasury”) may determine.
- Any approval, financing, facilitation or guarantee by a US person of a transaction by a foreign person that would be prohibited by the executive order if performed by a US person or within the United States.<sup>5</sup>

**New Investment Prohibition:** In a series of FAQs, OFAC provided guidance on how it will interpret “new investment.”<sup>6</sup> FAQ 1049 defines “new investment” as the commitment of capital or other assets for the purpose of generating returns or appreciation, made on or after the effective date of the relevant new investment prohibition. New investments include: (i) the purchase or acquisition of real estate in Russia (other than for noncommercial, personal use); (ii) entry into an agreement requiring the commitment of capital or other assets for the establishment or expansion of projects or operations in Russia, including the formation of joint ventures or other corporate entities in Russia; (iii) entry into an agreement providing for participation in royalties or ongoing profits in Russia; (iv) the lending of funds to persons located in Russia for commercial purposes, including when such funds are intended to be used to fund a new or expanded project or operation in Russia; (v) the purchase of an equity interest in an entity located in Russia; (vi) the purchase or acquisition of rights to natural resources or exploitation thereof in Russia; and (vii) the commitment of capital or other assets pursuant to the exercise of rights under an agreement entered into *before* the effective date of the relevant new investment prohibition, where such commitment is made on or after the effective date of the prohibition.

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<sup>3</sup> Prior to this broad investment prohibition, on March 8, 2022, President Biden signed E.O. 14066 prohibiting new investments in the energy sector. A few days later, President Biden signed E.O. 14068, which prohibited, among other things, new investment by a US person in any sector of the Russian economy as may be determined by the Secretary of the Treasury.

<sup>4</sup> OFAC interprets this phrase to include persons in the Russian Federation, individuals ordinarily resident in the Russian Federation and entities incorporated or organized under the laws of the Russian Federation or any jurisdiction within the Russian Federation. OFAC Frequently Asked Question (“FAQ”) 1058.

<sup>5</sup> 87 Fed. Reg. 20999 (Apr. 8, 2022). In addition, any transaction that evades or avoids, has the purpose of evading or avoiding, causes a violation of or attempts to violate any of the prohibitions of the executive order, and any conspiracy formed to violate any of the prohibitions of the order, are prohibited. This prohibition applies to all of the executive orders and to directives issued under E.O. 14024 discussed below.

<sup>6</sup> See FAQs 1049-1055.



New investment does *not* include: (i) the maintenance of an investment made prior to the effective date of the new investment prohibition;<sup>7</sup> (ii) entry into, performance of or financing of a contract, pursuant to ordinary commercial sales terms, to sell or purchase goods, services or technology to or from an entity in Russia; or (iii) wind down or divestment of a pre-existing investment, such as a pre-existing investment in an entity, project or operation, including any associated tangible property, located in Russia.<sup>8</sup>

OFAC clarified that the new investment prohibition does not prohibit the export or import of goods, services or technology, or related sales or purchases, to or from Russia, provided such transactions are made pursuant to ordinary commercial sales terms, such as payment of an invoice for goods made within the contracted time period, where such payment does not involve ongoing participation in royalties or ongoing profits.<sup>9</sup>

In addition, OFAC provided guidance indicating that US persons are prohibited from purchasing new and existing debt and equity securities issued by an entity in Russia. Under OFAC's guidance, US persons are not prohibited from selling or divesting, or facilitating the sale or divestment of, debt or equity securities issued by an entity in Russia to a non-US person;<sup>10</sup> OFAC also clarified that the conversion of depositary receipts to underlying local shares of non-sanctioned Russian issuers is not considered a prohibited new investment in Russia.<sup>11</sup> However, subsequently imposed sanctions on Russia's financial infrastructure, including numerous Russian securities registrars, discussed below, impact the ability of US persons to effect such divestments and conversions.

FAQ 1055 clarifies that US persons are not prohibited from lending funds to or purchasing a debt or equity interest in entities located outside of Russia, provided

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<sup>7</sup> "Maintenance" of investments generally includes all transactions ordinarily incident to performing under an agreement in effect prior to the prohibition's effective date, provided that such transactions are consistent with previously established practices and support pre-existing projects or operations. Maintenance includes: (i) transactions to ensure continuity of pre-existing projects or operations located in Russia (including payments to employees, suppliers, landlords, lenders and partners); (ii) the preservation and upkeep of pre-existing tangible property in Russia; and (iii) activities associated with maintaining pre-existing capital investments or equity investments. Maintenance activities do not include the expansion of pre-existing projects or operations beyond those in effect prior to the effective date of the new investment prohibition. FAQ 1050. OFAC also clarified that U.S. persons may continue to fund their subsidiaries and affiliates with projects or operations located in Russia prior to the effective date of the relevant new investment prohibition, provided that the use of such funds is limited to "maintenance" activities. FAQ 1052.

<sup>8</sup> FAQ 1053 clarifies that facilitation of a divestment of a pre-existing investment is not prohibited and that the prohibition on approval, financing, facilitation or guarantee by a US person of a transaction by a foreign person that would be prohibited if conducted by a US person does not prohibit US persons from facilitating the wind down or divestment of an existing investment in Russia, provided that such facilitation is on behalf of the selling party only.

<sup>9</sup> FAQ 1051.

<sup>10</sup> FAQ 1054.

<sup>11</sup> *Id.*

that: (i) such funds are not specifically intended for new projects or operations in Russia; and (ii) the entity located outside Russia derives less than 50% of its revenues from its investments in Russia. For purposes of assessing the foregoing, US persons may reasonably rely on the information available to them in the ordinary course of business, including publicly available information such as an entity's most recent quarterly or annual report. For purposes of determining the percentage of revenues derived from investments in Russia, revenues derived from the commercial sale of goods or services by an entity located outside of Russia to persons in Russia should not be included.

**Services Prohibition:** Treasury has issued several determinations pursuant to E.O. 14071 prohibiting the exportation, reexportation, sale or supply, directly or indirectly, from the United States or by a US person of certain services to any person located in Russia.<sup>12</sup>

To date, the following services have been the subject of such determinations:

- Accounting,<sup>13</sup> trust and corporate formation<sup>14</sup> and management consulting services,<sup>15</sup> effective as of June 7, 2022.<sup>16</sup>

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<sup>12</sup> FAQ 1061 clarifies that US persons are not generally prohibited from working as employees of entities located in Russia, and are only prohibited from providing the specifically enumerated prohibited services to companies in Russia in their capacity as employees.

<sup>13</sup> "Accounting services" include the measurement, processing and evaluation of financial data about economic entities and include tax preparation and filing. FAQs 1034 and 1068.

<sup>14</sup> "Trust and corporate formation services" include assisting persons in forming or structuring legal persons, such as trusts and corporations; acting or arranging for other persons to act as directors, secretaries, administrative trustees, trust fiduciaries, registered agents or nominee shareholders of legal persons; providing a registered office, business address, correspondence address or administrative address for legal persons; and providing administrative services for trusts. FAQ 1034. The prohibition applies to both new and existing trusts and companies, regardless of whether the services are performed as part of the formation of a new trust or company or as part of the administration or maintenance of an existing trust or company. FAQ 1063. OFAC also clarified that the prohibition does not itself bar US persons from serving on the board of directors of a company in Russia, but it does prohibit US persons from providing nominee officer or director services on behalf of Russian persons. FAQ 1060. Finally, FAQ 1065 explains that US persons are prohibited from serving as voting trustees on behalf of, or for shares of, persons located in Russia.

<sup>15</sup> "Management consulting services" include strategic business advice; organizational and systems planning, evaluation and selection; development or evaluation of marketing programs or implementation; mergers, acquisitions and organizational structure; staff augmentation and human resources policies and practices; brand management; and executive search and vetting services. FAQs 1034 and 1064. OFAC clarified that U.S. persons are not prohibited from providing educational services—such as online university courses—on the subjects of accounting, management consulting or trust and corporate formation to persons located in Russia. FAQ 1066.

<sup>16</sup> OFAC, Determination Pursuant to Section I(a)(ii) of E.O. 14071, *Prohibitions Related to Certain Accounting, Trust and Corporate Formation, and Management Consulting Services* (May 8, 2022), available [here](#).

- Quantum computing services,<sup>17</sup> effective as of October 15, 2022.<sup>18</sup>
- Services related to the maritime transport of crude oil and petroleum products of Russian Federation origin, effective as of December 5, 2022, and February 5, 2023, respectively, as discussed below.<sup>19</sup>
- Architecture services<sup>20</sup> and engineering services,<sup>21</sup> effective as of June 18, 2023.<sup>22</sup>

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<sup>17</sup> “Quantum computing services” include any of the following services when related to quantum computing, quantum computers, electronic assemblies thereof or cryogenic refrigeration systems related to quantum computing: infrastructure, web hosting or data processing services; custom computer programming services; computer systems integration design services; computer systems and data processing facilities management services; computing infrastructure, data processing services, web hosting services and related services; repairing computer, computer peripherals or communication equipment; other computer-related services; as well as services related to the exportation, reexportation, sale or supply, directly or indirectly, of quantum computing, quantum computers, electronic assemblies thereof or cryogenic refrigeration systems related to quantum computing to any person located in Russia. FAQ 1084.

<sup>18</sup> OFAC, Determination Pursuant to Section 1(a)(ii) of E.O. 14071, *Prohibitions Related to Certain Quantum Computing Services* (Sept. 15, 2022), available [here](#).

<sup>19</sup> US Department of the Treasury, Determination Pursuant to Section 1(a)(ii) of E.O. 14071, *Prohibition on Certain Services as They Relate to the Maritime Transport of Crude Oil of Russian Federation Origin* (Nov. 21, 2022), available [here](#); US Department of the Treasury, Determination Pursuant to Section 1(a)(ii) of E.O. 14071, *Prohibition on Certain Services as They Relate to the Maritime Transport of Petroleum Products of Russian Federation Origin* (Feb. 3, 2023), available [here](#).

<sup>20</sup> “Architecture services” include advisory services; pre-design services; design services, including schematic design, design development and final design; contract administration services; combined architectural design and contract administration services, including post construction services; and all other services requiring the expertise of architects. The prohibition applies to such services as they relate to residential, institutional, leisure, commercial and industrial buildings and structures; recreational areas; transportation infrastructure; and land subdivisions; and in all cases not necessarily related to a new construction project. The term also includes urban planning services (*i.e.*, land use, site selection and servicing of land for systemic, coordinated urban development) and landscape architectural services. FAQ 1129.

<sup>21</sup> “Engineering services” include assistance, advisory, consultative, design and recommendation services concerning engineering matters or during any phase of an engineering project. Engineering design services may be for: the construction of foundations and building structures (*i.e.*, structural engineering); mechanical and electrical installations for buildings; the construction of civil engineering works; industrial processes and production; or other engineering designs, such as those for acoustics, vibration, traffic control systems, or prototype development for new products. The term additionally includes geotechnical, groundwater and corrosion engineering services; integrated engineering services, such as those for transportation infrastructure or other projects; engineering-related scientific and technical consulting services, including geological, geophysical, geochemical, surface or subsurface surveying and map making services; testing and analysis services of chemical, biological and physical properties of materials or of integrated mechanical and electrical systems; and technical inspection services. FAQ 1128.

<sup>22</sup> OFAC, Determination Pursuant to Section 1(a)(ii) of E.O. 14071, *Prohibitions Related to Architecture Services and Engineering Services* (May 19, 2023), available [here](#).

- Services for the acquisition of aluminum, copper or nickel of Russian Federation origin,<sup>23</sup> effective as of April 12, 2024.<sup>24</sup>
- IT and software services,<sup>25</sup> effective as of September 12, 2024 (the “IT and Software Services Determination”),<sup>26</sup> specifically (i) IT consultancy and

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<sup>23</sup> The covered metals acquisition services include “warranting services for aluminum, copper, or nickel of Russian Federation origin on a global metal exchange; and services to acquire aluminum, copper, or nickel of Russian Federation origin as part of the physical settlement of a derivative contract.” FAQ 1169.

<sup>24</sup> OFAC, Determination Pursuant to Section 1(a)(ii) of E.O. 14071, *Prohibitions on Certain Services for the Acquisition of Aluminum, Copper, or Nickel of Russian Federation Origin* (Apr. 12, 2024), available [here](#).

<sup>25</sup> FAQ 1184 clarifies that the aim of the IT and Software Services Determination is not to prohibit all activity relating to the provision of IT and software-related services to Russia; the measures do not prohibit internet access or the delivery of internet-based communications services; and the importation from any country, or the exportation to any country, of any information or informational materials, regardless of format or medium, is generally exempt from the scope of sanctions prohibitions under the International Emergency Economic Powers Act. FAQ 1186 clarifies that IT support services and cloud-based services include the provision of technical expertise to solve problems for the client. In both FAQs 1185 and 1186 OFAC provides additional examples of activities that would and would not be prohibited by the IT and Software Services Determination.

<sup>26</sup> OFAC, Determination Pursuant to Section 1(a)(ii) of E.O. 14071, *Prohibition on Certain Information Technology and Software Services* (June 12, 2024), available [here](#). See FAQs 1193-1195 clarifying when a U.S. company may provide employees or contractors located in or outside of Russia with services prohibited by the determination.

design services<sup>27</sup> and (ii) IT support services<sup>28</sup> and cloud-based services<sup>29</sup> for the following categories of software: enterprise management software<sup>30</sup> and design and manufacturing software.<sup>31</sup>

- Petroleum services,<sup>32</sup> effective as of February 27, 2025, (the “Petroleum Services Determination”).<sup>33</sup>

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<sup>27</sup> “IT consultancy and design services” include both IT consulting services and IT design and development services for applications, and which terms are defined consistently with United Nations’ Central Product Classification (CPC) Codes 83131 and 83141, respectively. IT consultancy services include providing advice or expert opinion on technical matters related to the use of information technology, such as: (a) advice on matters such as hardware and software requirements and procurement; (b) systems integration; (c) systems security; and (d) provision of expert testimony on IT-related issues. IT design and development services for applications include services of designing the structure and/or writing the computer code necessary to create and/or implement a software application, such as: (a) designing the structure of a web page and/or writing the computer code necessary to create and implement a web page; (b) designing the structure and content of a database and/or writing the computer code necessary to create and implement a database; (c) designing the structure and writing the computer code necessary to design and develop a custom software application; and (d) customization and integration, adapting (modifying, configuring, etc.) and installing an existing application so that it is functional within the clients’ information system environment. FAQs 1185 and 1187.

<sup>28</sup> The term “information technology support services” is defined consistently with the United Nations’ Central Product Classification (CPC) Code 83132 to include: (1) providing technical expertise to solve problems for the client in using software, hardware or an entire computer system, such as: (a) providing customer support in using or troubleshooting the software; (b) upgrading services and the provision of patches and updates; (c) providing customer support in using or troubleshooting the computer hardware, including testing and cleaning on a routine basis and repair of IT equipment; (d) technical assistance in moving a client’s computer system to a new location; and (e) providing customer support in using or troubleshooting the computer hardware and software in combination; as well as (2) providing technical expertise to solve specialized problems for the client in using a computer system, such as: (a) auditing or assessing computer operations without providing advice or other follow-up action, including auditing, assessing and documenting a server, network or process for components, capabilities, performance or security; (b) data recovery services, *i.e.*, retrieving a client’s data from a damaged or unstable hard drive or other storage medium, or providing standby computer equipment and duplicate software in a separate location to enable a client to relocate regular staff to resume and maintain routine computerized operations in the event of a disaster such as a fire or flood; and (c) other IT technical support services not elsewhere classified. *Id.*

<sup>29</sup> Cloud-based services include the delivery of software via the internet or over the cloud, including through Software-as-a-Service (“SaaS”), or SaaS cloud services in relation to such software. *Id.*

<sup>30</sup> Enterprise management software means the following types of software: enterprise resource planning, customer relationship management, business intelligence, supply chain management, enterprise data warehouse, computerized maintenance management system, project management and product lifecycle management software. *Id.*

<sup>31</sup> Design and manufacturing software means the following types of software: building information modelling, computer-aided design, computer-aided manufacturing and engineer to order software. *Id.*

<sup>32</sup> Petroleum services include “services related to the exploration, drilling, well completion, production, refining, processing, storage, maintenance, transportation, purchase, acquisition, testing, inspection, transfer, sale, trade, distribution, or marketing of petroleum, including crude oil and petroleum products, as well as any activities that contribute to Russia’s ability to develop its domestic petroleum resources, or the maintenance or expansion of Russia’s domestic production and refining. This would include services related to natural gas as a byproduct of oil production in Russia.” FAQ 1216.

<sup>33</sup> OFAC, Determination Pursuant to Section 1(a)(ii) of E.O. 14071, *Prohibitions on Petroleum Services* (Jan. 10, 2025), available [here](#).

Notably, for the aforementioned accounting, trust and corporate formation, management consulting, quantum computing, architecture, engineering and IT and software services, these services prohibitions do not apply to: (i) any service to an entity located in Russia that is owned or controlled (directly or indirectly) by a US person; and (ii) any service in connection with the wind down or divestiture of an entity located in Russia that is not owned or controlled (directly or indirectly) by a Russian person. In addition, for these services, OFAC clarified that the prohibitions do not extend to persons located outside of Russia that are owned or controlled by persons located in Russia, provided that the services are not an indirect export to a person located in Russia (i.e., the benefit of the services may not be ultimately received by a person located in Russia); however, such prohibitions do apply to services provided to a parent company in Russia by its US subsidiary.<sup>34</sup> The IT and Software Services Determination also does not prohibit any service for software that would be eligible for a license exception or otherwise is authorized for export, reexport or transfer (in-country) to Russia by the Department of Commerce.<sup>35</sup>

The Petroleum Services Determination does not prohibit: (i) transactions related to operations of the Caspian Pipeline Consortium, Sakhalin II or Tengizchevroil projects; (ii) any petroleum services related to isotopes derived from petroleum manufacturing that are used for medical, agricultural or environmental purposes, such as Carbon-13; (iii) certain covered services related to the maritime transport of crude oil and petroleum products of Russian Federation origin purchased at or below the relevant price cap; or (iv) any service in connection with the wind down or divestiture of an entity located in the Russian Federation that is not owned or controlled, directly or indirectly, by a Russian person.<sup>36</sup>

**Russian-Origin Crude Oil and Petroleum Products:** To implement a price cap on Russian-origin crude oil<sup>37</sup> (“Russian oil”) and petroleum products<sup>38</sup> (“Russian petroleum”) agreed by the G7 leaders, the EU and Australia,<sup>39</sup> on November 21, 2022, the Secretary of the Treasury issued a determination prohibiting the exportation, reexportation, sale or supply, directly or indirectly, from the United States or by a US person of certain services related to the maritime transportation of Russian oil to any person located in Russia, if the Russian oil is purchased above the

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<sup>34</sup> FAQs 1059, 1188, 1062 (noting FAQ 1062 does not reference the IT and Software Services Determination, but OFAC has not updated this FAQ since May 19, 2023).

<sup>35</sup> FAQ 1192.

<sup>36</sup> OFAC, Determination Pursuant to Section 1(a)(ii) of E.O. 14071, *Prohibitions on Petroleum Services*, *supra*; General License 124; FAQ 1216.

<sup>37</sup> “Crude oil” is defined at Harmonized Tariff Schedule of the United States (“HTSUS”) subheading 2709.00. See OFAC, *Guidance on Implementation of the Price Cap Policy for Crude Oil and Petroleum Products of Russian Federation Origin* (Feb. 3, 2023, revised Dec. 20, 2023), available [here](#) (the “Price Cap Policy Guidance”).

<sup>38</sup> “Petroleum products” is defined at HTSUS subheading 2710. *Id.*

<sup>39</sup> Press Release of the US Department of the Treasury dated June 28, 2022, available [here](#).

price cap.<sup>40</sup> The determination took effect on December 5, 2022, and the price cap was set at \$60/barrel.<sup>41</sup>

In addition, on February 3, 2023, the Secretary of the Treasury issued a determination imposing equivalent prohibitions with respect to Russian petroleum, which took effect on February 5, 2023.<sup>42</sup> The price cap was set at \$45/barrel for “Discount to Crude”<sup>43</sup> Russian petroleum and at \$100/barrel for “Premium to Crude”<sup>44</sup> Russian petroleum.<sup>45</sup>

OFAC prohibited the following services as they relate to the maritime transport of Russian oil and Russian petroleum sold above the relevant price cap:<sup>46</sup>

- **Trading/commodities brokering:** Buying, selling or trading commodities and/or brokering the sale, purchase or trade of commodities on behalf of other buyers or sellers.
- **Financing:** Providing a commitment for the provision or disbursement of any debt, equity, funds or economic resources, including grants, loans, guarantees, suretyships, bonds, letters of credit, supplier credits, buyer credits and import or export advances.
  - The processing or clearing of payments by an intermediary bank is not considered “financing” for the purposes of this prohibition if the bank: (i) is operating solely as an intermediary; and (ii) does not have any direct relationship with the person providing services related to the maritime transport of the Russian oil or Russian petroleum as it relates to the transaction.
- **Shipping:** Owning or operating a ship for the purpose of carrying or delivering cargo and/or freight transportation; chartering or sub-chartering ships to deliver

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<sup>40</sup> US Department of the Treasury, Determination Pursuant to Section 1(a)(ii) of E.O. 14071, *Prohibition on Certain Services as They Relate to the Maritime Transport of Crude Oil of Russian Federation Origin* (Nov. 21, 2022), available [here](#).

<sup>41</sup> US Department of the Treasury, Determination Pursuant to Section 1(a)(ii), 1(b) and 5 of E.O. 14071, *Price Cap on Crude Oil of Russian Federation Origin* (Dec. 5, 2022), available [here](#).

<sup>42</sup> US Department of the Treasury, Determination Pursuant to Section 1(a)(ii) of E.O. 14071, *Prohibition on Certain Services as They Relate to the Maritime Transport of Petroleum Products of Russian Federation Origin* (Feb. 3, 2023), available [here](#).

<sup>43</sup> Articles subject to the Discount to Crude price cap include naphtha, residual fuel oil and waste oils. See Price Cap Policy Guidance.

<sup>44</sup> Articles subject to the Premium to Crude price cap include gasoline, motor fuel blending stock, gasoil and diesel fuel, kerosene and kerosene-type jet fuel and vacuum gas oil. *Id.*

<sup>45</sup> US Department of the Treasury, Determination Pursuant to Section 1(a)(ii), 1(b) and 5 of E.O. 14071, *Price Cap on Petroleum Products of Russian Federation Origin* (Feb. 3, 2023), available [here](#).

<sup>46</sup> See Price Cap Policy Guidance.



cargo or transport freight; brokering between shipowners and charterers; and serving as a shipping/vessel agent.

- **Insurance:** Providing insurance, reinsurance or protection and indemnity (“P&I”) services; satisfying claims related to underwriting insurance policies that protect policyholders against losses that may occur as a result of property damage or liability; assuming all or part of the risk associated with existing insurance policies originally underwritten by other insurance carriers, including the reinsurance of a non-US insurance carrier by a US person; and providing liability insurance for maritime liability risks associated with the operation of a vessel, including cargo, hull, vessel, P&I and charterer’s liability.
- **Flagging:** Registering or maintaining the registration of a vessel with a country’s national registry of vessels. This definition does not include the deflagging of vessels transporting Russian oil or Russian petroleum sold above the relevant price cap.
- **Customs brokering:** Assisting importers and exporters in meeting requirements governing imports and exports. This definition does not include legal services or assisting importers and exporters in meeting the requirements of US sanctions.

Shipping, freight, customs and insurance costs are not included in the price caps and must be invoiced separately and at commercially reasonable rates. OFAC has stated that it would view the billing of commercially unreasonable shipping, freight, customs or insurance costs as a sign of potential evasion of the relevant price cap.<sup>47</sup>

OFAC provided US service providers with a safe harbor from enforcement so that they can provide covered services without concern that they will be penalized for inadvertently violating US law or regulation, provided that they comply in good faith with a recordkeeping and attestation process. To meet the requirements of the safe harbor, US service providers must ensure that refiners or other purchasers in third countries that have not prohibited the import of Russian oil or Russian petroleum provide documentation showing that the Russian oil or Russian petroleum was purchased at or below the relevant price cap. OFAC published guidance by “tier” of actor describing the diligence each type of actor must undertake to be afforded the safe harbor, and updated that guidance on December 20, 2023 to include new expectations for service providers to (i) receive attestations within a specified timeframe for each lifting or loading of Russian oil or Russian petroleum products, and (ii) retain, provide or receive itemized ancillary cost information as required.<sup>48</sup> US persons may reasonably rely on a certificate of origin

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<sup>47</sup> *Id.*

<sup>48</sup> *Id.*



but should exercise caution if they have reason to believe such certificate has been falsified or is otherwise erroneous.<sup>49</sup>

### Prohibition on Certain Imports and Exports

On March 8, 2022, President Biden signed E.O. 14066 prohibiting the importation into the United States of the following products of “Russian Federation origin”:<sup>50</sup> crude oil; petroleum; petroleum fuels, oils and products of their distillation; liquefied natural gas; coal; and coal products. The prohibition does not apply to imports that are not of Russian Federation origin, even if such items transit through or depart from the Russian Federation.<sup>51</sup>

Furthermore, on March 11, 2022, President Biden signed E.O. 14068 prohibiting, among other things:

- Imports into the United States of the following products of Russian origin: fish, seafood and preparations thereof;<sup>52</sup> alcoholic beverages; non-industrial diamonds;<sup>53</sup> and any other products of Russian Federation origin as may be determined by the Secretary of the Treasury. On June 28, 2022, gold was added to the list of prohibited Russian-origin goods imports.<sup>54</sup>
- Export, reexport, sale or supply from the United States or by a US person of luxury goods, and any other items as may be determined by the Secretary of Commerce, to any person in Russia. The list of US-origin luxury goods issued by the Bureau of Industry and Security (“BIS”) of the US Department of Commerce includes certain spirits, tobacco products, clothing items, jewelry, vehicles and antique goods.<sup>55</sup>

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<sup>49</sup> *Id.*

<sup>50</sup> OFAC anticipates publishing regulations defining “Russian Federation origin” as “goods produced, manufactured, extracted, or processed in the Russian Federation, excluding any Russian Federation origin good that has been incorporated or substantially transformed into a foreign-made product.” FAQ 1019.

<sup>51</sup> FAQ 1020.

<sup>52</sup> FAQ 1025 confirms that GL 6D remains valid and authorizes, among other things, transactions ordinarily incident and necessary to the production, manufacturing, sale, transport, or provision of agricultural commodities, including products such as fish, seafood, or preparations thereof, to, from, or transiting the Russian Federation, provided such transactions are not for the importation of Russian-origin products into the United States as prohibited by E.O. 14068.

<sup>53</sup> FAQ 1027 clarifies that the terms “fish, seafood and preparations thereof,” “alcoholic beverages,” and “non-industrial diamonds” are defined by reference to the Harmonized Tariff Schedule of the United States articles.

<sup>54</sup> OFAC, Determination Pursuant to Section 1(a)(i)(A) of E.O. 14068, *Prohibitions Related to Imports of Gold of Russian Federation Origin* (Dec. 22, 2023), available [here](#). This determination made technical, non-substantive changes to a prior version of the determination, dated June 28, 2022, in light of an amendment to E.O. 14068. The prohibition excludes gold of Russian Federation origin that was located outside of the Russian Federation prior to June 28, 2022 (see FAQ 1070).

<sup>55</sup> For additional information, see “Luxury Products” subsection under “Export Controls” below.

- Export, reexport, sale or supply (directly or indirectly) from the United States or by a US person of US dollar-denominated banknotes to the Russian government or any person in Russia.

OFAC clarified that non-US persons are not exposed to sanctions under E.O. 14068 for importing Russian-origin products into jurisdictions outside the United States, provided such imports do not involve a sanctioned person or any other prohibited transaction.<sup>56</sup>

On December 22, 2023, President Biden issued E.O. 14114, which, among other things, amended and expanded trade sanctions noted above that target the import of Russian-origin fish, seafood, alcoholic beverages and non-industrial diamonds into the United States.<sup>57</sup> Specifically, products that were “mined, extracted, produced, or manufactured wholly or in part in Russia, or harvested in Russian waters or by Russia-flagged vessels, notwithstanding whether such products have been incorporated or substantially transformed into other products outside of the Russian Federation” may now be targeted by the restriction. OFAC concurrently issued a new determination identifying salmon, cod, pollock or crab produced wholly or in part in Russia or harvested in waters under the jurisdiction of the Russian Federation or by Russia-flagged vessels as subject to this broader restriction.<sup>58</sup>

On February 8, 2024, in coordination with G7 leaders, OFAC published two determinations applying E.O. 14068 prohibitions to certain diamonds:

- Effective March 1, 2024, for diamonds of 1.0 carat weight or greater and September 1, 2024, for diamonds of 0.5 carat weight or greater, the importation and entry into the United States of non-industrial diamonds mined, extracted, produced or manufactured in Russia are prohibited (the “Diamonds Determination”).<sup>59</sup>
- Effective March 1, 2024, the importation and entry into the United States of diamond jewelry and unsorted diamonds of either Russian origin or exported from Russia are prohibited (the “Diamond Jewelry and Unsorted Diamonds Determination”).<sup>60</sup> However, pursuant to a general license issued in June 2024,

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<sup>56</sup> FAQ 1026.

<sup>57</sup> Executive Order 14114, “Taking Additional Steps With Respect to the Russian Federation’s Harmful Activities” (Dec. 22, 2023), available [here](#).

<sup>58</sup> OFAC, Determination Pursuant to Section 1(a)(i)(B) of E.O. 14068, *Prohibitions Related to Imports of Certain Categories of Fish, Seafood, and Preparations Thereof* (Dec. 22, 2023), available [here](#).

<sup>59</sup> OFAC, Determination Pursuant to Section 1(a)(i)(B) of E.O. 14068, *Prohibitions Related to Imports of Certain Categories of Diamonds* (Feb. 8, 2024), available [here](#). See also FAQ 1165 explaining this determination and FAQ 1027 for the definition of non-industrial diamonds.

<sup>60</sup> OFAC, Determination Pursuant to Sections 1(a)(i)(A) and 1(a)(i)(D) of E.O. 14068, *Prohibitions Related to Imports of Diamond Jewelry and Unsorted Diamonds of Russian Federation Origin and Diamond Jewelry and Unsorted Diamonds Exported From the Russian Federation* (Feb. 8, 2024), available [here](#). See also FAQ 1166 explaining this determination; FAQ 1027 for the definition of diamond jewelry; FAQ 1019 for the definition of Russian Federation origin.

the importation into the United States of diamond jewelry is authorized if that jewelry was physically located outside of the Russian Federation before, and not exported or reexported from the Russian Federation since, March 1, 2024.<sup>61</sup>

On April 12, 2024, in coordination with the UK, OFAC published a determination applying E.O. 14068 prohibitions to Russian-origin aluminum, copper and nickel produced on or after April 13, 2024 (the “Metals Import Determination”).<sup>62</sup> OFAC clarified that the Metals Import Determination does not (i) apply to metals that have been incorporated or substantially transformed into other products outside of the Russian Federation,<sup>63</sup> or (ii) impose new prohibitions on banks acting as intermediaries in payments related to Russian metals.<sup>64</sup>

Any approval, financing, facilitation or guarantee by a US person of a transaction by a foreign person that would be prohibited if performed by a US person or within the United States is also prohibited.<sup>65</sup>

### Full Blocking Sanctions

E.O. 14024 authorizes blocking sanctions on persons determined to operate or to have operated in the technology and defense and related materiel sectors of the Russian economy or any other sectors as determined by the Secretary of the Treasury.<sup>66</sup>

Treasury has expanded the scope of E.O. 14024<sup>67</sup> under this provision to cover Russia’s financial services sector;<sup>68</sup> aerospace, marine and electronics sectors;<sup>69</sup> accounting, trust and corporate formation services and management consulting

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<sup>61</sup> See General License 103; FAQ 1189.

<sup>62</sup> OFAC, Determination Pursuant to Section 1(a)(i)(A) of Executive Order 14068, *Prohibitions Related to Imports of Aluminum, Copper, and Nickel of Russian Federation Origin* (Apr. 12, 2024), available [here](#). See also FAQs 1168 and 1169 explaining the prohibitions under this determination and FAQ 1170 for definitions of the terms aluminum, copper and nickel.

<sup>63</sup> FAQ 1171.

<sup>64</sup> FAQ 1172.

<sup>65</sup> 87 Fed. Reg. 14381 (Mar. 15, 2022).

<sup>66</sup> FAQ 1126 summarizes and defines the Russian Federation economy sectors in scope for potential sanctions pursuant to E.O. 14024.

<sup>67</sup> E.O. 14114 also amended E.O. 14024 to, among other things, cover the construction, aerospace or manufacturing sectors of Russia’s economy, or other such sectors as may be determined to support Russia’s military-industrial base by the Secretary of the Treasury.

<sup>68</sup> US Department of the Treasury, Determination Pursuant to Section 1(a)(i) of E.O. 14024 (Feb. 22, 2022), available [here](#).

<sup>69</sup> US Department of the Treasury, Determination Pursuant to Section 1(a)(i) of E.O. 14024 (Mar. 31, 2022), available [here](#).

sectors;<sup>70</sup> quantum computing sector;<sup>71</sup> metals and mining sector;<sup>72</sup> architecture, engineering, construction, manufacturing and transportation sectors;<sup>73</sup> and energy sector.<sup>74</sup>

On November 21, 2024, OFAC issued guidance warning that any FFI that joins or has already joined the Russian financial messaging system Sistema Peredachi Finansovoykh Soobscheniy or “System for Transfer of Financial Messages” (“SPFS”) may be designated for operating or having operated in the financial services sector

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<sup>70</sup> OFAC, Determination Pursuant to Section 1(a)(i) of E.O. 14024 (May 8, 2022), available [here](#).

<sup>71</sup> OFAC, Determination Pursuant to Section 1(a)(i) of E.O. 14024 (Sept. 15, 2022), available [here](#). FAQ 1086 defines “quantum computing sector of the Russian Federation economy” to include activities related to products and services in or involving the Russian Federation in research, development, manufacturing, assembling, maintenance, repair, sale, or supply of quantum computing, quantum computers, electronic assemblies thereof or cryogenic refrigeration systems related to quantum computing. OFAC also interprets the term “quantum computing sector of the Russian Federation economy” to include any of the following services when related to quantum computing: infrastructure, web hosting or data processing services; custom computer programming services; computer systems integration design services; computer systems and data processing facilities management services; computing infrastructure, data processing services, web hosting services and related services; repairing computer, computer peripherals, and communication equipment; other computer-related services; as well as the exportation, reexportation, sale or supply, directly or indirectly, of quantum computing, quantum computers, electronic assemblies thereof, or cryogenic refrigeration systems related to quantum computing to or from the Russian Federation.

<sup>72</sup> OFAC, Determination Pursuant to Section 1(a)(i) of E.O. 14024, *Metals and Mining Sector of the Russian Federation Economy* (Feb. 24, 2023), available [here](#). FAQ 1115 defines the term “metals and mining sector of the Russian Federation economy” to include any act, process or industry of extracting, at the surface or underground, ores, coal, precious stones or any other minerals or geological materials in the Russian Federation, or any act procuring, processing, manufacturing or refining such geological materials or transporting them to, from or within the Russian Federation. FAQ 1117 further explains that OFAC does not intend to target persons for operating in the metals and mining sector where the provision of goods or services is solely for the safety and care of personnel, protection of human life, prevention of accidents or injuries, maintenance or repair necessary to avoid environmental or other significant damage or activities related to environmental mitigation or remediation.

<sup>73</sup> OFAC, Determination Pursuant to Section 1(a)(i) of E.O. 14024, *Architecture, Engineering, Construction, Manufacturing, and Transportation Sectors of the Russian Federation Economy* (May 19, 2023), available [here](#).

<sup>74</sup> US Department of the Treasury, Determination Pursuant to Section 1(a)(i) of E.O. 14024, *Energy Sector of the Russian Federation Economy* (Jan. 10, 2025), available [here](#). FAQ 1213 defines “energy sector of the Russian Federation economy” to include activities such as the procurement, exploration, extraction, drilling, mining, harvesting, production, refinement, liquefaction, gasification, regasification, conversion, enrichment, fabrication, manufacturing, testing, financing, distribution, purchase or transport to, from or involving the Russian Federation, of petroleum, including crude oil, lease condensates, unfinished oils, natural gas, liquefied natural gas, natural gas liquids or petroleum products, or other products capable of producing energy, such as coal, wood or agricultural products used to manufacture biofuels; the development, production, testing, generation, transmission, financing or exchange of power, through any means, including nuclear, electrical, thermal, and renewable, to, from or involving the Russian Federation; and any related activities, including the provision or receipt of goods, services or technology to, from, or involving the energy sector of the Russian Federation economy. OFAC’s Russia-related General License (“GL”) 8L, which authorized all transactions prohibited by E.O. 14024 involving certain entities that are ordinarily incident and necessary to the wind down of any transaction related to energy, expired on March 12, 2025.

of the Russian economy, and indicating that OFAC views joining SPFS as a red flag and is prepared to more aggressively target FFIs that take such action.<sup>75</sup>

**Specially Designated Nationals and Blocked Persons List:** OFAC and the US Department of State have imposed full blocking sanctions under E.O. 14024 and other sanctions authorities by placing numerous entities and individuals on OFAC's List of Specially Designated Nationals and Blocked Persons ("SDN List"). Additionally, all entities that are owned 50% or more (directly or indirectly) by any of these entities or individuals are subject to blocking, even if not identified by OFAC.<sup>76</sup>

Since February 2022, OFAC has added over 6,000 Russia-related targets to the SDN List. These include financial institutions representing over 80% of Russia's banking sector by assets, top Russian state-owned banks, and many securities registrars, state-owned enterprises, political figures, prominent business figures and others. Persons from various third countries connected to Russia's sanctions evasion efforts also have been targeted. For a non-exhaustive list of Russian billionaires who have been sanctioned, see our Russian Billionaires Table at [Annex A](#), for financial institutions, see [Annex B](#), and for certain other entities and individuals on the SDN List, see [Annex C](#).

Generally, US persons are prohibited from any dealings with, and are required to block and freeze the assets of, persons placed on the SDN List and any entities that are owned (directly or indirectly) 50% or more by such persons.<sup>77</sup> These restrictions also prohibit making any contribution or provision of funds, goods or services by, to or for the benefit of any blocked person and receiving any contribution or provision of funds, goods or services from any such person.

US persons may not buy, sell or otherwise engage in transactions related to debt or equity of persons placed on the SDN List or entities owned 50% or more by such persons and must block such holdings unless exempted or otherwise authorized by OFAC. However, a US fund that contains such blocked holdings generally is not itself considered a blocked entity as long as the blocked holdings represent less than a 50% share by value of the fund. As a result, US persons may continue to invest in the fund, and the fund may continue to operate (subject to compliance with other

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<sup>75</sup> See OFAC, *OFAC Alert: Sanctions Risk for Foreign Financial Institutions that Join Russian Financial Messaging System, System for Transfer of Financial Messages* (Nov. 21, 2024), available [here](#).

<sup>76</sup> This is the so-called "50% Rule," which states that the property and interests in property of entities directly or indirectly owned 50% or more in the aggregate by one or more blocked persons are considered blocked.

<sup>77</sup> FAQ 1080 notes that accounts held by U.S. persons at blocked Russian financial institutions (including checking and savings accounts, credit cards, certificates of deposit, loans, and mortgages) are themselves considered blocked property unless exempt. U.S. persons must stop using such accounts, treat them as blocked, and file a blocking report with OFAC. GL 50 authorizes transactions ordinarily incident and necessary to close individual accounts held at a blocked institution.

sanctions measures, such as the restrictions on new investment in Russia). The fund may divest itself of blocked holdings to the extent authorized by OFAC.<sup>78</sup>

US persons, including US operators of credit card systems and US acquirers, are prohibited from processing transactions involving sanctioned FFIs, and non-US operators of credit card systems whose cards are issued by sanctioned FFIs may also violate US sanctions if such cards are used in the United States.<sup>79</sup>

### Secondary Sanctions

The United States has authority to apply “secondary sanctions” on non-US persons that have “materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of” persons blocked pursuant to E.O. 14024 or certain activities for or on behalf of, or for the benefit of, the Russian government (including malicious cyber-enabled activities, interference in a US or other foreign government election, actions or policies that undermine democratic processes or institutions and other specified malign activities).<sup>80</sup> As a general matter, secondary sanctions do not impose direct compliance obligations but instead seek to discourage non-US persons from engaging in targeted activities by threatening the imposition of certain penalties.

As amended by E.O. 14114, E.O. 14024 subjects FFIs that engage in certain activities involving Russia’s military-industrial base to heightened secondary sanctions risks, including in relation to expanded restrictions on certain Russian goods imports. Specifically, under the new authorities, an FFI may be targeted by secondary sanctions if US authorities determine that the FFI has:

- conducted or facilitated a “significant” transaction for or on behalf of a person already targeted by US blocking sanctions for operating or having operated in the technology, defense and related materiel, construction, aerospace or manufacturing sectors of the Russian Federation economy (or other sectors determined in the future to support Russia’s military-industrial base); or
- (i) conducted or facilitated a “significant” transaction or (ii) provided any service involving Russia’s military-industrial base, including the sale to Russia, directly or indirectly, of items specified in a related determination, including items related to Russia’s production of advanced precision-guided weapons and other critical items.<sup>81</sup>

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<sup>78</sup> FAQ 982.

<sup>79</sup> FAQ 1030.

<sup>80</sup> E.O. 14024 section 1(a)(vi).

<sup>81</sup> OFAC, Determination Pursuant to Section 11(a)(ii) of Executive Order 14024 (Dec. 22, 2023), [available here](#) (listing certain machine tools and manufacturing equipment; manufacturing materials for semiconductors and related electronics; electronic test equipment; propellants, chemical precursors for propellants and explosives; lubricants and lubricant additives; bearings; advanced optical systems; and navigation instruments); FAQ 1150.



While the transactions covered in the first prong were already targeted by the provisions of the existing executive orders aimed at preventing transactions with designated parties, the second prong is new and particularly broad because it exposes FFIs to sanctions risks based on the facilitation of transactions with unsanctioned parties. Such transactions may not be identified through screening for transactions involving entities included on OFAC's SDN List. That said, for purposes of US secondary sanctions risk for FFIs, OFAC has said it remains focused on counteracting activity that involves sanctions evasion or third-country support to Russia's military-industrial base and that foreign persons do not risk the imposition of sanctions for engaging in transactions authorized for US persons under general licenses issued under the Russia sanctions program.<sup>82</sup>

The new authorities authorize the imposition of secondary sanctions on an FFI not only for direct support to Russia's military-industrial base, which is defined broadly to include any person blocked pursuant to E.O. 14024, and dealings with sanctioned Russian clients, but also for indirect touchpoints, such as facilitating a non-Russian customer's dealings or providing services to a non-Russian customer in furtherance of a transaction related to Russia's military-industrial base, including for transactions in currencies other than US dollars.<sup>83</sup> E.O. 14114 authorizes the imposition of full blocking sanctions, as well as correspondent account or payable-through account (so-called "CAPTA") sanctions, which would prohibit US financial institutions from providing correspondent account services to a targeted FFI, effectively cutting that FFI out of participation (as originator, beneficiary or intermediary) in any USD funds transfers.

OFAC provides guidance for several of the key terms used in E.O. 14114, generally following definitions used for earlier Russia-focused secondary sanctions (*e.g.*, Section 228 of the Countering America's Adversaries Through Sanctions Act ("CAATSA")):<sup>84</sup>

- "Russia's military-industrial base" includes (but is not limited to) "all persons blocked pursuant to E.O. 14024, as well as any person operating in the technology, defense and related materiel, construction, aerospace and manufacturing sectors of the Russian Federation economy (and other sectors as may be determined pursuant to E.O. 14024)" and may also include "individuals and entities that support the sale, supply, or transfer of critical items identified in determinations pursuant to subsection 11(a)(ii) of E.O. 14024."<sup>85</sup>
- A "significant transaction or transactions" will, in general, be considered in light of "(a) the size, number and frequency of the transaction(s); (b) the nature of the transaction(s); (c) the level of awareness of management and whether the

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<sup>82</sup> FAQ 1182.

<sup>83</sup> FAQ 1152.

<sup>84</sup> FAQ 1151.

<sup>85</sup> FAQ 1181.

transactions are part of a pattern of conduct; (d) the nexus of the transaction(s) to persons sanctioned pursuant to E.O. 14024, or to persons operating in Russia's military-industrial base; (e) whether the transaction(s) involve deceptive practices; (f) the impact of the transaction(s) on US national security objectives; and (g) such other relevant factors that OFAC deems relevant."

OFAC further provides related guidance for FFIs, as updated on June 12, 2024, to address, inter alia, the revised definition of "Russia's military-industrial base" to include all persons blocked under E.O. 14024 (the "Updated Sanctions Advisory").<sup>86</sup> The Updated Sanctions Advisory contains examples of activities that could expose FFIs to sanctions risk, as well as recommendations for developing and maintaining a risk-based sanctions compliance program. Because the secondary sanctions risks under E.O. 14114 are not limited to those FFIs that "knowingly" engage in the significant transactions covered by the executive order, the Updated Sanctions Advisory also outlines several recommendations that FFIs should follow to identify their exposure to activity involving Russia's military-industrial base and to mitigate related risk.<sup>87</sup>

At the end of the Biden Administration in January 2025, OFAC designated or re-designated under E.O. 13662 hundreds of Russian individuals and entities, including nearly 100 major entities across Russia's financial services, energy and defense and related materiel sectors that were already designated pursuant to E.O. 14024. Non-US persons, including FFIs, that knowingly facilitate significant transactions for or on behalf of individuals or entities designated under E.O. 13662 could be subject to certain mandatory secondary sanctions. Specifically, under Section 226 of CAATSA and implementing regulations, CAPTA sanctions are required to be imposed on an FFI determined by the Secretary of the Treasury, in consultation with the Secretary of State, to knowingly facilitate a significant transaction on behalf of any Russian person included on OFAC's SDN List under certain authorities, including E.O. 13662. In addition, Section 228 of CAATSA and implementing regulations require blocking sanctions to be imposed on any foreign person determined by the Secretary of the Treasury, in consultation with the Secretary of State, to knowingly: (i) materially violate, attempt to violate, conspire to violate or cause a violation of any license, order, regulation or prohibition contained in or issued pursuant to certain authorities, including E.O. 13662; or (ii) facilitate a significant transaction or transactions for or on behalf of persons subject to sanctions imposed by the United States with respect to the Russian Federation under certain authorities, including E.O. 13662, or their child, spouse, parent or sibling.<sup>88</sup>

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<sup>86</sup> OFAC Sanctions Advisory, "Updated Guidance for Foreign Financial Institutions on OFAC Sanctions Authorities Targeting Support to Russia's Military-Industrial Base" (June 12, 2024), [available here](#).

<sup>87</sup> FAQs 1147-1152, 1181 and 1182 address questions related to secondary sanctions risks for FFIs for engaging in certain transactions, or providing any service, involving Russia's military-industrial base.

<sup>88</sup> See FAQs 541-546, 574.



In order to waive or terminate sanctions imposed on a person designated pursuant to E.O. 13662, CAATSA requires the President to submit a report for Congressional review describing the proposed action and the reasons for it. The President may not take the proposed action during a Congressional review period of at least 30 days, or until Congress passes a joint resolution of approval, and may also be prohibited from taking action if Congress passes a joint resolution of disapproval.

**Expanded Secondary Sanctions Related to Trade in Russian Gold:** The Fiscal Year 2023 National Defense Authorization Act (“NDAA”), enacted December 23, 2022, includes provisions directing the President to impose sanctions related to trade in Russian gold.

Specifically, Section 5590 of the NDAA requires that the President submit periodic reports to Congress identifying foreign persons that knowingly participated in a significant transaction for the sale, supply or transfer (including transportation) of gold, directly or indirectly, to or from (i) Russia or (ii) the government of Russia, including from reserves of the Central Bank of the Russian Federation held outside of Russia. The reports must also identify foreign persons who knowingly participated in a significant transaction that otherwise involved gold in which the Russian government had any interest.

The President is authorized to impose blocking sanctions, and may impose visa sanctions, against those persons identified in the reports.

**Prohibition on Transactions with the Central Bank of the Russian Federation, Sovereign Debt and NSD**

Directive 4 under E.O. 14024, “Prohibitions Related to Transactions Involving the Central Bank of the Russian Federation, the National Wealth Fund of the Russian Federation, and the Ministry of Finance of the Russian Federation,” prohibits US persons from engaging in any transaction involving the Central Bank of the Russian Federation, the National Wealth Fund of the Russian Federation or the Ministry of Finance of the Russian Federation (“Directive 4 Entities”), including any transfer of assets to such entities or any foreign exchange transaction for or on behalf of such entities.<sup>89</sup>

Because the directive’s prohibition covers direct and indirect involvement of the Directive 4 Entities,<sup>90</sup> OFAC has urged US persons to be cautious of nonroutine foreign exchange transactions that may indirectly involve Directive 4 Entities. OFAC also noted that US persons should exercise caution in engaging in foreign exchange transactions on MOEX given the heightened risk that the Central Bank of

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<sup>89</sup> OFAC, Directive 4 (as amended) under Executive Order 14024, *Prohibitions Related to Transactions Involving the Central Bank of the Russian Federation, the National Wealth Fund of the Russian Federation, and the Ministry of Finance of the Russian Federation* (May 19, 2023), available [here](#). A prior version of this Directive, which was issued on February 28, 2022, is superseded by this version.

<sup>90</sup> FAQ 998.

the Russian Federation could be a counterparty to such transactions.<sup>91</sup> Following the subsequent imposition of June 2024 blocking sanctions on MOEX pursuant to E.O. 14024, US persons can no longer engage in any transactions on MOEX, absent an OFAC license.

OFAC clarified that its “50% Rule” does not apply to this directive<sup>92</sup> and that US persons are not required to block transactions involving Directive 4 Entities but must only reject such transactions.<sup>93</sup>

OFAC also clarified that Directive 4 does not prohibit trading in the secondary markets for debt or equity of Directive 4 Entities, provided that no Directive 4 Entity is a counterparty to such transaction.<sup>94</sup> However, the new investment prohibition (as described above), as well as Directive 1A (as described below), place restrictions relevant to such activity.

Effective May 19, 2023, Directive 4 imposes a reporting requirement on US persons in possession or control of property in which any of the Directive 4 Entities has a direct or indirect interest. Reporting to OFAC is required by June 30 every year.

Directive 1A, “Prohibitions Related to Certain Sovereign Debt of the Russian Federation,” prohibits US financial institutions from participating in the secondary market for bonds issued after March 1, 2022, by the Directive 4 Entities (prohibitions on participation in primary market and lending had been introduced earlier).<sup>95</sup> Subsequently, the new investment prohibition of E.O. 14071 prohibited US persons from purchasing debt and equity securities issued by any entity in Russia, including bonds issued by Directive 4 Entities. Entities determined to be subject to the prohibitions of Directive 1A or Directive 4 are listed on OFAC’s Non-SDN Menu-Based Sanctions List.

Further, June 2024 blocking sanctions imposed on MOEX, NCC and NSD pursuant to E.O. 14024 prohibit US persons from selling or divesting debt and equity securities if such transactions involve MOEX, NCC or NSD, or any entity in which one of these entities owns, directly or indirectly, individually or in the aggregate, a 50% or greater interest. These designations, among other impacts, effectively required US persons to block the securities held through NSD upon expiration of OFAC general licenses authorizing certain wind-down and divestment transactions.

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<sup>91</sup> FAQ 981, 1002.

<sup>92</sup> FAQ 1001.

<sup>93</sup> FAQ 1004.

<sup>94</sup> FAQ 1005.

<sup>95</sup> OFAC, Directive 1A under Executive Order 14024, *Prohibitions Related to Certain Sovereign Debt of the Russian Federation* (February 22, 2022), available [here](#). A prior version of this Directive, which was issued on April 15, 2021 and which is replaced and superseded by this version, prohibited the same activities with respect to participation in the primary market for ruble or non-ruble denominated bonds issued after June 14, 2021 by the entities determined to be subject to the Directive, and with respect to lending ruble or non-ruble denominated funds to the entities determined to be subject to the Directive.

On October 2, 2024, the President of the Russian Federation enacted Decree No. 840, which required the transfer of shares held by foreign investors from “hostile states” from their local custodians’ accounts at NSD to accounts for such custodians opened directly with the Russian issuers’ local registrars by October 12, 2024, the expiration date of OFAC’s general licenses.<sup>96</sup> OFAC, in response, issued and subsequently updated FAQ 1197, which describes Decree No. 840 as an attempt to evade or avoid OFAC sanctions. The FAQ cautions US persons that transfers pursuant to Decree No. 840 may be considered null and void pursuant to OFAC’s regulations and may involve other blocked persons, including more than 40 local Russian registrars designated by OFAC pursuant to E.O. 14024. OFAC indicated further that US persons should continue to treat securities transferred from NSD pursuant to Decree No. 840, as well as securities in the possession or control of SDN Russian registrars (and any dividends or income received via NSD or SDN Russian registrars), as blocked.

#### **Correspondent and Payable-Through Account Sanctions on Sberbank**

Prior to the imposition of full blocking sanctions on Public Joint Stock Company Sberbank of Russia (“Sberbank”) and its subsidiaries on April 6, 2022, OFAC imposed restrictions on Sberbank and 25 FFI subsidiaries that are 50% or more owned, directly or indirectly, by Sberbank pursuant to Directive 2 under E.O. 14024.

Directive 2, “Prohibitions Related to Correspondent or Payable-Through Accounts and Processing of Transactions Involving Certain Foreign Financial Institutions,”<sup>97</sup> prohibits US financial institutions<sup>98</sup> from:

- opening or maintaining a correspondent account<sup>99</sup> or payable-through account<sup>100</sup> for or on behalf of FFIs determined to be subject to the prohibitions of the directive, or their property or interests in property; and

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<sup>96</sup> See Debevoise Update, “NSD’s Removal from Russian Custody Infrastructure: Sanctions Implications” (Oct. 23, 2024), available [here](#).

<sup>97</sup> OFAC, Directive 2 under Executive Order 14024, *Prohibitions Related to Correspondent or Payable-Through Accounts and Processing of Transactions Involving Certain Foreign Financial Institutions* (February 24, 2022), available [here](#).

<sup>98</sup> The prohibition only applies to US financial institutions and does not apply to foreign subsidiaries of US financial institutions (see FAQ 972). US individuals and companies that are not “US financial institutions” can process transactions involving FFIs subject to the directive. See FAQ 973. Although non-US financial institutions are not within the scope of Directive 2’s restrictions, they may not use their own accounts to process US dollar or other transactions on behalf of Sberbank at a US financial institution. FAQ 970.

<sup>99</sup> Directive 2 defines “correspondent account” as “an account established by a US financial institution for [an FFI] to receive deposits from, or to make payments on behalf of, the [FFI], or to handle other financial transactions related to such [FFI].”

<sup>100</sup> The term “payable-through account” is defined as “a correspondent account maintained by a US financial institution for [an FFI] by means of which the [FFI] permits its customers to engage, either directly or through a subaccount, in banking activities usual in connection with the business of banking in the United States.”

- processing a transaction involving such FFIs or their property or interests in property.

Directive 2 does not impose blocking sanctions and, thus, does not require US financial institutions to block the assets of FFIs subject to the prohibitions of the directive. Instead, the directive requires that US financial institutions reject any transaction involving any such FFI or its property or interests in property. This includes rejecting transactions related to any securities (including depositary receipts) issued by such FFI, including secondary market trading, or custodied by such FFI.<sup>101</sup>

OFAC clarified that all FFIs that are 50% or more owned by a designated entity are covered, but that the prohibitions do not apply to subsidiaries that are not FFIs, even if those non-FFI subsidiaries are 50% or more owned, directly or indirectly, individually or in the aggregate, by one or more FFIs determined to be subject to the directive.<sup>102</sup> OFAC also explained that the prohibitions of Directive 2 apply with respect to any currency, not just transactions denominated in US dollars.<sup>103</sup>

For FFIs determined to be subject to Directive 2, the prohibitions of the directive would take effect 30 days after the date of such determination. Entities determined to be subject to the prohibitions of this directive will be listed on OFAC's CAPTA List.

### Debt and Equity Prohibitions

Prior to the implementation of the new investment prohibition under E.O. 14071, which by its broad mandate covers transactions under Directive 3, and subsequent blocking sanctions imposed on MOEX, NCC and NSD, Directive 3 prohibited US persons and persons within the United States from all transactions in, provision of financing for and other dealings in: (i) new debt of longer than 14 days' maturity; and (ii) new equity, in each case of entities determined to be subject to the prohibitions of the directive or their property or interests in property and entities owned 50% or more owned by them, and irrespective of currency denomination.<sup>104</sup>

OFAC determined 13 entities were subject to the prohibitions under Directive 3, some of which (*i.e.*, Sberbank, Alfa-Bank JSC ("Alfa-Bank"), PJSC Alrosa ("Alrosa"), Credit Bank of Moscow PJSC, Joint Stock Company Sovcomflot ("Sovcomflot"), Gazprombank JSC ("Gazprombank") and PJSC Gazprom Neft ("Gazprom Neft"))

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<sup>101</sup> FAQ 967.

<sup>102</sup> FAQ 969.

<sup>103</sup> FAQ 971.

<sup>104</sup> OFAC, Directive 3 under Executive Order 14024, *Prohibitions Related to New Debt and Equity of Certain Russia-related Entities* (February 24, 2022), available [here](#). FAQs 981-989 address debt and equity restrictions under Directive 3.

later became subject to full blocking sanctions.<sup>105</sup> Prohibitions took effect on March 26, 2022, for these entities and their 50% or more owned subsidiaries.<sup>106</sup>

For any entity later determined to be subject to Directive 3, the prohibitions of the directive would take effect 30 days after the date of such determination. Entities determined to be subject to the prohibitions of this directive will be listed on OFAC's Non-SDN Menu-Based Sanctions List.

### **Prohibition on Russian-Affiliated Vessels Entering US Ports**

On April 22, 2022, President Biden issued Proclamation 10371 prohibiting Russian-affiliated vessels from entering into US ports.<sup>107</sup> "Russian-affiliated vessels" means: (i) vessels of Russian registry (*i.e.*, the vessel is Russian flagged); (ii) vessels that are Russian owned (*i.e.*, the legal title of ownership of the vessel that appears on the ship's registration documents is the government of the Russian Federation or a Russian company, citizen, or permanent resident); or (iii) vessels that are Russian operated (*i.e.*, a Russian company, citizen or permanent resident is responsible for the commercial decisions concerning the employment of a ship and decides how and where that asset is employed).

The prohibition does not apply in two scenarios:

- Russian-affiliated vessels used in the transport of source material,<sup>108</sup> special nuclear material<sup>109</sup> and nuclear byproduct material<sup>110</sup> for which, and for such time as, the Secretary of Energy determines that no viable source of supply is available that would not require transport by Russian-affiliated vessels; and
- Russian-affiliated vessels requesting only to enter US ports due to force majeure, solely to allow seafarers of any nationality to disembark or embark for purposes of conducting crew changes, emergency medical care or for other humanitarian need.

The prohibition went into effect on April 28, 2022.

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<sup>105</sup> The entities determined to be subject to Directive 3 were Sberbank, Alfa-Bank, Alrosa, Credit Bank of Moscow PJSC, Gazprombank JSC, JSC Russian Agricultural Bank, PJSC Gazprom, PJSC Gazprom Neft, OJSC Russian Railways, PJSC Transneft, PJSC Rostelecom, PJSC RusHydro and JSC Sovcomflot.

<sup>106</sup> Subsequently, and as noted above, the new investment prohibition of E.O. 14071 prohibited US persons from purchasing debt and equity securities issued by any entity in Russia, including securities issued by Directive 3 entities.

<sup>107</sup> 87 Fed. Reg. 24265 (Apr. 22, 2022).

<sup>108</sup> The term "source material" has the same meaning given to that term in section 11(z) of the Atomic Energy Act of 1954 (AEA) ([42 U.S.C. 2014\(z\)](#)).

<sup>109</sup> The term "special nuclear material" has the same meaning given to that term in section 11(aa) of the AEA ([42 U.S.C. 2014\(aa\)](#)).

<sup>110</sup> The term "byproduct material" has the same meaning given to that term in section 11(e) of the AEA ([42 U.S.C. 2014\(e\)](#)).

### General Licenses

For the purpose of minimizing unintended consequences on third parties, OFAC issued a number of GLs in connection with the foregoing actions. Below is a list of GLs in effect as of the publication date of this document.

#### **GL 1B: Activities Involving Federal State Budgetary Institution Marine Rescue Service**<sup>111</sup>

GL 1B authorizes all transactions prohibited by E.O. 14039, E.O. 14024 or the Protecting Europe's Energy Security Act of 2019, 22 U.S.C. 9526 note, as amended, involving Federal State Budgetary Institution Marine Rescue Service ("MRS"), or any entity in which MRS owns, directly or indirectly, a 50% or greater interest, that are not related to the construction of the Nord Stream 2 pipeline project, the TurkStream pipeline project or any project that is a successor to either such project.

GL 1B does not authorize any transactions or activities with any vessels identified on OFAC's SDN List as blocked property of MRS, including vessels identified as blocked property of any entity in which MRS owns, directly or indirectly, a 50% or greater interest.<sup>112</sup>

#### **GL 2: Servicing Transactions Involving VEB**

GL 2 authorizes all transactions prohibited by E.O. 14024 involving VEB and its subsidiaries that are ordinarily incident and necessary to the servicing of bonds issued before March 1, 2022, by the Directive 4 Entities.

#### **GL 6D: Transactions Related to Agricultural Commodities, Medicine, Medical Devices, the COVID-19 Pandemic or Clinical Trials**<sup>113</sup>

GL 6D authorizes transactions related to: (1) the production, manufacturing, sale, transport or provision of agricultural commodities,<sup>114</sup> agricultural equipment, medicine,<sup>115</sup> medical devices,<sup>116</sup> replacement parts and components for medical devices or software updates for medical devices; (2) the prevention, diagnosis or treatment of COVID-19 (including research or clinical studies relating to COVID-19); or (3) clinical trials and other medical research activities.

GL 6D authorizes certain services that would otherwise be prohibited under the determination of May 8, 2022, made pursuant to E.O. 14071, which prohibited

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<sup>111</sup> Effective December 18, 2024, GL 1B replaces and supersedes GL 1A, issued August 20, 2021.

<sup>112</sup> See FAQ 894.

<sup>113</sup> Effective June 12, 2024, GL 6D replaces and supersedes GL 6C, issued January 17, 2023.

<sup>114</sup> Agricultural commodities are products that fall within the term "agricultural commodity" as defined in section 102 of the Agricultural Trade Act of 1978 (7 U.S.C. 5602) and are intended for use as: (i) food for humans (including raw, processed and packaged foods; live animals; vitamins and minerals; food additives or supplements; and bottled drinking water) or animals (including animal feeds); (ii) seeds for food crops; (iii) fertilizers or organic fertilizers; or (iv) reproductive materials (such as live animals, fertilized eggs, embryos and semen) for the production of food animals.

<sup>115</sup> Medicine is an item that falls within the definition of the term "drug" in section 201 of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 321).

<sup>116</sup> A medical device is an item that falls within the definition of "device" in section 201 of the Federal Food, Drug, and Cosmetic Act.

certain accounting, trust and corporate formation and management consulting services, or the IT and Software Services Determination.

OFAC clarified that, for a US financial institution to engage in transactions authorized under GL 6D, all funds transfers must be processed indirectly through a non-sanctioned, non-US financial institution.<sup>117</sup>

**GL 7A: Transactions Related to Overflight and Emergency Landings**<sup>118</sup>

GL 7A authorizes transactions that are ordinarily incident and necessary to: (i) the receipt of, and payment of charges for, services rendered in connection with overflights of the Russian Federation or emergency landings in the Russian Federation by aircraft registered in the United States or owned or controlled by, or chartered to, US persons; and (ii) provide air ambulance and related medical services, including medical evacuation, to individuals in the Russian Federation.

OFAC clarified that, for a US financial institution to engage in transactions authorized under GL 7A, all funds transfers must be processed indirectly through a non-sanctioned, non-US financial institution.<sup>119</sup>

**GL 13O: Certain Administrative Transactions Prohibited by Directive 4**<sup>120</sup>

GL 13O authorizes US persons or entities owned or controlled (directly or indirectly) by a US person, through **12:01 a.m. EST on January 9, 2026**, to pay taxes, fees or import duties, and purchase or receive permits, licenses, registrations, certifications or tax refunds, to the extent such transactions are prohibited by Directive 4, provided such transactions are ordinarily incident and necessary to such persons' day-to-day operations in the Russian Federation.

GL 13O does not authorize transactions that involve the payment of "exit tax," which the Russian government may require prior to the divestment of assets located in the Russian Federation.<sup>121</sup> U.S. persons whose divestment of assets in the Russian Federation will involve a payment of such an "exit tax" require a specific license from OFAC.<sup>122</sup>

**GL 14: Clearing and Settlement Transactions Prohibited by Directive 4**

GL 14 authorizes all transactions prohibited by Directive 4 involving the Directive 4 Entities where the Directive 4 Entity's sole function in the transaction is to act as an operator of a clearing and settlement system, provided that: (i) there is no transfer of assets to or from any Directive 4 Entity, unless separately authorized; and (ii) no

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<sup>117</sup> FAQ 978. Throughout this document, we refer to the most recent versions of GLs that have been amended, even if the FAQs have not yet been updated to reflect the new GL number.

<sup>118</sup> Effective May 5, 2022, GL 7A replaces and supersedes GL 7, issued February 24, 2022.

<sup>119</sup> FAQ 978.

<sup>120</sup> Effective September 29, 2025, GL 13O replaces and supersedes GL 13N issued July 8, 2025.

<sup>121</sup> FAQ 1118.

<sup>122</sup> *Id.*



Directive 4 Entity is either a counterparty or a beneficiary to the transaction (unless separately authorized).

**GL 18: Transactions Related to US Dollar-Denominated Banknote Noncommercial, Personal Remittances Prohibited by E.O. 14068**

GL 18 authorizes all transactions prohibited by E.O. 14068 that are ordinarily incident and necessary to the transfer of US dollar-denominated banknote noncommercial, personal remittances<sup>123</sup> from: (i) the United States or a US person, wherever located, to an individual located in the Russian Federation; or (ii) a US person who is an individual located in the Russian Federation. Noncommercial, personal remittances do not include charitable donations to or for the benefit of an entity or funds transfers for use in supporting or operating a business, including a family-owned business.<sup>124</sup>

Transferring institutions may rely on the originator of a funds transfer with regard to compliance with GL 18, provided that the transferring institution does not know or have reason to know that the funds transfer is not in compliance with GL 18.

**GL 19: Transactions Related to Personal Maintenance of US Individuals Located in the Russian Federation Prohibited by E.O. 14068**

GL 19 authorizes individuals who are US persons located in the Russian Federation to engage in all transactions prohibited by E.O. 14068 that are ordinarily incident and necessary to their personal maintenance within the Russian Federation, including payment of housing expenses, acquisition of goods or services for personal use, payment of taxes or fees and purchase or receipt of permits, licenses or public utility services.

**GL 20: Third-Country Diplomatic and Consular Funds Transfers**

GL 20 authorizes US persons to engage in all transactions ordinarily incident and necessary to the official business of third-country diplomatic or consular missions located in Russia that are prohibited by E.O. 14024 or section 1(a)(iv) of E.O. 14068.

**GL 25G: Transactions Related to Telecommunications and Certain Internet-Based Communications**<sup>125</sup>

GL 25G authorizes all transactions ordinarily incident and necessary to the receipt or transmission of telecommunications involving the Russian Federation. In addition, the exportation or reexportation, sale or supply (directly or indirectly) from the United States or by US persons (wherever located) to the Russian Federation of services incident to the exchange of communications over the internet (e.g., chat and email, social networking, sharing of photos and movies, web browsing, blogging, social media platforms, collaboration platforms, video conferencing, e-

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<sup>123</sup> Noncommercial, personal remittances do not include charitable donations to or for the benefit of an entity or funds transfers for use in supporting or operating a business, including a family-owned business.

<sup>124</sup> FAQ 1028 confirms that GL 18 authorizes methods of payment including ATM withdrawals and hand-carrying of US dollar-denominated banknotes.

<sup>125</sup> Effective October 30, 2024, GL 25G replaces and supersedes GL 25F, dated September 13, 2024.



gaming, e-learning platforms, automated translation, web maps, user authentication services, web hosting and domain name registration services) is authorized.

GL 25G also authorizes software, hardware or technology exportation or reexportation, sale or supply (directly or indirectly) from the United States or by US persons to the Russian Federation of software, hardware or technology incident to the exchange of communications over the internet, provided that the exportation, reexportation, sale or supply to the Russian Federation of such software, hardware or technology is licensed or otherwise authorized by the Department of Commerce pursuant to the Export Administration Regulations (“EAR”) if the software, hardware or technology is subject to the EAR or, if the software, hardware or technology is not subject to the EAR, would be eligible for a license exception or otherwise authorized by the Department of Commerce if it were subject to the EAR.

OFAC clarified that GL 25G does not authorize any transactions involving JSC Channel One Russia, JSC NTV Broadcasting Company, Television Station Russia-1, LLC Algoritm, New Eastern Outlook, Oriental Review, Garantex Europe OU (“Garantex”), Autonomous Non-Profit Organization Dialog, Autonomous Non-Profit Organization Dialog Regions, Federal State Unitary Enterprise International Information Agency Rossiya Segodnya, Autonomous Non Profit Organization TV Novosti, XH Smart Tech China Co Ltd or CJSC Perspective Technologies Agency, unless separately authorized.

**GL 27: Certain Transactions in Support of Nongovernmental Organizations’ Activities**

GL 27 authorizes all transactions ordinarily incident and necessary to certain activities<sup>126</sup> by nongovernmental organizations, provided that the only involvement of blocked persons is the processing of funds by financial institutions blocked pursuant to E.O. 14024.

**GL 31: Transactions Related to Patents, Trademarks and Copyrights**

GL 31 authorizes the following transactions in connection with a patent, trademark, copyright or other form of intellectual property protection (“IP protection”) in the United States or Russia: (i) the filing and prosecution of any application to obtain IP

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<sup>126</sup> The authorized activities are those that: (1) support humanitarian projects to meet basic human needs in Ukraine or Russia, including drought and flood relief; food, nutrition and medicine distribution; the provision of health services; assistance for vulnerable or displaced populations, including individuals with disabilities and the elderly; and environmental programs; (2) support democracy building in Ukraine or Russia, including activities to support rule of law, citizen participation, government accountability and transparency, human rights and fundamental freedoms, access to information and civil society development projects; (3) support education in Ukraine or Russia, including combating illiteracy, increasing access to education, international exchanges and assisting education reform projects; (4) support non-commercial development projects directly benefiting the people of Ukraine or Russia, including those related to health, food security and water and sanitation; and (5) support environmental and natural resource protection in Ukraine or Russia, including the preservation and protection of threatened or endangered species, responsible and transparent management of natural resources and the remediation of pollution or other environmental damage.

protection; (ii) the receipt of IP protection; (iii) the renewal or maintenance of IP protection; and (iv) the filing and prosecution of any opposition or infringement proceeding with respect to IP protection or the entrance of a defense to any such proceeding.

**GL 38A: Transactions Related to Pension Payments**<sup>127</sup>

GL 38A authorizes all transactions ordinarily incident and necessary to the processing of pension payments to: (i) US persons; or (ii) non-US persons not located in Russia that are prohibited by E.O. 14024, provided that the only involvement of blocked persons is the processing of funds by financial institutions blocked pursuant to E.O. 14024.

**GL 40C: Transactions Related to Civil Aviation Safety**<sup>128</sup>

GL 40C authorizes all transactions ordinarily incident and necessary to the provision, exportation or reexportation of goods, technology or services to ensure the safety of civil aviation involving one or more of the blocked entities listed in the annex to GL 40C and that are prohibited by E.O. 14024.

However, the aircraft must be registered in a jurisdiction solely outside of the Russian Federation and the goods, technology or services that are provided, exported or reexported must be for use on aircraft operated solely for civil aviation purposes.

**GL 42: Transactions with the Federal Security Service**

GL 42 authorizes all transactions involving the FSB prohibited by E.O. 14024 that are ordinarily incident and necessary for: (1) requesting, receiving, utilizing, paying for or dealing in licenses, permits, certifications or notifications issued or registered by the FSB for the importation, distribution or use of information technology products in the Russian Federation, provided that (i) the exportation, reexportation or provision of any goods or technology that are subject to the EAR is licensed or otherwise authorized by the Department of Commerce, and (ii) the payment of any fees to the FSB for such licenses, permits, certifications or notifications does not exceed \$5,000 in any calendar year; (2) complying with law enforcement or administrative actions or investigations involving the FSB; and (3) complying with rules and regulations administered by the FSB.

**GL 44: Export or Reexport of Certain Accounting Services to US Individuals in Russia**

GL 44 authorizes all transactions ordinarily incident and necessary to the exportation, reexportation, sale or supply (directly or indirectly) from the United States or by a US person of tax preparation or filing services to any individual who is a US person located in the Russian Federation.

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<sup>127</sup> Effective August 19, 2022, GL 38A replaces and supersedes GL38, issued June 2, 2022.

<sup>128</sup> Effective November 14, 2022, GL 40C replaces and supersedes GL40B, issued August 3, 2022.

**GL 46: Transactions in Support of an Auction Process to Settle Certain Credit Derivative Transactions Prohibited by the New Investment Prohibition**

GL 46 authorizes all transactions related to the establishment, administration, participation in and execution of an auction process as announced by the EMEA Credit Derivatives Determination Committee to settle credit derivative transactions with a reference entity of “the Russian Federation” and prohibited by the new investment prohibition in E.O. 14071.<sup>129</sup>

The purchase or receipt of debt obligations of the Russian Federation by US persons is authorized for the period beginning two business days prior to the announced date of the auction and ending eight business days after the conclusion of the auction. All transactions ordinarily incident and necessary to facilitating, clearing and settling transactions authorized under this license are also authorized.

**GL 50: Closing of Individual Accounts at Blocked Financial Institutions**

GL 50 authorizes all transactions prohibited by E.O. 14024 that are ordinarily incident and necessary to (i) the closing of an account of an individual (wherever located) who is not a blocked person (the “account holder”), held at a financial institution blocked pursuant to E.O. 14024 and (ii) the unblocking and lump sum transfer of all remaining funds and other assets in the account to the account holder, including to an account of the account holder held at a non-blocked financial institution.<sup>130</sup>

**GL 52: Journalistic Activities and Establishment of News Bureaus**

GL 52 authorizes US news reporting organizations or US individuals who are journalists, photojournalists or broadcast or technical personnel to engage in a variety of transactions to the extent such transactions are ordinarily incident and necessary to journalistic activities or to establish or operate a news bureau. Any transactions involving Joint Stock Company Channel One Russia, Joint Stock Company NTV Broadcasting Company, Television Station Russia-1, LLC Algoritm, New Eastern Outlook or Oriental Review remain prohibited, unless separately authorized.

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<sup>129</sup> FAQ 1072 explains that GL 46 authorizes transactions such as the submission and acceptance of bids and offers and physical settlement requests by auction participants and their customers, or the delivery and acceptance of the Russian Federation debt obligations and corresponding settlement amounts. OFAC also explained that, although GL 46 authorizes US persons to purchase or receive Russian debt obligations for the period beginning two business days prior to the announced date of the auction and ending eight business days after the conclusion of the auction, the general license does not require the clearance and settlement of such transactions to be completed within eight business days after the conclusion of the auction.

<sup>130</sup> FAQ 1081 confirms that individuals do not need to provide official documentation proving that they have closed their account at a blocked Russian financial institution when utilizing GL 50.

**GL 53A: Transactions for Diplomatic Missions of the Russian Federation Involving Gazprombank Joint Stock Company or Prohibited by Directive 4 under Executive Order 14024**<sup>131</sup>

GL 53A authorizes US persons to engage in all transactions ordinarily incident and necessary to the official business of diplomatic or consular missions of the government of the Russian Federation (“Russian missions”) that are prohibited by E.O. 14024 and involve Gazprombank, or any entity in which Gazprombank owns, directly or indirectly, a 50% or greater interest, or that would otherwise be prohibited by Directive 4, including the compensation of employees of Russian missions.

OFAC confirmed that the GL 53A authorization applies to transactions related to Russian missions located in or outside the United States and that non-US persons may engage in transactions authorized for US persons under GL 53A without risk of sanctions under E.O. 14024.<sup>132</sup>

**GL 54A: Certain Transactions Involving VEON Ltd. or VEON Holdings B.V.**<sup>133</sup>

GL 54A authorizes all transactions ordinarily incident and necessary to (i) the purchase or receipt of any debt or equity securities of VEON Ltd. or VEON Holdings B.V. that are prohibited by the new investment prohibition of E.O. 14071, provided that the debt or equity securities were issued prior to June 6, 2022, and (ii) facilitating, clearing and settling of such transactions.

**GL 55D: Certain Services Related to Sakhalin-2**<sup>134</sup>

GL 55D authorizes, through 12:01 a.m. EST on December 19, 2025, (i) all transactions related to the maritime transport of crude oil originating from the Sakhalin-2 project that would otherwise be prohibited by the Russian oil price cap determination of November 21, 2022, provided that the Sakhalin-2 byproduct is solely for importation into Japan, (ii) all transactions prohibited by E.O. 14024 involving Gazprombank or any entity in which Gazprombank owns, directly or indirectly, a 50% or greater interest, that are related to the Sakhalin-2 project, including such transactions involving Sakhalin Energy LLC, and (iii) all transactions prohibited by the Petroleum Services Determination described above that are related to the Sakhalin-2 project.

**GL 56A: Certain Services with Respect to the EU**<sup>135</sup>

GL 56 authorizes all transactions related to the importation of Russian oil or Russian petroleum that would be prohibited by the price cap on Russian oil or Russian petroleum into the Republic of Bulgaria, the Republic of Croatia or landlocked EU Member States as described in Council Regulation (EU) 2022/879 of June 3, 2022.

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<sup>131</sup> Effective November 21, 2024, GL 53A replaced and superseded GL 53, issued November 10, 2022.

<sup>132</sup> FAQ 1096.

<sup>133</sup> Effective January 17, 2023, GL 54A replaced and superseded GL 54, issued November 18, 2022.

<sup>134</sup> Effective June 18, 2025, GL 55D replaced and superseded GL 55C, issued November 21, 2024.

<sup>135</sup> Effective February 3, 2023, GL 56A replaced and superseded GL 56, issued November 22, 2022.

**GL 57A: Certain Services Related to Vessel Emergencies**<sup>136</sup>

GL 57A authorizes all transactions otherwise prohibited by the price cap on Russian oil or Russian petroleum that are ordinarily incident and necessary to addressing vessel emergencies related to the health or safety of the crew or environmental protection, including safe docking or anchoring, emergency repairs or salvage operations.

GL 57A does not authorize any transactions related to the sale of Russian oil or Russian petroleum.

**GL 64: Certain Transactions Involving Kommersant**

GL 64 authorizes all transactions involving Joint Stock Company Kommersant or any entity in which Joint Stock Company Kommersant owns, directly or indirectly, a 50% or greater interest, that are ordinarily incident and necessary to the operations of the newspaper *Kommersant*.

**GL 65: Certain Transactions Involving Megafon or Digital Invest Limited Liability Company**

GL 65 authorizes all transactions ordinarily incident and necessary to the receipt or transmission of telecommunications involving (i) Megafon or Digital Invest Limited Liability Company (“Digital Invest”) or any entity in which Megafon or Digital Invest owns, directly or indirectly, individually or in the aggregate, a 50% or greater interest, and (ii) Tajikistan or Uzbekistan.

GL 65 does not authorize: (i) the opening or maintaining of a correspondent or payable-through account for or on behalf of any entity subject to Directive 2; (ii) any debit to an account on the books of a US financial institution of any Directive 4 Entities; or (iii) any transactions prohibited by E.O. 14066 or E.O. 14068.

**GL 84: Transactions Related to Closing a Correspondent or Payable-Through Account**

GL 84 authorizes, during a 10-day period beginning on the effective date of the imposition of the prohibition, US financial institutions that maintain correspondent accounts or payable-through accounts for any FFI subject to the CAPTA prohibition of section 11(b)(i) of E.O. 14024, as amended, to engage in the following transactions: (i) processing only those transactions through the account, or permitting the foreign financial institution to execute only those transactions through the account, for the purpose of, and necessary for, closing the account; and (ii) transferring the funds remaining in the correspondent account or the payable-through account to an account of the foreign financial institution located outside of the United States and closing of the correspondent account or the payable-through account.

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<sup>136</sup> Effective February 3, 2023, GL 57A replaced and superseded GL 57, issued November 22, 2022.

**GL 94: Transactions Involving OWH SE i.L. (Formerly Known as VTB Bank Europe SE)**

GL 94 authorizes all transactions prohibited by the RuHSR, or the Ukraine-/Russia-Related Sanctions Regulations, 31 CFR part 589, involving OWH SE i.L. (formerly known as VTB Bank Europe SE), or any entity in which OWH SE i.L. owns, directly or indirectly, a 50% or greater interest ("OWH SE i.L. Entities"). GL 94 also provides that all property and interests in property of OWH SE i.L. Entities are unblocked.

**GL 103: Transactions Related to Imports of Certain Diamond Jewelry Prohibited by E.O. 14068**

GL 103 authorizes all transactions prohibited by the Diamond Jewelry and Unsorted Diamonds Determination that are ordinarily incident and necessary to the importation and entry into the United States, including importation for admission into a foreign trade zone located in the United States, of diamond jewelry that was physically located outside of the Russian Federation prior to March 1, 2024, and not exported or reexported from the Russian Federation on or after March 1, 2024.

**GL 104A: Transactions Related to Imports of Certain Diamonds Prohibited by E.O. 14068<sup>137</sup>**

GL 104A authorizes, through 12:01 a.m. EDT on September 1, 2026, all transactions prohibited by the Diamonds Determination that are ordinarily incident and necessary to the importation and entry into the United States, including importation for admission into a foreign trade zone located in the United States, of the following categories of diamonds, provided that the diamonds were physically located outside of the Russian Federation before, and were not exported or reexported from the Russian Federation since: (i) March 1, 2024, for non-industrial diamonds with a weight of 1.0 carat or greater; or (ii) September 1, 2024, for non-industrial diamonds with a weight of 0.5 carats or greater.

Note that the importation and entry into the United States, including importation for admission into a foreign trade zone located in the United States, of non-industrial diamonds of Russian Federation origin remains prohibited pursuant to the Diamond Jewelry and Unsorted Diamonds Determination.

**GL 115B: Certain Transactions Related to Civil Nuclear Energy<sup>138</sup>**

GL 115B authorizes, through 12:01 a.m. EST on December 19, 2025, all transactions prohibited by E.O. 14024 involving one or more of the following entities that are related to civil nuclear energy: (1) Gazprombank; (2) Vnesheconombank; (3) Otkritie; (4) Sovcombank; (5) Sberbank; (6) VTB; (7) Alfa-Bank; (8) Rosbank; (9) Bank Zenit; (10) Bank Saint-Petersburg; (11) NCC; (12) any entity in which one or more of the above persons own, directly or indirectly, individually or in the

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<sup>137</sup> Effective August 27, 2025, GL 104A replaced and superseded GL 104, issued August 23, 2024.

<sup>138</sup> Effective June 27, 2025, GL 115B replaced and superseded GL 115A, issued January 10, 2025.

aggregate, a 50% or greater interest; or (13) the Central Bank of the Russian Federation.

The term “related to civil nuclear energy” means transactions undertaken solely to maintain or support civil nuclear projects initiated before November 21, 2024.<sup>139</sup>

**GL 124B: Petroleum Services and Other Transactions Related to the Caspian Pipeline Consortium, Tengizchevroil and Karachaganak Projects**<sup>140</sup>

GL 124B authorizes all transactions prohibited by the Petroleum Services Determination that are related to the Caspian Pipeline Consortium, Tengizchevroil, or Karachaganak projects.

GL 124B also authorizes all transactions prohibited by E.O. 14024 involving one or more of the following blocked persons that are related to the operations of the Caspian Pipeline Consortium, Tengizchevroil or Karachaganak projects: (i) Rosneft; (ii) Lukoil; or (iii) any entity in which Rosneft or Lukoil owns, directly or indirectly, individually or in the aggregate, a 50% or greater interest.

**GL 126: Wind Down of Transactions Involving Rosneft or Lukoil**

GL 126 authorizes through 12:01 a.m. EST on November 21, 2025, all transactions prohibited by E.O. 14024 that are ordinarily incident and necessary to the wind down of any transaction involving: (i) Rosneft; (ii) Lukoil; or (iii) any entity in which Rosneft or Lukoil owns, directly or indirectly, individually or in the aggregate, a 50% or greater interest. However, any payment to a blocked person must be made into a blocked account.

**GL 127: Certain Transactions Related to Debt or Equity of, or Derivative Contracts Involving, Rosneft or Lukoil**

GL 127 authorizes through 12:01 a.m. EST on November 21, 2025, all transactions prohibited by E.O. 14024 that are ordinarily incident and necessary to the divestment or transfer, or the facilitation of the divestment or transfer, to a non-U.S. person, of debt or equity issued or guaranteed by: (i) Rosneft; (ii) Lukoil; or (iii) any entity in which Rosneft or Lukoil owns, directly or indirectly, individually or in the aggregate, a 50% or greater interest. The authorization is limited to transactions involving these specified blocked persons and does not extend to dealings involving any other persons blocked under the RuHSR unless separately authorized.

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<sup>139</sup> OFAC notes that “civil nuclear energy” includes the following activities when undertaken solely to maintain or support civil nuclear energy projects and operations initiated or under construction as of November 21, 2024: the extraction, production, refinement, conversion, enrichment, fabrication, transport or purchase of uranium in any form; the production, generation, transmission or exchange of nuclear power, fuel or waste; and the operation of civil nuclear energy projects. However, GL 115B does not authorize, for instance, transactions involving Gazprombank related to the development of new civil nuclear energy power plants after November 21, 2024, or related to the Paks II nuclear power plant project, including Paks II. Nuclear Power Plant Private Limited Company (Paks II. Ltd.), or any successor project. FAQ 1203.

<sup>140</sup> Effective November 14, 2025, GL 124B replaced and superseded GL 124A, issued October 22, 2025.



This general license also authorizes through 12:01 a.m. EST on November 21, 2025, all transactions prohibited by E.O. 14024 that are ordinarily incident and necessary to facilitating, clearing, and settling trades of such debt or equity that were placed prior to 4:00 p.m. EDT on October 22, 2025.

Additionally, the license authorizes through 12:01 a.m. EST on November 21, 2025, all transactions prohibited by E.O. 14024 that are ordinarily incident and necessary to the wind down of derivative contracts entered into prior to 4:00 p.m. EDT on October 22, 2025 that: (i) include as a counterparty, Rosneft, Lukoil or any entity in which Rosneft or Lukoil owns, directly or indirectly, individually or in the aggregate, a 50% or greater interest; or (ii) are linked to debt or equity of such parties. However, any payments to a blocked person must be made into a blocked account.

GL 127 does not authorize: (i) US persons to sell, or to facilitate the sale of, the aforementioned parties' debt or equity to, directly or indirectly, any person whose property and interests in property are blocked; or (ii) US persons to purchase or invest in, or to facilitate the purchase of or investment in, directly or indirectly, such debt or equity, other than purchases of or investments in such debt or equity ordinarily incident and necessary to the divestment or transfer, or the facilitation of the divestment or transfer, of the debt or equity as described above.

**GL 128A: Certain Transactions Involving Lukoil Retail Service Stations Located Outside of Russia**<sup>141</sup>

GL 128 authorizes through 12:01 a.m. EST on December 13, 2025, all transactions prohibited by E.O. 14024 that are ordinarily incident and necessary to the purchase of goods and services from or the maintenance, operation or wind down of Lukoil retail service stations located outside of the Russian Federation<sup>142</sup> ("Lukoil Retail Service Stations"), provided that any payment, directly or indirectly, to a blocked person (other than blocked Lukoil Retail Service Stations) is made into a blocked account.

**GL 129: Transactions Involving Rosneft Deutschland GmbH and RN Refining & Marketing GmbH**

GL 129 authorizes through 12:01 a.m. EDT on April 29, 2026, all transactions prohibited by the RuHSR involving Rosneft Deutschland GmbH ("Rosneft Germany") or RN Refining & Marketing GmbH ("Rosneft R&M"), or any entity in which Rosneft Germany or Rosneft R&M owns, directly or indirectly, individually or in the aggregate, a 50% or greater interest.

**GL 130: Transactions Involving Certain Lukoil Entities in Bulgaria**

GL 130 authorizes through 12:01 a.m. EDT on April 29, 2026, all transactions prohibited by E.O. 14024 involving Lukoil Neftohim Burgas JSC, Lukoil Bulgaria

<sup>141</sup> Effective November 14, 2025, GL 128A replaced and superseded GL 128, issued October 22, 2025.

<sup>142</sup> The term "Lukoil Retail Service Stations" means physical retail service stations located outside the Russian Federation and in existence on or before October 22, 2025, in which (1) Lukoil has an interest, or (2) any entity in which Lukoil owns, directly or indirectly, a 50 percent or greater interest, has an interest.



EOOD, Lukoil Aviation Bulgaria EOOD, Lukoil Bulgaria Bunker EOOD, or any entity in which one or more of those persons own, directly or indirectly, individually or in the aggregate, a 50% or greater interest. The authorization does not extend to transactions involving other Lukoil-affiliated blocked persons.

**GL 131: Certain Transactions for the Negotiation of and Entry Into Contingent Contracts for the Sale of Lukoil International GmbH and Related Maintenance Activities**

GL 131 authorizes through 12:01 a.m. EST on December 13, 2025, all transactions prohibited by E.O. 14024 that are ordinarily incident and necessary to the negotiation of and entry into contracts with Lukoil or any of its affiliates for the sale, disposition or transfer of Lukoil International GmbH (“LIG”) or any entity in which LIG owns, directly or indirectly, individually or in the aggregate, a 50% or greater interest (collectively, the “LIG Entities”), provided that the performance of any such contract is made expressly contingent on the receipt of separate authorization from OFAC. For purposes of this general license, a contingent contract includes executory contracts, executory pro forma invoices, agreements in principle, executory offers capable of acceptance such as bids or proposals in response to public tenders, binding memoranda of understanding, or any other similar agreement.

OFAC guidance clarifies that authorized activities include negotiations on terms for definitive agreements and related financial, legal and operational due diligence, including the engagement of outside counsel and other advisors, but that the license does not authorize transactions to effectuate the actual sale, disposition or transfer of any LIG Entity or asset.<sup>143</sup> OFAC also noted that Treasury would evaluate any proposed sale of LIG based on factors that support U.S. national security and foreign policy objectives, such as whether the transaction: completely severs ties with Lukoil, blocks funds owed to Lukoil until sanctions are lifted, and does not provide a windfall to Lukoil.<sup>144</sup>

The license also authorizes through 12:01 a.m. EST on December 13, 2025, all transactions prohibited by E.O. 14024 that are ordinarily incident and necessary to the maintenance or wind down of operations, contracts or other agreements of LIG Entities. OFAC guidance indicates that such maintenance or wind-down activities may include the performance of pre-existing agreements, provided that such transactions are consistent with previously established practices and support pre-existing projects or operations, and may encompass, for example, payments to employees, suppliers, landlords, lenders and partners, the preservation and upkeep of pre-existing tangible property and activities associated with maintaining pre-existing

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<sup>143</sup> FAQ 1224.

<sup>144</sup> *Id.*

capital investments.<sup>145</sup> However, any payment to LIG Entities or any other blocked persons must be made into a blocked account.

### Embargo of Breakaway Territories

E.O. 14065 imposes an embargo, apparently modeled on E.O. 13685's embargo of Crimea, on the self-declared Donetsk People's Republic ("DPR") and Luhansk People's Republic ("LPR") regions of Ukraine (or such other regions of Ukraine as may be determined by the Secretary of the Treasury).<sup>146</sup>

E.O. 14065 effectively prohibits new US investment in and any US trade with the regions.<sup>147</sup> The order authorizes future sanctions against persons determined to have operated in the DPR or LPR regions and certain other individuals and entities associated with such persons.

OFAC clarified that E.O. 14065 does not block the entire Donetsk and Luhansk oblasts. In determining whether a location is within the regions subject to sanctions, one may reasonably rely on vetted information from reliable third parties (*e.g.*, postal codes and maps).<sup>148</sup>

### General Licenses

In connection with these sanctions related to the breakaway territories, OFAC issued various general licenses:

#### **GL 18: Transactions Related to Agricultural and Medical Commodities and the COVID-19 Pandemic in the DPR and LPR Regions**

GL 18 authorizes transactions that are ordinarily incident and necessary to: (1) the exportation or reexportation of agricultural commodities, medicine, medical devices, replacement parts and components for medical devices or software updates for medical devices to the DPR and LPR regions or persons in other countries purchasing specifically for resale to these regions; or (2) the prevention, diagnosis or treatment of COVID-19 (including research or clinical studies relating to COVID-19) in the DPR and LPR regions.

#### **GL 19: Telecommunications and Mail Transactions in the DPR and LPR Regions**

GL 19 authorizes all transactions that are ordinarily incident and necessary to the receipt or transmission of telecommunications in the DPR and LPR regions. The

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<sup>145</sup> *Id.*

<sup>146</sup> 87 Fed. Reg. 10293 (Feb. 23, 2022).

<sup>147</sup> E.O. 14065 prohibits the following activities in the DPR and LPR regions (the "Covered Regions"): (i) new investment in the Covered Regions by a US person, wherever located; (ii) the importation into the United States, directly or indirectly, of any goods, services or technology from the Covered Regions; (iii) the exportation, reexportation, sale or supply, directly or indirectly, from the United States or by a US person, wherever located, of any goods, services or technology to the Covered Regions; and (iv) any approval, financing, facilitation or guarantee by a US person, wherever located, of a transaction by a foreign person that would be prohibited if performed by a US person or within the United States.

<sup>148</sup> FAQ 1009.

license does not authorize the provision, sale or lease of telecommunications equipment or technology or capacity on telecommunications transmission facilities.

**GL 20: Official Business of Certain International Organizations in the DPR and LPR Regions**

GL 20 authorizes transactions by employees, grantees or contractors for the conduct of the official business of: (i) the United Nations (including its programs, funds and other entities and bodies, as well as its specialized agencies and related organizations); (ii) the International Centre for Settlement of Investment Disputes and the Multilateral Investment Guarantee Agency; (iii) the African Development Bank Group, the Asian Development Bank, the European Bank for Reconstruction and Development and the Inter-American Development Bank Group, including any fund entity administered or established by any of the foregoing; (iv) the International Committee of the Red Cross and the International Federation of Red Cross and Red Crescent Societies; and (v) the Organization for Security and Co-operation in Europe.

**GL 21: Noncommercial, Personal Remittances and Operation of Accounts**

GL 21 authorizes all transactions that are ordinarily incident to the transfer of noncommercial, personal remittances to or from the DPR and LPR regions, or for or on behalf of an individual ordinarily resident in those regions.

Transactions that are ordinarily incident and necessary to maintaining, operating or closing an account of an individual ordinarily resident in those regions, other than an SDN, are authorized, provided that the transactions processed through the account: (i) are of a personal nature and are not for the benefit of an entity, including supporting or operating a business; and (ii) do not involve transfers directly or indirectly to the DPR or LPR regions or for the benefit of persons ordinarily resident in the DPR or LPR regions unless the transfers are noncommercial, personal remittances.

US depository institutions, US-registered brokers or dealers in securities and US-registered money transmitters are authorized to process noncommercial, personal remittances regardless of whether the originator or beneficiary is an individual who is a US person. The license is not limited to a specific method of payment.<sup>149</sup>

**GL 22: Exportation of Certain Services and Software Incident to Internet-Based Communications**

GL 22 authorizes all transactions that are ordinarily incident and necessary to the exportation or reexportation, directly or indirectly, from the United States or by a US person, wherever located, to persons in the DPR and LPR regions of services incident to the exchange of personal communications over the internet or certain software that is necessary to enable such services.

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<sup>149</sup> FAQ 1007.

However, this license does not authorize the exportation or reexportation, directly or indirectly, of services or software with knowledge or reason to know that such services or software are intended for any person whose property and interests in property are blocked.<sup>150</sup>

**GL 23: Certain Transactions in Support of Nongovernmental Organizations' Activities**

GL 23 authorizes transactions by nongovernmental organizations that are ordinarily incident and necessary to support certain activities in the DPR or LPR regions. Such activities include humanitarian, democracy-building and educational projects; non-commercial development; and activities to support environmental and natural resource protection.

**GL 24: Transactions Related to the Provision of Maritime Services**

GL 24 authorizes transactions related to the provision or receipt of civil maritime services performed by individuals who are ordinarily resident in the DPR or LPR regions, provided that such services: (i) are performed outside of the DPR or LPR regions; and (ii) are not performed on behalf of any entity located in, or organized under, the laws of the DPR or LPR regions.

**GL 25: Journalistic Activities and Establishment of News Bureaus in the DPR and LPR Regions**

GL 25 authorizes US news reporting organizations or US individuals employed by a news reporting organization<sup>151</sup> (journalist, photojournalist, supporting broadcast or technical personnel) to engage in a variety of transactions in the DPR or LPR regions to the extent such transactions are ordinarily incident and necessary to journalistic activities.

**GL 26A: Transactions Authorized Pursuant to the Russian Harmful Foreign Activities Sanctions Regulations**

GL 26A authorizes all transactions prohibited by E.O. 13662 involving one or more blocked persons listed in the Annex to GL 26A, or any entity in which those blocked persons own, directly or indirectly, individually or in the aggregate, a 50% or greater interest, that are authorized or exempt under the RuHSR, including transactions authorized by a general or specific license.

GL26A does not authorize: (i) any transaction prohibited by a directive issued pursuant to E.O. 13662, as incorporated into sections 589.202 through 589.205 of the Ukraine-/Russia-Related Sanctions Regulations, 31 CFR part 589 ("URSR"); or (ii) any transaction involving any person blocked pursuant to the RuHSR or the URSR, other than the blocked persons described in paragraph (a) of GL 26A, unless separately authorized.

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<sup>150</sup> *Id.*

<sup>151</sup> "News reporting organization" means an entity whose primary purpose is the gathering and dissemination of news to the general public.

## Belarus

### Full Blocking Sanctions

OFAC has imposed full blocking sanctions on various Belarusian entities and individuals in response to Belarus's support for and facilitation of the Russian invasion of Ukraine, including senior government officials (including President Aleksandr Lukashenka), state-owned banks and affiliated finance/leasing arms, core defense and heavy-industrial enterprises and their senior executives, and aviation and logistics companies, among others. Blocking sanctions have also targeted prominent Belarusian businessmen supporting President Lukashenka and their companies.

Additionally, all entities that are owned 50% or more (directly or indirectly) by any of these entities or individuals are subject to blocking, even if not identified by OFAC.

As with the blocking sanctions described above, all property and interests in property of the designated individuals and entities that are in the United States or in the possession or control of US persons are blocked and must be reported to OFAC. All transactions by US persons or within (or transiting) the United States that involve any property or interests in property of designated or otherwise blocked persons are prohibited unless authorized by OFAC or otherwise exempt.

### General Licenses

In connection with these sanctions on Belarus, OFAC issued general licenses authorizing certain transactions related to:

#### **GL 6: Official Business of the US Government**

GL 6 authorizes all transactions that are for the conduct of the official business of the US government by its employees, grantees or contractors.

#### **GL 7: Official Business of the UN and Other Organizations**

GL 7 authorizes all transactions by employees, grantees or contractors for the conduct of the official business of: (i) the United Nations (including its programs, funds and other entities and bodies, as well as its specialized agencies and related organizations); (ii) the International Centre for Settlement of Investment Disputes and the Multilateral Investment Guarantee Agency; (iii) the African Development Bank Group, the Asian Development Bank, the European Bank for Reconstruction and Development and the Inter-American Development Bank Group, including any fund entity administered or established by any of the foregoing; and (iv) the International Committee of the Red Cross and the International Federation of Red Cross and Red Crescent Societies.

## Export Controls

BIS now maintains several restrictions specific to Russia and Belarus.

### New Licensing Requirements

On April 9, 2022, BIS expanded earlier licensing requirements for Russia and Belarus to all controlled items designated on the Commerce Control List.<sup>152</sup> Previously, BIS had issued the “Implementation of Sanctions Against Russia Under the Export Administration Regulations (EAR)” (“Russia Rule”) and the “Imposition of Sanctions Against Belarus Under the EAR” (“Belarus Rule” and, together with the Russia Rule, the “Rules”). The Russia Rule became effective on February 24, 2022, and the Belarus Rule on March 2, 2022. Both implemented new license requirements and licensing policies to further restrict the access of Russia and Belarus to controlled US goods, software and technologies, particularly items that Russia and Belarus rely on for their defense, aerospace and maritime industries, including semiconductors, computers, telecommunications, information security equipment, lasers and sensors.<sup>153</sup>

Beyond items on the Commerce Control List, on September 15, 2022, BIS issued a rule imposing further export controls on industrial and commercial items that can support Russian and Belarusian military aggression against Ukraine. The rule expanded the scope of export controls by, among other things, adding Belarus to the industry sector sanctions that previously applied only to Russia and expanding “military end user” and “military-intelligence end user” controls to cover six critical entities producing items for the Russian and Belarusian military and industrial sectors. In addition, the rule imposes controls on quantum computing-related hardware, software and technology, complementing the prohibition on quantum computing services to Russia.<sup>154</sup> Since then, BIS has further expanded the scope of the Russian and Belarusian industry sector restrictions (oil and gas production, commercial and industrial items and chemical and biological precursors) and the sanctions on luxury goods to better align them with the controls that have been implemented by US allies and partners imposing substantially similar controls on Russia and Belarus.<sup>155</sup> BIS issued guidance noting that the expanded US export controls may be applied to third-country companies and government entities outside of Russia or Belarus attempting to provide material support for Russia’s and Belarus’s military and industrial sectors, including to replenish (“backfill”) technologies and other prohibited items.<sup>156</sup>

On May 19, 2023, BIS expanded the list of items requiring licensing to (i) electronics, instruments and advanced fibers for the reinforcement of composite materials and (ii) discrete chemicals, biologics, fentanyl and its precursors and

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<sup>152</sup> Press Release of the US Department of Commerce dated April 9, 2022, available [here](#).

<sup>153</sup> 87 Fed. Reg. 12226 (Mar. 3, 2022). On March 2, 2022, BIS extended the export control policies put in place for Russia to Belarus (87 Fed. Reg. 13048 (Mar. 8, 2022)).

<sup>154</sup> Press Release of the US Department of Commerce dated September 15, 2022, available [here](#); 87 Fed. Reg. 57068 (Sept. 16, 2022).

<sup>155</sup> 88 Fed. Reg. 12175 (Feb. 27, 2023).

<sup>156</sup> FAQ issued by the US Department of Commerce dated September 30, 2022, available [here](#).

related equipment designated as items subject to the EAR but not specified on BIS's Commerce Control List ("EAR99 items").<sup>157</sup>

On January 23, 2024, BIS further expanded the list of items to include certain chemicals, lubricants and metals, as well as aircraft, spacecraft and parts thereof. The rule also expanded controls on certain EAR99 antennas and antenna reflectors to further restrict these items from going to Iran and Russia, including when produced abroad with US technology or software.<sup>158</sup>

On June 12, 2024, BIS again expanded the list of items requiring licensing to: (i) 522 additional Harmonized Tariff Schedule entries, intended to further undermine the Russian and Belarusian industrial bases and their ability to continue to support Russia's military aggression in Ukraine, resulting in BIS control over 22 chapters of Harmonized Tariff Schedule codes for export, reexport or transfer to or within Russia or Belarus; (ii) certain riot control agents; and (iii) certain software subject to the EAR.<sup>159</sup> BIS also limited the scope of eligible commodities and software that may be authorized for export, reexport or transfer (in-country) under License Exception Consumer Communications Devices ("CCD") to and within Russia and Belarus such that certain items, including lower-level graphics processing units, are no longer eligible for export to Russia or Belarus pursuant to License Exception CCD.<sup>160</sup>

#### **"Military End Users" and "Military End Uses"**

Restrictions on Russian "military end users" and "military end uses" now cover all items subject to the EAR with exceptions for items classified as ECCN 5A992.c or 5D992.c (e.g., certain "mass market" computers and similar electronics and "mass market" software), so long as they are not for Russian "government end users" or Russian state-owned enterprises.<sup>161</sup>

On December 21, 2022, BIS imposed additional restrictions on the Private Military Company Wagner ("Wagner Group"), which has been subject to US sanctions and on the Entity List since 2017 for its involvement in Russia's 2014 invasion of

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<sup>157</sup> Press Release of the US Department of Commerce dated May 19, 2023, available [here](#).

<sup>158</sup> Press Release of the US Department of Commerce dated January 23, 2024, available [here](#).

<sup>159</sup> 87 Fed. Reg. 51644 (June 18, 2024). The software subject to the additional license requirements includes: enterprise resource planning; customer relationship management; business intelligence; supply chain management; enterprise data warehouse; computerized maintenance management system; project management software; product lifecycle management; building information modelling; computer aided design; computer-aided manufacturing; engineering to order; and, as of August 2024, software for the operation of computer numerical control (CNC) machine tools (see 89 Fed. Reg. 68539 (Aug. 27, 2024)).

<sup>160</sup> 87 Fed. Reg. 51644.

<sup>161</sup> On June 2, 2022, BIS issued a final rule revising certain provisions of the EAR, including revising the controls for Russian and Belarussian military end uses and military end users by extending license requirements to include food and medicine designated as EAR99. License applications for such items will be subject to a case-by-case review policy. Press Release of the US Department of Commerce dated June 2, 2022, available [here](#).



Ukraine. This action designates the Wagner Group as a Russian military end user and restricts its access to certain foreign-produced items.<sup>162</sup>

BIS has also added seven Iranian entities involved in the manufacture of unmanned aerial vehicles (“UAVs”) to the Entity List as Russian military end users. Marking the one-year anniversary of Russia’s invasion of Ukraine, BIS added 86 entities supporting Russia’s defense sector and war effort to the Entity List, with 76 of those entities being concurrently designated as Russian/Belarusian military end users.

On October 6, 2023, BIS added 13 entities to the Entity List and designated them as Russian/Belarusian military end users for supporting Russia’s military through the procurement, development and proliferation of UAVs. As military end users, these entities are subject to the so-called Russia/Belarus-Military End User and Procurement Foreign Direct Product (“FDP”) Rule, which subjects them to a license requirement and a license review policy of denial for all items subject to the EAR (except for food and medicine designated as EAR99). More than 50 new entities that were added to the Entity List on February 23, 2024, were concurrently designated as Russian/Belarusian military end users.<sup>163</sup>

#### **New Foreign Direct Product Rules**

The Rules add an FDP Rule at 15 CFR 734.9(f) that is applicable to the entire countries of Russia and Belarus and another, broader new FDP rule at 15 CFR 734.9(g) directed at both Russian and Belarusian “military end users” and “Russian or Belarusian Procurement Entities” (i.e., an entity that poses a significant risk of involvement in the supply or diversion of items subject to the EAR to procurement networks for Russia’s or Belarus’s defense industry or intelligence services). The aim of these rules is to limit these two countries’ access to certain items manufactured with US software or technology, even if manufactured by a non-US person outside the United States.

On May 23, 2023, BIS expanded the destination scope of the FDP Rule to the temporarily occupied Crimea region of Ukraine to make it more difficult for items to be procured for Russia’s use in Crimea in support of its military aggression in Ukraine.<sup>164</sup>

#### **SDN-Related End-User Controls**

Effective March 21, 2024, BIS expanded “luxury goods” sanctions against Russian and Belarusian oligarchs and malign actors to implement license requirements on exports, reexports and transfers (in-country) of all items subject to the EAR

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<sup>162</sup> Press Release of the US Department of Commerce dated December 21, 2022, available [here](#).

<sup>163</sup> Press Release of the US Department of Commerce dated February 23, 2024, available [here](#).

<sup>164</sup> 88 Fed. Reg. 33422 (May 23, 2023).

involving a person blocked under any of 14 OFAC-administered sanctions programs, including seven program identifiers related to Russia's invasion of Ukraine.<sup>165</sup>

Prior to this rule, the EAR had imposed licensing restrictions on exports, reexports and transfers (in-country) of "luxury goods" in which Russian or Belarusian oligarchs or "malign actors" blocked under seven of these Russia-related sanctions program identifiers—[BELARUS], [BELARUS-EO14038], [RUSSIA-EO14024], [UKRAINE-EO13660], [UKRAINE-EO13661], [UKRAINE-EO13662] and [UKRAINE-EO13685]—served as parties to the transaction. Among other changes, the March 2024 rule expands the license requirement to all items subject to the EAR, which encompasses all previously identified "luxury goods," and moves the relevant regulatory contents from previous § 746.10(a)(2) into a consolidated single section of the EAR under § 744.8.

Importantly, BIS notes that these license requirements under § 744.8 apply even to any reexportation or transfer (in-country) transaction that is not subject to regulation by OFAC, including due to the fact that the transaction does not involve US persons or the US financial system, thus ensuring that the US government can restrict such activity.<sup>166</sup> Additionally, there is a prohibition on the use of any license exceptions to overcome these license requirements, although the EAR authorization requirements will take into account OFAC general licenses and exemptions to ensure consistency, and a restrictive presumption of denial review policy will apply to license applications involving these persons as parties to the transaction.<sup>167</sup>

### Violations and Temporary Denial Orders

Since March 2022, BIS has identified numerous commercial and private aircraft that have flown into Russia in apparent violation of the EAR and notified the public that providing any form of service to these aircraft requires authorization.<sup>168</sup> There are now a total of 184 aircraft identified on the list for apparent violations of US export controls.

BIS has issued Temporary Denial Orders ("TDOs") to various airlines for their ongoing export violations of Russia-related export controls.<sup>169</sup> TDOs terminate the

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<sup>165</sup> 89 Fed. Reg. 20107 (Mar. 21, 2024). The program identifiers are: [BELARUS], [BELARUS-EO14038], [RUSSIA-EO14024], [UKRAINE-EO13660], [UKRAINE-EO13661], [UKRAINE-EO13662], [UKRAINE-EO13685], [FTO], [SDGT], [NPWMD], [ILLCIT DRUGS-EO14059], [SDNT], [SDNTK] and [TCO].

<sup>166</sup> *Id.* at 20109.

<sup>167</sup> *Id.*

<sup>168</sup> Press Release of the US Department of Commerce dated March 18, 2022, available [here](#).

<sup>169</sup> Three Russian Airlines (Aeroflot, Azur Air and UTair) on April 7, 2022; Aviastar on April 21, 2022; Rossiya Airlines on May 20, 2022; Open Joint Stock Company Belavia Belarusian Airlines ("Belavia") on June 16, 2022; Nordwind Airlines, Pobeda Airlines and S7 Airlines on June 24, 2022; URAL Airlines JSC on October 13, 2022; and Smartavia on May 16, 2023. On September 12, 2025, BIS authorized certain activities of Belavia, including flights (i.e., exports and reexports) of certain Belavia aircraft to and from any destination, servicing, maintaining and/or refurbishing certain Belavia aircraft, and export, reexport, or transfer (in-country) of certain equipment, supplies and materials going to or for the use of certain Belavia aircraft, subject to certain terms and limitations. See BIS Letter to Belavia (Sept. 12, 2025), available [here](#).

right of these entities to participate in transactions subject to the EAR, including exports and reexports from the United States. The TDOs are issued for 180 days and may be renewed.

BIS has also issued TDOs to individuals and companies for their involvement with Russian intelligence, including a number of export violations to procure highly sensitive technology (including advanced semiconductors) for Russian military, defense sector and research institutions.<sup>170</sup>

### Identification of Priority Export Items

BIS and various other agencies have identified priority items that may be used by Russia and/or Belarus to further military and defense capabilities (and which may, therefore, be at higher risk of export control evasion). The items identified by BIS and other agencies are intended to assist in the risk-based screening of export-related financial transactions and include, among others, the following commodities: (i) aircraft parts/equipment; (ii) antennas; (iii) breathing systems; (iv) cameras; (v) GPS systems; (vi) inertial measurement units; (vii) integrated circuits; and (viii) oil field equipment.<sup>171</sup> In addition, 50 “Common High-Priority Items” have been identified by their “Harmonized System” codes, including various electronic integrated circuits, wireless transceiver modules and related machines, radio navigational aids, capacitors, ball and roller bearings needed for heavy vehicles or other machinery and antennae used for navigation systems and other electrical parts.<sup>172</sup>

On June 12, 2024, BIS indicated that it had informed over 130 US distributors of additional restrictions on shipments to known suppliers to Russia.<sup>173</sup> BIS noted the action was taken as part of BIS’s ongoing efforts to crack down on shipment of high-priority items to Russia and the controls focused on disrupting the flow of US and foreign-produced electronic components destined to Russia through intermediaries. Concurrently, BIS stated it would more extensively target foreign companies who

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<sup>170</sup> See, e.g., Press Release of the US Department of Commerce dated December 13, 2022, available [here](#).

<sup>171</sup> See Financial Crimes Enforcement Network (“FinCEN”) and BIS, FIN-2022-Alert003, *FinCEN and the U.S. Department of Commerce’s Bureau of Industry and Security Urge Increased Vigilance for Potential Russian and Belarusian Export Control Evasion Attempts* (June 28, 2022), available [here](#).

<sup>172</sup> The full, updated Common High Priority List is available [here](#). See FinCEN and BIS, FIN-2023-NTC2, *FinCEN and the U.S. Department of Commerce’s Bureau of Industry and Security Announce New Reporting Key Term and Highlight Red Flags Relating to Global Evasion of U.S. Export Controls* (Nov. 6, 2023), available [here](#); FinCEN and BIS, FIN-2023-Alert004, *Supplemental Alert: FinCEN and the U.S. Department of Commerce’s Bureau of Industry and Security Urge Continued Vigilance for Potential Russian Export Control Evasion Attempts* (May 19, 2023), available [here](#); BIS, *Guidance to Prevent Evasion of Prioritized Harmonized System Codes to Russia*, available [here](#); BIS and partners in Australia, Canada, New Zealand and the UK, *Exporting Commercial Goods Guidance for Industry and Academia: Russia Sanctions – Common High Priority Items List* (Sept. 26, 2023), available [here](#). See also US Department of State, *Guidance to Industry on Iran’s UAV-Related Activities* (June 9, 2023) (noting use of Iranian UAVs to enable Russia’s war in Ukraine), available [here](#).

<sup>173</sup> Press Release of the US Department of Commerce dated June 12, 2024, available [here](#).

supply US-branded products to Russia through Entity List additions and other related actions.

### Entity List

BIS has added over 1,000 entities to the Entity List in connection with Russia's invasion of Ukraine and continued military aggression.<sup>174</sup> The entities added are located in various jurisdictions, including Belarus, Russia, the Crimea region of Ukraine, Switzerland, Latvia, China, Canada, France, Luxembourg, the Netherlands, the United Kingdom, Estonia, Finland, Germany, Belgium, India, South Korea, Kyrgyzstan, Türkiye, Uzbekistan, Armenia, Cyprus, Kazakhstan and the United Arab Emirates ("UAE"), and were placed on the Entity List for numerous reasons, including:

- for acquiring and attempting to acquire items subject to the EAR in support of Belarus's and Russia's militaries;
- for their continued supply to Russian military end users;<sup>175</sup>
- for acquiring or attempting to acquire US-origin items related to the quantum computing sector;<sup>176</sup>
- for their significant contributions to or their involvement in the Russian military and/or the defense industrial base;<sup>177</sup>
- for shipping US-origin and US-branded items to Russia in contravention of US export controls;<sup>178</sup> and
- for engaging in sanction evasion.

Being placed on the Entity List applies a highly restrictive policy of denial for the review of license applications for exports, reexports and transfers (in-country) to the listed entities of all items subject to the EAR and prohibits the use of all license exceptions for such transactions.

Effective June 12, 2024, BIS also made changes to the Entity List structure to enable BIS to publish high-diversion-risk addresses, and not only entities, on the Entity List.<sup>179</sup> As a result, the Entity List now includes addresses presenting a high risk of diversion for controlled items without an associated entity name, thus triggering a license requirement for all entities using that address.

<sup>174</sup> The latest additions to the Entity List were published as 15 CFR 744 on December 11, 2024, available [here](#).

<sup>175</sup> Press Release of the US Department of Commerce dated June 28, 2022, available [here](#).

<sup>176</sup> Press Release of the US Department of Commerce dated September 30, 2022, available [here](#).

<sup>177</sup> Press Release of the US Department of Commerce dated December 8, 2022, available [here](#); Press Release of the US Department of Commerce dated October 6, 2023, available [here](#); Press Release of the US Department of Commerce dated December 6, 2023, available [here](#).

<sup>178</sup> Press Release of the US Department of Commerce dated August 23, 2024, available [here](#).

<sup>179</sup> 87 Fed. Reg. 51644 (June 18, 2024).

To date, BIS has included addresses in Hong Kong and Türkiye associated with significant transshipment of sensitive goods to Russia or a significant number of entities whose activities risk violating the EAR.<sup>180</sup>

### Oil Refining Sector

On March 2, 2022, BIS issued two rules targeting Russia's oil refining sector.

The first rule builds on existing restrictions put in place on the Russian deepwater oil and gas exploration and extraction industries in 2014 by imposing a policy of denial on such items and applying similarly stringent restrictions on a wide variety of items necessary for refining oil. The purpose of this new rule is to limit Russia's ability to raise revenue from the sale of refined products, including gasoline that it can use to support its military efforts.<sup>181</sup>

The second rule adds 91 new parties in 10 countries<sup>182</sup> to the Department of Commerce's Entity List based on their involvement in, contributions to, or other support of the Russian security services, military and defense sectors and military and/or defense research and development efforts.<sup>183</sup>

### Iranian UAVs

In response to investigations indicating that pieces of Iranian UAVs were found on the battlefield in Ukraine, in some cases with US-branded "parts" and "components," BIS issued a new rule on February 24, 2023, imposing new export control measures on Iran.<sup>184</sup>

The export control measures include:

- requiring licenses for a subset of EAR99 items, including semiconductors that are destined for Iran, regardless of whether a US person is involved in the transaction;
- establishing a new list (Supplement No. 7 to part 746) identifying these EAR99 items by HTS-6 Code to allow BIS and other US government agencies to track and quantify these exports;
- creating a new "Iran FDP Rule" specific to Iran for items in certain categories of the Commerce Control List and EAR99 items identified in the new supplement; and

<sup>180</sup> *Id.* at 51647-51648; 89 Fed. Reg. 68544.

<sup>181</sup> 87 Fed. Reg. 12856 (Mar. 8, 2022).

<sup>182</sup> These entities are located in: Russia (81), United Kingdom (3), Estonia (3), Spain (2), Malta (2), Kazakhstan (1), Latvia (1), Belize (1), Singapore (1) and Slovakia (1).

<sup>183</sup> 87 Fed. Reg. 13048 (Mar. 8, 2022).

<sup>184</sup> 88 Fed. Reg. 12150 (Feb. 27, 2023).

- revising the existing Russia/Belarus FDP rule to cover EAR99 items that have been found in UAVs containing parts and components branded as US or US-origin.

On May 19, 2023, BIS supplemented the Iran FDP Rule by expanding the list of items requiring a license for export or reexport to Iran to include various electrical parts of machinery or apparatus not elsewhere specified or included in the EAR.<sup>185</sup>

On February 27, 2024, and pursuant to E.O. 13224, OFAC added two companies that own and operate a vessel on behalf of Iran's Ministry of Defense and Armed Forces Logistics ("MODAFL"), which "continues to facilitate the delivery of Iranian weapons, most notably unmanned aerial vehicles (UAVs), to Russia in support of its war of aggression in Ukraine."<sup>186</sup> In a related action, OFAC designated Generation Trading FZE, a UAE-based front company used by Iran's MODAFL to facilitate the sale of sample UAV models, UAV parts and related ground stations to support UAV production in Russia.<sup>187</sup>

#### **BIS Guidance to Financial Institutions on Compliance with the EAR**

On October 9, 2024, BIS issued guidance providing best practice recommendations for financial institutions to ensure compliance with the EAR, noting that financial institutions' responsibilities under the EAR have increased significantly following Russia's invasion of Ukraine in February 2022, among other reasons.<sup>188</sup> This BIS guidance is relevant for both US and non-US financial institutions in light of the EAR's so-called "commodity jurisdiction," which means that US export controls compliance obligations generally apply to any person, including non-US persons, dealing in items subject to the EAR. BIS's guidance sets out expectations for financial institutions regarding risk-based customer due diligence and transaction monitoring for potential violations or evasion of US export controls, including, among other steps, screening against lists of Russian or Belarusian military-intelligence end users or entities that have shipped Common High Priority List items to Russia since 2023 and monitoring for red flags related to Russia-related export control evasion.

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<sup>185</sup> 88 Fed. Reg. 33422 (May 23, 2023).

<sup>186</sup> Press Release of the US Department of the Treasury, "Treasury Targets Vessel Shipping Iranian Commodities Valued at over \$100 Million for Iran's Ministry of Defense," dated February 27, 2024, available [here](#).

<sup>187</sup> Press Release of the US Department of the Treasury, "On Second Anniversary of Russia's Further Invasion of Ukraine and Following the Death of Aleksey Navalny, Treasury Sanctions Hundreds of Targets in Russia and Globally," dated February 23, 2024, available [here](#).

<sup>188</sup> See BIS, *Bureau of Industry and Security Issues New Guidance to Financial Institutions on Best Practices for Compliance with the Export Administration Regulations* (Oct. 9, 2024), available [here](#).

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## EU Sanctions

Since February 23, 2022, the EU has introduced multiple tranches of sanctions in response to events in Ukraine, which will have a profound and wide-ranging impact on trade between Russia and the EU. These sanctions can be broadly categorized as follows:

- **Financial sanctions**
  - **Asset freezes and travel bans:** targeting prominent Russian businessmen, Russian banks and Russian state-owned institutions. The asset freeze regime has also targeted individuals in Belarus considered to be assisting Russia in its military actions in Ukraine.
  - **“Any transaction” prohibition:** a sanctions regime different from asset freeze, which targets certain Russian state-owned-entities, crypto asset services providers, Russia and non-Russian financial institutions, RDIF and its affiliates, and Russian persons litigating against EU counterparties in Russia and prohibits entering into any transactions with them.
  - **Financial sector sanctions:** including expanded capital market restrictions, restrictions preventing Russian persons from accessing certain financial services and credit rating services within the EU, restrictions on physically taking euros into Russia and restrictions on dealing with the Russian Central Bank’s assets and reserves, **restrictions on provision of crypto-asset services and various services of payment intermediaries and restrictions on dealings with certain crypto-assets linked to Russia.**
  - **Targeted investment restrictions:** including restrictions on public (i.e., EU government) financing for trade or investment in Russia, restrictions on investing in companies operating in the Russian energy or mining sectors, a restriction on investing, participating or contributing to projects that are co-financed by the Russian Direct Investment Fund, **and restriction on investing in entities located in the listed Russian special economic zones.**
- **Trade sanctions**
  - **Export restrictions:** for dual-use goods and technology, goods and technology that contribute to Russia’s military or technological enhancement or industrial capacity, various energy, refining, aviation and maritime goods and technology, and luxury goods.



- **Import restrictions:** on a wide range of what are deemed to be revenue generating goods, ranging from Russian origin iron, steel and liquefied natural gas to various other common export products.
- **Intellectual property:** a prohibition on accepting certain intellectual property registration applications from Russian applicants.
- **Ukrainian cultural property restrictions:** on the purchase, import, transfer, sale, supply or export of Ukrainian cultural property illegally removed from Ukraine.
- **Trade restrictions for non-government controlled areas of Ukraine:** EU-imposed import and investment restrictions, as well restrictions on export of transport, telecom and energy goods and provision of certain services on Donetsk, Luhansk, Zaporizhzhia and Kerson regions of Ukraine that are not controlled by the government of Ukraine.
- **Oil price cap:** prohibiting maritime transport of Russia-origin oil and oil products to third countries, unless it falls under a certain price limit set by the EU, UK and US.
- **Transport restrictions:** Russian air carriers are cut off from operating with the EU, and transport undertakings with Russian ownership cannot operate in Europe.
- **Russian ports, locks and airports restrictions:** the EU prohibited entering into any transactions with listed Russian ports, locks and airports.
- **Media restrictions:** prohibiting the broadcast of or contribution to the broadcast of a number of key Russian stations.
- **Professional services restrictions:** prohibiting EU persons from providing a range of services, from accounting and legal services to engineering, IT consultancy services, certain types of industrial software and software for banking, and services for artificial intelligence and high-performance computing.
- **Trust services restrictions:** prohibiting provision of services to trusts with Russian beneficiaries.
- **Travel restrictions for Russian diplomats and Russian citizens:** notification requirements for Russian members of diplomatic and consular staff travelling to an EU Member State outside their accreditation and restrictions on issuance of multiple-entry Schengen visas to Russian citizens residing in Russia.

These restrictions have been complemented by unprecedented direct report requirements applicable to EU operators and a strong push from the EU Commission for EU Member States to increase enforcement activities in relation to these sanctions regimes.

### Financial Sanctions

The most significant new restrictions imposed by the EU consist of measures targeting Russian entities' and individuals' access to EU financial services. These include the expansion of the previously existing EU capital market restrictions and the introduction of a range of novel restrictions that work to cut Russia off from the European financial markets, and business with Europe more generally.

The impact of these restrictions is amplified though the EU issuing guidance which confirms that EU nationals working for a non-EU subsidiary of an EU company are personally bound by the sanctions and can therefore be held personally liable for participating in transactions that breach EU sanctions. Furthermore, decisions made by foreign subsidiaries that need to be cleared by their EU parent companies may also fall within the scope of EU sanctions.

### Asset Freezes and Travel Bans

The EU has imposed a number of asset freezes and travel bans, targeting prominent Russian businessmen, Russian banks, Russian state-owned institutes and Russian political figures. The asset freezes have also targeted persons in Belarus considered to be assisting in Russia's actions in Ukraine, persons in Iran supplying drones to Russia, and Russian persons allegedly involved in military and defense sector, as well as disinformation and propaganda. The EU also expanded the listing criteria for asset freeze designations to include those who facilitate circumvention of sanctions. On June 23, 2023,<sup>189</sup> this circumvention-based listing ground was extended to apply to persons and entities taking steps to significantly frustrate EU sanctions against Russia. The EU Council clarified that this designation ground aims to target third-country operators not bound by EU sanctions measures. Indicators of significant frustration could include (but are not limited to): (i) the main activity of a third country operator consisting of purchasing restricted goods in the EU that reach Russia; (ii) the recent creation of a company for purposes related to restricted goods reaching Russia; or (iii) a drastic increase in the turnover of a third-country operator involved in such activities.

On February 24, 2025, the EU introduced two new asset freeze designation grounds aimed at natural or legal persons:<sup>190</sup>

- that own, control, manage or operate “shadow fleet” vessels that transport crude oil or petroleum products, originating in Russia or exported from Russia, or that

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<sup>189</sup> Council Regulation (EU) 2023/1215 of 23 June 2023, available [here](#).

<sup>190</sup> Council Regulation (EU) 2025/390 of 24 February 2025, available [here](#).

otherwise provide material, technical or financial support to the operations of such vessels; or

- forming part of, supporting materially or financially, or benefitting from Russia's military and industrial complex, including by being involved in the development, production or supply of military technology and equipment.

In total, asset freezes and travel bans have been imposed on over 1,755 individuals and over 625 entities since February 21, 2022.<sup>191</sup> As of December 16, 2022, EU Member States reported EUR 18.9 billion of frozen assets located in their jurisdictions. On April 13, 2022, the EU amended its asset freeze regime. Asset freezes do not apply to funds or economic resources made available by organizations and agencies that are pillar-assessed by the Union and with which the Union has signed a financial framework partnership agreement for humanitarian purposes, provided that the provision of such funds or economic resources is necessary for exclusively humanitarian purposes in Ukraine. Furthermore, the relevant government bodies of Member States can now grant specific or general authorizations to release or make available funds or economic resources that are necessary for exclusively humanitarian purposes in Ukraine. An authorization will automatically be granted if a relevant government body does not respond to a request for such an authorization within five days of receipt by giving a negative decision, making a request for information or making a notification for additional time.

On July 21, 2022, the EU imposed an obligation for EU asset frozen persons to report their assets located in any Member State to the competent authority of that Member State within six weeks of the asset freeze being imposed. Where an asset freeze has already been imposed, the asset frozen person must report their assets before September 1, 2022. Failure to do so will be considered a circumvention of EU sanctions (which may, in turn, mean that the assets are confiscated if later identified by EU authorities). On February 25, 2023, EU introduced a new obligation to provide the following information to EU Member State authorities within two weeks of acquiring it: (i) information on the frozen funds or funds of an asset frozen persons which were not treated as frozen, and (ii) information on any assets belonging to an asset frozen person that were moved, transferred or altered two weeks before listing of the relevant person.

Furthermore, persons and entities must now report information they hold about asset frozen persons or entities, such as account information and amount of frozen assets, to the Member State in which they are located or resident.

On December 16, 2022, the EU introduced a new derogation to combat food insecurity. This allows Member States to unfreeze the assets of and to make funds

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<sup>191</sup> For further information see Annexes A, B and C.

and economic resources available to individuals playing a significant role in the international trade of agricultural and food products, including fertilizers and wheat.

Russian nationals have also been prohibited from holding any positions in the governing bodies of EU critical infrastructures and entities.

Starting from June 23, 2023, the EU Member State authorities may also authorize release of frozen funds belonging to a designated person or provision of services to a designated person, so long as this is strictly necessary to set up, certify or evaluate a firewall. Under a “firewall,” the EU understands an arrangement that (i) removes the control of a designated person over the assets of a non-listed entity incorporated in the EU and (ii) ensures that no further funds or economic resources will accrue for the benefit of a designated person.

On September 13, 2023, the EU removed asset freeze sanctions from three Russian businessmen (Aleksandr Shulgin, Farkhad Akhmedov and Grigory Berezkin) and one deceased Russian military official. Removal of Aleksandr Shulgin is a response to the decision of the Court of Justice of the European Union on September 6, 2023, where the Court agreed that the EU has no basis to maintain sanctions against Aleksandr Shulgin.<sup>192</sup> The EU has not published any official reasoning for removal of the other Russian businessmen.

On December 18, 2023, the EU made a number of changes to its asset freeze regime. In particular, the EU extended its listing criteria (i) to cover entities and individuals who benefit from the compulsory transfer of ownership of, or control over, entities established in Russia that were previously owned or controlled by EU entities, and (ii) to provide that deceased asset frozen persons can now remain asset frozen where there is a likelihood that the assets could still be used to finance the war in Ukraine.<sup>193</sup>

The EU also introduced new derogation grounds, allowing (i) the frozen funds to be released where an EU Member State has determined that it is in the public interest to deprive an asset frozen person or entity of the frozen funds, assuming that any compensation is frozen; (ii) sale or use of shares in, or assets of, Russian entities where the ownership or control by an EU individual of that entity has been compulsorily transferred by the Russian government, in order to enable payment, consideration or compensation arising in the context of such compulsory transfer; (iii) payments by the newly designated Alfa Insurance under its insurance programs; (iv) the sale and transfer by June 30, 2024, of proprietary rights directly or indirectly owned by certain sanctioned Russian businessmen, including Mikhail Fridman, Petr Aven, Gennady Timchenko and Arkady and Boris Rotenberg, and sanctioned

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<sup>192</sup> Judgment of the Court of Justice of the European Union in case T-364/22, available [here](#).

<sup>193</sup> Council Regulation (EU) 2023/2873 of 18 December 2023, available [here](#).

Russian entities JSC VO Technopromexport and LLC VO Technopromexport; and (v) winding down of transactions with JSC Alabuga until June 20, 2024.

On December 18, 2023, the EU also requested that EU Member State authorities appoint, by October 31, 2024, national authorities competent to identify and trace, where appropriate, the funds and economic resources of designated persons to prevent sanctions breaches and circumvention.

On January 3, 2024, the EU imposed an asset freeze on PJSC Alrosa, the world's largest diamond mining company, and its CEO.<sup>194</sup>

On February 23, 2024, the EU imposed asset freezes on 106 individual and 88 entities, with a strong focus on Russia's military-industrial complex.<sup>195</sup>

On June 24 and 28, 2024, the EU imposed asset freezes on 71 persons and 51 entities, including Ural Airlines, Volga Dnepr Group and Volga Dnepr Airlines.<sup>196</sup>

Furthermore, the EU introduced a new licensing ground to release funds that were frozen as a result of involvement of a designated intermediary bank during a transfer of those funds from Russia to the EU, provided that the transfer of funds (i) is between two non-designated persons, (ii) is carried out using accounts in non-designated credit institutions and (iii) does not involve making available funds to designated persons or result in the circumvention of EU sanctions. The EU also introduced a licensing ground to release a payment that was frozen as a result of a transfer from Russia to the EU initiated through or from a designated legal entity, provided that the transfer of payment (i) is between two non-designated persons (where the beneficiary of the released payment is a national or resident of the EU, the European Economic Area ("EEA") or Switzerland) and (ii) does not involve making available funds to designated persons or circumvention of EU sanctions. These two new licensing grounds do not apply to funds frozen in the central securities depositories.

On October 14, 2024, the EU designated on the asset freeze list Iranian airlines, procurement and production firms involved in the supply of UAVs to Russia.

Notably, the EU designated NSD on the EU asset freeze list on June 3, 2022, long before the US and UK designations. Unlike OFAC, the EU Commission has not yet responded to the measures taken by the Russian authorities to remove NSD from the custodial chain for shares of Russian issuers that are held by foreign investors from "hostile states"; these measures were interpreted by OFAC as an attempt to undermine the effect of Western sanctions on NSD.

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<sup>194</sup> Council Decision (CFSP) 2024/195 of 21 December 2023, available [here](#).

<sup>195</sup> Council Implementing Regulation (EU) 2024/753 of 23 February 2024, available [here](#).

<sup>196</sup> Council Implementing Regulation (EU) 2024/1746 of 24 June 2024, available [here](#), and Council Regulation (EU) 2024/1842 of 28 June 2024, available [here](#).

On December 16, 2024, the EU designated 54 persons and 30 entities, including oil shipping companies, commercial airline UTAIR, a private jet company that serviced flights between Russia and the EU, and Chinese and Hong Kong entities supplying drone components and microelectronic components to Russia.<sup>197</sup>

On December 16, 2024, the EU also introduced a new licensing ground to release cash balances frozen by Euroclear and Clearstream at the participant accounts of NSD or any other Russian asset frozen entity. This applies in scenarios where NSD has debited a cash amount from Euroclear's or Clearstream's own accounts at NSD under a law, decree, regulation, judicial or administrative decision or any other measure attributable to Russia, without the prior consent of Euroclear or Clearstream. In response, Euroclear and Clearstream can release cash balances from NSD's or another asset frozen person's accounts and use such balances to meet legal obligations to Euroclear and Clearstream participants.<sup>198</sup>

On February 24, 2025, the EU designated 48 individuals and 35 entities on the asset freeze list, including Russian defense entities, electronics manufacturers and research institutes, companies operating Russia's "shadow fleet" and a Chinese firm specializing in producing satellite imagery.<sup>199</sup>

On May 20, 2025, the EU designated 17 individuals and 58 entities on the asset freeze list, including Russian defense entities, electronics manufacturers, shipping companies, UAV manufacturers and companies operating Russia's "shadow fleet." This action included asset freeze designation of a major Russian energy company, PJSC Surgutneftegas. The EU also designated on the asset freeze list a number of Chinese, Israeli and UAE entities involved in the supply of industrial goods, electronics, UAV, helicopter and drone components and oil shipping.<sup>200</sup> Many of these designations were made under the new asset freeze designation ground included in the 16th package of EU sanctions and target those supporting Russia's military and industrial complex.

On July 18, 2025, the EU designated 14 individuals and 41 entities on the asset freeze list, including Indian refinery Nayara Energy Limited and entities located in the UAE, Azerbaijan, China, Hong Kong, Mauritius and Singapore.<sup>201</sup>

On October 23, 2025, the EU designated 22 individuals and 42 entities on the asset freeze list, including entities located in China, Kyrgyzstan, Hong Kong and the United Arab Emirates.<sup>202</sup>

<sup>197</sup> Council Regulation (EU) 2024/3182 of 16 December 2024, available [here](#).

<sup>198</sup> Council Regulation (EU) 2024/3182 of 16 December 2024, available [here](#).

<sup>199</sup> Council Implementing Regulation (EU) 2025/389 of 24 February 2025, available [here](#).

<sup>200</sup> Council Implementing Regulation (EU) 2025/933 of 20 May 2025, available [here](#).

<sup>201</sup> Council Implementing Regulation (EU) 2025/1476 of 18 July 2025, available [here](#).

<sup>202</sup> Council Implementing Regulation (EU) 2025/2035 of 23 October 2025, available [here](#).

On October 23, 2025, the EU introduced a licensing ground to allow two more Russian insurance companies (Gas Industry Insurance Company SOGAZ and Insurance Joint Stock Company VSK) to release frozen funds to make indemnity and other benefit payments to an entity, national or resident of the EU, Switzerland, EEA or a “partner country.” Previously this licensing ground applied only to the designated insurance company AlfaStrakhovanie Group.<sup>203</sup>

#### **New Asset Freeze Regime—Russia’s Hybrid Threats**

On October 8, 2024, the EU enacted Council Regulation (EU) 2024/2642 concerning restrictive measures in view of Russia’s broader politically destabilizing activities (“Russia Hybrid Threats Regime”). The new regime authorizes the imposition of asset freeze sanctions on persons, entities or bodies responsible for, implementing, supporting or benefitting from actions by or policies of the Russian government that undermine or threaten democracy, the rule of law, stability, security, sovereignty or independence in the EU, in its Member States, in any international organization or in any third country.<sup>204</sup>

On December 16, 2024, the EU made its first designations under the new Russia Hybrid Threats Regime. These designations include 16 individuals and three entities from Russian intelligence and disinformation networks.<sup>205</sup>

On May 20, 2025, the EU made further designations under the Russia Hybrid Threats Regime, adding to the UK asset freeze list 22 individuals and six entities, such as Russian media companies, a radio frequency regulator and a server hosting provider.<sup>206</sup>

On May 20, 2025, the Russia Hybrid Threats Regime was also expanded to provide a framework for a broader range of EU sanctions restrictions, which could indicate that the EU seeks to establish grounds to impose additional sanctions on Russia without needing to link such restrictions to Russia’s invasion of Ukraine. The new framework:<sup>207</sup>

- Extends asset freeze designation grounds to include the facilitation of or involvement in certain targeted activities.
- Introduces a prohibition on engaging, directly or indirectly, in any transaction relating to or involving any listed tangible asset. These assets include vessels, aircraft, real estate, ports, airports and physical elements of digital and communication networks that (i) are used in activities of a destabilizing character attributable to or benefitting the Russian government, such as damage

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<sup>203</sup> Council Regulation (EU) 2025/2037 of 23 October 2025, available [here](#).

<sup>204</sup> Council Regulation (EU) 2024/2642 of 8 October 2024.

<sup>205</sup> Council Implementing Regulation (EU) 2024/3188 of 16 December 2024, available [here](#).

<sup>206</sup> Council Implementing Regulation (EU) 2025/965 of 20 May 2025, available [here](#).

<sup>207</sup> Council Regulation (EU) 2025/964 of 20 May 2025, available [here](#).



to critical infrastructure, international air, land and marine traffic, espionage, transfer of weapons or military personnel and manipulation of information, or (ii) are owned, chartered or operated by, or used on behalf of, a person designated under the Russia Hybrid Threats Regime. So far, no assets have been added to the list.

- Introduces a prohibition on engaging, directly or indirectly, in any transaction with:
  - listed non-EU credit or financial institutions or crypto assets services providers involved in transactions that facilitate activities by, or otherwise provide support to; or
  - listed entities providing technical or operational assistance to:

persons, entities or bodies engaged in activities falling under the Russia Hybrid Threats Regime. So far, no entities have been added to the list.

- Introduces restrictions for listed Russian media companies, including: (i) a prohibition for European operators to broadcast or to enable, facilitate or otherwise contribute to broadcasting any content by the listed Russian media companies; (ii) the suspension of any broadcasting license or authorization, transmission or distribution arrangement for such listed Russian media companies; and (iii) a prohibition to advertise products or services in any content produced or broadcast by such listed Russian media companies. So far, no entities have been added to the list.

On June 26, 2025, and July 15, 2025, the EU made further asset freeze designations under the Russia Hybrid Threats Regime. These designations target the state-owned Russian Television and Radio Broadcasting Network, persons associated with it, and persons and entities engaged in Russian propaganda and spreading disinformation.<sup>208</sup>

### Ownership and Control

On July 3, 2024, the EU Council updated the EU Best Practices for the Effective Implementation of Restrictive Measures (the “EU Best Practices”) and clarified in which cases an entity owned or controlled by a designated person can become targeted by EU asset freeze sanctions:<sup>209</sup>

- The ownership threshold for imposition of asset freeze sanctions has been changed from “more than 50% of the proprietary rights” to “50% or more of

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<sup>208</sup> Council Implementing Regulation (EU) 2025/1444 of 15 July 2025, available [here](#); Council Implementing Regulation (EU) 2025/1278 of 26 June 2025 available [here](#).

<sup>209</sup> EU Council - Update of the EU Best Practices for the effective implementation of restrictive measures, No. 11623/24 of 3 July 2024, available [here](#).

the proprietary rights.” The EU ownership test, thus, aligns with the approach of the United States to automatic extension of US blocking sanctions.

- The EU Best Practices reconfirmed that the aggregated ownership of two or more designated minority shareholders that meets the 50% threshold will be considered for extending EU asset freeze sanctions to their subsidiary.
- The EU Best Practices have not materially changed the control test—it continues to be based on a non-exhaustive list of control criteria, such as a power to appoint the majority of the board of directors, or a power to control the majority of voting rights. However, the EU Best Practices have clarified that the control criterion of exercising dominant influence over an entity includes “de facto” dominant influence.
- The EU Best Practices offer a list of control red flags, such as (i) a designated person holding a non-majority interest in an entity which is the largest among other shareholders, (ii) a designated person retaining a buy back right under favorable conditions after selling the asset, (iii) a transfer of shares shortly before or after designation of the shareholder, (iv) use of trusts and shell companies to create a needlessly complex corporate structure, or (v) close connections between the new owner and the previous designated owner or involvement of third parties with suspiciously broad authority.

On October 23, 2025, the EU explicitly defined the ownership and control tests in Regulation (EU) 269/2014. Owning a legal person, entity or body is defined as “being in possession of 50 % or more of the proprietary rights of a legal person, entity or body, or having a majority interest therein.” Controlling a legal person, entity or body is defined as:

- (i) “having the right or exercising the power to appoint or remove a majority of the members of the administrative, management or supervisory body of a legal person, entity or body;
- (ii) having appointed solely as a result of the exercise of one’s voting rights a majority of the members of the administrative, management or supervisory bodies of a legal person, entity or body who have held office during the present and previous financial year;
- (iii) controlling alone, pursuant to an agreement with other shareholders in or members of a legal person, entity or body, a majority of shareholders’ or members’ voting rights in that legal person, entity or body;
- (iv) having the right to exercise a dominant influence over a legal person, entity or body, pursuant to an agreement entered into with that legal person, entity

or body or to a provision in its Memorandum or Articles of Association, where the law governing that legal person, entity or body permits its being subject to such agreement or provision;

- (v) having the power to, de facto, exercise the right to exercise a dominant influence referred to in point (iv), without being the holder of that right;
- (vi) having the right to use all or part of the assets of a legal person, entity or body;
- (vii) managing the business of a legal person, entity or body on a unified basis, while publishing consolidated accounts; or
- (viii) sharing jointly and severally the financial liabilities of a legal person, entity or body, or guaranteeing them.”<sup>210</sup>

Although these “ownership” and “control” tests reflect the EU Council’s guidance set out in the EU Best Practices and opinions previously issued by the European Commission, the purpose of including them in this legislation is currently unclear because the operative parts of the relevant EU legislation do not, in fact, refer to these concepts.

#### The “Any Transaction” Prohibition

All transactions with certain state-owned entities are now prohibited, unless they are strictly necessary for, among other exempted areas, (i) the purchase, import or transport of certain metals or natural gas from Russia into the EU, EEA, Switzerland or the Western Balkans, and (ii) non-prohibited transactions with oil, including refined petroleum products and related to energy projects outside Russia in which such state-owned entity is a minority shareholder. This includes transactions with legal persons, entities or bodies established outside the EU that are 50% or more owned by these state-owned entities. The relevant state-owned entities are:

- OPK Oboronprom
- United Aircraft Corporation
- Uralvagonzavod
- Rosneft
- Transneft
- Gazprom Neft
- Russian Regional Development Bank
- JSC PO Sevmash
- Almaz-Antey
- Kamaz
- Rostec (Russian Technologies State Corporation)
- Sovcomflot
- United Shipbuilding Corporation
- Russian Maritime Register of Shipping

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<sup>210</sup> Council Regulation (EU) 2025/2037 of 23 October 2025, available [here](#).

These restrictions form a novel form of EU sanctions that go beyond a typical EU asset freeze and, in some ways, are closer to the US blocking sanctions concept.

Furthermore, EU nationals are prohibited from holding any posts on the governing bodies of all Russian state-owned or controlled legal persons, entities or bodies.

On July 18, 2025, the EU introduced an exemption from the “any transaction” prohibition for EU entities that act on behalf of, or at the direction of, the listed state-owned Russian entities, provided that: (i) competent authorities have imposed a public trusteeship or similar public firewall measure on such an entity; or (ii) a similar firewall measure is authorized by competent authorities in order to ensure these entities’ continued functioning and compliance with restrictive measures.<sup>211</sup> This amendment addresses the controversies that have arisen as a result of EU authorities imposing trusteeships on European subsidiaries of certain Russian state-owned companies, including Rosneft.

On October 23, 2025, the EU removed exemptions for (i) trades in certain metals, gas, oil and petroleum products and transactions relating to minority-owned non-Russian energy projects for Gazprom Neft and (ii) trades in metals, gas, oil and petroleum products for Rosneft (except for transit of oil or refined petroleum products originating in a third country that are only being loaded in, departing from or transiting through Russia, provided that both the origin and the owner of those goods are non-Russian).<sup>212</sup> The EU also extended an authorization for EU persons to wind down joint ventures with Russian state-owned entities targeted by the “any transaction prohibition” and a licensing ground to participate in divestment of such Russian state-owned entities from their interests in EU entities, in each case until December 31, 2026.<sup>213</sup>

On June 24, 2024, the EU created a framework for applying “any transaction” prohibitions against (i) non-EU credit or financial institutions and entities providing crypto assets services involved in transactions that facilitate the supply of certain prohibited categories of goods to Russia, (ii) entities acting on behalf or at the direction of entities falling within category (i) and (iii) persons who lodged a claim before a Russian court against an EU person to obtain an injunction, order, relief, judgment or other court decision in connection with any transaction the performance of which has been affected by Russia-related sanctions.<sup>214</sup>

On February 24, 2025, the EU expanded these restrictions by prohibiting “any transactions” with non-EU credit or financial institutions and entities providing crypto assets services that: (i) are involved in frustrating sanctions imposed on

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<sup>211</sup> Council Regulation (EU) 2025/1494 of 18 July 2025, available [here](#).

<sup>212</sup> Council Regulation (EU) 2025/2033 of 23 October 2025, available [here](#).

<sup>213</sup> Council Regulation (EU) 2025/2033 of 23 October 2025, available [here](#).

<sup>214</sup> Council Regulation (EU) 2024/1745 of 24 June 2024, available [here](#).

certain Russian vessels that contribute to Russia's capacity to wage war against Ukraine; or (ii) circumvent the Oil Price Cap.<sup>215</sup>

On July 18, 2025, the EU significantly redrafted and expanded this "any transaction" prohibition to target the following listed persons: (i) non-EU credit or financial institutions and entities providing crypto assets services that are significantly frustrating EU trade or financial sanctions targeting Russia; (ii) non-EU credit or financial institutions and entities providing crypto assets services that support Russia's aggression against Ukraine, including by processing transactions or providing export financing for trade operations that frustrate trade sanctions targeting Russia; and (iii) other non-EU entities significantly frustrating sanctions targeting Russian oil exports and the Russian "shadow fleet."<sup>216</sup> The prohibition has also been extended to entities acting on behalf of or at the direction of any of the listed credit or financial institutions and other entities. The EU has so far used these new designation grounds to impose sanctions on two Chinese banks.

On October 23, 2025, the EU further expanded the listing criteria (i)-(iii) in the foregoing paragraph to include credit or financial institutions that provide payment services. With respect to category (i) of targeted entities, in addition to frustration of EU sanctions targeting Russia, an "any transaction" listing will also threaten non-EU credit and financial institutions that provide crypto-asset or payment services to legal persons, entities or bodies designated on the EU asset freeze list.<sup>217</sup>

The EU also expanded the application of the "any transaction" prohibition to entities providing crypto-asset services or payment services that operate as a mirror or successor entity of a listed credit or financial institution. Mirror or successor entities are defined as those that meet at least two of the following criteria: (i) substantially identical content, feeds or transaction flows; (ii) continuity of branding, design or user interface; (iii) overlapping ownership, control or management; (iv) redirection or migration of users from a listed entity; or (v) continuity of technical infrastructure, including use of the same code base, domains or applications. The EU listed eight entities as targets of the expanded "any transaction" restriction, including banks in Tajikistan and Kazakhstan.<sup>218</sup>

On July 18, 2025, the EU imposed the following "any transaction" prohibitions:

- A prohibition to engage, directly or indirectly, in any transaction in connection with the natural gas pipelines Nord Stream and Nord Stream 2, with regard to the completion, operation, maintenance or use of the

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<sup>215</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

<sup>216</sup> Council Regulation (EU) 2025/1494 of 18 July 2025, available [here](#).

<sup>217</sup> Council Regulation (EU) 2025/2033 of 23 October 2025, available [here](#).

<sup>218</sup> Council Regulation (EU) 2025/2033 of 23 October 2025, available [here](#).

pipelines. The prohibition also applies to any transaction connected to financing for the completion, operation or use of these pipelines.<sup>219</sup>

- A prohibition to engage in any transaction with (i) RDIF; (ii) a legal person, entity or body owned or controlled by RDIF; (iii) a listed legal person, entity or body established outside the EU in which an entity in (i) or (ii) has made, directly or indirectly, a significant investment; (iv) a listed legal person, entity or body established outside the EU providing investment services or other financial services to any entity in (i), (ii) or (iii); and (v) a legal person, entity or body acting on behalf of or at the direction of an entity referred to in (i), (ii), (iii) or (iv).<sup>220</sup> The EU has listed several entities under point (iii): VizorLabs LLC, Kama (Atom) JSC, BitRiver LLC and LABADVANCE LLC. With respect to this prohibition, EU sanctions authorities may authorize transactions strictly necessary for the divestment and withdrawal from Russia or the wind-down of business activities in Russia associated with the above RDIF-related entities until December 31, 2026.
- A full transaction ban against legal persons, entities or bodies established outside Russia that use the SPFS or equivalent specialized financial messaging services set up by the Central Bank of Russia or Russian government. On February 24, 2025, the EU imposed such “any transaction” bans on Bank BelVEB, Belgazprombank and VTB Bank (PJSC) Shanghai Branch on the basis that they use SPFS. **On October 23, 2025, the EU added four new banks from Belarus and Kazakhstan to the list.**<sup>221</sup>
- A full transaction ban against targeted Russian banks and any entity established in Russia that is more than 50% owned by such listed entity. The list of entities includes all banks that were previously subject to a ban on using the SWIFT messaging system and an additional 22 previously un-listed Russian banks.<sup>222</sup> **On October 23, 2025, five new Russian banks were added to the list.**<sup>223</sup>

### Financial Sector Sanctions

**Expansion of Capital Market Restrictions:** EU capital market restrictions have been in force since 2014, when they were first imposed on a number of Russian banks, military manufacturers and oil and gas companies (e.g., Sberbank, VTB, VEB, GazpromNeft and Transneft). Very broadly, these restrictions prevent persons subject to EU jurisdiction from dealing with transferable securities (including crypto

<sup>219</sup> Council Regulation (EU) 2025/1494 of 18 July 2025, available [here](#).

<sup>220</sup> Council Regulation (EU) 2025/1494 of 18 July 2025, available [here](#).

<sup>221</sup> Council Regulation (EU) 2025/2033 of 23 October 2025, available [here](#).

<sup>222</sup> Council Regulation (EU) 2025/1494 of 18 July 2025, available [here](#).

<sup>223</sup> Council Regulation (EU) 2025/2033 of 23 October 2025, available [here](#).

assets) and money market instruments issued by targeted entities and offering new loans or credit to targeted entities.

The EU's expansion of these restrictions applies in three main ways:

- The EU added a number of targets to its capital market restriction list, with restrictions applying to transferable securities and money market instruments issued after April 12, 2022. These now additionally target: (i) banks that are deemed to be supporting the Russian government (Alfa Bank, Otkritie, Bank Rossiya and Promsvyazbank); (ii) state owned manufacturers (Almaz-Antey, Kamaz, Novorossiysk Commercial Sea Port, Rostec, Russian Railways, JSC PO Sevmash, Sovcomflot, United Shipbuilding Corporation and Russian Maritime Register of Shipping); and (iii) the Russian government and the Central Bank of the Russian Federation.
- The EU tightened the restrictions on entities previously targeted by EU capital market restrictions (e.g., by removing the minimum maturity period for affected transferable securities, money market instruments and loans).
- The EU also restricted the listing and provision of services of shares of a legal person, entity or body established in Russia and with over 50% public ownership on EU trading venues from April 12, 2022.

EU capital market restrictions originally included an exemption for (i) loans or credit for non-prohibited imports or exports of goods and non-financial services between the EU and any third state; (ii) emergency funding to meet solvency and liquidity criteria for more than 50% owned subsidiaries of listed entities; and (iii) drawdown or disbursements made under a contract concluded before February 26, 2022. On December 18, 2023, the EU added a requirement that EU persons must notify the EU Member State authorities within three months of the date of any such exempted loan, credit, drawdown or disbursement.<sup>224</sup>

**Financial Services Restrictions Targeting Russian Persons:** The EU has implemented unprecedented restrictions targeting all Russian nationals and residents and Russian companies, entities and bodies ("Russian Persons").

- There is a prohibition on the acceptance of deposits exceeding EUR 100,000 from Russian Persons, except for nationals of a Member State, the EEA or Switzerland or natural persons having a temporary or permanent residence permit in a Member State, the EEA or Switzerland. Member State authorities may authorize the acceptance of certain types of deposits, for instance (i) deposits which are necessary for non-prohibited cross-border trade in goods and services between the EU and Russia; and (ii) deposits intended exclusively for the payment of fees

<sup>224</sup> Council Regulation (EU) 2023/2878 of 18 December 2023, available [here](#).



or service charges for the routine holding or maintenance of frozen funds or economic resources.

- The EU also banned the provision of crypto-asset wallet, account or custody services to Russian Persons, regardless of the total value of those crypto assets. The prohibition does not apply to nationals of a Member State, the EEA or Switzerland or natural persons having a temporary or permanent residence permit in a Member State, the EEA or Switzerland. Similar authorizations from a Member State authority, as for deposit restrictions above, are available for the crypto-assets related services. On December 18, 2023, the EU prohibited Russian nationals or residents from owning or controlling, or holding any posts in the governing bodies of, the EU providers of crypto-asset wallet, account or custody services, after January 18, 2024.<sup>225</sup>

On October 23, 2025, the EU expanded the crypto-asset restriction by prohibiting provision of the following services to Russian nationals, residents and entities:<sup>226</sup>

- (i) crypto-asset services, as defined in Regulation (EU) 2023/1114 (which is a broader scope of services than previously prohibited crypto-asset wallet, account and custody services);
- (ii) the issuance of payment instruments, acquiring of payment transactions, or payment initiation services as defined in Directive (EU) 2015/2366; and
- (iii) the issuance of electronic money.

The EU Council clarified that the restrictions on provision of payment services do not impose obligations on payment initiation service providers to determine the nationality, residence or place of establishment of payment service users on a transaction-by-transaction basis, nor on acquirers of payment transactions to conduct sanctions screening of individual payment card transactions. Primary responsibility for sanctions compliance in relation to the execution of payment transactions rests with the account-servicing payment service provider (e.g., a bank card issuer).

- The holding of accounts of or provision of services for Russian Persons by the EU Central Securities Depositories ("CSD") is prohibited in relation to any transferable securities issued after April 12, 2022.
- Selling securities or units in collective investment undertakings and providing exposure to such investments denominated in Euro and all official currencies of

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<sup>225</sup> Council Regulation (EU) 2023/2878 of 18 December 2023, available [here](#).

<sup>226</sup> Council Regulation (EU) 2025/2033 of 23 October 2025, available [here](#).

the EU Member States issued after April 12, 2022, to Russian Persons is prohibited. The prohibition does not apply to nationals of a Member State, the EEA or Switzerland or natural persons having a temporary or permanent residence permit in a Member State, the EEA or Switzerland. On June 23, 2023, this prohibition was expanded to transferable securities denominated in any other currency and issued after August 6, 2023.

- Diplomats, other Russian officials and business people are no longer able to benefit from visa facilitation provisions.
- EU entities that are more than 40% directly or indirectly owned by a Russian entity, national or resident must report on a quarterly basis, from May 1, 2024, all fund transfers above EUR 100,000 out of the EU. From July 1, 2024, credit and financial institutions must also report, on a twice-a-year basis, information on all fund transfers out of the EU exceeding a cumulative amount of EUR 100,000 initiated for such entities.<sup>227</sup>
- On October 23, 2025, the EU prohibited engaging directly or indirectly in any transactions involving the crypto-asset A7A5 from November 25, 2025.<sup>228</sup> A7A5 is a Ruble-backed stablecoin launched in Kyrgyzstan in January 2025. Issuance of A7A5 allowed customers of Garantex to regain value of their investments after Garantex was sanctioned by the US, EU and UK and all Garantex funds were moved to Grinex (subsequently also sanctioned by the US and UK, and designated on the EU asset freeze list on October 23, 2025).

As part of these changes, the EU also expanded the anti-circumvention provisions to prevent non-Russian Persons acting as substitutes for Russian Persons for this purpose.

**Euro Cash Restrictions:** The sale, supply, transfer or export of banknotes denominated in Euro and all official currencies of EU Member States to Russian persons, including the government and the Central Bank of the Russian Federation, or for use in Russia, is prohibited. A small number of Member States authorizations are included, such as for diplomatic services.

On February 24, 2025, the EU exempted banknotes used for civil society and media activities that promote democracy, human rights and rule of law in Russia and rely on funding from the EU, Member States or “partner countries” (this exemption supplemented already existing exemptions for personal use by persons travelling to Russia and for diplomatic purposes).<sup>229</sup>

<sup>227</sup> Council Regulation (EU) 2023/2878 of 18 December 2023, available [here](#).

<sup>228</sup> Council Regulation (EU) 2025/2033 of 23 October 2025, available [here](#).

<sup>229</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

**SWIFT and SPFS Restrictions:** The EU cut off the following Russian banks from the international SWIFT messaging system:

<ul style="list-style-type: none"><li>• Otkritie</li><li>• Novikombank</li><li>• PSB</li><li>• Bank Rossiya</li><li>• Sberbank</li><li>• Credit Bank of Moscow</li><li>• Ak Bars Bank</li><li>• Bank Uralsib</li><li>• Tochka Bank</li><li>• National Reserve Bank</li><li>• Roseximbank</li><li>• Bank SINARA</li><li>• Primsotsbank</li></ul>	<ul style="list-style-type: none"><li>• Sovcombank</li><li>• VEB</li><li>• VTB</li><li>• Joint Stock Company Russian Agricultural Bank (JSC Rosselkhozbank)</li><li>• BBR Bank</li><li>• RNKO Platezhnyy Konstruktor</li><li>• Peterburg's Settlement Centre</li><li>• Kuznets Business Bank</li><li>• MIR Business Bank</li><li>• Bank Kuban Kredit<sup>230</sup></li></ul>
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As noted above, on July 18, 2025, the ban on accessing SWIFT has been converted into an “any transaction” prohibition.<sup>231</sup>

Since 2014, the Russian government has attempted to develop an alternative to the SWIFT financial messaging system, the SPFS referenced above. On June 24, 2024, the EU prohibited (i) EU entities operating outside Russia from connecting to the SPFS and (ii) any EU person from engaging in any transactions with specified non-Russian persons who use the SPFS.<sup>232</sup>

On October 23, 2025, the EU extended the SPFS transaction ban to other payment services that include a financial messaging functionality, including the Russian National Payment Card System (“Mir”) or the Fast Payments System (“SBP”); this extension applies from January 25, 2026.<sup>233</sup>

**Restrictions on Dealing with the Central Bank of Russia for Currency Services:** The EU has imposed a ban on transactions that relate to the management of reserves and assets of the Russian Central Bank, including transactions with any legal person, entity or body acting on its behalf such as the Russian National Wealth Fund.

On December 16, 2024, the EU clarified the obligations of CSDs with respect to Russian Central Bank assets and reserves that are immobilized as a result of EU sanctions, prohibiting their management. In particular, CSDs will not be liable for

<sup>230</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

<sup>231</sup> Council Regulation (EU) 2025/1494 of 18 July 2025, available [here](#).

<sup>232</sup> Council Regulation (EU) 2024/1745 of 24 June 2024, available [here](#).

<sup>233</sup> Council Regulation (EU) 2025/2033 of 23 October 2025, available [here](#).

managing in good faith the CBR's assets and reserves, and cash balances stemming from them, unless it is proved that such action was a result of negligence.<sup>234</sup>

**Restrictions on Credit Rating Services:** The EU prohibited the provision of credit ratings and access to any subscription services related to credit rating activities to Russian nationals, residents and entities.

## Investment Restrictions

A number of sanctions relating to investments have also been imposed, as follows:

- It is prohibited to invest, participate or otherwise contribute to projects co-financed by the Russian Direct Investment Fund.
- An authority may authorize, under certain conditions, an investment participation in or contribution to projects co-financed by the Russian Direct Investment Fund if it determines that it is due under contracts concluded before March 2, 2022.
- It is prohibited to provide public (i.e., EU governmental) financing or financial assistance for investment in or trade with Russia, with some limited exemptions (for example, for agricultural trade). On February 24, 2025, the EU tightened this restriction by removing a previous exemption permitting public financing or financial assistance up to the total value of EUR10,000,000 per project benefiting EU SMEs (however, an EU person may still apply for a license to continue providing such financing).<sup>235</sup>
- It is prohibited to invest in entities operating in the energy sector in Russia. On June 24, 2024, the wording used for this prohibition was expressly extended to apply to investments in projects under construction for the production of liquified natural gas ("LNG").<sup>236</sup> An authority may authorize, under certain conditions, such an investment participation where it is deemed necessary to ensure critical energy supply within the EU or transport fossil fuels from or through Russia into the EU. An authorization may also be granted for activities necessary to operate a deep-water offshore gas project in the Mediterranean Sea in which an entity targeted by the EU "any transaction" prohibitions is a minority shareholder, if such project is controlled and operated by an EU entity.<sup>237</sup>
- It is prohibited to invest in entities that are operating in the Russian mining or quarrying sector. On February 24, 2025, the EU tightened this restriction by

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<sup>234</sup> Council Regulation (EU) 2024/3187 of 16 December 2024, available [here](#).

<sup>235</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

<sup>236</sup> Council Regulation (EU) 2024/1745 of 24 June 2024, available [here](#).

<sup>237</sup> Council Regulation (EU) 2023/2878 of 18 December 2023, available [here](#).

removing an exemption for mining and quarrying activities involving certain critical raw materials (however, an EU person may still apply for a license in such circumstances).<sup>238</sup>

- It is prohibited to award or continue the execution of public contracts within the scope of the public procurement directive to or with (i) a Russian national, resident or legal entity; (ii) an entity more than 50% owned by such Russian national, resident or legal entity; or (iii) to a person or entity acting on the behalf or at the direction of (i) or (ii). An authority may authorize such an investment or participation for contracts related to nuclear power, space programs, strictly necessary goods and services, diplomacy, natural gas and oil and certain other metals and minerals. It is prohibited to provide direct or indirect support (including financing) under an EU, European Atomic Energy Community (“Euratom”) or Member State national program to any Russian entity that is over 50% publicly owned or controlled, subject to certain exemptions. On June 24, 2024, this prohibition was expanded to apply to prohibit financial support that is provided to any entities established in Russia and their subsidiaries.<sup>239</sup>
- It is prohibited for European political parties, NGOs and media service providers to receive donations or financing from the Russian government, as well as Russian entities with more than 50% public ownership and their non-EU subsidiaries.<sup>240</sup>

## Trade Sanctions

### Export Restrictions

The EU implemented a number of sanctions restricting Russian access to EU goods and technologies, including the following groups of export restrictions:

- energy sector and oil refinery-related products;
- an expansion of the restrictions on dual-use goods and technology;
- advanced technology;
- aircraft;
- goods that contribute to the enhancement of Russian industrial capacities;
- luxury products; and
- oil tankers.

**Energy Sector and Oil Refinery-Related Products:** The EU has significantly strengthened restrictions on the provision of certain goods and technology that are suited to certain categories of exploration and production projects to any person or entity in Russia or for use in Russia, in both cases including its Exclusive Economic

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<sup>238</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

<sup>239</sup> Council Regulation (EU) 2024/1745 of 24 June 2024, available [here](#).

<sup>240</sup> Council Regulation (EU) 2024/1745 of 24 June 2024, available [here](#).

Zone and Continental Shelf. Since August 1, 2014, the EU has required exporters to have licenses before exporting these goods and technologies to Russian persons. The new requirements prohibit selling, supplying, transferring and exporting these goods and technologies except for narrow exemptions and prohibits provision of related financing or financial assistance. The energy-related prohibition was later extended to also apply to goods and technology that are suited for oil refining and liquefaction of natural gas.

On June 23, 2023, the EU extended this restriction to cover the sale, licensing or transfer of intellectual property rights or trade secrets related to energy sector and oil refining goods to any person or entity in Russia or for use in Russia.<sup>241</sup>

On December 18, 2023,<sup>242</sup> the EU clarified that the related prohibition on providing technical assistance, brokering services and financing does not extend to the provision of insurance or reinsurance to EU entities in relation to their activities outside the energy sector in Russia until June 20, 2024. After that date, provision of such insurance and reinsurance services requires an authorization.<sup>243</sup>

On June 24, 2024, the EU prohibited the direct and indirect sale, supply, transfer or export of goods, technology and services used for the completion of liquefied natural gas projects (with the restriction giving the example of “terminals and plants”) to Russian persons. The prohibition includes a ban on the provision of direct or indirect technical assistance, brokering services, financing or financial assistance in relation to these goods. The ban took effect on September 26, 2024, for contracts entered into before June 25, 2024.<sup>244</sup> On February 24, 2025, this prohibition was expanded to include the direct and indirect sale, supply, transfer or export of goods, technology and services used for the completion of crude oil projects in Russia, including exploration and production projects.<sup>245</sup> The restriction, however, does not apply to oil production projects with regular commercial production established prior to February 25, 2025.

On February 24, 2025, the EU prohibited the sale, supply, transfer or provision, directly or indirectly, of listed types of software relating to oil and gas exploration and production projects, to any person or entity in Russia or for use in Russia, including its Exclusive Economic Zone and Continental Shelf.<sup>246</sup> The prohibition includes a ban on the provision of direct or indirect technical assistance, brokering services, financing or financial assistance in relation to the restricted software, and a prohibition on selling or licensing intellectual property rights or trade secrets related

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<sup>241</sup> Council Regulation (EU) 2023/1214 of 23 June 2023, available [here](#).

<sup>242</sup> Council Regulation (EU) 2023/2878 of 18 December 2023, available [here](#).

<sup>243</sup> Council Regulation (EU) 2023/2878 of 18 December 2023, available [here](#).

<sup>244</sup> Council Regulation (EU) 2024/1745 of 24 June 2024, available [here](#).

<sup>245</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

<sup>246</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

to such software. The EU authorized provision of the restricted software for execution until May 26, 2025, of contracts concluded before February 25, 2025.<sup>247</sup>

**Dual-Use Goods:** The sale, supply, transfer or export to Russia of dual-use goods and technology, including the provision of related technical services, brokering services, financing or financial assistance is now prohibited (with some exemptions).

The EU prohibited transit through Russia of EU-exported dual-use goods and technology to avoid circumvention.

On June 23, 2023, the EU extended this restriction to cover the sale, licensing or transfer of intellectual property rights or trade secrets related to dual-use goods and technology to any person or entity in Russia or for use in Russia.

On December 16, 2024, the EU added 32 entities to the list of persons supporting Russia's military-industrial complex that are subject to tighter export restrictions in relation to dual-use goods and goods that contribute to the technological enhancement of Russia's defense and security sectors. Some of these entities are located in China, India, Iran, Serbia and the UAE and have been involved in the circumvention of trade restrictions or have engaged in the procurement of sensitive items used for Russian military operations, like UAVs and missiles.<sup>248</sup> On March 20, 2025, the EU added an additional 31 entities to the list of persons supporting Russia's military-industrial complex that are subject to tighter export restrictions in relation to dual-use goods and goods that contribute to the technological enhancement of Russia's defense and security sectors. Some of these entities are located in China, Hong Kong, Kazakhstan, Uzbekistan, Türkiye, the United Arab Emirates, India, Serbia and Vietnam and have been involved in the circumvention of export restrictions, including with respect to UAVs or computer numerical control machine tools.<sup>249</sup> On July 18, 2025, the EU expanded the list by adding 26 entities, including entities from China, Hong Kong and Türkiye.<sup>250</sup> **On October 23, 2025, the EU further expanded the list by adding 45 entities, including entities from Hong Kong, China, India and Thailand.**<sup>251</sup>

On February 24, 2025, the EU revised exemptions and licensing grounds for the dual-use goods export restrictions. Most importantly, the EU removed an exemption for goods meant for personal use of persons traveling to Russia and transformed an exemption for software updates and consumer communication devices (e.g., consumer grade smartphones and laptops) into a licensing ground.<sup>252</sup> The EU also

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<sup>247</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

<sup>248</sup> Council Regulation (EU) 2024/3187 of 16 December 2024, available [here](#).

<sup>249</sup> Council Regulation (EU) 2025/931 of 20 May 2025, available [here](#).

<sup>250</sup> Council Regulation (EU) 2025/1494 of 18 July 2025, available [here](#).

<sup>251</sup> Council Regulation (EU) 2025/2033 of 23 October 2025, available [here](#).

<sup>252</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).



added further types of goods and technology to the list of restricted dual-use goods, such as computer numerical control machine tools and video-game controllers.

**Advanced Technology and Maritime Technology:** In addition, the sale, supply, transfer or export to Russia of goods and technology that might contribute to Russia's military and technological enhancement, or the development of the defense and security sector (including semiconductors), including the provision of related technical services, brokering services, financing or financial assistance is also prohibited (with some exemptions).

The above prohibitions include, among other things, the following goods and technology:

- coal and coke of coal, chemicals and goods that can be used for capital punishment, torture or other inhumane treatment;
- electronics, specialized vehicles, machine parts and spare parts for trucks and jet engines, as well as goods for the construction sector that can be directed to Russia's military, such as antennas or cranes; and
- electronic components used in Russian weapons systems retrieved on the battlefield, such as drones, missiles and helicopters, as well as specific rare earth materials, electronic integrated circuits and thermal cameras.

There is also a ban on the sale and supply of maritime navigation goods and technology, regardless of whether it originated in the EU, to any natural or legal person in Russia, for use in Russia, or for use on Russian-flagged vessels subject to a humanitarian exemption. This ban also applies to the provision of technical assistance, brokering services, provision, manufacture and maintenance of these goods, as well as financing the sale and supply of these goods or related services.

The sale, supply, transfer or export of civilian firearms and their components and ammunition, military vehicles and equipment, paramilitary equipment and spare parts is also prohibited.

On June 23, 2023, the EU prohibited transit via the territory of Russia of goods and technology which contribute to Russia's military and technological enhancement or to the development of its defense and security sector unless certain exemptions apply or licenses are obtained.

Further, the EU extended this restriction to cover the sale, licensing or transfer of intellectual property rights or trade secrets related to military and security enhancement goods and technology, maritime equipment and firearms to any person or entity in Russia or for use in Russia.

Finally, a new licensing ground allows persons to request an authorization to deal with military and security enhancement goods intended for the exclusive use and under the full control of the authorizing Member State and to fulfill its maintenance obligations in areas which are under a long-term lease agreement between that Member State and the Russian Federation.

The EU maintains a List of Economically Critical Goods, which tracks industrial goods targeted by EU restrictive measures that had anomalous trade flows via certain third countries to Russia (i.e. those that experienced at least a 100% increase in exports).<sup>253</sup> The list was last updated on October 18, 2023. The EU also maintains the List of Common High Priority Items, which identifies a number of sanctioned dual-use and advanced technology items found in battlefields in Ukraine (and therefore known to be critical for the Russian military).<sup>254</sup>

On December 18, 2023, the EU introduced a “no Russia clause” that requires EU exporters, from March 20, 2024, to contractually prohibit reexportation to and use in Russia of common high-priority items or firearms, if such items are sold, supplied, transferred or exported to a third country, with the exception of the “*partner countries*” (i.e., US, Japan, UK, Australia, Canada, New Zealand, Norway, South Korea, Switzerland, Lichtenstein and Iceland<sup>255</sup>). This restriction did not apply to the execution until January 1, 2025, of contracts concluded before December 19, 2023, or until their expiry date, whichever is earlier. The list of the common high-priority items included in the relevant EU regulation is comprised of the dual-use and advanced technology items found in battlefields in Ukraine, which were previously identified by EU guidance. On February 22, 2024, the EU Commission issued FAQs on the application of the “no Russia clause.” In particular, the FAQs clarified what could serve as an adequate remedy for a “no Russia clause” depending on the risk category of the jurisdiction.<sup>256</sup> On June 24, 2024, the EU introduced an exemption to the “no Russia clause” for contracts relating to certain machines, machine tools and parts. Furthermore, the EU introduced a requirement that EU persons contractually prohibit their commercial counterparts in third countries from using, or allowing the use of, the intellectual property or trade secrets transferred by EU persons to such counterparties, in connection with common high priority items to be sold, supplied or exported to Russia or for use in Russia.<sup>257</sup>

On February 23, 2024, and June 24, 2024, the EU significantly expanded the list of entities targeted by military and dual-use export restrictions, adding companies from China, Kazakhstan, Kyrgyzstan, India, Serbia, Thailand, Sri Lanka, Türkiye and the UAE. These companies were identified as supplying restricted equipment to Russia

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<sup>253</sup> List of Economically Critical Goods (Oct. 18, 2023), available [here](#).

<sup>254</sup> List of Common High Priority Items (Sept. 22, 2023), available [here](#).

<sup>255</sup> Council Regulation (EU) 2024/1745 of 24 June 2024, available [here](#).

<sup>256</sup> Frequently asked questions concerning the “No reexport to Russia” clause and sanctions adopted following Russia’s military aggression against Ukraine (Feb. 22, 2024), available [here](#).

<sup>257</sup> Council Regulation (EU) 2024/1745 of 24 June 2024, available [here](#).

and face additional restrictions on their ability to purchase dual-use goods, military goods and technological enhancement goods from EU counterparties.<sup>258</sup> As part of the same package, the EU also expanded its list of restricted military and technological enhancement goods by adding components for the development and production of UAVs. On February 24, 2025, the EU expanded restrictions on entities targeted by military and dual-use export restrictions by prohibiting financing or financial assistance, technical assistance, brokering services or other services, as well as sale, licensing or transfer of intellectual property rights and trade secrets that relate to the restricted goods and their provision to the targeted entities.<sup>259</sup>

From December 26, 2024, EU persons who sell common high-priority items must undertake a proportionate assessment of risks of reexportation of their goods to Russia or for use in Russia, keep such assessment up to date and implement proportionate policies to mitigate such risks. The same requirement applies to any non-EU subsidiary that is owned or controlled by an EU parent if that subsidiary sells common high-priority items. This requirement does not apply to EU persons who sell common high priority items only within the EU and “*partner countries*.”<sup>260</sup> Starting from February 24, 2025, these risk mitigation measures also applied to certain goods that do not fall within the common high-priority goods category, such as various types of switchers and generating sets.<sup>261</sup>

On February 24, 2025, the EU revised exemptions and licensing grounds for export restrictions targeting goods and technology which might contribute to Russia’s military and technological enhancement. Most importantly, the EU removed an exemption for goods meant for personal use of persons travelling to Russia and changed an exemption for software updates and consumer communication devices (e.g., consumer grade smartphones and laptops) into a licensing ground.<sup>262</sup>

On February 24, 2025, the EU also added additional types of goods and technology to the list of goods and technology that might contribute to Russia’s military and technological enhancement, such as computer numerical control machine tools and video-game controllers.<sup>263</sup>

On May 20, 2025, the EU expanded the list of items that might contribute to Russia’s military and technological enhancement or to the development of its defense and security sector by including chemicals and equipment used in the production of printed circuit boards and spare parts for machine tools.<sup>264</sup> On July 18, 2025, the EU further expanded the list of items that might contribute to

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<sup>258</sup> Council Regulation (EU) 2024/745 of 23 February 2024, available [here](#).

<sup>259</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

<sup>260</sup> Council Regulation (EU) 2024/1745 of 24 June 2024, available [here](#).

<sup>261</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

<sup>262</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

<sup>263</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

<sup>264</sup> Council Regulation (EU) 2025/932 of 20 May 2025, available [here](#).

Russia's military and technological enhancement or to the development of its defense and security sector by including additional computer numerical control machines and constituent chemicals for propellants.<sup>265</sup>

On July 18, 2025, the EU also introduced a requirement to obtain an authorization for the export of goods and technology that might contribute to Russia's military and technological enhancement to any third country other than Russia, if the exporter has been informed by the competent authority of the Member State that the items in question are or may be intended for any natural or legal person, entity or body in Russia or for use in Russia.<sup>266</sup> This new measure does not substitute a prohibition on exporting restricted items to Russia indirectly, but rather provides Member States with discretion to use one of the mechanisms (*i.e.*, authorization process or breach enforcement) to prevent restricted goods from being sent to Russia.

On July 18, 2025, the EU revised restrictions relating to dealings with goods and technology included in the Common Military List of the European Union ("Common Military List"), which were previously implemented through a combination of local EU Member State legislation and EU sanctions regulations. The EU currently prohibits the: (i) purchase, import or transfer, directly or indirectly, of the goods and technology listed in the Common Military List into the EU if they originate in Russia or are exported from Russia; (ii) sale, supply, transfer or export, directly or indirectly, of the goods and technology listed in the Common Military List, whether or not originating in the EU, to any natural or legal person, entity or body in Russia or for use in Russia; and (iii) provision of technical assistance, brokering and other services, financing and financial assistance with respect to the restricted military goods and technology.<sup>267</sup>

**Aircraft:** There are three restrictive measures currently in place in relation to aircraft and the aviation sector.

- prohibition on the sale, supply, transfer or export of goods and technology suited for use in the aviation and space industry, including the sale of all aircraft, spare parts and equipment to Russian airlines, including aircraft and drone engines and their parts.
- prohibition on the provision of related technical and financial assistance, including the overhaul, repair, inspection, replacement, modification or defect rectification of an aircraft or component, with the exception of pre-flight inspection.

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<sup>265</sup> Council Regulation (EU) 2025/1494 of 18 July 2025, available [here](#).

<sup>266</sup> Council Regulation (EU) 2025/1494 of 18 July 2025, available [here](#).

<sup>267</sup> Council Regulation (EU) 2025/1494 of 18 July 2025, available [here](#).

- prohibition on the provision of insurance and reinsurance, and maintenance services, related to those goods and technology.

On June 23, 2023, the EU extended this restriction to cover the sale, licensing or transfer of intellectual property rights or trade secrets related to aviation goods to any person or entity in Russia or for use in Russia.

The EU also prohibited the transit of aviation goods and technology through Russia, unless a license is obtained. This includes a new licensing ground that allows requesting an authorization to deal with aviation goods intended for the exclusive use and under the full control of the authorizing Member State and in order to fulfill its maintenance obligations in areas which are under a long-term lease agreement between that Member State and the Russian Federation.

**Goods That Enhance Russia's Industrial Capacity:** The EU has banned the sale, supply, transfer or export, directly or indirectly, of goods that could contribute to the enhancement of Russian industrial capacities, regardless of whether they originate in the EU, to any person or entity in Russia or for use in Russia, including the provision of technical services, brokering services, financing or financial assistance in relation to the above. The restrictions cover such items as hydrogen, sulphates, nitrites, paints, film, asphalt, synthetic rubber, etc.

On June 23, 2023, the EU extended this restriction to include the sale, licensing or transfer of intellectual property rights or trade secrets related to these goods to any person or entity in Russia or for use in Russia.

On December 18, 2023, the EU prohibited the transit of goods that enhance Russia's industrial capacity via the territory of Russia.<sup>268</sup>

In addition to the above trade restrictions, on June 23, 2023, the EU adopted a licensing ground allowing authorization of sale, supply, transfer, export or transit through Russia of dual-use, military enhancement, maritime goods and technology, or goods and technology enhancing Russia's industrial capacities, or the provision of related technical assistance, brokering services or other services, financing or financial assistance, for the operation and maintenance of the Caspian Pipeline Consortium (CPC) pipelines and associated infrastructure. A license also may be obtained to provide auditing services, engineering services, legal advisory services, technical testing and analysis services for the operation and maintenance of the CPC pipelines and associated infrastructure.

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<sup>268</sup> Council Regulation (EU) 2023/2878 of 18 December 2023, available [here](#).

On February 23, 2024, the EU expanded the list of restricted goods that enhance Russia's industrial capacity by adding all types of electrical transformers, static converters and inductors.<sup>269</sup>

On February 24, 2025, the EU added additional goods to the list of goods that could contribute to the enhancement of Russia's industrial capacities, including certain minerals, chemicals, glass materials and fireworks.<sup>270</sup>

On July 18, 2025, the EU further expanded the list of goods that might contribute to the enhancement of Russian industrial capacities by adding various types of machinery, chemicals and plastic. In parallel, the EU expanded the list of items subject to the prohibition on transit via the territory of Russia.<sup>271</sup>

On October 23, 2025, the EU further expanded the list of goods that might contribute to the enhancement of Russian industrial capacity by adding salts and ores, articles of rubber, tubes, tires, millstones and construction materials. The prohibition will not apply until January 25, 2026 for contracts concluded before October 24, 2025, and until April 25, 2026 for contracts relating to refractory bricks, blocks, tiles, and similar ceramic constructional goods or ceramic wares for laboratory, chemical, or other technical use concluded before October 24, 2025.<sup>272</sup>

**Luxury Products:** The sale, supply, transport or export of luxury goods with a value of over EUR 300 to any person or entity in Russia or for use in Russia is prohibited, subject to certain diplomatic and consular exemptions. On June 23, 2023, the EU extended this restriction to include a prohibition on providing technical services, brokering services, financing or financial assistance, or other services in relation to the provision, manufacture, maintenance and use of luxury products. Furthermore, it is now also prohibited to sell, license or transfer intellectual property rights or trade secrets related to luxury goods to any person or entity in Russia or for use in Russia.

On June 23, 2023, the EU imposed a prohibition to sell, supply, transfer or export, directly or indirectly, listed sensitive goods and technology to any natural or legal person, entity or body in one of the specifically determined third countries, as well as a prohibition to provide technical assistance, brokering services or other services, financing or financial assistance, or transfer intellectual property or trade secrets in respect of such goods or technology. The EU promised to impose these sanctions on third countries which systematically and persistently failed to prevent the sale, supply, transfer or export to Russia of such sensitive goods and technology. The EU

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<sup>269</sup> Council Regulation (EU) 2024/745 of 23 February 2024, available [here](#).

<sup>270</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

<sup>271</sup> Council Regulation (EU) 2025/1494 of 18 July 2025, available [here](#).

<sup>272</sup> Council Regulation (EU) 2025/2033 of 23 October 2025, available [here](#).

has not yet identified any third countries or goods and technology as the target of these restrictions.

**Oil Tankers:** On December 18, 2023, the EU prohibited the sale or other transfer of ownership of tankers used for the transport of crude oil and petroleum, whether or not originating in the EU, to Russian entities and individuals or for use in Russia. On December 18, 2023, the EU also required notice from EU persons with respect to any sale or other transfer of ownership of oil tankers to any third country.<sup>273</sup> On February 19, 2024, the EU Commission published a notification form for such tanker sales to third countries.

### Import Restrictions

EU implemented a number of sanctions restricting Russia's ability to receive revenues from selling goods produced or extracted in Russia to the EU, including the following groups of import restrictions:

- iron and steel products;
- goods that generate significant revenues for Russia;
- coal or other fossil fuels;
- oil and petroleum products;
- LNG;
- gold; or
- diamonds.

**Import of Iron and Steel Products and Coal:** The EU prohibited the import and transport of iron and steel products, coal and other fossil fuels<sup>274</sup> that originate in Russia or have been exported from Russia, as well as the purchase of iron and steel products that are located or originate in Russia. This includes a ban on providing related technical assistance, brokering services, financing or financial assistance. On September 30, 2023, the ban on import or purchase of iron and steel processed in a third country incorporating iron and steel products originating in Russia came into effect (with an exception for particular types of iron and steel which become subject to this ban later). Starting from December 18, 2023, importers are required to provide evidence of the country of origin unless the product is imported from Norway or Switzerland.<sup>275</sup> On February 23, 2024, the United Kingdom was added to the list of authorized partner countries.<sup>276</sup>

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<sup>273</sup> Council Regulation (EU) 2023/2878 of 18 December 2023, available [here](#).

<sup>274</sup> On June 23, 2023, restrictions on coal and other fossil fuels were consolidated within the restrictions on goods that generate significant revenues for Russia.

<sup>275</sup> Council Regulation (EU) 2023/2878 of 18 December 2023, available [here](#).

<sup>276</sup> Council Regulation (EU) 2024/745 of 23 February 2024, available [here](#).



**Goods That Generate Significant Revenues for Russia:** The EU banned the purchase, import and transfer, directly or indirectly, of goods that generate significant revenues for Russia and originate in Russia or are exported from Russia. This includes a ban on providing related technical assistance, brokering services, financing or financial assistance.

On September 12, 2023, the EU Commission clarified that the prohibition on import of revenue generating goods from Russia to the EU applies to personal items and vehicles of persons temporarily traveling from Russia to the EU. The EU Commission urged EU Member State authorities to pay particular attention to motor vehicles registered in Russia, as they are goods prone to circumvention and, otherwise, apply import restrictions to personal items of the travelers in a proportionate and reasonable manner.<sup>277</sup> Poland, Finland, Estonia, Latvia and Lithuania announced that they would ban vehicles with Russian license plates from entering their territories.<sup>278</sup>

On December 18, 2023, the EU authorized import of revenue-generating goods, including vehicles, that are intended for the personal use of persons travelling to the EU or of their immediate family members. The amendment also clarifies that the restriction applicable to incoming vehicles from Russia does not prevent vehicles with Russian license plates from being registered in a Member State, so long as the vehicle was already in the EU on December 19, 2023.<sup>279</sup>

On February 24, 2025, the EU expanded the revenue generating goods restriction to cover imports of primary aluminum originating from Russia or exported from Russia.<sup>280</sup>

On October 23, 2025, the EU removed the exemption for saturated acyclic hydrocarbons (goods falling under CN code 2901 10 00) in the list of revenue generating goods. The EU permitted to execute until January 25, 2025 contracts concluded before October 24, 2025. The EU also exempted until July 25, 2025 the purchase or import to Hungary of saturated acyclic hydrocarbons originating in Russia or exported from Russia, provided that these goods are intended for exclusive use in Hungary. These goods cannot be sold on outside of Hungary.<sup>281</sup>

**Oil and Petroleum Products:** The EU has imposed a prohibition on the import or transfer, directly or indirectly, of crude oil or petroleum products if they originate in

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<sup>277</sup> EU Commission, Frequently Asked Questions, “Import, Purchase & Transfer of Listed Goods” (Sept. 12, 2023), available [here](#).

<sup>278</sup> Associated Press, “Baltic states ban vehicles with Russian license plates in line with EU sanctions interpretation” (Sept. 13, 2023), available [here](#); Associated Press, “Finland joins Baltic neighbors in banning Russian-registered cars from entering their territory” (Sept. 15, 2023), available [here](#); Associated Press, “Poland imposes EU ban on all Russian-registered passenger cars” (Sept. 17, 2023), available [here](#).

<sup>279</sup> Council Regulation (EU) 2023/2878 of 18 December 2023, available [here](#).

<sup>280</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

<sup>281</sup> Council Regulation (EU) 2025/2033 of 23 October 2025, available [here](#).

Russia or are exported from Russia. This includes a prohibition on an EU Member State selling crude oil delivered by pipeline from Russia to Member States or third parties. Importantly, EU Commission guidance has clarified that this general prohibition only applies when the relevant crude oil or petroleum is being imported into, or is destined for, the EU.

The ban applied from December 5, 2022, to one-off transactions for near-term delivery, concluded and executed before that date, or to the execution of contracts for the purchase, import or transfer of crude oil-related goods concluded before June 4, 2022, provided the relevant national competent authority has been notified. The ban applied from February 5, 2023, for similar transactions for petroleum-related products on the same terms.

The ban does not apply to seaborne crude oil and petroleum products, provided that they originate from outside Russia, are not owned by a Russian person and are only loaded in or transported through Russia. Further, the ban does not apply to crude oil that is delivered by pipeline from Russia to Member States.

The ban contains provisions to allow seaborne crude oil from Russia to be imported if the supply of crude oil by pipeline from Russia to a landlocked Member State is interrupted for reasons outside the control of that state, until the supply is resumed or crude oil delivered by pipeline is sanctioned. The oil exploration ban, ban on energy sector investments, ban on port access, ban on road transport and the public concession contract ban were also all amended to specify that they do not apply to crude oil or petroleum products already prohibited by this new ban.

On December 16, 2024, the EU extended Croatia's authority to license the purchase, import or transfer of vacuum gas oil of Russian origin until December 31, 2025. The EU also clarified that the prohibitions on import of Russian-origin oil into the EU will start applying to imports to and sales in Czechia from June 5, 2025.<sup>282</sup>

On July 18, 2025, the EU prohibited the purchase, import or transfer, directly or indirectly, into the EU petroleum products obtained in a third country, of crude oil originating in Russia. The EU also prohibited the provision of technical assistance, brokering services, financing and financial assistance, insurance and re-insurance services relating to such restricted petroleum trades.<sup>283</sup>

The EU will require importers to provide evidence of the country of origin of the crude oil used for the refining of the final product, unless the product is imported from a "partner country" (i.e., Canada, Norway, the UK, the US or Switzerland). Petroleum products imported from third countries that were net exporters of crude oil in the previous calendar year shall be considered to have been obtained from

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<sup>282</sup> Council Regulation (EU) 2024/3187 of 16 December 2024, available [here](#).

<sup>283</sup> Council Regulation (EU) 2025/1494 of 18 July 2025, available [here](#).

their domestic crude oil and not from crude oil originating from Russia, unless Member State authorities have reasonable grounds to doubt this.<sup>284</sup>

On July 18, 2025, the EU terminated the exemption for Czechia to receive crude oil by pipelines from Russia.<sup>285</sup>

On October 23, 2025, the EU expanded the list of “partner countries” for importation of petroleum products by adding Australia, Japan and New Zealand.<sup>286</sup>

**LNG:** On June 24, 2024, the EU introduced the following limitations for import of Russian LNG into the EU:<sup>287</sup>

- A prohibition on the provision of reloading services in the EU for the purposes of transshipment operations of LNG originating in Russia or exported from Russia. The prohibition includes a ban on the provision of direct or indirect technical assistance, brokering services, financing or financial assistance relating to these reloading services. A license can be obtained to provide reloading services for the transshipment of Russian LNG to a Member State if necessary to ensure the energy supply in such Member States.

Furthermore, Member States may introduce rules and guidance by December 26, 2024, requiring enhanced due diligence requirements for the identification of reloading services provided for the purpose of transshipment operations; the previous business practices of shippers; the time between the unloading and reloading; indications of direct commercial connections between the unloading and reloading, including the purchase of new unloading and reloading services in bundle; and the country of registration of the economic operators involved. On February 24, 2025, the EU introduced an exemption for reloading services that are necessary for the transport of LNG originating in Russia or exported from Russia between ports of the same EU Member State, including from the mainland of the EU Member State to its outermost regions.<sup>288</sup>

- A prohibition on the direct and indirect purchase, import or transfer of LNG originating in Russia or exported from Russia through EU LNG terminals that are not connected to the interconnected natural gas system. The prohibition includes a ban on the provision of direct or indirect technical assistance, brokering services, financing or financial assistance in relation to these goods. Starting from February 24, 2025, EU persons may apply for a license authorizing import or transfer of LNG originating in Russia or exported from

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<sup>284</sup> Council Regulation (EU) 2025/1494 of 18 July 2025, available [here](#).

<sup>285</sup> Council Regulation (EU) 2025/1494 of 18 July 2025, available [here](#).

<sup>286</sup> Council Regulation (EU) 2025/2033 of 23 October 2025, available [here](#).

<sup>287</sup> Council Regulation (EU) 2024/1745 of 24 June 2024, available [here](#).

<sup>288</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

Russia through EU LNG terminals that are not connected to the interconnected natural gas system, if the LNG is purchased, imported or transferred from a connected terminal in another EU Member State for purposes of ensuring energy supply.<sup>289</sup>

- On July 18, 2025, the EU allowed competent authorities of any EU Member State that is not directly connected to the interconnected natural gas system of another EU Member State and that received the first commercial supply of its first long-term natural gas supply contract after July 20, 2025, to authorize the purchase, import or transfer of LNG originating in Russia or exported from Russia, after having determined that the purchase, import or transfer is used to ensure its energy supply.<sup>290</sup>

On October 23, 2025, the EU prohibited, starting from April 25, 2026, the purchase, import or direct or indirect transfer of LNG that originates in or is exported from Russia. The prohibition extends to the provision of direct or indirect technical assistance, brokering services, financing or financial assistance or any other services related to LNG. The prohibition will apply from January 1, 2027, if the contract to purchase, import or transfer LNG has a duration of longer than a year, was concluded before June 17, 2025, and was not amended thereafter, with permitted amendments including lowering contracted quantities or prices or implementing administrative changes.<sup>291</sup>

**Gold:** The EU imposed a ban on imports of gold if it originates in Russia and has been exported from Russia into the EU or to any third country after July 22, 2022. This includes a prohibition on importing certain gold products processed in third countries if the gold used was exported from Russia after July 22, 2022. There are exemptions for gold necessary for official diplomatic missions or personal use. This prohibition also includes a ban on providing related technical assistance, brokering services, financing or financial assistance.

**Diamonds:** On December 18, 2024, the EU imposed a ban on direct and indirect imports of diamonds and products incorporating diamonds (both non-industrial natural and synthetic diamonds) originating in or exported from Russia, as well as diamonds and products incorporating diamonds of any origin that transited via Russia into the EU, after January 1, 2024.<sup>292</sup> From March 1, 2024, it is prohibited to import products incorporating diamonds, processed in a third country, that consist of Russian-origin or exported diamonds of or above 1 carat. Finally, from September 1, 2024, it is also prohibited to import products incorporating diamonds, processed in a third country, that consist of Russian-origin or exported diamonds of or above 0.5 carat or 0.1 gram per diamond. The diamonds import ban also prohibits

<sup>289</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

<sup>290</sup> Council Regulation (EU) 2025/1494 of 18 July 2025, available [here](#).

<sup>291</sup> Council Regulation (EU) 2025/2033 of 23 October 2025, available [here](#).

<sup>292</sup> Council Regulation (EU) 2023/2878 of 18 December 2023, available [here](#).

providing related technical assistance, brokering services, financing or financial assistance.

The EU also introduced a traceability mechanism that took effect from January 1, 2024, which requires importers to provide evidence of the country of origin of the diamonds or products incorporating diamonds. From September 1, 2024, the traceability evidence needs to include a corresponding certificate certifying that the diamonds are not mined, processed or produced in Russia.

On June 24, 2024, the EU clarified that the diamond import prohibition does not apply to rough diamonds imported from Russia prior to January 1, 2024, on the basis that there are “considerable stocks” of diamonds held outside Russia that no longer provide revenue to Russia but that may need to be exported for processing or imported after processing. The ban does not apply to temporary imports or exports of jewelry for repairs, auctions and trade fairs. Furthermore, the indirect import ban on Russian diamonds processed in third countries does not apply to jewelry incorporating such diamonds until the G7 coordinates to ban such imports.<sup>293</sup>

On February 24, 2025, the EU clarified the requirement for a certificate of origin for diamonds and explained that such a certificate should comply with the Kimberley Process certification scheme for international trade in rough diamonds.<sup>294</sup>

### **Intellectual Property Restrictions**

EU intellectual property offices and other similar institutions are prohibited from accepting certain intellectual property registration applications from Russian nationals or natural persons residing in Russia, or Russian entities, including if jointly filed by such Russian persons and entities with one or more non-Russian natural or legal person resident or established outside of Russia.<sup>295</sup>

### **Ukrainian Cultural Property**

On June 24, 2024, the EU prohibited the direct and indirect purchase, import, transfer, sale, supply or export of Ukrainian cultural property goods and other goods of archaeological, historical, cultural, rare scientific or religious importance where there are reasonable grounds to suspect that the goods have been removed from Ukraine without the consent of their legitimate owner or have been removed after March 1, 2014, in breach of Ukrainian or international law. EU sanctions also prohibit the provision of technical assistance, brokering services, financing or financial assistance for such transactions with Ukrainian cultural property.<sup>296</sup>

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<sup>293</sup> Council Regulation (EU) 2024/1745 of 24 June 2024, available [here](#).

<sup>294</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

<sup>295</sup> Council Regulation (EU) 2024/1745 of 24 June 2024, available [here](#).

<sup>296</sup> Council Regulation (EU) 2024/1745 of 24 June 2024, available [here](#).

### Non-Government Controlled Areas of Ukraine

The EU has imposed trade restrictions on the DPR, LPR, Zaporizhzhia and Kherson regions of Ukraine. These restrictions broadly mirror the wide-ranging trade sanctions that affect the Crimea and Sevastopol and consist of:

- import bans on goods from these territories, including a prohibition on ancillary services such as insurance for such imports;
- investment restrictions relating to this region;
- restrictions on the provision of certain listed transport, telecommunications, energy and oil and gas related goods, and any associated technical or financial services;
- a ban on certain services for the construction and engineering services industries in the region; and
- a prohibition on providing service directly related to tourism in this region.

### Oil Price Cap

EU sanctions prohibit maritime transport and related technical assistance, brokering services or financial assistance for maritime transport of Russian crude oil (as of December 5, 2022) or Russian petroleum products (as of February 5, 2023) (the “EU Third Country Shipment Restriction”) to third countries or between third countries.

The EU introduced a “price cap derogation” allowing the provision of Russian crude oil or petroleum products otherwise restricted under the EU Third Country Shipment Restriction if these are purchased at or below the G7 pre-established price cap.

From December 5, 2022, the EU capped the price of crude oil, petroleum oils and oils obtained from bituminous minerals that originate in or are exported from Russia at USD\$60 per barrel.<sup>297</sup> From February 5, 2023, the EU capped the price of petroleum products traded at a discount to crude oil at USD\$45 per barrel and the price of petroleum products traded at a premium to crude oil at USD\$100 per barrel. As described above, crude oil or petroleum products that originate in or are exported from Russia and are purchased at or below the agreed price cap are exempted from prohibitions in place. The functioning of the price cap mechanism is reviewed every two months to respond to developments in the market, and the price cap is 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.

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<sup>297</sup> See Commission Consolidated FAQs on the Implementation of Council Regulation No 833/2014 and Council Regulation No 269/2014, Oil Price Cap Guidance, [available here](#). Press Release of the Council of the EU “Russian oil: EU agrees on level of price cap” (Dec. 3, 2022), [available here](#); Press Release of the Council of the EU “EU agrees on level of price caps for Russian petroleum products” (Feb. 4, 2023), [available here](#); and Q&As of the European Commission “G7 agrees oil price cap to reduce Russia’s revenues, while keeping global energy markets stable” (Dec. 3, 2022), [available here](#).



The EU Oil Price Cap determines three “tiers” of actors in the oil supply chain depending on whether they routinely know the price paid in their ordinary course of business and their role in the oil supply transactions. The three “tiers” have different scope of price attestation, due diligence and reporting requirements in accordance with the EU Oil Price Cap. To support compliance with the price caps and attestation requirements, on December 18, 2023, the EU required that service providers with no access to the purchase price per barrel collect itemized price information for ancillary costs as provided by operators further up the supply chain of Russian crude oil or petroleum product trade. The itemized price information must be provided upon request to counterparties within 30 days of a request being made and to competent authorities. The EU Commission clarified that, as of February 20, 2024, attestations should be provided/collected “*per voyage*” and should be obtained within 30 days of each lifting or loading of Russia oil or petroleum products. This requirement does not apply to financial institutions providing general financing, reinsurers and reinsurance brokers.<sup>298</sup>

The Council also introduced an emergency clause allowing the transport of oil and petroleum products beyond the price cap or the provision of technical assistance, brokering services or financing or financial assistance related to the transport, when these are 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. A further exemption covers trading in Russian-origin oil and petroleum products that originate in a third country and are only being loaded in, departing from or transiting through Russia, provided that both the origin and the owner of those goods are non-Russian.

On December 18, 2023, the EU introduced a requirement for the Commission and EU Member States to periodically share information about vessels and entities “of concern,” that is, vessels and entities engaging in deceptive practices while transporting Russian crude oil and petroleum products.<sup>299</sup>

On February 24, 2025, the EU prohibited temporary storage and placement of crude oil and petroleum products originating in Russia or exported from Russia under the free zone procedure in the territory of the EU, regardless of their price.<sup>300</sup> This restriction does not apply to seaborne crude oil and petroleum products that originate in a third country and are only being loaded in, departing from, or transiting through Russia.

On July 18, 2025, the EU introduced a dynamic procedure to modify the price cap for Russian crude oil depending on the average market price. The EU Commission will

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<sup>298</sup> Council Regulation (EU) 2023/2878 of 18 December 2023, available [here](#); See also FAQs on sanctions against Russia and Belarus, with focus on the following provision: Article 3n of Council Regulation (EU) No 833/2014 (Jan. 26, 2024), available [here](#).

<sup>299</sup> Council Regulation (EU) 2023/2878 of 18 December 2023, available [here](#).

<sup>300</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).



monitor price assessments of Russian crude oil provided by authorized reporting agencies and calculate the average market price of the Russian crude oil over a period of 22 weeks starting as of July 15, 2025, and for an equivalent period of 22 weeks every six months thereafter. Based on this, the EU Commission will set the price cap that shall be equal to the average market price for Russian crude oil minus 15%. Should the newly calculated price vary by 5% or less from the applicable price cap, the price cap shall not be amended.

Starting from September 3, 2025, the oil price cap per barrel will be decreased to USD\$47.60 per barrel. Those who entered into contracts before July 20, 2025, can discharge those contracts at the previous price cap of USD\$60 until October 18, 2025. Going forward, each time the price cap is amended, prior contracts that are compliant with the existing price cap should benefit from a transitional period of 90 days.<sup>301</sup> By April 15, 2026, and every six months thereafter, the EU Commission shall assess the functioning of the oil price cap and coordinate with the Price Cap Coalition.

### Transport Restrictions

The EU imposed a ban on Russian air carriers and non-Russian aircraft owned, chartered or otherwise controlled by any Russian entity or individual from landing, taking off or flying over EU territory. On June 24, 2024, the EU extended this prohibition to ban aircraft from landing in, taking off from or overflying the territory of the EU where the aircraft are used for a non-scheduled flight and with regard to which a Russian natural or legal person is in a position to effectively determine the place or time of their take-off or landing (e.g., a business jet flight to a conference or a holiday destination). Furthermore, aircraft operators are now also obliged to provide, upon request of a competent authority, information on the beneficial ownership of the aircraft and the person chartering the aircraft, as well as information about passengers and crew members.<sup>302</sup> On February 24, 2025, the EU prohibited listed air carriers operating domestic flights within Russia, or selling, supplying, transferring or exporting aircraft or aviation goods or technology to a Russian air carrier or for flights within Russia, to land in, take off from or overfly the EU. Similar restrictions apply to any entity owned or controlled by such air carriers.<sup>303</sup> The EU has not yet designated any air carriers under the new restriction. The EU also introduced a derogation ground for certain unmanned aircraft used for private non-commercial and non-corporate flights carried out within the territory and airspace of the EU for recreational purposes.<sup>304</sup>

Starting from June 24, 2023, the EU stopped providing access to ports and locks in the territory of the EU by any vessel (i) performing ship-to-ship transfers in violation of the oil import restrictions and oil price cap or (ii) illegally interfering

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<sup>301</sup> Council Regulation (EU) 2025/1494 of 18 July 2025, available [here](#).

<sup>302</sup> Council Regulation (EU) 2024/1745 of 24 June 2024, available [here](#).

<sup>303</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

<sup>304</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

with, switching off or otherwise disabling its shipborne automatic identification system at any point of the voyage.

The EU also imposed a ban on Russian vessels accessing EU ports and locks, subject to certain exemptions. This includes a ban on vessels that changed their flag or registration from Russia to another nation after February 24, 2022.

Road transport undertakings established in Russia are prohibited from transporting goods by road within the EU (except between Kaliningrad and Russia), except for mail transport, and certain other exemptions. On June 23, 2023, this restriction was extended to apply to trailers or semi-trailers registered in Russia, including where those trailers or semi-trailers are hauled by trucks registered in other countries. On June 24, 2024, this prohibition was extended to ban EU entities owned 25% or more by a Russian natural or legal person from being admitted to become a road transport undertaking that transports goods by road within the territory of the EU, including in transit. Furthermore, as of July 26, 2024, it is prohibited for any EU road transport undertaking established after April 8, 2022, that is owned 25% or more by a Russian natural or legal person to transport goods by road in the EU. EU road transport undertakings must supply information on their ownership structures upon request by competent national authorities.<sup>305</sup> On February 24, 2025, the EU prohibited road transport undertakings established in the EU before April 8, 2022, to change their capital structure in a way that increases the share of a Russian natural or legal person to 25% or more.<sup>306</sup>

The EU banned the direct or indirect provision of technical assistance, brokering services or financing or financial assistance related to the transport (including through ship-to-ship transfers) to third countries of crude oil or petroleum products that originate in Russia or that have been exported from Russia. The prohibition does not apply to the transport of crude oil or petroleum products that originate from a third country and are only being loaded in, departing from or transiting through Russia, provided that both the origin and the owner of those goods are non-Russian.

On June 24, 2024, the EU created a list of vessels that contribute to Russia's capacity to wage war against Ukraine (e.g., by assisting prohibited exports to Russia or imports from Russia or contributing to the development of Russia's energy sector). These vessels are prohibited from accessing EU ports, anchorage zones and locks, and EU persons cannot import, purchase, sell, transfer or supply such listed vessels, provide any financial assistance, including insurance, or technical assistance to the listed vessels, nor can they operate or crew such vessels or provide flag registration.<sup>307</sup>

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<sup>305</sup> Council Regulation (EU) 2024/1745 of 24 June 2024, available [here](#).

<sup>306</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

<sup>307</sup> Council Regulation (EU) 2024/1745 of 24 June 2024, available [here](#).

On December 16, 2024, the EU added 52 vessels to the list of vessels that contribute to Russia's capacity to wage war against Ukraine (e.g., by assisting prohibited exports to Russia or imports from Russia or contributing to the development of Russia's energy sector). These vessels are prohibited from accessing EU ports, anchorage zones and locks, and EU persons cannot provide financial or technical services to these vessels.<sup>308</sup> On May 20, 2025, the EU added 189 vessels to this list.<sup>309</sup> On July 18, 2025, the EU added 105 vessels to this list.<sup>310</sup>

On October 23, 2025, the EU added 117 vessels to this list, included as a vessel designation ground transportation of mineral products that originate in Russia or are exported from Russia by using "shadow fleet" practices and added a restriction on provision of reinsurance services to the targeted vessels.<sup>311</sup> The EU also prohibited selling, providing, underwriting or otherwise entering into an arrangement that results in the transfer of risk insurance coverage for five years after the sale or lease of vessels or aircrafts that were operated directly or indirectly by the Government of Russia or a Russian entity.<sup>312</sup>

#### **Travel Restrictions for Russian Diplomats and Russian Citizens**

On October 23, 2025, the EU introduced a requirement for Russian diplomats, consular staff and their family members to notify the Member States (other than that of their accreditation) to which they are travelling at least 24 hours before the intended date of entry into their territory. Member States are authorized to introduced authorization requirements for such travels or transits.

On November 7, 2025, the EU restricted issuance of multiple-entry visas to Russian citizens residing in Russia, unless they are (i) close relatives of Russian citizens residing in a Member State or of EU citizens, or (ii) transportation workers, such as truck and bus drivers, seafarers or members of train crews. This restriction is without prejudice to the possibility for Member States to issue in justified cases a multiple-entry visa to an applicant who proves the need or justifies the intention to travel frequently or regularly, provided that they prove their integrity and reliability.<sup>313</sup>

#### **Russian Ports, Locks and Airports**

On February 24, 2025, the EU prohibited engaging in any transactions, directly or indirectly, with listed Russian ports, locks and airports that are involved in transportation of goods used for Russia's warfare in Ukraine, maritime transportation of oil and petroleum from Russia or of Russian origin by Russia's

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<sup>308</sup> Council Regulation (EU) 2024/3187 of 16 December 2024, available [here](#).

<sup>309</sup> Council Regulation (EU) 2025/931 of 20 May 2025, available [here](#).

<sup>310</sup> Council Regulation (EU) 2025/1494 of 18 July 2025, available [here](#).

<sup>311</sup> Council Regulation (EU) 2025/2033 of 23 October 2025, available [here](#).

<sup>312</sup> Council Regulation (EU) 2025/2033 of 23 October 2025, available [here](#).

<sup>313</sup> Commission Implementing Decision C(2025) 7552 of 6 November 2025, available [here](#).

“shadow fleet,” certain prohibited exports to Russia and imports from Russia, or violation, circumvention or significant frustration of EU sanctions against Russia.<sup>314</sup>

Transactions with Russian ports and locks are exempted from the restriction, if they are necessary for: (i) maritime safety and humanitarian purposes; (ii) the purchase, import or transfer of natural gas, certain crucial metals and iron ore from or through Russia into the EU, EEA, Switzerland or Western Balkans; (iii) the purchase, import or transfer of oil and petroleum products originating or exported from Russia (unless prohibited by the Oil Price Cap or restrictions on oil and petroleum imports into the EU), or non-Russian oil and petroleum products transiting through Russia from third countries; (iv) the purchase, import or transfer of pharmaceuticals, medical, agricultural and food products, unless prohibited by EU sanctions; (v) transactions necessary for operation and safety of existing, and completion of new, civil nuclear capabilities. Exemptions for transactions with Russian airports are mostly limited to humanitarian purposes, the purchase of pharmaceuticals, agricultural, medical and food products, emergency situations, diplomatic missions and personal travel.<sup>315</sup>

The list of banned Russian ports and airports includes the largest Russian industrial ports, such as Ust-Luga, Novorosiysk and Primorsk, and international airports, including Moscow-based Vnukovo airport.<sup>316</sup>

On July 18, 2025, the EU exempted from the ban imposed on Russian ports transactions for the purchase, import or transfer of coal originating from a third country that is only being loaded in, departs from or transits through Russia, provided that both the origin and owner of the goods are non-Russian.<sup>317</sup> The EU also exempted from the ban imposed on Russian airports transactions for the establishment, operation, maintenance, fuel supply, retreatment, safety and continuation of design, construction and commissioning of civil nuclear capabilities.<sup>318</sup>

On October 23, 2025, the EU expanded the ports and locks prohibition to include listed ports and locks in third countries other than Russia. No foreign port or lock has yet been included in the list.<sup>319</sup>

### Media Restrictions

The EU imposed specific Russia-related restrictions related to broadcasting. Specifically, it is prohibited for operators to broadcast or to enable, facilitate or otherwise contribute to the broadcasting of any content by the listed legal persons,

<sup>314</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

<sup>315</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

<sup>316</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

<sup>317</sup> Council Regulation (EU) 2025/1494 of 18 July 2025, available [here](#).

<sup>318</sup> Council Regulation (EU) 2025/1494 of 18 July 2025, available [here](#).

<sup>319</sup> Council Regulation (EU) 2025/2033 of 23 October 2025, available [here](#).

entities or bodies, including through transmission or distribution by any means such as cable, satellite, IP-TV, internet service providers, internet video-sharing platforms or applications, whether new or pre-installed. It is also prohibited to advertise products or services in any content produced or broadcast by the media outlets listed below. In addition, any broadcasting license or authorization, transmission and distribution arrangement with the following entities must be suspended:

- |                                |                               |                                     |
|--------------------------------|-------------------------------|-------------------------------------|
| • RT–Russia Today English      | • Katehon                     | • First Channel                     |
| • RT–Russia Today UK           | • RT–Russia Today France      | • Oriental Review                   |
| • RT–Russia Today Germany      | • RT–Russia Today Spanish     | • New Eastern Outlook               |
| • RT–Arabic                    | • Sputnik                     | • Voice of Europe                   |
| • NTV/NTV Mir                  | • Sputnik Arabic              | • RIA Novosti                       |
| • Rossiya 1                    | • REN TV                      | • Izvestija                         |
| • RT Balkan                    | • Fondsk                      | • Rossiiskaja Gazeta <sup>320</sup> |
| • Tsargrad                     | • Lenta                       | • NewsFront                         |
| • Eurasia Daily                | • Krasnaya Zvezda (TV Zvezda) | • RuBaltic                          |
| • Strategic Culture Foundation |                               | • SouthFront <sup>321</sup>         |

### Services Restrictions

The EU imposed a prohibition on directly or indirectly providing the following services to the government of Russia or to legal persons, entities or bodies established in Russia:

- accounting, auditing, book-keeping or tax consulting services;
- business and management consulting or public relations services;
- architectural and engineering services;
- IT consultancy services;
- legal advisory services, unless strictly necessary for the exercise of the right of defense in judicial proceedings and the right to an effective legal remedy;
- advertising, market research and public opinion polling services;
- technical testing and analysis services;
- provision of software
  - for enterprise management;
  - for industrial design and manufacture; and
  - with certain uses in the banking and financial sector; and

<sup>320</sup> Council Regulation (EU) 2024/1428 of 17 May 2024, available [here](#); Council Implementing Regulation (EU) 2024/1776 of 24 June 2024, available [here](#).

<sup>321</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

- construction services.<sup>322</sup>

Starting from December 18, 2023, the prohibition also extends to provision of technical assistance, brokering and other services, financing or financial assistance related to such restricted services.<sup>323</sup> As of February 24, 2025, the prohibition further extends to selling, licensing or transferring intellectual property rights or trade secrets related to the enterprise management and industrial design and manufacturing software and provision of such software to any legal persons in Russia.<sup>324</sup>

Until September 30, 2024, the ban did not apply to the provision of services intended for the exclusive use of legal persons, entities or bodies established in Russia that are owned by, or solely or jointly controlled by a person from the EU, EEA, Switzerland or one of the “partner countries” (i.e., US, Japan, UK, Australia, Canada, New Zealand, Norway, South Korea, Switzerland, Lichtenstein and Iceland). After June 20, 2024, the exemption stopped being automatic and requires an authorization from EU authorities.<sup>325</sup> On June 24, 2024, the EU clarified that this prohibition does not apply to the provision of services by EU nationals who have resided in Russia since before February 24, 2022, to entities or bodies established in Russia that are owned by, or solely or jointly controlled by a person from the EU, EEA, Switzerland or one of the “partner countries.”<sup>326</sup>

National competent authorities may make exceptions where these services are necessary for humanitarian purposes or for civil society activities that directly promote democracy, human rights or the rule of law in Russia.

On October 23, 2025, the EU also prohibited providing the following services to the government of Russia or Russian entities as of November 25, 2025: (i) artificial intelligence services consisting of access to models or to platforms for their training, fine-tuning and inference; (ii) high-performance computing, including access to graphic processing unit -accelerated computing, or quantum computing services; and (iii) commercial space-based services consisting of Earth observation or satellite navigation. The EU also prohibited providing services directly related to tourism activities in Russia.<sup>327</sup> Further, the EU introduced a requirement to obtain a prior authorization for the provision to the Russian government of any services not specifically restricted by the EU. Each application will be assessed on a case-by-case basis and can be granted only to the extent provision of such services does not violate other EU trade and financial sanctions targeting Russia.<sup>328</sup>

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<sup>322</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

<sup>323</sup> Council Regulation (EU) 2023/2878 of 18 December 2023, available [here](#).

<sup>324</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

<sup>325</sup> Council Regulation (EU) 2023/2878 of 18 December 2023, available [here](#).

<sup>326</sup> Council Regulation (EU) 2024/1745 of 24 June 2024, available [here](#).

<sup>327</sup> Council Regulation (EU) 2025/2033 of 23 October 2025, available [here](#).

<sup>328</sup> Council Regulation (EU) 2025/2033 of 23 October 2025, available [here](#).

### Trusts-Related Services

The EU prohibited the registering, providing a registered office, business or administrative address and providing management services to a trust or similar legal arrangement: where the trustor or beneficiary is a Russian national, resident or entity or is more than 50% owned by a Russian national, resident or entity; or where the entity or person is acting under the control or at the direction of a Russian national, resident or entity. This prohibition includes a prohibition to act as, or arrange for another person to act as, a trustee, nominee shareholder, director, secretary or a similar position, for a trust or similar legal arrangement.

National competent authorities may authorize a person to act as a trustee nominee, shareholder, director or secretary for a trust or similar legal arrangement, provided that the service provider does not accept or make available any funds or economic resources or otherwise provide benefits from assets placed in a trust, to those the ban applies to. If Member States grant such an authorization, they must notify the EU Commission.

On June 23, 2023, the EU also expanded the notification requirements for trade sanctions. EU Member States now need to inform other EU Member States about denials of authorization. If a Member State faces a request for license for an essentially identical transaction, it must consult with the Member State that issued the original denial. A divergent decision on such authorization should be explained in detail to other EU Member States. Further, any EU natural or legal persons shall supply any information which would facilitate the implementation of the relevant sanctions to the competent authority of the Member State where they are resident or located within two weeks of acquiring this information. Such person also is required to cooperate with the competent authority in any verification of the provided information.

### Special Economic, Innovation or Preferential Zones of Russia

On October 23, 2025, the EU imposed investment and commercial restrictions on legal entities that are registered as residents of, or whose registered office, principal place of business, or permanent establishment is located within, certain special economic, innovation or preferential zones in Russia ("SEZ"). The list of restricted SEZ includes:<sup>329</sup>

- Special Economic Zone of Industrial-Production Type "Alabuga";
- Special Economic Zone of Technological-Innovative Type "Technopolis Moscow";
- Special Economic Zone of Industrial-Production Type "Lipetsk";

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<sup>329</sup> Council Regulation (EU) 2025/2033 of 23 October 2025, available [here](#).



- Special Economic Zone of Industrial-Production Type “Togliatti”;
- Special Economic Zone of Industrial-Production Type “Lyudinovo”;
- Special Economic Zone of Technological-Innovative Type “St. Petersburg”;
- Special Economic Zone of Technological-Innovative Type “Dubna”;
- Special Economic Zone of Technological-Innovative Type “Innopolis”;
- Special Economic Zone of Port Type “Ulyanovsk”;
- Skolkovo Innovation Center; and
- Free Port of Vladivostok.

With respect to SEZ and their residents, the EU prohibits:<sup>330</sup>

- acquiring any new or extending any existing participation in ownership or control in an entity that is registered as a resident of, or whose registered office, principal place of business, or permanent establishment is located within, the SEZ (the “SEZ Entity”). Starting from January 25, 2026, is it also prohibited to maintain any existing participation in ownership or control of an SEZ Entity based in Alabuga or Technopolis Moscow.
- creating any new joint venture, branch, or representative office in the SEZ or with an SEZ Entity. Starting from January 25, 2026, is it also prohibited to maintain any existing joint venture, branch, or representative office in Alabuga or Technopolis Moscow or with SEZ Entities of Alabuga and Technopolis Moscow.
- entering into any new contract or arrangement for the supply of goods or services or of related intellectual property rights or trade secrets to, from, or for use in the SEZ or with a SEZ Entity. Starting from January 25, 2026, the EU also prohibits the maintenance of any existing contract or arrangement for the supply of goods or services or of related intellectual property rights or trade secrets to, from, or for use in Alabuga or Technopolis Moscow or with SEZ Entities of Alabuga and Technopolis Moscow.
- granting, or being part of any arrangement to grant, any loan or credit or otherwise providing financing, including equity capital, to an SEZ Entity or for the documented purpose of financing such SEZ Entity.

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<sup>330</sup> Council Regulation (EU) 2025/2033 of 23 October 2025, available [here](#).

- providing investment services directly related to the restricted investment or commercial activities.

These prohibitions extend to entities located outside of the SEZ that are owned or controlled by the SEZ Entities.

The EU provides a list of licensing grounds that may allow engagement with SEZ Entities, including a licensing ground for divestment and withdrawal from Russia or the wind-down of business activities in Russia.

### Russia Divestments

EU businesses may require licenses to divest of their holdings in Russia. The main reason is that the EU Commission has taken a view that any transfer of restricted goods or transfer of control over an entity holding such restricted goods in Russia to a new buyer, is a prohibited transaction requiring an authorization.

A previous set of licensing grounds for divestment transactions expired on December 31, 2024. The EU's plan to extend the licensing grounds for a further period faced pushback and was the subject of significant press speculation in the course of preparing the 15th package of the Russia-related sanctions. The EU ultimately renewed the divestment licensing grounds, which is available until December 31, 2025.<sup>331</sup> On October 23, 2025, the EU renewed the divestment licensing ground and extended it until December 31, 2026.<sup>332</sup>

In the recitals to the new regulation, the EU, for the first time, pushed EU entities to divest from Russia as soon as possible (although this has not been formulated as a mandatory requirement).

### Extension of Belarusian Sanctions

The EU has also imposed further sanctions on Belarus in connection with Belarus's apparent collaboration with Russia in relation to Russia's actions in Ukraine:

- More than 155 Belarusian individuals and entities related to the Belarus defense and military sector, government, judiciary or propaganda, as well as those involved in illegal transportation of Ukrainian children, have been added to the asset freeze list since 2022. Some recent designations relate to violations of human rights in Belarus rather than collaboration with Russia.
- On June 29, 2024, the asset freeze designation grounds for Belarusian persons were expanded to include persons facilitating circumvention of sanctions or otherwise significantly frustrating sanctions.<sup>333</sup> On February 24, 2025, the EU

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<sup>331</sup> Council Regulation (EU) 2024/3187 of 16 December 2024, available [here](#).

<sup>332</sup> Council Regulation (EU) 2025/2033 of 23 October 2025, available [here](#).

<sup>333</sup> Council Regulation (EU) 2024/1865 of 29 June 2024, available [here](#).

introduced further designation grounds for persons who form part of, support, materially or financially, or benefit from the military and industrial complex of Belarus, including by being involved in the development, production or supply of military technology and equipment.<sup>334</sup>

- Further restrictions related to the trade of goods used for the production or manufacturing of tobacco products, mineral fuels, bituminous substances and gaseous hydrocarbon products, potassium chloride products, wood products, cement products, iron and steel products and rubber products have been introduced.
- Restrictions on the export of dual-use goods and technology and on the provision of related services, as well as restrictions on exports of certain goods and technology that might contribute to Belarus's military, technological, defense and security development, together with restrictions on the provision of related services, have also been introduced.
- On August 3, 2023, the EU imposed similar export restrictions on aviation and firearm goods and technology. The EU also added certain semiconductor and electronics goods to the list of restricted goods and technology deemed to contribute to Belarus's military and technological enhancement. In parallel, the EU introduced additional licensing grounds applicable to some of these products, which, for example, include a license for goods necessary for production at a Belarus joint venture majority owned by an EU investor.
- In the same sanctions package, the EU adjusted certain other export licensing grounds and exemptions, including by introducing a new license allowing wind down of telecom service operations in Belarus through February 6, 2024.<sup>335</sup>
- On June 29, 2024, the export and import restrictions targeting Belarus were to a great extent harmonized with restrictions imposed on Russia:<sup>336</sup>
  - New restrictions on the sale, supply, transfer, export or transit of (i) goods that could contribute to the enhancement of Belarusian industrial capacities, (ii) maritime navigation goods and technology, (iii) goods and technology suited for use in oil refining and liquefaction of natural gas and (iv) certain luxury goods, whether or not originating in the EU, to any Belarusian legal or natural person or for use in Belarus. The EU also imposed restrictions on the provision of financing, financial or technical assistance, brokering or other services relating to such goods and technology.

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<sup>334</sup> Council Regulation (EU) 2025/392 of 24 February 2025, available [here](#).

<sup>335</sup> Council Regulation (EU) 2023/1594 of 3 August 2023, available [here](#).

<sup>336</sup> Council Regulation (EU) 2024/1865 of 29 June 2024, available [here](#).

- Further, on June 29, 2024, the EU prohibited the transit via Belarus of (i) dual-use goods and technologies, (ii) goods and technology that might contribute to Belarus's military and technological enhancement or to the development of its defense and security sector, (iii) goods that could contribute to the enhancement of Belarusian industrial capacities, (iv) firearms, firearm parts and essential components and ammunition, (v) goods and technology suited for use in aviation or the space industry and (vi) certain machinery, in each case that were exported from the EU.
- In respect of the above new and expanded export restrictions (except for machinery exports), the EU also prohibited the sale, license or transfer in any other way of intellectual property rights or trade secrets relating to the respective goods to any Belarusian legal or natural person or for use in Belarus.
- As of June 29, 2024, restrictions on the purchase, import or transfer of (i) crude oil and (ii) goods that allow Belarus to diversify its sources of revenue (e.g., certain aircraft engines, jet fuels, oxidation inhibitors and static dissipater additives) if they originate in or are exported from Belarus. The EU also prohibited provision of financing, financial or technical assistance, brokering or other services relating to such restricted goods.
- As of June 29, 2024, restrictions on the purchase, import or transfer of gold if it originates in Belarus and has been exported from Belarus into the EU or to any third country after July 1, 2024.<sup>337</sup> Furthermore, the EU restricted the purchase, import or transfer of gold products processed in third countries that incorporate the prohibited Belarusian gold. The EU sanctions also restrict provision of financing, financial or technical assistance, brokering or other services relating to the prohibited gold.
- From July 1, 2024, restrictions on the purchase, import or transfer of certain diamonds and products incorporating diamonds if they (i) originate in Belarus and have been exported from Belarus into the EU or to any third country or (ii) originate elsewhere but transited via Belarus.<sup>338</sup> The EU sanctions also restrict provision of financing, financial or technical assistance, brokering or other services relating to the prohibited diamonds.
- On July 18, 2025, the EU revised restrictions relating to dealings with goods and technology included in the Common Military List, which were previously split between local EU Member State legislations and EU sanctions regulations. This amendment ensured that exports and imports of, and

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<sup>337</sup> Council Regulation (EU) 2024/1865 of 29 June 2024, available [here](#).

<sup>338</sup> Council Regulation (EU) 2024/1865 of 29 June 2024, available [here](#).

ancillary services for, goods included in the Common Military List are prohibited with respect to Belarus at the EU level.<sup>339</sup>

- On July 18, 2025, the EU expanded the list of goods that may contribute to Belarus's military or technological enhancement by adding certain chemical precursors to energetic materials, spare parts for machine tools, computer numerical control machines and chemicals for propellants. The EU also expanded the list of goods that might contribute to the enhancement of Belarusian industrial capacities, by adding certain machinery, chemicals and plastic.<sup>340</sup>
- On July 18, 2025, the EU also introduced a requirement to obtain an authorization for the export of goods and technology that might contribute to Belarus's military and technological enhancement to any third country, if the exporter has been informed that the items in question are or may be intended for any natural or legal person, entity or body in Belarus or for use in Russia.<sup>341</sup> This new measure provides more flexibility for an EU Member State in finding ways to prevent restricted goods from being sent to Belarus.
- On February 24, 2025, the EU prohibited selling, supplying, transferring or providing, directly or indirectly, listed types of software relating to oil and gas exploration and production projects to any natural or legal person, entity or body in Belarus or for use in Belarus.<sup>342</sup>
- Restrictions on transactions related to the management of reserves as well as of assets of the Central Bank of Belarus, including transactions with legal persons or entities acting on behalf of or at the direction of the Central Bank.
- Restrictions on the listing and provision of services on EU trading venues for the transferable securities of any legal person, entity or body established in Belarus and with over 50% public ownership. This ban applied from April 12, 2022.
- Restrictions on the provision of public financing or financial assistance for trade with, or investment in, Belarus, unless:
  - it is a result of a binding financing commitment established prior to March 10, 2022;
  - it is for trade in food, and for agricultural, medical or humanitarian purposes.

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<sup>339</sup> Council Regulation (EU) 2025/1472 of 18 July 2025, available [here](#).

<sup>340</sup> Council Regulation (EU) 2025/1472 of 18 July 2025, available [here](#).

<sup>341</sup> Council Regulation (EU) 2025/1472 of 18 July 2025, available [here](#).

<sup>342</sup> Council Regulation (EU) 2025/392 of 24 February 2025, available [here](#).

Since February 24, 2025, the EU does not exempt from this restriction the provision of public financing or financial assistance up to the total value of EUR 10,000,000 per project benefitting EU SMEs (however, an EU person may apply for a license to continue providing such financing).<sup>343</sup>

- Restrictions on accepting deposits over EUR 100,000 from Belarusian nationals or residents, or legal persons or entities established in Belarus, or (starting from February 24, 2025) legal persons, entities or bodies established outside the EU and whose proprietary rights are directly or indirectly owned more than 50% by Belarusian nationals or residents. On February 24, 2025, the EU also prohibited the provision of crypto-asset wallet, account or custody services to Belarusian nationals, residents or entities. Finally, starting from March 26, 2025, the EU prohibits Belarusian nationals and residents from owning or controlling, or holding any posts in the governing bodies of, EU entities that provide crypto-asset wallet, account or custody services.<sup>344</sup>
- Restrictions on the provision of certain core and ancillary services for transferable securities issued after April 12, 2022, to Belarusian nationals or residents, or any legal person or entity established in Belarus, by EU CSDs. This ban does not apply to EU nationals or any person with a temporary or permanent residence permit in the EU.
- Restrictions on the sale, supply, transfer or export of banknotes denominated in Euro and any official currencies of the EU Member States to Belarus or to any natural or legal person, entity or body in Belarus, including the government and the Central Bank of Belarus, or for use in Belarus. This ban does not apply where such a sale, supply, transfer or export of banknotes is necessary for:
  - personal use of individuals traveling to Belarus or members of their immediate families traveling with them;
  - the official purposes of diplomatic missions, consular posts or international organizations in Belarus enjoying immunities in accordance with international law; or
  - civil society activities that directly promote democracy, human rights or the rule of law in Belarus and receive public funding from the EU, EU Member States or “partner countries.”<sup>345</sup>
- Restrictions on the provision of specialized financial messaging services used to exchange financial data (SWIFT) to Belagroprombank, Bank Dabrabyt, Development Bank of the Republic of Belarus and Belinvestbank (Belarusian

<sup>343</sup> Council Regulation (EU) 2025/392 of 24 February 2025, available [here](#).

<sup>344</sup> Council Regulation (EU) 2025/392 of 24 February 2025, available [here](#).

<sup>345</sup> Council Regulation (EU) 2025/392 of 24 February 2025, available [here](#).

Bank for Development and Reconstruction) or to entities established in Belarus whose proprietary rights are more than 50% owned by these entities. On July 18, 2025, the EU converted these restrictions into a prohibition to engage, directly or indirectly, in any transaction with listed legal persons, entities and bodies (including the banks already cut off from SWIFT and any entities designated in the future), or with any legal person, entity or body established in Belarus that is more than 50% owned by such listed entity.<sup>346</sup>

- As of June 29, 2024, restrictions on acquiring any new or extending any existing participation in, granting loans or credit to or creating any new joint ventures with any entity operating in the energy sector in Belarus. The EU Member State authorities may authorize, under certain conditions, such an investment where (i) it is deemed necessary for ensuring critical energy supply within the EU or transporting fossil fuels from or through Belarus into the EU, or (ii) it concerns an entity in the Belarus energy sector that is owned by an EU parent entity.<sup>347</sup>
- Prohibition on road transport undertakings established in Belarus transporting goods by road within the EU, except for mail transport, and certain other exemptions. On June 29, 2024, the EU extended this prohibition to ban EU entities 25% or more owned by Belarusian natural or legal persons from being admitted to become road transport undertakings that transports goods by road within the territory of the EU, including in transit. After August 2, 2024, any EU road transport undertaking owned 25% or more by a Belarusian natural or legal person is prohibited from transporting goods by road within the territory of the EU, including in transit.<sup>348</sup> On February 24, 2025, the EU prohibited road transport undertakings established in the EU before April 8, 2022, from changing their capital structure in a way that increases the share of a Belarussian natural or legal person to 25% or more.<sup>349</sup>
- As of June 29, 2024, restrictions on providing:
  - accounting, auditing, including statutory audit, bookkeeping or tax consulting services, or business and management consulting or public relations services;
  - construction,<sup>350</sup> architectural and engineering services, legal advisory services and IT consultancy services;
  - market research and public opinion polling services, technical testing and analysis services and advertising services;

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<sup>346</sup> Council Regulation (EU) 2025/1472 of 18 July 2025, available [here](#).

<sup>347</sup> Council Regulation (EU) 2024/1865 of 29 June 2024, available [here](#).

<sup>348</sup> Council Regulation (EU) 2024/1865 of 29 June 2024, available [here](#).

<sup>349</sup> Council Regulation (EU) 2025/392 of 24 February 2025, available [here](#).

<sup>350</sup> Council Regulation (EU) 2025/392 of 24 February 2025, available [here](#).



- certain software for the management of enterprises and software for industrial design and manufacture; or
- technical assistance, brokering or other services, financing or financial assistance in relation to the services listed above

to Belarus or its government, public bodies or its corporations or agencies, as well as natural or legal persons acting on their behalf.<sup>351</sup> On October 23, 2025, the services restriction was extended to providing: (i) commercial space-based services consisting of Earth observation or satellite navigation; (ii) artificial intelligence services consisting of access to models or to platforms for their training, fine-tuning and inference; (iii) high-performance computing, including access to graphic processing unit accelerated computing, or quantum computing services; and (iv) software with certain uses in the banking and financial sector.<sup>352</sup> The EU also imposed an authorization requirement for provision of any services not specifically targeted by EU restrictions to Belarus, its government, or its public bodies, corporations or agencies.<sup>353</sup>

- As of October 23, 2025, a prohibition on providing (i) crypto-asset services (which is a wider category than previously prohibited crypto-wallet, account and custody services), (ii) issuing of payment instruments, acquiring of payment transactions, or payment initiation services, and (ii) issuing of electronic money to Belarussian nationals, residents and entities.<sup>354</sup>

On June 29, 2024, the EU allowed Member States to authorize the release of asset frozen funds or provision of restricted services in order to set up a firewall that: (i) removes a Belarusian-listed person's control of assets belonging to an EU non-listed entity; and (ii) ensures that no further funds or economic resources accrue to the benefit of the Belarusian-listed person.<sup>355</sup>

## EU Guidance

For the first time, the EU's sanctions packages against Russia have been accompanied by extensive FAQs, which are updated on a regular basis and have at least touched on every aspect of this sanctions regime.<sup>356</sup> Many of the answers provided by the EU in this document will likely apply equally to all other EU sanctions regimes, making this an invaluable source for interpreting EU sanctions restrictions more broadly.

<sup>351</sup> Council Regulation (EU) 2024/1865 of 29 June 2024, available [here](#).

<sup>352</sup> Council Regulation (EU) 2025/2041 of 23 October 2025, available [here](#).

<sup>353</sup> Council Regulation (EU) 2025/2041 of 23 October 2025, available [here](#).

<sup>354</sup> Council Regulation (EU) 2025/2041 of 23 October 2025, available [here](#).

<sup>355</sup> Council Regulation (EU) 2024/1865 of 29 June 2024, available [here](#).

<sup>356</sup> Commission Consolidated FAQs on the Implementation of Council Regulation No 833/2014 and Council Regulation No 269/2014, available [here](#).

The EU has also published a number of additional guidance documents that, although not forming part of the Russia FAQs, set out important clarifications on the intended application of the Russia sanctions and best compliance practices. These guidance documents include the following:

- **Global Advisory on Russia Sanctions Evasion of the Multilateral REPO Task Force:** describes the types of Russian sanctions evasion techniques, such as transfer of beneficial ownership to family members and close associates, purchase of real estate to hold value, use of complex ownership structures helping to avoid identification or use of third-party jurisdictions and false trade information to get access to prohibited goods.<sup>357</sup>
- **Guidance on Firewalls:** describes ring-fencing “safeguards” that a non-designated EU entity may implement to prevent a designated person from exercising control over an entity and to ensure that an EU entity may continue operating as usual. Such “safeguards” include the removal of the designated person from the day-to-day operation and any business decision of the entity and the resulting resources and profits. The Guidance encourages EU Member States to implement a system of cross-border recognition of firewalls.<sup>358</sup>
- **Guidance on Enhanced Due Diligence to Shield Against Russia Sanctions Circumvention:** describes the steps of strategic sanctions risks assessment, suggests an approach to enhanced due diligence which may adequately prevent those risks from occurring, and lists circumvention red flags.<sup>359</sup> On February 19, 2024, this guidance was updated.
- **Advisory for the Maritime Oil Industry and Related Sectors:** draws attention to the growing “shadow” maritime oil trade by actors who try to evade price caps on crude oil and petroleum products of Russian origin or actors connected to sanctioned persons and countries. Such “shadow” trade increases maritime safety and environmental risks and makes it more challenging to hold responsible parties accountable. The advisory provides recommendations concerning specific best practices in the maritime oil industry to prevent and disrupt the prohibited “shadow” sanctioned trade.<sup>360</sup>

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<sup>357</sup> Global Advisory on Russia Sanctions Evasion Issued Jointly by the Multilateral REPO Task Force (Mar. 9, 2023), available [here](#).

<sup>358</sup> Guidance Note – Implementation of Firewalls in cases of EU entities owned or controlled by a designated person or entity (Nov. 29, 2023), available [here](#). The EU issued its first Guidance on Firewalls for Agricultural and Food Trades in May 2023. The EU expanded the Guidance to all EU entities with links to designated persons, regardless of industry in November.

<sup>359</sup> European Commission Guidance for EU operators: Implementing enhanced due diligence to shield against Russia sanctions circumvention (Feb. 19, 2024), available [here](#).

<sup>360</sup> Price Cap Coalition – Advisory for the Maritime Oil Industry and Related Sectors (Oct. 12, 2023), available [here](#).

- The EU has historically published a number of EU Commission Opinions on various sanctions topics, which continue to include important guidance on concepts like the EU's interpretation of the "ownership and control" test.

## Enforcement

The enforcement provision of the Russia and Belarus sanctions has been strengthened to require Member States to impose criminal penalties where appropriate and provide measures for confiscation of the proceeds of a sanctions infringement.

On November 28, 2022, the EU Council unanimously adopted a decision to add the violation of restrictive measures to the list of EU crimes included in Article 83(1) of the Treaty on the Functioning of the European Union.<sup>361</sup> This allows the EU to set out rules concerning the definition of a criminal breach of sanctions and the minimum penalties imposed for such a breach.

Following on from this, on December 2, 2022, the European Commission proposed a Directive<sup>362</sup> on the criminalization of sanctions violations. The next step was for the Directive to undergo a review by the European Parliament and Council per the ordinary co-legislative procedure. On June 9, 2023, the Council settled on its negotiation position and presented a revised version of the draft Directive.<sup>363</sup> On July 7, 2023, the Civil Liberties Committee of the European Parliament prepared a report on the draft Directive for further consideration by the European Parliament.<sup>364</sup> On December 12, 2023, the Council and European Parliament reached political agreement on the EU Commission's Directive proposal. The Directive was adopted on April 24, 2024, and took effect on May 19, 2024.<sup>365</sup>

The Directive:

- defines the criminal offenses related to the violation of EU sanctions;

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<sup>361</sup> See Press Release from the Council of the EU "Sanctions: Council adds the violation of restrictive measures to the list of EU crimes" (Nov. 28, 2022), [available here](#).

<sup>362</sup> See Proposal for a Directive on the definition of criminal offences and penalties for the violation of Union restrictive measures (Dec. 2, 2022), [available here](#); Press Release from the European Commission "Ukraine: Commission proposes to criminalize the violation of EU sanctions" (Dec. 2, 2022), [available here](#); and Q&As from the European Commission "Commission proposes to criminalize evasion of EU sanctions" (Dec. 2, 2022), [available here](#).

<sup>363</sup> See Press Release from the Council "EU sanctions: Council finalises position on law that aligns penalties for violations" (June 9, 2023), [available here](#).

<sup>364</sup> See REPORT on the proposal for a directive of the European Parliament and of the Council on the definition of criminal offences and penalties for the violation of Union restrictive measures (July 7, 2023), [available here](#).

<sup>365</sup> Directive (EU) 2024/1226 of the European Parliament and of the Council of 24 April 2024 on the definition of criminal offences and penalties for the violation of Union restrictive measures and amending Directive (EU) 2018/1673, [available here](#).

- standardizes the penalties for those found guilty of a defined criminal offense;
- safeguards lawyers through professional secrecy by removing any obligation to report information obtained in connection with judicial, administrative or arbitral proceedings; and
- designates concealed funds or economic resources obtained through circumvention as proceeds of crime.

EU Member States were required to implement the Directive requirements by May 20, 2025.

Starting from February 24, 2023, the EU applied expanded enforcement and anti-circumvention measures including:

- more detailed reporting obligations on funds and economic resources belonging to listed individuals and entities that have been frozen or were subject to any move shortly before the listing;
- reporting obligations to the Member States and to the Commission on immobilized reserves and assets of the Central Bank of Russia; and
- an obligation for aircraft operators to notify non-scheduled flights to their national competent authorities.

On June 24, 2024, the EU introduced a number of amendments to prevent circumvention of sanctions and enhance enforcement:<sup>366</sup>

- The EU significantly expanded the scope of the “circumvention” offense by adding the underlined wording: “It shall be prohibited to participate, knowingly and intentionally, in activities the object or effect of which is to circumvent the prohibitions set out in this Regulation, including by participating in such activities without deliberately seeking that object or effect but being aware that the participation may have that object or effect and accepting that possibility.”
- The EU introduced a requirement for EU persons to undertake “best efforts” to ensure that any non-EU legal person, entity or body that they own or control does not participate in activities that undermine the EU trade sanctions against Russia and EU asset freeze and trade sanctions against Belarus. “Best efforts” should be understood as comprising all actions that are suitable and necessary to achieve the result of preventing the undermining of sanctions so long as they are feasible for the EU person in view of its nature, its size and the relevant factual circumstances. Such circumstances include situations where the EU person, due

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<sup>366</sup> Council Regulation (EU) 2024/1745 of 24 June 2024, available [here](#).

to reasons outside of its control, such as the legislation of a third country, is not able to exercise control over a non-EU subsidiary. On February 24, 2025, the “best efforts” obligation was extended to EU asset freeze sanctions targeting Russia.<sup>367</sup>

- EU Member States are required to take self-disclosure into account as a mitigating factor when deciding on penalties for EU sanctions violations.

On December 16, 2024, the EU introduced a prohibition on enforcing or giving effect to any injunction, order, relief, judgment or other decision of Russian courts made pursuant to Russian legislation that authorizes Russian courts to prohibit the initiation or continuation of proceedings in foreign courts or tribunals (anti-suit injunction) against Russian persons targeted by Western sanctions or in connection with disputes with non-sanctioned Russian persons that arise from any Western sanctions. In addition, EU courts and authorities will not provide assistance to any investigation in connection with, and will not give effect to any criminal punishment imposed by Russian courts for, an alleged violation of such injunction, order, relief, judgment or other decision of the Russian court.<sup>368</sup>

On February 24, 2025, the EU authorized the Commission to exchange with the competent authorities of “partner countries” (i.e., US, Japan, UK, Australia, Canada, New Zealand, Norway, South Korea, Switzerland, Lichtenstein and Iceland) on a reciprocal basis information concerning third-country trade, transactions and operation for the purpose of preventing circumvention of sanctions targeting Russia and Belarus.<sup>369</sup> The EU also implemented a requirement for EU Member State authorities, including enforcement, customs and financial intelligence authorities, to exchange information with the Commission and competent authorities of their or other EU Member States, in particular where they detect instances or attempts of breach or circumvention of sanctions.<sup>370</sup>

## Frozen Assets

On February 12, 2024, the EU adopted a regulation clarifying the obligations of CSDs holding assets and reserves of the Central Bank of Russia that are immobilized as a result of EU sanctions.

The CSD holding such assets and reserves with a total value exceeding EUR 1 million must apply the following rules regarding cash balances accumulating exclusively due to the EU sanctions:

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<sup>367</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#).

<sup>368</sup> Council Regulation (EU) 2024/3187 of 16 December 2024, available [here](#).

<sup>369</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#); Council Regulation (EU) 2025/390 of 24 February 2025, available [here](#); Council Regulation (EU) 2025/392 of 24 February 2025, available [here](#).

<sup>370</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#); Council Regulation (EU) 2025/390 of 24 February 2025, available [here](#); Council Regulation (EU) 2025/392 of 24 February 2025, available [here](#).

- account for such cash balances separately;
- register revenues accruing from or generated by such cash balances separately in the financial accounts;
- not dispose of the net profits determined in respect of such revenues by way of distribution in the form of dividends or otherwise for the benefit of any third party, until the EU decides to contribute such profits to the EU budget to support Ukraine and its recovery and reconstruction; and
- supervisory authorities may authorize releases of a part of the net profits in view of complying with statutory capital and risk-management requirements.

A CSD must report to the EU Commission and to their national supervisory authorities, by June 30 of each year, on the total amount of cash balances, revenues and net profits resulting from the assets and reserves of the Central Bank of Russia on their accounts.<sup>371</sup>

Potential financial contributions to Ukraine may be in the future channeled through the Ukraine Facility on which the EU Council and the European Parliament reached a provisional agreement on February 6, 2024. The Ukraine Facility will pool the EU's budget support to Ukraine into one single instrument to support Ukraine in the course of 2024-2027.<sup>372</sup>

On May 21, 2024, the Council adopted a set of legal acts ensuring that the CSDs holding Russian sovereign assets and reserves of more than EUR 1 million make a financial contribution from their corresponding net profits accumulating since February 15, 2024, for further military support to Ukraine through the European Peace Facility (the EU's off-budget instrument to support worldwide peace initiatives) (90%), as well as for support of Ukraine's defense industry capacities and reconstruction needs with EU budgetary programs (10%). This allocation is reviewed annually, with the first review scheduled before January 1, 2025.<sup>373</sup>

On October 24, 2024, the EU established the Ukraine Loan Cooperation Mechanism, through which revenues originating from frozen Russian assets in the EU will be used to repay macro-financial assistance loans provided by the EU and bilateral loans provided by G7 partners.<sup>374</sup>

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<sup>371</sup> Council Regulation (EU) 2024/576 of 12 February 2024, available [here](#).

<sup>372</sup> Press Release, "Ukraine Facility: Council and Parliament agree on new support mechanism for Ukraine" 9 Feb. 6, 2024), available [here](#).

<sup>373</sup> Press Release, "Extraordinary revenues generated by immobilised Russian assets: Council greenlights the use of net windfall profits to support Ukraine's self-defence and reconstruction" (May 21, 2024), available [here](#).

<sup>374</sup> Council Regulation (EU) 2024/2773 of 24 October 2024, available [here](#), and Council Implementing Regulation (EU) 2024/2761 of 24 October 2024, available [here](#).

The EU continues discussing ways to use immobilized assets of the Russian government to support Ukraine. Currently, EU Member State entities are discussing a so-called “Reparations Loan” to Ukraine that will be financed from cash balances associated with immobilized Russian assets. Ukraine would pay back such loan once Russia pays reparations.<sup>375</sup> However, Belgium, where the majority of Russian assets are frozen, continues expressing concerns on the consequences of such measures.<sup>376</sup>

### Recognition of Awards and Recovery of Sanctions-Related Damages in the EU Courts

Starting from June 24, 2024, EU nationals and entities are entitled to recover, in judicial proceedings before the EU Member State courts, any damages:

- incurred by such EU person as a consequence of claims lodged with courts in third countries by Russian claimants in connection with any contract or transaction the performance of which has been affected by EU sanctions; or
- caused to that EU person by any Russian person who benefitted from a decision on confiscation of such EU person’s assets in Russia, provided that such decision is illegal under international customary law or under a bilateral investment treaty between Russia and an EU Member State;

provided that the EU person concerned does not have effective access to the remedies under the relevant jurisdiction.<sup>377</sup>

On February 24, 2025, the EU clarified that such damages may be recovered from the designated persons or persons acting on their behalf who have lodged the claims with the courts in third countries, or from persons, entities or bodies that own or control such claimants.<sup>378</sup>

On July 18, 2025, the EU also authorized EU Member States to recover, in judicial proceedings before the EU Member State courts, any damages, including legal costs, incurred by that EU Member State as a consequence of investor-state dispute settlement proceedings brought against an EU Member State in connection with EU sanctions measures.<sup>379</sup> The recovery of damages is possible from any Russian person that initiated, intervened or participated in the investor-state dispute settlement or that seeks to enforce any award, decision or judgement related to the investor-state dispute settlement and persons that own or control any of such dispute participants.

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<sup>375</sup> 2025 State of the Union Address by President von der Leyen (Sept. 10, 2025), available [here](#).

<sup>376</sup> Euro News, EU Commission and Belgium see no breakthrough in Ukraine reparation loan talks (Nov. 7, 2025), available [here](#).

<sup>377</sup> Council Regulation (EU) 2024/1745 of 24 June 2024, available [here](#).

<sup>378</sup> Council Regulation (EU) 2025/395 of 24 February 2025, available [here](#); Council Regulation (EU) 2025/390 of 24 February 2025, available [here](#); Council Regulation (EU) 2025/392 of 24 February 2025, available [here](#).

<sup>379</sup> Council Regulation (EU) 2024/1745 of 24 June 2024, available [here](#).



In each of the above damages recovery cases, if no EU Member State court has jurisdiction over such damages dispute, a court of an EU Member State that has sufficient connection to that case (e.g., a court in the country of the claimant's domicile) can accept the jurisdiction and hear the case.

On July 18, 2025, the EU prohibited EU Member State courts to recognize any: (i) injunction, order, relief, judgement, arbitral award or administrative decision; (ii) request for assistance to proceedings; and (iii) penalty based on any injunction, order, relief, judgement, arbitral award or administrative decision, in each case issued outside the EU pursuant to investor-state dispute settlement proceedings against a Member State in connection with sanctions measures imposed by the EU.<sup>380</sup> The EU also mandates EU Member States to raise any available objections to recognition and enforcement of arbitral awards that were rendered against them in such investor-state dispute settlement proceedings.<sup>381</sup>

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<sup>380</sup> Council Regulation (EU) 2025/1494 of 18 July 2025, available [here](#).

<sup>381</sup> Council Regulation (EU) 2025/1494 of 18 July 2025, available [here](#).

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## UK Sanctions

The UK has introduced a number of Russian sanctions that broadly fall into the following categories. While these restrictions are in some ways similar to the EU restrictions, there are a number of significant differences.

- **Financial Sanctions**
  - **Asset Freezes:** an expansion of the previous asset freeze list to include a number of prominent Russian businessmen, Russian politicians and Russian banks.
  - **Financial Sector Restrictions:** including expanded capital market restrictions to all Russian persons and restrictions on dealing with Russian sovereign debt. The UK has also imposed correspondent banking restrictions and restrictions on transactions with the Central Bank of the Russian Federation and the Russian government.
  - **Broad Investment Restrictions:** including a prohibition on directly acquiring any ownership or control in an entity connected with Russia.
  - **Trust Services Restrictions:** prohibiting the provision of ongoing or new trust services to or for the benefit of a designated person or a person connected with Russia.
- **Trade Sanctions**
  - **Export Restrictions:** for dual-use and critical industry goods and technology, G7 dependency and Russia's vulnerable goods and technology, various energy, refining, aviation and maritime goods and technology, luxury goods and certain types of industrial software.
  - **Import Restrictions:** targeting iron and steel, coal, oil, oil products and LNG, revenue generating goods and gold.
  - **Trade Restrictions for Non-Government Controlled Territories of Ukraine:** the UK imposed import and investment restrictions, as well restrictions on export of infrastructure-related goods and provision of certain services on regions of Ukraine that are not controlled by the government of Ukraine.
  - **Oil Price Cap:** prohibiting maritime transport of Russian-origin oil and oil products to third countries, unless they fall under a certain price limit set by the EU, UK and US.

- **Transport Restrictions:** including aviation restrictions and restrictions on Russian vessels entering UK ports.
- **Internet Services Restrictions:** including new obligations for social media, internet access and application store providers.
- **Professional Services Sanctions:** consisting of restrictions on UK persons providing a wide range of professional services to persons based in Russia and Russian companies.

## Financial Restrictions

The most significant new restrictions imposed by the UK consist of measures targeting Russian entities' and individuals' access to UK financial services. These include the expansion of the previously existing UK capital market restrictions on all Russian persons and the introduction of a range of novel restrictions that limit access of Russian persons to investments from the UK.

Importantly, the UK applies a strict liability standard to sanctions violations, which in practice means that a UK person may be held liable even in the absence of knowledge or reasonable cause to suspect the breach.

## Asset Freezes

The UK has imposed asset freezes on various entities and individuals under the expanded asset freeze designation criteria, which were introduced on February 10, 2022, as discussed in a previous version of our Client Update. These criteria were later expanded to allow designations on the basis of descriptions, rather than just by name.

Asset freezes and travel bans have been imposed on over 1,635 individuals and over 510 entities since February 22, 2022.<sup>382</sup> On October 15, 2025, OFSI announced that it had frozen £28.7 billion of Russian assets since February 2022.<sup>383</sup>

OFSI clarified that it will not aggregate different designated persons' holdings in a company when assessing ownership or control, unless the holdings are subject to a joint arrangement between the designated parties or one party controls the rights of the other. Please note that asset freezes can extend to entities owned or controlled by a sanctioned individual. On November 14, 2024, the UK clarified that making funds or economic resources available to any person for the benefit of a designated person includes making funds or economic resources available for the benefit of a person that is owned or controlled directly or indirectly by them.<sup>384</sup> The UK also introduced an exemption allowing asset frozen persons to make "required

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<sup>382</sup> For further information see Annexes A, B and C.

<sup>383</sup> See OFSI Annual Review 2024 to 2025: Effective Sanctions, available [here](#).

<sup>384</sup> The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2024, available [here](#).

payments,” namely those to government bodies, such as the Financial Conduct Authority, the registrar of companies and local authorities. These payments were previously covered by general licenses allowing various tax and statutory payments, which have since been revoked. Furthermore, the UK clarified the scope and wording of reporting obligations for UK relevant firms, expanded the list of relevant firms to include, for instance, art dealers and insolvency practitioners, and granted OFSI statutory powers to conduct annual reviews of frozen assets.

UK asset freeze sanctions also targeted Russian officials who have promoted and enforced the conscription and mobilization of citizens and criminal mercenaries to fight in Russia’s war in Ukraine, senior Russian commanders and persons, including Iranian officials and entities, alleged to be involved in the production or supply of military equipment, such as drones, to the Russian government.

On May 28, 2024, OFSI expanded the asset freeze designation grounds by adding:

- a ground to designate any person who owns or controls an entity destabilizing Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine, or serves as a director, trustee or other manager, or holds the right, directly or indirectly, to nominate at least one director (whether executive or non-executive), trustee or equivalent of a person in the respective entity; and
- a ground to designate any person who provides financial services or makes available funds, economic resources, goods or technology to a person that is involved in obtaining a benefit from or supporting the government of Russia.

On July 31, 2024, the UK government revoked the above changes, but only to re-introduce them as a new set of amendments allowing additional time for Parliamentary scrutiny.<sup>385</sup>

On August 8, 2023, the UK added 19 persons to the Russian asset freeze list deemed to be supplying Russia’s military. This included individuals and entities across Türkiye, Iran, the UAE, Slovakia and Switzerland.<sup>386</sup>

On September 29, 2023, the UK designated 10 Russian individuals and the Russian Central Election Commission for organizing recent elections in Crimea and the Kherson, Zaporizhzhia, Donetsk and Luhansk regions.<sup>387</sup>

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<sup>385</sup> The Russia (Sanctions) (EU Exit) (Amendment) (No. 3) Regulations 2024.

<sup>386</sup> Press Release of the UK Foreign, Commonwealth & Development Office (“FCDO”), “Largest ever UK action targets Putin’s access to foreign military supplies” (Aug. 8, 2023), *available* [here](#).

<sup>387</sup> Press Release of the FCDO, “UK announces new sanctions in response to Russian sham elections in Ukraine” (Sept. 29, 2023), *available* [here](#).

On November 11, 2023, the UK designated 20 individuals and nine entities operating in and supporting Russia's gold, oil and strategic sectors, including a UAE network supporting Russia's gold trades.<sup>388</sup> On December 6, 2023, the UK designated 25 individuals and 21 entities for supplying and importing military goods to Russia, including businesses in China, Serbia, Türkiye, the UAE and Uzbekistan.<sup>389</sup>

On December 14, 2023, the UK introduced a requirement for designated persons to inform HM Treasury of the nature, value and location of their funds and economic resources in the UK or in any jurisdiction (if such designated person is a citizen of the UK or is located in the UK) and, subsequently, to provide notice about any changes to such funds or economic resources.<sup>390</sup>

On February 22, 2024, the UK added various individuals and entities to the asset freeze list, including munitions manufacturers, importers and manufacturers of machine tools, oil traders, "shadow fleet" vessels and diamond and aluminum producers.

On June 13, 2024, the UK designated on the asset freeze list MOEX, NSD and NCC. The UK also designated entities operating the Murmansk LNG and continued designating suppliers of foreign technologies to Russia, including entities from China, Israel, Kyrgyzstan and Türkiye, along with ships that transport military goods from North Korea to Russia.

On October 12, 2024, the UK general license authorizing the sale, divestment or transfer of financial instruments held at NSD, as well as the payment of safe-keeping fees, expired.

OFSI recognized that the measures taken by the Russian authorities to remove NSD from the custodial chain for shares of Russian issuers that are held by foreign investors from "hostile states" undermine UK sanctions imposed on the NSD. OFSI noted that the government is exploring options to further clarify its position on the NSD-related sanctions.

On October 28, 2024, the UK designated three Russian agencies and three individuals for their involvement in interference activities through propaganda.<sup>391</sup>

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<sup>388</sup> Press Release of the FCDO, "UK cracks down on gold and oil networks propping up Russia's war economy" (Nov. 8, 2023), available [here](#).

<sup>389</sup> Press Release of the FCDO, "UK hits military suppliers propping up Russia's war machine" (Dec. 6, 2023), available [here](#).

<sup>390</sup> The Russia (Sanctions) (EU Exit) (Amendment) (No. 4) Regulations 2023, available [here](#).

<sup>391</sup> Press Release of the FCDO, "UK sanctions Putin's interference actors" (Oct. 28, 2024), available [here](#).

On November 25, 2024, the UK designated two insurance companies linked to the Russian “shadow fleet.”<sup>392</sup>

On November 7, 2024, the UK designated Chinese, Turkish and Kazakh entities for supplying military goods to Russia, as well as several mercenary groups.<sup>393</sup>

On February 24, 2025, the UK designated 66 persons and entities, including JSC Siberian Airlines and Kyrgyzstan-based OJSC Keremet Bankas, as well as producers and suppliers of machine tools, electronics and dual-use goods for Russia’s military, including microprocessors used in weapons systems.<sup>394</sup>

On May 9, 2025, the UK designated nine persons and entities on the UK asset freeze list, including a major insurer, Soglasie Insurance Company.<sup>395</sup>

On May 20, 2025, the UK designated 82 persons and entities on the UK asset freeze list. This round of designations heavily targeted Russian shares registrars and financial infrastructure, including the Deposit Insurance Agency, St. Petersburg Currency Exchange and Petersburg Settlement Centre.<sup>396</sup>

On May 28, 2025, the UK designated one person and six entities, including the Market Special Depository.

On June 17, 2025, the UK designated ten persons and entities on the UK asset freeze list, including operators of “shadow fleet” vessels and two UK residents operating a shadowy network of shell companies.<sup>397</sup>

On July 21, 2025, the UK imposed asset freeze sanctions on two entities enabling Russia’s illicit shadow fleet oil trade—Intershipping Services LLC, responsible for registering shadow fleet vessels under the Gabonese flag, and Litasco Middle East DMCC (linked to Russian oil company Lukoil) for its ongoing role in moving large volumes of Russian oil on shadow fleet vessels.<sup>398</sup>

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<sup>392</sup> Press Release of the FCDO, “UK imposes new wave of sanctions to choke Russian oil revenues as Foreign Secretary arrives in Italy for G7” (Nov. 25, 2024), available [here](#).

<sup>393</sup> Press Release of the FCDO, “UK strikes at the heart of Putin’s war machine” (Nov. 7, 2024), available [here](#).

<sup>394</sup> Press Release of FCDO, “UK announces largest sanctions package against Russia since 2022” (Feb. 24, 2025), available [here](#).

<sup>395</sup> FCDO Policy Paper. “Russia sanctions targets” (May 9, 2025), available [here](#).

<sup>396</sup> Press Release of the FCDO, “UK announces major sanctions in support of Ukraine” (May 20, 2025), available [here](#).

<sup>397</sup> Press Release of the FCDO, “UK turns the screw on Putin as allies unite behind Ukraine” (June 17, 2025), available [here](#).

<sup>398</sup> Press Release of the FCDO, “UK hammers Putin’s energy revenues with fresh sanctions” (July 21, 2025), available [here](#).

On August 20, 2025, the UK imposed asset freeze sanctions on persons participating in Russia's attempts to avoid sanctions by exploiting Kyrgyz financial systems and crypto networks.<sup>399</sup>

On September 12, 2025, the UK imposed asset freeze sanctions on 30 entities and persons involved in supplying electronics, chemicals and explosives to Russia that are used to manufacture missiles and other weapons systems.<sup>400</sup>

On September 19, 2025, the UK designated two Georgian individuals and two Georgian entities on the UK asset freeze list for supporting Russian financial, technological and transport sectors and involvement in Russian media.<sup>401</sup> On October 15, 2025, the UK imposed asset freeze sanctions on individuals and entities involved in Russian energy, defense and financial services sectors and supplying critical equipment to Russia.<sup>402</sup> The list of designated entities includes Russian oil giants Rosneft and Lukoil, as well as Chinese ports that engaged with UK-designated Russian vessels.

#### Financial Sector Restrictions

**Expanded Capital Markets Restrictions:** The updated UK sanctions regime expands the UK capital market restrictions to all "*persons connected with Russia*," but only in relation to shares and transferable securities issued on or after March 1, 2022. Secondary trading of Russian transferable securities and money market instruments issued before this date is thus still permitted.

The restrictions also cover the provision of new loans to Russian connected persons after March 1, 2022 (other than individuals). The loan restrictions were later expanded to cover a broader range of non-Russian entities ultimately owned by persons connected with Russia.

"*Persons connected with Russia*" means persons ordinarily resident in Russia, persons who are physically located in Russia and Russian entities. These capital market restrictions also apply to entities more than 50% owned by a person connected to Russia, though there is a general exemption for persons who were not, as of March 1, 2022, domiciled in Russia or owned by entities or persons based outside of Russia. In practice, this means that any entities owned by an individual in Russia will also be subject to these UK capital market restrictions.

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<sup>399</sup> Press Release of the FCDO, "UK targets sanctions circumvention and crypto networks exploited by Russia" (Aug. 20, 2025), available [here](#).

<sup>400</sup> Press Release of the FCDO, "UK ratchets up pressure on Putin's military machine as Foreign Secretary travels to Kyiv", available [here](#)

<sup>401</sup> Press Release of the FCDO, "UK sanctions Georgia-linked supporters of Putin's illegal war in Ukraine" (Sept. 19, 2025), available [here](#).

<sup>402</sup> Press Release of the FCDO, "Huge blow for Putin's war machine as UK sanctions Russian oil" (Oct. 15, 2025), available [here](#).



The exemption for UK-incorporated subsidiaries of entities targeted by the original UK capital market restrictions (e.g., Sberbank and VTB) has been removed. The UK has also removed the “non-restricted trade” exemption for loans made to any persons subject to UK capital market restrictions.

**Other Financial Sector Restrictions:** The UK imposed the following other Russia-related financial sector sanctions:

- Restrictions on correspondent banking relationships and processing of sterling payments to, from or via specifically designated persons or a credit or financial institution that is owned or controlled directly or indirectly by such designated person. On December 14, 2023, the UK expanded this restriction to payments in all currencies and to catch the involvement of such designated persons at any stage in the payment chain.<sup>403</sup>
- Restrictions prohibiting provision of financial services for the purpose of foreign exchange reserve and asset management to the Central Bank of the Russian Federation, the National Wealth Fund of the Russian Federation and the Ministry of Finance of the Russian Federation. Starting from December 14, 2023, relevant firms (e.g., financial institutions, accountants) are required to inform the Treasury if they know or have a reasonable cause to suspect that they hold funds or economic resources of such entities.<sup>404</sup>
- Prohibitions on exporting banknotes denominated in sterling or any official currencies of the EU Member States to or for use in Russia.
- Suspension of the Bank of England’s legislative duty to make a decision in relation to a notification of third-country resolution action in respect of a designated person or entities owned or controlled by a designated person.

#### **Investment Restrictions**

The UK also imposed a prohibition on all new UK outward investment into Russia, which include the following activities (partially overlapping with the capital market restrictions):

- Directly acquiring any ownership interest in land located in Russia.
- Indirectly acquiring any ownership interest in land located in Russia for the purpose of making funds or economic resources available directly or indirectly to a person connected with Russia.

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<sup>403</sup> The Russia (Sanctions) (EU Exit) (Amendment) (No. 4) Regulations 2023, [available here](#).

<sup>404</sup> The Russia (Sanctions) (EU Exit) (Amendment) (No. 4) Regulations 2023, [available here](#).

- Directly acquiring any ownership or control in an entity connected with Russia. An entity connected with Russia means one that is established or constituted under the laws of, or domiciled in, Russia.
- Indirectly acquiring any ownership or control in an entity connected with Russia for the purpose of making funds or economic resources available directly or indirectly to a person connected with Russia, or for the benefit of a person connected with Russia.
- Directly or indirectly acquiring any ownership or control in an entity, other than a person connected with Russia, for the purpose of making funds or economic resources available directly or indirectly to a person connected with Russia, or for the benefit of a person connected with Russia.
- Directly or indirectly establishing any joint venture with a person connected with Russia.
- Opening a representative office or establishing a branch or subsidiary in Russia.
- Providing investment services related to any of the above activities.

There are three key exemptions to the Russian investment prohibition. These are:

- A grandfathering provision allowing contractual obligations to be concluded if those obligations arose before July 19, 2022. This exemption includes a reporting obligation to notify HM Treasury no later than five working days before the activity is carried out.
- Secondary trading of transferable securities issued by Russian companies is permitted where the relevant shares are already listed on a recognized regulated market.
- The third exemption applies to freely tradeable shares issued by non-Russian entities, unless they were issued for the purpose of making funds or economic resources available directly or indirectly to a person connected with Russia, or for the benefit of a person connected with Russia.

#### **Trust Related Services**

New Regulations were introduced to prohibit the provision of ongoing or new trust services to or for the benefit of a designated person or a person connected with Russia. The trust services ban exempts provision of trust services to or for the benefit of a person connected with Russia pursuant to an ongoing arrangement under which the services were provided immediately before December 16, 2022.

The trust services restrictions extend not only to beneficiaries of trusts but also to potential beneficiaries under trust documents and persons who are not beneficiaries on paper but are reasonably expected to obtain or be able to obtain a significant financial benefit from such trust or similar arrangement.

## Trade Sanctions

On October 10, 2024, the newly formed Office of Trade Sanctions Implementation (“OTSI”) has been granted new civil enforcement powers for breaches of trade sanctions.<sup>405</sup>

## Export Restrictions

The UK imposed a number of sanctions restricting Russian access to UK goods and technologies, including the following groups of export restrictions:

- critical industry quantum computing and advanced materials goods and technology;
- dual-use, military, defense and security goods and technology;
- oil, gas and refining related goods and technology;
- aviation and maritime goods and technology;
- G7 dependency and Russia’s vulnerable goods and technology; and
- luxury goods

**Critical Industry, Dual-Use, Defense and Security Goods and Technology:** As compared to EU sanctions, the UK dual-use and critical industry trade restrictions generally mirror the EU’s trade restrictions on dual-use goods and advanced technology goods, such as manufacturing equipment for microprocessors. In addition to it, the UK prohibited the export of certain restricted military goods and technology to or for use in non-government controlled Ukrainian territory with a few exceptions, including for non-military use for a non-military end user and humanitarian assistance; this includes making these goods available to a person connected with or for use in non-government controlled Ukrainian territory. On April 20, 2023, the UK significantly expanded the list of the critical-industry goods and technologies, adding such items as rare earth metals and compounds and continuous flow reactors. The UK has also expanded the list of defense and security goods, adding various irritating chemical substances and mixtures.

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<sup>405</sup> See our Debevoise Update, “OTSI: New Trade Sanctions Enforcement Powers,” available [here](#).

On April 24, 2025, the UK further expanded the list of critical-industry goods and technologies, adding certain vehicles, metals and plastic.<sup>406</sup>

**Oil, Gas and Refining-Related Goods and Technology:** The UK also prohibited export of oil and gas extraction and oil refining related goods to or for use in Russia. While oil refining technologies have already been subject to this restriction, technologies relating to oil and gas extraction have been included in the scope of the restriction on April 24, 2025.<sup>407</sup> These sanctions include a prohibition on supplying restricted goods from a third country to Russia, making them available to a person connected with Russia or transferring restricted technology to a place in Russia or to a person connected with Russia. The prohibition also applies to the provision of related technical assistance, financial services, funds and brokering services related to these goods and technology.

**Aviation and Maritime Goods and Technology:** UK trade restrictions cover aircraft, including providing associated technical assistance, financial services and broking services. However, there is an exemption for aircraft flying out of the UK on regular scheduled services, which appears to be intended for future use for civilian passenger aircraft to be able to fly out of the UK to Russia and not be restricted as an export. The UK has also restricted Russian aircraft from entering UK airspace. Further, the UK prohibited providing technical assistance relating to aircraft and ships to a designated person, subject to certain safety exemptions. Finally, the UK prohibited the export of jet fuel and fuel additives to, or for use in, Russia. However, UK aviation-related restrictions do not include the broad EU-equivalent of ancillary overhaul inspection or parts replacement, which were sanctioned by the EU.

The UK also prohibited the export of maritime goods and technology for the placing on board of Russian-flagged vessels.

**G7 Dependency and Russia's Vulnerable Goods:** The UK prohibited the export of "G7 dependency and further goods" and "Russia's vulnerable goods" to or for use in Russia, as well as supply or delivery of such items from a third country to a place in Russia or to a person connected with Russia. These goods include a wide range of items and are listed in Schedules 3E and 3I of the Russia (Sanctions) (EU Exit) Regulations 2019. On April 20, 2023, the list of "G7 dependency and further goods" was further expanded to add certain iron and steel products, coal, coke and semi coke of coal, peat, glass, certain motors, engines, machinery and pumps. The UK also expanded the list of "Russia's vulnerable goods," adding a wide range of machinery, containers and electronics.

Starting from April 24, 2025, the UK also prohibits the transfer of "G7 dependency and further technology" and "Russia's vulnerable technology" to a place in Russia or

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<sup>406</sup> The Russia (Sanctions) (EU Exit) (Amendment) Regulations 2025, available [here](#).

<sup>407</sup> The Russia (Sanctions) (EU Exit) (Amendment) Regulations 2025, available [here](#).

to a person connected with Russia.<sup>408</sup> The prohibition also applies to the provision of related technical assistance, financial services, funds and brokering services related to these goods and technology.

On April 24, 2025, the UK also expanded the lists of “Russia’s vulnerable goods and technology” and “G7 dependency goods and technology” by adding various chemicals, electronics, and machinery.<sup>409</sup>

**Luxury Goods:** The UK has also prohibited export of luxury goods to Russia or for use in Russia. This includes a prohibition on supplying luxury goods from a third country to Russia and making luxury goods available to a person connected with Russia. On December 14, 2023, the UK also prohibited the provision of technical assistance, financial services and funds, as well as brokering services, for prohibited exports of luxury goods.<sup>410</sup>

On December 7, 2023, the UK National Crime Agency issued an alert<sup>411</sup> to UK financial sector, transportation and logistics providers to inform them of common techniques suspected to be in use to evade sanctions on the export of high-risk goods, which Russia is using in the battlefield in Ukraine.

### Import Restrictions

The UK implemented a number of sanctions restricting Russia’s ability to receive revenues from selling goods produced or extracted in Russia to the UK, including the following groups of import restrictions:

- goods and technology that generate significant revenues for Russia;
- iron and steel;
- coal and other fossil fuels;
- crude oil and oil products, liquified natural gas;
- gold; and
- diamonds.

**Revenue Generating Goods:** The UK prohibited the import of revenue generating goods that originate in, or are consigned from, or located in, Russia. On April 20, 2023, the UK substantially restructured the prohibition and divided the revenue

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<sup>408</sup> The Russia (Sanctions) (EU Exit) (Amendment) Regulations 2025, available [here](#).

<sup>409</sup> The Russia (Sanctions) (EU Exit) (Amendment) Regulations 2025, available [here](#).

<sup>410</sup> The Russia (Sanctions) (EU Exit) (Amendment) (No. 4) Regulations 2023, available [here](#).

<sup>411</sup> UK National Crime Agency (“NCA”) Red Alert, “Exporting High-Risk Goods” (Dec. 7, 2023), available [here](#).

generating goods into two categories: (i) revenue generating goods that are prohibited from being imported into the UK (the pre-existing list with significant expansions) and (ii) a new list of revenue generating goods, which are prohibited from being supplied both to the UK and to any third country. The ban also prohibits the provision of technical assistance, financial services and funds and brokering services relating to revenue generating goods.

The second category of the revenue generating goods has brought the UK sanctions closer to the scope of similar EU sanctions. The UK has also introduced an exception from these trade sanctions for the second category of revenue generating goods, if they were lawfully imported to the UK or the Isle of Man or if they are located in Russia and are used by the UK person or their immediate family members for a personal purpose.

**Iron and Steel:** The UK prohibited the import of iron and steel products that originate or are consigned from Russia and acquisition of such iron and steel products, directly or indirectly, regardless of whether they are meant to enter the UK. This also includes a prohibition on directly or indirectly supplying or delivering iron and steel products from a place in Russia to a third country. The UK also prohibits the provision of technical assistance, financial services and funds in relation to iron and steel products. On April 20, 2023, the UK imposed an import ban on iron and steel products processed in a third country using Russian iron or steel products. This ban came into effect on September 30, 2023. The ban includes a prohibition on providing related technical assistance and financial and brokering services. The UK provided exception from the prohibition for the iron and steel goods lawfully imported to the UK or the Isle of Man.

On December 14, 2023, the UK expanded the list of iron and steel products to include pig iron, ferro-alloys and ferrous products. These import restrictions does not apply to goods consigned from Russia before December 15, 2023, and imported into the UK before January 14, 2023.<sup>412</sup>

Further, the UK exempted from the import restriction (i) all targeted iron and steel products which were exported from Russia before they became the target of export restrictions and which are not to be released for free circulation in the UK or Isle of Man; and (ii) ancillary services in relation to iron and steel originating in Russia where those products were exported from Russia before they became banned.<sup>413</sup>

**Coal and Coal Products, Oil and Oil Products:** The UK prohibited the import of Russian oil and oil products, coal or coal products and LNG. These prohibitions include a prohibition on acquiring these goods, directly or indirectly, where they originate in or are located in Russia with the intention of having the goods enter the

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<sup>412</sup> The Russia (Sanctions) (EU Exit) (Amendment) (No. 4) Regulations 2023, available [here](#).

<sup>413</sup> The Russia (Sanctions) (EU Exit) (Amendment) (No. 4) Regulations 2023, available [here](#).

UK. The prohibition also applies to the provision of related technical assistance, financial services, funds and brokering services related to these goods.

On April 20, 2023, the UK removed the prohibition on the direct or indirect supply and delivery of the oil and oil products, coal and coal products, as well as the first category of the revenue generating goods (regardless of the origin) from a place in Russia to the UK (LNG was originally not subject to such restriction). With respect to gold, supplies and deliveries of the Russian-origin gold from third countries to the UK were removed from the scope of prohibition as well. These actions included the removal of the prohibition to provide related technical assistance, financial services, funding and brokering services for the relevant supplies.

**Gold:** The UK also prohibited the import of gold (including gold jewelry) where that gold has been exported from Russia and originates in Russia. It is also prohibited to acquire gold, directly or indirectly, where it originates in or is located in Russia with the intention of having it enter the UK. The prohibition also applies to the provision of related technical assistance, financial services, funds and brokering services related to these goods.

On November 8, 2023, the UK National Crime Agency issued an alert<sup>414</sup> to financial institutions, gold dealers and lawyers warning that Russia is laundering sanctioned gold to mask its origin so that it can be hidden in supply chains and sold in the UK and around the world for the purpose of circumventing sanctions. The alert describes circumvention typologies that may be used for trading in different forms of gold.

**Metals:** On December 14, 2023, the UK prohibited the import of metals which are consigned from Russia and the acquisition, directly or indirectly, of metals originating in or located in Russia.<sup>415</sup> The UK also prohibited supplying or delivering such metals from a place in Russia to a third country. The prohibited metals include, among others, copper, nickel, aluminum, lead, zinc and molybdenum. The UK provided an exception from the prohibition for metals lawfully imported to the UK or the Isle of Man.

The new import restriction does not apply to metals consigned from Russia before December 15, 2023, and imported into the UK before January 14, 2024. Further, the UK exempted from the import prohibition metals which were exported from Russia before the amendments took effect and which are not to be released for free circulation in the UK or the Isle of Man.

**Diamonds:** On December 14, 2023, the UK prohibited the import of diamonds (both natural and synthetic) and diamond jewelry which are consigned from Russia. These

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<sup>414</sup> NCA Red Alert, "Gold-based Financial and Trade Sanctions Circumvention" (Nov. 8, 2023), available [here](#).

<sup>415</sup> The Russia (Sanctions) (EU Exit) (Amendment) (No. 4) Regulations 2023, available [here](#).



prohibitions include a prohibition on acquiring diamonds and diamond jewelry, directly or indirectly, which originate in or are located in Russia. The UK also prohibited supplying or delivering diamonds or diamond jewelry from a place in Russia to a third country. The prohibition applies to the provision of related technical assistance, financial services, funds and brokering services related to these goods. The UK provided an exception from the prohibition for diamonds and diamond jewelry lawfully imported to the UK or the Isle of Man.<sup>416</sup>

On March 1, 2024, the UK imposed similar import restrictions on diamonds that originate in Russia and are processed in a third country. The restrictions does apply to any diamonds equal to or larger than 1 carat, starting from March 1, 2024, and to any diamonds equal to or larger than 0.5 carat, starting from September 1, 2024.<sup>417</sup> On April 24, 2025, the UK imposed further import restrictions on synthetic diamonds of at least 0.5 carats that were manufactured in Russia and processed in a third country.<sup>418</sup>

The UK imposed additional duties of 35 percentage points on a range of goods including platinum, palladium, nickel, silicon, antibiotics and more.

#### **Non-Government Controlled Territories of Ukraine**

Existing trade embargos on Crimea were expanded to also apply to Donetsk and Luhansk, subject to an exemption for the performance of contractual obligations that arose before February 23, 2022, where the UK government has been notified of such performance. Starting from June 20, 2023, similar sanctions apply to Kherson and Zaporizhzhia regions.

#### **Provision of Software**

On April 24, 2025, the UK introduced restrictions on “sectoral software and technology,” which include:

- Business enterprise software and technology, such as software for resources planning, customer relationship management, business intelligence and supply chain management;
- Industrial design software and technology, such as software for building information modeling and computer aided design and manufacturing software; and
- Oil and gas related software and technology, such as oil and gas exploration and production software, reservoir simulation software, drilling and hydraulic fracturing software and software for production management.

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<sup>416</sup> The Russia (Sanctions) (EU Exit) (Amendment) (No. 5) Regulations 2023, available [here](#).

<sup>417</sup> The Russia (Sanctions) (EU Exit) (Amendment) Regulations 2024, available [here](#).

<sup>418</sup> The Russia (Sanctions) (EU Exit) (Amendment) Regulations 2025, available [here](#).

UK sanctions prohibit making available or transferring such “sectoral software and technology” to a person connected with Russia or for use in Russia, and providing technical assistance, financial services, funds, or brokering services in connection with arrangements relating to such “sectoral software and technology.”<sup>419</sup>

## Oil Price Cap

The UK imposed a broadly similar Oil Price Cap as the EU.

In particular, the UK prohibits maritime transportation from Russia to a third country or between third countries of oil (from December 5, 2022) and petroleum products (from February 5, 2023), if the price per barrel exceeds the agreed price caps (i.e., \$60 for oil, \$45 for discount-to-crude petroleum products and \$100 for premium-to crude petroleum products).<sup>420</sup> The UK also prohibits provision of financial services or other ancillary services relating to such maritime transportation.

Similar to the EU, the UK Oil Price Cap determines three “tiers” of actors in the oil supply chain depending on whether they routinely know the price paid in their ordinary course of business and their role in the oil supply transactions.<sup>421</sup> The three “tiers” have different scope of price attestation, due diligence and reporting requirements.<sup>422</sup> On December 20, 2023, the UK introduced increased reporting requirements for insurers, ship owners, ship management companies and some other “Tier 3A” and “Tier 3B” market participants, which take force on February 19, 2024.<sup>423</sup> Similar to the EU, on February 19, 2024, the UK introduced a requirement to provide/collect attestations on oil price for each voyage and share itemized ancillary costs information within 30 days of such request.<sup>424</sup>

All entities involved in the Oil Price Cap trades must keep accurate, complete and English-readable electronic or paper records of their activities undertaken under the relevant license. The use of the UK Oil Price Cap exemption may in practice be more administratively burdensome than the equivalent EU mechanism.<sup>425</sup>

UK Oil Price Cap restrictions do not apply where oil and petroleum products originate from a country other than Russia, there is no ownership by a person connected with Russia and only loading in, departing from or transiting through Russia is concerned. Further exemptions apply where a maritime transportation of

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<sup>419</sup> The Russia (Sanctions) (EU Exit) (Amendment) Regulations 2025, available [here](#).

<sup>420</sup> See GL INT/2022/2469656, available [here](#).

<sup>421</sup> See GL INT/2022/2469656, available [here](#).

<sup>422</sup> See OFSI’s list of reporting forms, available [here](#).

<sup>423</sup> UK Maritime Services Ban and Oil Price Cap, Industry Guidance, available [here](#).

<sup>424</sup> General License – Oil Price Cap INT/2024/4423849, available [here](#).

<sup>425</sup> For more information on the UK Oil Price Cap, see HM Treasury’s guidance, available [here](#); the Department for Business, Energy & Industrial Strategy’s guidance, available [here](#); OFSI’s blog posts, available [here](#) and [here](#).

oil or petroleum products is required to prevent serious and significant impact on human health or safety, infrastructure or the environment or to ensure supplies to EU landlocked Member States, if pipeline supplies are interrupted.

On July 18, 2025, the UK reduced the crude oil price cap from \$60 to \$47.60 starting from 23:01 on September 2, 2025. Crude oil contracts signed at the previous cap of \$60 before September 2, 2025, are subject to a 45-day wind-down period. These contracts may be fulfilled provided that the oil is offloaded at the port of destination by October 17, 2025.<sup>426</sup>

### Transport Restrictions

The UK now prohibits Russian ships from entering or accessing UK ports. This prohibition applies to ships that are owned, controlled or chartered or operated by a designated person or a person connected with Russia, a ship flying the Russian flag, a ship registered in Russia or a specified ship.

The UK has also imposed a ban on Russian airlines accessing UK airspace and landing at UK airports. This ban also extends to providing insurance and reinsurance services relating to aviation, space goods or space technology to a person connected with Russia or for use in Russia. This equally applies to any aircraft owned, operated or chartered by a Russian person.

Furthermore, the UK has imposed a ban on the registration of aircraft and potential termination of registration of aircraft owned, operated or chartered by a sanctioned person.

Starting from July 31, 2024, the UK government may “specify” vessels that are involved in destabilizing Ukraine, obtaining benefits from the Russian government or circumventing sanctions by way of carrying in the interest of Russian dual use or military goods, Russian oil and oil products or other goods that could contribute to destabilizing Ukraine or undermining or threatening its territorial integrity, sovereignty or independence. Such “specification” may result in a prohibition for the “specified ship” to enter UK ports and detention of such vessel.<sup>427</sup> In addition, Russian oil or petroleum products cannot be supplied or delivered on a “specified ship” and no financial or brokering service can be provided with respect to such “specified ship,” even if the Russian oil that it carries meets the Oil Price Cap thresholds.<sup>428</sup> On October 17, 2024, the UK imposed the largest package of shipping sanctions on Russia so far, by “specifying” 18 “shadow” oil tankers and four LNG tankers.<sup>429</sup>

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<sup>426</sup> OFSI General License INT/2024/4423849, available [here](#).

<sup>427</sup> The Russia (Sanctions) (EU Exit) (Amendment) (No. 3) Regulations 2024.

<sup>428</sup> See OFSI General License INT/2024/4423849, as amended, available [here](#).

<sup>429</sup> Press Release of the FCDO, “UK strikes at the heart of Russian energy revenues funding Putin’s war” (Oct. 17, 2024), available [here](#).

On November 25, 2024, the UK “specified” a further 30 vessels of the Russian shadow fleet responsible for transporting oil and oil products.<sup>430</sup> On December 17, 2024, the UK “specified” additional 20 shadow fleet vessels.<sup>431</sup>

On May 20, 2025, the UK “specified” a further 101 vessels of the Russian shadow fleet responsible for transportation of Russian oil and oil products and otherwise supporting the Russian government.<sup>432</sup>

On June 17, 2025, and July 21, 2025, the UK “specified” a further 20 and 135 vessels of the Russian shadow fleet.<sup>433</sup>

On September 12, 2025, the UK “specified” a further 70 vessels of the Russian shadow fleet.<sup>434</sup>

On September 19, 2025, the UK “specified” two oil tankers for transporting Russian oil to the Georgian port of Batumi.<sup>435</sup> On October 15, 2025, the UK “specified” a further 44 vessels of the Russian shadow fleet.<sup>436</sup>

## Internet Services Restrictions

On April 29, 2022, the UK imposed obligations on social media providers, internet access service providers and application store providers. Social media providers must take reasonable steps to ensure that content on their platform that has been posted or shared by a designated person is not “encountered” by a UK user. A person who provides an internet access service must take reasonable steps to prevent a UK user from accessing, by means of that service, an internet service provided by a designated person. Application store providers must now take reasonable steps to prevent UK users from downloading or otherwise accessing an internet service provided by a designated person.

Furthermore, new powers have been granted to OFCOM to monitor compliance with the two restrictions above and to impose fines; it is an offense for someone to

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<sup>430</sup> Press Release of the FCDO, “UK imposes new wave of sanctions to choke Russian oil revenues as Foreign Secretary arrives in Italy for G7” (Nov. 25, 2024), available [here](#).

<sup>431</sup> Press Release of the FCDO, “Prime Minister announces new sanctions and £35 million of emergency support for Ukraine as Russia continues to attack critical national infrastructure” (Dec. 17, 2024), available [here](#).

<sup>432</sup> FCDO Policy Paper, “Russia sanctions targets” (May 9, 2025), available [here](#).

<sup>433</sup> Press Release of the FCDO, “UK turns the screw on Putin as allies unite behind Ukraine” (June 17, 2025), available [here](#); Press Release of the FCDO, “UK hammers Putin’s energy revenues with fresh sanctions” (July 21, 2025), available [here](#).

<sup>434</sup> Press Release of the FCDO, “UK ratchets up pressure on Putin’s military machine as Foreign Secretary travels to Kyiv”, available [here](#).

<sup>435</sup> Press Release of the FCDO, “UK sanctions Georgia-linked supporters of Putin’s illegal war in Ukraine” (Sept. 19, 2025), available [here](#).

<sup>436</sup> Press Release of the FCDO, “Huge blow for Putin’s war machine as UK sanctions Russian oil” (Oct. 15, 2025), available [here](#).

refuse to comply with an OFCOM request related to this monitoring or to otherwise obstruct or provide false information.

The UK also prohibited providing interception and monitoring services to, or for the benefit of, the Russian government.

### Services Restrictions

The UK prohibited the provision of certain services to a person connected with Russia, including:

- accounting and auditing services;
- business and management consulting services;
- public relations services;
- IT consultancy and design services;
- architectural services;
- engineering services;
- advertising services; and
- auditing services.

The services ban does not apply to internet access services or services that are incidental to the exchange of communications over the Internet.

Unlike the EU restrictions that extend only to Russian entities, the UK services ban applies to the provision of services to persons connected with Russia,<sup>437</sup> which can cover individuals receiving the benefit of the prohibited services.

The UK services ban also does not provide an exemption for Russian entities owned or controlled by UK persons or entities. However, until recently, provision of services from UK parent companies and their UK subsidiaries to their Russian subsidiaries was considered to be a licensing consideration that is consistent with the aims of the UK sanctions regime. On this basis, UK parent companies could request OFSI to issue an individual license to continue providing services to their Russian group entities. On October 31, 2024, this licensing consideration was removed. Prior to this removal, to obtain a license to provide services to a Russian subsidiary, a UK parent company would have need to demonstrate how the provision of any ongoing services aligned with the overarching purposes of UK sanctions.<sup>438</sup>

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<sup>437</sup> For further information, see the Export Control Joint Unit's guidance, available [here](#).

<sup>438</sup> NOTE 2024/26: update on Russia sanctions licensing for intra-corporate services (September 30, 2024), available [here](#).

On June 23, 2023, the UK expanded service restrictions to legal advisory services. In particular, the new sanctions prohibit provision of legal advisory services to any person who is not a United Kingdom person in relation to, or in connection with, any activity which would be prohibited by sanctions regulations if performed by a United Kingdom person or in the territory of the United Kingdom. Legal advisory services include only non-contentious matters, such as advice on application and interpretation of law, actions on behalf of a client in a commercial transaction and preparation of legal documents.<sup>439</sup>

On August 11, 2023, the UK Department of Business and Trade (the “DBT”) issued a general trade license that exempts the following services from the scope of the legal advisory restrictions: (i) advising on whether an action or proposed action complies with or could trigger punitive measures under any “restrictive measures” concerning Russia or non-government controlled Ukrainian territory (with “restrictive measures” covering any form of sanctions, export or import controls imposed by any jurisdiction); (ii) advising more generally on compliance with or addressing the risk of punitive measures in relation to (a) any Russia-related “restrictive measures,” (b) any Russian counter-sanctions measures that have as their object or effect the frustration of any “restrictive measures” and (c) any criminal law imposed by any jurisdiction; and (iii) advising in relation to the discharge of or compliance with UK statutory or regulatory obligations.<sup>440</sup>

On September 6, 2024, the legal advisory services restriction was amended to address the concerns of the legal services sector and put into legislation the exemptions that were previously provided by the DBT general trade license:<sup>441</sup>

- Pursuant to the amended regulation, a United Kingdom person may breach sanctions by providing legal advisory services “*knowing*” that their object or effect is to enable or facilitate any activity that would be prohibited by sanctions regulations if performed by a United Kingdom person or in the territory of the United Kingdom. This amendment narrows down the scope of violation, which could previously occur regardless of whether a United Kingdom person knew or suspected that its legal services support any prohibited conduct.
- The scope of exemptions has been expanded to cover legal advisory services relating to compliance with or discharge of obligations under any “*relevant law*” or application of punitive measures. The definition of the “*relevant law*” includes any sanctions imposed by any jurisdiction, Russian counter-sanctions and any criminal law imposed by any jurisdiction. These new

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<sup>439</sup> The Russia (Sanctions) (EU Exit) (Amendment) (No. 3) Regulations 2023, available [here](#).

<sup>440</sup> General Trade License, Russia-sanctions – Legal Advisory Services, available [here](#).

<sup>441</sup> The Russia (Sanctions) (EU Exit) (Amendment) (No. 4) Regulations 2024.

exemptions substitute the DBT general trade license, which has been immediately revoked.

- The definition of “legal advisory services” has been clarified to exclude (i) proceedings before administrative agencies, courts or other duly constituted official tribunals, arbitration or mediation proceedings “*in any jurisdiction*” (previously, this exemption could be read as applying only to proceedings in the United Kingdom), and (ii) legal services in connection with the management of claims under a contract of insurance or reinsurance.

### General Licenses for Financial Sanctions

Since implementing its autonomous sanctions regime, the UK has been able to issue US-style general licenses for conduct that would otherwise be prohibited by sanctions (this differs from EU sanctions, which usually require a person to apply for an individual license). The following licenses related to financial sanctions have been issued and remain unexpired:

- A license relating to asset recovery by “Non-Crown Relevant Organisations”; it is of indefinite duration.
- A license allowing winding down, payments for basic needs and payments related to insolvency proceedings involving Amsterdam Trade Bank N.V, a majority-owned subsidiary of Alfa-Bank JSC, until May 12, 2030. This license was amended to permit the bankruptcy trustees of Amsterdam Trade Bank N.V. to fulfill their statutory functions.
- A license allowing UK persons to make payments to PJSC Aeroflot, JSC Rossiya Airlines, JSC Ural Airlines, Russian Railways and their subsidiaries for the purchase of tickets for passenger rail and passenger air journeys originating in or within Russia until May 23, 2026. The license also allows purchasing tickets from the South Caucasus Railway CJSC for journeys between Armenia and Georgia and within these countries until May 23, 2026.
- A license allowing UK, EU and Guernsey subsidiaries of VTB and Sberbank to make payments for their basic needs, pay reasonable fees and service charges arising from holding and maintenance of their frozen funds and economic resources and pay reasonable legal fees. The license also allows payments related to the insolvency proceedings of such subsidiaries. The license expires on April 3, 2030. On January 2, 2024, the license was amended to reflect the change of name of VTB’s EU subsidiary to OWH SE. On May 31, 2024, the license was further amended to permit a scheme of arrangement prepared by the Joint Administrators of VTB Capital plc.



- A license allowing Interim Managers and trustees to act as receivers and managers in respect of the property and affairs of a charity until May 30, 2028.
- A license allowing non-asset frozen persons to continue business operations involving civil telecommunications services and news media services, until May 30, 2026.
- A license of an indefinite duration allowing certain humanitarian organizations to provide humanitarian assistance to Ukraine and its non-government controlled areas.
- A license of indefinite duration allowing asset frozen individuals or entities to make payments to UK insurers for insurance premiums and broker commissions relating to the provision of insurance cover provided to UK properties (including employer's liability insurance) and UK vehicles, and to receive payment following successful claims against their insurance policies and various types of refunds.
- A license authorizing payments until August 14, 2027, to Credit Bank of Moscow, Gazprombank, Sberbank or TBank, or a subsidiary of any of these, for the purpose of making energy available for use in Mongolia.
- A license allowing Crown servants, contractors and their family members to carry out activities in their personal capacity that would otherwise be prohibited.
- A license allowing banks to take payment of bank fees from frozen accounts.
- A license authorizing UK law firms and counsels to receive payment for legal services rendered to a designated person, subject to certain conditions including a legal fee cap of £4 million and legal expenses cap of 10% (up to £400,000), until October 28, 2025 (this cap is split equally between services provided under a prior arrangement and under a new arrangement with a designated person). The cap applies to each legal advisor instructed by a designated person (in the previous version of this license, caps applied to all legal work across all legal advisors for one designated person). The caps apply to all in-house lawyers employed by a designated person as if they were, together, a single law firm. Starting from April 29, 2025, the previous similar legal fee caps have been reset. **On October 29, 2025, the license was renewed for a period until April 28, 2026. The renewed license expanded coverage to most of UK sanctions regimes and specified that it does not permit payments for the benefit of any person designated on the UK asset freeze list under a United Nations sanctions regime. Otherwise, scope of the license remains the same.**
- A license of indefinite duration authorizing designated persons (and entities they own or control) to make utility payments for gas and electricity supplies and gas

and electricity meter-related payments for owned or rented UK properties from a frozen UK bank account.

- A license authorizing Lithuanian Railways to receive payments from Russian Railways in relation to passenger transit between Kaliningrad and other parts of Russia, until April 13, 2027.
- A license authorizing a bond issuer to restructure bonds held by designated persons, so long as funds or economic resources are not made available to the designated person, until March 27, 2026.
- A license allowing the wind-down of trust services to a designated person, until 90 days after the designation of that person.
- A license authorizing making, receiving or processing any payments, or taking any other action, in connection with the insolvency of European subsidiaries of GTLK, until July 31, 2030.
- A license of indefinite duration authorizing payments to water companies in the UK for water and sewage services by UK designated persons who own or rent properties in the UK.
- A license of indefinite duration authorizing persons who owe funds to a designated person under a court order to make payments of such funds into a court and authorizing the court to receive such payments.
- A license authorizing the use of the retail banking services of designated Russian banks, provided that the payments made or received are intended for personal use, and the total amount of outgoing payments does not exceed £50,000. The license applies until May 27, 2026.
- A license of indefinite duration authorizing designated persons (or other persons acting on behalf of such designated persons) to make payments to statutory auditors.
- A license of indefinite duration allowing visa application providers to receive and remit certain mandatory payments—such as courier services to and from the Visa Application Centre, specialist appointments to support visa application form completion, and photo, ID and biometric scanning fees—from and to designated persons (or other persons acting on their behalf).
- A license authorizing any person to make, receive or process any payments or take any other action in connection with the liquidation of East-West United Bank in Luxembourg until August 8, 2029.

- A license authorizing certain financial institutions to process payments made in 2022 from or via a designated credit or financial institution, provided the sender and intended recipient were not asset frozen, until **November 7, 2027**.
- A license of indefinite duration authorizing persons to make and facilitate payments in respect of UK government debt where either the legal holder or the direct or indirect recipient or beneficiary of that payment is a designated person or owned or controlled by a designated person, provided the payments are frozen.
- A license of indefinite duration authorizing a maximum of £350 per month for the first two months after designation to be made available to or for the benefit of a designated person and to be paid by and received from the designated person for the purposes of basic needs, such as purchasing food, beverages, medicine and personal and household products.
- A license authorizing certain commodities and energy-focused international organizations to receive membership payments due from the Russian Government from its accounts held with Gazprombank, until February 20, 2030.
- A license authorizing UK nationals to purchase petrol from petrol stations owned by Gazprom Neft or its subsidiaries in Kyrgyzstan and Tajikistan, provided the petrol is for a vehicle owned or rented by a UK national, until March 15, 2027. **On October 15, 2025, petrol stations owned by Rosneft and Lukoil or their subsidiaries in Kyrgyzstan or Tajikistan were included in the scope of the license.**
- A license authorizing UK persons to continue business operations with Gazpromneft-Sakhalin LLC to the extent they relate to the Sakhalin-2 oil and gas project. The exemption for the Sakhalin-2 project applies until June 28, 2026. **On October 15, 2025, the license was expanded to authorize UK persons to continue business operations with Rosneft and Lukoil to the extent they relate to the following projects: Caspian Pipeline Consortium, TengizChevroil, Shah Deniz, South Caucasus Pipeline, Azerbaijan Gas Supply Company, and Karachaganak. The exemption for these projects applies until October 14, 2027.**
- A license of indefinite duration authorizing a designated person to make payments to arbitrators and arbitration associations, as well as to legal representatives for the purposes of paying arbitration costs, for a value of up to £500,000 per arbitration.
- A license allowing persons to carry out activities required to enable or ordinarily incident and necessary to the transfer of assets and liabilities as part of the integration of Credit Suisse Group AG into UBS Group AG following the acquisition of Credit Suisse Group AG by UBS Group AG, until April 26, 2030.

- A license of indefinite duration, authorizing Financial Conduct Authority, the Prudential Regulation Authority, or the Bank of England to take actions in respect to designated persons as they relate to protecting consumers, ensuring prudential supervision or protecting, maintaining or enhancing the stability and integrity of the financial system of the United Kingdom.
- A license of indefinite duration authorizing UK persons to make and UK financial institutions to process any insurance payment premiums due to the Deposit Insurance Agency.
- A license of indefinite duration authorizing vessels owned or operated by, or on behalf of, the Government of the Gabonese Republic to continue business operations with Intershipping Services LLC.
- A license of indefinite duration that allows non-designated persons who have made investments through designated brokers to transfer their funds to a non-designated broker (assuming that the designated broker is the only sanctioned party involved).
- A license authorizing winding down of, or divestment from, any transactions with, including closing out of any positions in, designated Indian and Chinese energy companies Nayara Energy Limited, National Pipeline Group Beihai Liquefied Natural Gas Co Ltd, Shandong Yulong Petrochemical Company, Shandong Baogang International Port Co, Jingang Port Co, Shandong Haixing Port Co, and their subsidiaries, until November 13, 2025.
- A license authorizing winding down of, or divestment from, any transactions with, including closing out of any positions in, Rosneft, Lukoil and their subsidiaries, until November 28, 2025.
- A license authorizing continuation of business operations with Rosneft Deutschland GmbH, RN Refining & Marketing GmbH and their subsidiaries, including, but not limited to, payments to and from such entities under any existing or new obligations or contracts, payments to or from any other person under any obligations or contracts, and provision of, and receipt of, economic resources to or from such entities, until October 22, 2027.
- A license authorizing continuation of business operations with Lukoil Bulgaria EOOD, Lukoil Neftochim Burgas AD, Lukoil Aviation Bulgaria EOOD and Lukoil Bunker Bulgaria EOOD and their subsidiaries, including, but not limited to, payments to and from such entities under any existing or new obligations or contracts, payments to or from any other person under any obligations or contracts, and provision of, and receipt of, economic resources to or from such entities, until February 14, 2026.

In 2022, OFSI received 1031 specific license applications and, as of December 6, 2022, records showed that OFSI issued 82 new or amended specific licenses under the Russia Regulations.<sup>442</sup> In 2023, OFSI issued 164 specific licenses under the Russia Regulations.<sup>443</sup> In 2024, OFSI issued 252 specific licenses under the Russia Regulations.<sup>444</sup> So far in 2025, OFSI issued 279 specific licenses under the Russia Regulations.<sup>445</sup>

## Belarus Sanctions Regime

On July 5, 2022, the UK extended its Belarus sanctions regime to mirror that imposed on Russia. Another major round of sanctions followed on June 9, 2023. Measures against Belarus include the following sanctions:

- Designation by description. On June 9, 2023, the UK expanded the designation criteria to be able to target a wide range of Belarus public officials and their family members. UK designated more than 130 persons and organizations in Belarus. On August 8, 2023, the UK designated six Belarus defense organizations linked to the manufacturing of military technology supporting Russia's military efforts.<sup>446</sup>
- Financial restrictions, including dealing with transferable securities or money-market instruments issued by and extending loans and credit arrangements to Belarus, Belarus state-owned entities and banks, as well as persons connected with Belarus. On June 9, 2023, the UK expanded the securities-related prohibition to persons acting on behalf or at the direction of the previously targeted groups. Financial sanctions imposed on Belarus also prohibit provision of financial service for Belarus's foreign exchange reserves and asset management and prohibit export to Belarus of sterling and banknotes denominated in the official currency of the EU.
- Trade sanctions, including:
  - exports of critical-industry goods, dual-use goods, interception and monitoring goods, internal repression goods, luxury goods, military goods; oil refining goods, quantum computing and advanced materials goods; tobacco industry goods; goods that can be used to produce chemical and biological weapons and machinery-related goods; and

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<sup>442</sup> See Question for Treasury of the UK Parliament "Sanctions: Russia" (Dec. 6, 2022), available [here](#).

<sup>443</sup> See OFSI Annual Review 2022 to 2023: Strengthening our Sanctions (Dec. 14, 2023), available [here](#).

<sup>444</sup> See OFSI Annual Review 2023 to 2024: Engage, enhance, enforce (March, 2025), available [here](#).

<sup>445</sup> See OFSI Annual Review 2024 to 2025: Effective Sanctions (October, 2025), available [here](#).

<sup>446</sup> Press Release of the FCDO, "Largest ever UK action targets Putin's access to foreign military supplies" (Aug. 8, 2023), available [here](#).

- imports of arms and related material, iron and steel products, mineral products, potash, gold, cement, wood and rubber; and
- internet services restrictions to prevent access to content of designated persons.
- Restrictions related to aircraft and ships, including a prohibition on Belarusian aircraft overflying or landing in the UK and a prohibition on Belarusian ships entering UK ports.

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We are closely monitoring the situation and expect to continue to provide updates of any relevant developments. Please do not hesitate to contact us with any questions.

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## ANNEX A

## RUSSIAN BILLIONAIRES—BLOCKING SANCTIONS OR ASSET FREEZE DESIGNATIONS

This table has been prepared by reference to the Forbes 2022 World's Billionaires List.

No	Name	Industry	Wealth (USD)	US SDN List	EU Asset Freezes	UK Asset Freezes
1.	Vladimir Lisin	Steel, transport	\$18.4 bn	NO	NO	NO
2.	Vladimir Potanin	Metals	\$17.3 bn	YES	NO	YES
3.	Leonid Mikhelson	Gas, chemicals	\$14 bn	NO	NO	YES
4.	Alexey Mordashov	Steel, investments	\$13.2 bn	YES	YES	YES
5.	Mikhail Fridman	Oil, banking, telecom	\$11.8 bn	YES	YES	YES
6.	Alisher Usmanov	Steel, telecom, investments	\$11.5 bn	YES	YES	YES
7.	Gennady Timchenko	Oil, gas	\$11.3 bn	YES	YES	YES
8.	Andrey Melnichenko	Coal, fertilizers	\$11.1 bn	YES	YES	YES
9.	Vagit Alekperov	Oil	\$10.5 bn	NO	NO	YES
10.	Mikhail Prokhorov	Investments	\$10.3 bn	NO	NO	NO
11.	German Khan	Oil, banking, telecom	\$7.8 bn	YES	YES	YES
12.	Roman Abramovich	Steel, investments	\$6.9 bn	NO	YES	YES
13.	Viktor Rashnikov	Steel	\$6.6 bn	YES	YES	YES
14.	Dmitry Rybolovlev	Fertilizers	\$6.6 bn	NO	NO	NO
15.	Alexei Kuzmichev	Oil, banking, telecom	\$6 bn	YES	YES	YES
16.	Alexander Abramov	Steel, mining	\$5.5 bn	NO	NO	YES
17.	Viktor Vekselberg	Metals, energy	\$5.5 bn	YES	NO	YES
18.	Leonid Fedun	Oil	\$5 bn	NO	NO	NO
19.	Andrei Guriev & family	Fertilizers	\$4.8 bn	YES	NO <sup>447</sup>	YES
20.	Andrei Skoch	Steel	\$4.7 bn	YES	YES	YES
21.	Viatcheslav Kantor	Fertilizers, real estate	\$4.6 bn	NO	NO <sup>448</sup>	YES
22.	Suleiman Kerimov & family	Gold	\$4.4 bn	YES	YES	YES
23.	Pyotr Aven	Oil, banking, telecom	\$4.3 bn	YES	YES	YES

<sup>447</sup> Only Andrei A. Guriev (DOB: March 7, 1982), the son of Andrei G. Guriev, is designated.

<sup>448</sup> Council Implementing Regulation 2025/527 (Mar. 14, 2025), available [here](#), removed Mr. Viatcheslav Kantor from the asset freeze list.

No	Name	Industry	Wealth (USD)	US SDN List	EU Asset Freezes	UK Asset Freezes
24.	Iskander Makhmudov	Mining, metals, machinery	\$3.6 bn	YES	NO	YES
25.	Sergei Galitsky	Retail	\$3.2 bn	NO	NO	NO
26.	Zarakh Iliev	Real estate	\$3.2 bn	YES	NO	YES
27.	Sergei Popov	Banking	\$3.1 bn	NO	NO	NO
28.	Igor Kesaev	Tobacco distribution, retail	\$2.6 bn	YES	YES	YES
29.	Alexander Frolov	Mining, steel	\$2.3 bn	NO	NO	YES
30.	Alexander Svetakov	Real estate	\$2.2 bn	NO	NO	NO
31.	Tatyana Bakalchuk	Ecommerce	\$2.1 bn	NO	NO	NO
32.	Igor Makarov	Investments	\$2.1 bn	NO	NO	NO
33.	Alexander Mamut	Investments	\$2.1 bn	NO	NO	NO
34.	Egor Kulkov	Pharmaceuticals	\$2 bn	NO	NO	NO
35.	Alexander Skorobogatko	Real estate, airport	\$2 bn	NO	NO	NO
36.	Andrei Kozitsyn	Metals	\$1.9 bn	NO	YES	NO
37.	Alexander Nesis	Metals, banking, fertilizers	\$1.9 bn	NO	NO	NO
38.	Alexander Ponomarenko	Real estate, airport	\$1.9 bn	YES	YES	YES
39.	Igor Altushkin	Metals	\$1.8 bn	YES	YES	YES
40.	Farkhad Akhmedov	Investments	\$1.7 bn	NO	NO <sup>449</sup>	NO <sup>450</sup>
41.	Oleg Deripaska	Aluminum, utilities	\$1.7 bn	YES	YES	YES
42.	Dmitry Kamenshchik	Airport	\$1.7 bn	NO	NO	NO
43.	Arkady Rotenberg	Construction, pipes, banking	\$1.7 bn	YES	YES	YES
44.	Vladimir Yevtushenkov	Telecom, investments	\$1.7 bn	NO	YES	YES
45.	Vasily Anisimov	Real estate	\$1.6 bn	NO	NO	NO
46.	Sergei Gordeev	Real estate	\$1.6 bn	YES	NO	NO
47.	Ivan Savvidis	Agribusiness	\$1.6 bn	NO	NO	NO
48.	Nikolai Buinov	Oil, gas	\$1.5 bn	NO	NO	YES
49.	Pyotr Kondrashev	Investments	\$1.5 bn	NO	NO	NO
50.	Yuri Shefler	Alcohol	\$1.5 bn	NO	NO	NO
51.	Mikhail Shelkov	Titanium	\$1.5 bn	NO	NO	NO
52.	Elena Baturina	Investments, real estate	\$1.4 bn	NO	NO	NO

<sup>449</sup> Council Implementing Regulation (EU) 2023/1765 (Sept. 13, 2023), *available here*, removed Mr. Farkhad Akhmedov from the asset freeze list.

<sup>450</sup> The UK removed Mr. Farkhad Akhmedov from the asset freeze list on March 19, 2025.

No	Name	Industry	Wealth (USD)	US SDN List	EU Asset Freezes	UK Asset Freezes
53.	Viktor Kharitonin	Pharmaceuticals	\$1.4 bn	NO	NO	NO
54.	Anatoly Lomakin	Investments	\$1.4 bn	NO	NO	NO
55.	Vadim Moshkovich	Agriculture, land	\$1.4 bn	NO	YES	YES
56.	Alexey Repik	Pharmaceuticals	\$1.4 bn	NO	NO	YES <sup>451</sup>
57.	Denis Sverdlov	Electric vehicles	\$1.4 bn	NO	NO	NO
58.	Gavril Yushvaev	Precious metals, real estate	\$1.4 bn	NO	NO	NO
59.	Oleg Boyko	Diversified	\$1.3 bn	NO	NO	NO
60.	Mikhail Gutseriev & brother	Oil, real estate	\$1.3 bn	NO	YES <sup>452</sup>	YES
61.	Yuri Kovalchuk	Banking, insurance, media	\$1.3 bn	YES	YES	YES
62.	God Nisanov	Real estate	\$1.3 bn	YES	NO	YES
63.	Albert Shigaboutdinov	Refinery, chemicals	\$1.3 bn	NO	NO	YES
64.	Rustem Sulteev	Refinery, chemicals	\$1.3 bn	NO	YES	NO
65.	Andrei Bokarev	Metals, mining	\$1.2 bn	YES	NO	YES
66.	Gleb Fetisov	Investments	\$1.2 bn	NO	NO	NO
67.	Andrei Kosogov	Banking	\$1.2 bn	NO	NO	NO
68.	Megdet Rahimkulov & family	Investments	\$1.2 bn	NO	NO	NO
69.	Andrei Rappoport	Investments	\$1.2 bn	NO	NO	NO
70.	Airat Shaimiev	Refinery, chemicals	\$1.2 bn	NO	NO	YES
71.	Radik Shaimiev	Refinery, chemicals	\$1.2 bn	NO	NO	NO
72.	Samvel Karapetyan	Real estate	\$1.1 bn	NO	NO	NO
73.	Sergei Kolesnikov	Building materials	\$1.1 bn	NO	NO	NO
74.	Andrei Komarov	Investments	\$1.1 bn	NO	NO	NO
75.	Igor Rybakov	Building materials	\$1.1 bn	NO	NO	NO
76.	Igor Yusufov	Oil & gas	\$1.1 bn	NO	NO	NO
77.	Eugene Kaspersky	Software	\$1 bn	NO	NO	NO
78.	Boris Rotenberg	Construction, pipes, chemicals	\$1 bn	YES	YES	YES
	<b>TOTAL:</b>			<b>26</b>	<b>24</b>	<b>38</b>

<sup>451</sup> Designated as “Alexander Repik.”

<sup>452</sup> Only Mikhail Gutseriev is designated.

## ANNEX B

## FINANCIAL INSTITUTIONS—BLOCKING SANCTIONS OR ASSET FREEZE DESIGNATIONS

Entity	US Regime	EU Regime	UK Regime
Absolut Bank PAO	YES	NO	NO
Ak Bars Bank	YES	NO	NO
Aktsionernoe Obshchestvo Agentstvo Regionalnyi Nezavisimyi Registrator (Agency Regional Independent Registrar)	YES	NO	YES
Aktsionernoe Obshchestvo Bank Agroros	YES	NO	NO
Aktsionernoe Obshchestvo Depozitarnaya Kompaniya Region (Depository Company Region)	YES	NO	YES
Aktsionernoe Obshchestvo Independent Specialized Depository	YES	NO	YES
Aktsionernoe Obshchestvo Mezhhregionalnyi Registratorskii Tsentr (Interregional Registration Center)	YES	NO	YES
Aktsionernoe Obshchestvo Natsionalnaya Spetsializirovannaya Finansovaya Kompaniya (National Specialized Financial Company)	YES	NO	YES
Aktsionernoe Obshchestvo Nezavisimaya Registratorskaya Kompaniya R.O.S.T. (Independent Registrar R.O.S.T. Company)	YES	NO	YES
Aktsionernoe Obshchestvo Professionalnyi Registratsionnyi Tsentr (Professional Registration Centre)	YES	NO	YES
Aktsionernoe Obshchestvo Registrator Kapital (Registrar Capital)	YES	NO	YES
Aktsionernoe Obshchestvo Registratsionnaya Kompaniya Tsentr Invest (Registration Company Centre Invest)	YES	NO	YES
Aktsionernoe Obshchestvo Spetsializirovannyi Registrator Kompas (Specialized Registrar Compass)	YES	NO	YES
Aktsionernoe Obshchestvo Surgutinvestneft	YES	NO	YES
Aktsionernoe Obshchestvo Vedenie Reestrov Kompanii (Vedenie Company Registers)	YES	NO	YES
Alfa-Bank	YES	YES	YES
AO Reestr (Register)	YES	NO	YES
AO Spetsializirovannyi Depozitarii Infinitum (Specialized Depository Infinitum)	YES	NO	YES
Bank Avangard	YES	NO	NO
Bank Iturup LLC	YES	NO	NO
Bank RostFinance	YES	NO	NO
Bank Saint Petersburg	YES	NO	YES
BBR Bank Joint Stock Company	YES	NO	YES
BCS Bank AO	YES	NO	NO
Black Sea Bank for Development and Reconstruction	YES	YES	YES
Blanc Bank LLC	YES	NO	NO
Bratsky Narodny Bank JSC	YES	NO	NO
Central Bank of Russia	NO	NO	NO
Centre for International Settlements Bank	YES	YES	NO
Centrocredit Bank	YES	NO	NO
Commercial Bank Energotransbank Joint Stock Company	YES	NO	NO
Commercial Bank Khlynov Joint Stock Company	YES	NO	NO
Commercial Bank Kremlyovskiy	YES	NO	NO

Entity	US Regime	EU Regime	UK Regime
Commercial Joint Stock Bank Viking	YES	NO	NO
Corporate Finance Bank LLC	YES	NO	NO
Credit Bank of Moscow	YES	YES	YES
Dom.RF	YES	NO	YES
East West United Bank	YES	NO	NO
Evroaziatskii Registrator (Eurasian Registrar)	YES	NO	YES
Evrofinance Mosnarbank	YES	NO	NO
Expobank	YES	NO	NO
Far Eastern Bank	YES	YES	NO
Fora Bank Joint Stock Commercial Bank	YES	NO	NO
Garant Invest Bank Joint Stock	YES	NO	NO
Garantex Europe OU	YES	YES <sup>453</sup>	YES
Gazprombank	YES	NO	YES
Genbank	YES	NO	YES
Home Credit & Finance Bank	YES	NO	NO
Industrial Savings Bank	YES	NO	YES
International Settlement Bank	YES	YES	YES
Interstate Bank	YES	NO	NO
Joint Stock Commercial Bank Chelindbank	YES	NO	NO
Joint Stock Commercial Bank International Financial Club	YES	NO	NO
Joint Stock Commercial Bank Modulbank	YES	NO	NO
Joint Stock Commercial Bank National Reserve Bank Joint Stock Company	YES	NO	NO
Joint Stock Commercial Bank Slavia Joint Stock Company	YES	NO	NO
Joint Stock Commercial Mortgage Bank Akibank Public Joint Stock Company	YES	NO	NO
Joint Stock Company Aktiv	YES	NO	YES
Joint Stock Company Auto Finance Bank	YES	NO	NO
Joint Stock Company Bank Accept	YES	NO	NO
Joint Stock Company Bank Finservice	YES	NO	NO
Joint Stock Company Bank United Capital	YES	NO	NO
Joint Stock Company Coalmetbank	YES	NO	NO
Joint Stock Company Commercial Bank Ural FD	YES	NO	NO
Joint Stock Company Databank	YES	NO	NO
Joint Stock Company Guta Bank	YES	NO	NO
Joint Stock Company Industria Reestr (Industry Register)	YES	NO	YES
Joint Stock Company NS Bank	YES	NO	NO
Joint Stock Company Public Trust Bank	YES	NO	NO
Joint Stock Company RDC Paritet (RDC Parity)	YES	NO	YES
Joint Stock Company Registrator Intraco	YES	NO	YES
Joint Stock Company Registry Society Status	YES	NO	YES

<sup>453</sup> Designated as "Garantex."

Entity	US Regime	EU Regime	UK Regime
Joint Stock Company Royal Credit Bank	YES	NO	NO
Joint Stock Company Severgazbank	YES	NO	NO
Joint Stock Company VTB Registrar	YES <sup>454</sup>	YES <sup>455</sup>	YES
Joint Stock Company VTB Specialized Depository	YES <sup>456</sup>	YES <sup>457</sup>	YES
Joint Stock Investment Commercial Bank Eniseisk United Bank	YES	NO	NO
JSC DRAGA (Specialized Registrar Holder of the Register of Shareholders Gas Industry)	YES	NO	YES
JSC Exi Bank	YES	NO	NO
JSC Investment Group	YES	NO	NO
JSC Noviy Registrator (New Registrar)	YES	NO	YES
JSC Republican Specialregistrar Yakut Fund Center	YES	NO	YES
JSC RT Registrar	YES	NO	YES
JSC Service Reestr (Service Registry)	YES	NO	YES
JSCB Energobank	YES	NO	NO
Kamsky Commercial Bank	YES	NO	NO
Keremet Bank OJSC	YES	NO	YES
Korporativnaya Registratorskaya Kompaniya (Corporate Registrar Company)	YES	NO	YES
Lanta-Bank Commercial Bank	YES	NO	NO
Limited Liability Company Bank Orange	YES	NO	NO
Limited Liability Company Bank Round	YES	NO	NO
Limited Liability Company Depository and Corporate Technologies	YES	NO	YES
Limited Liability Company Krona Bank	YES	NO	NO
Limited Liability Company Market Fund Administration (Market Special Depository)	YES	NO	YES
Limited Liability Company Special Depository Partner	YES	NO	YES
Limited Liability Company Specialized Depository Company Garant	YES	NO	YES
Locko Bank	YES	NO	NO
Maritime Joint Stock Bank Joint Stock Company	YES	NO	NO
Marshal Global	YES	NO	YES
MB Bank	YES	NO	NO
Metallurgical Investment Bank Commercial Bank	YES	NO	YES
Moscow Industrial Bank	YES	NO	YES
Moskovskii Fondovyi Tsentr (Moscow Stock Center)	YES	NO	YES
MTS Bank	YES	NO	YES
National Custodial Company Stock Closed Corporation	YES	NO	YES

<sup>454</sup> Joint Stock Company VTB Registrar is not designated on the OFAC SDN list, but it is majority owned by the designated VTB Bank.

<sup>455</sup> Joint Stock Company VTB Registrar is not designated on the EU asset freeze list, but it is majority owned or controlled by the designated VTB Bank.

<sup>456</sup> Joint Stock Company VTB Specialized Depository is not designated on the OFAC SDN list, but it is majority owned by the designated VTB Bank.

<sup>457</sup> Joint Stock Company VTB Specialized Depository is not designated on the EU asset freeze list, but it is majority owned or controlled by the designated VTB Bank.

Entity	US Regime	EU Regime	UK Regime
National Payment Card System Joint Stock Company/ Mir National Payment System	YES	NO	YES
National Settlement Depository	YES	YES	YES
National Standard Bank Joint Stock Company	YES	NO	NO
New Moscow Bank	YES	NO	NO
NK Bank Joint Stock Company	YES	NO	NO
Novikombank	YES	YES	YES
Novosibirsk Social Commercial Bank Levoberezhny	YES	NO	NO
Obshchestvo S Ogranichennoy Otvetstvennostyu Oboronregistr (Responsibility of Oboronregistr)	YES	NO	YES
OOO Partner	YES	NO	YES
OOO Reestr RN	YES	NO	YES
OOO Registrator Garant (Registrar Garant)	YES	NO	YES
Otkritie Financial Corporation Bank	YES	YES	YES
Petersburg Social Commercial Bank	YES	NO	NO
Post Bank	YES	NO	NO
Primorsky Territorial Commercial Bank Society with Limited Liability	YES	NO	NO
Primorye Commercial Bank	YES	NO	NO
Promsvyazbank	YES	YES	YES
Public Joint Stock Commercial Bank Derzhava	YES	NO	NO
Public Joint Stock Company Bank Alexandrovsky	YES	NO	NO
Public Joint Stock Company Bank Sinara	YES	NO	NO
Public Joint Stock Company Bystrobank	YES	NO	NO
Public Joint Stock Company Finstar Bank	YES	NO	NO
Public Joint Stock Company Metkombank	YES	NO	NO
Public Joint Stock Company National Bank Trust	YES	NO	NO
Public Joint Stock Company SPB Bank	YES	NO	NO
Public Joint Stock Social Commercial Bank of Primorye Primsotsbank	YES	NO	YES
Registrar KRTS (KRC Registrar)	YES	NO	YES
Rosbank	YES	YES	NO <sup>458</sup>
Rossita Bank	YES	NO	NO
Rossiya Bank	YES	YES	YES
Russian Agricultural Bank (Rosselkhozbank)	NO	NO	YES
Russian Direct Investment Fund	YES	YES	YES
Russian Financial Corporation Bank JSC	YES	NO	NO
Russian National Commercial Bank	YES	YES	YES
Russian Public Joint Stock Commercial Roads Bank	YES	NO	NO
Russian Regional Development Bank	YES	NO	YES
Russian Standard Bank	YES	NO	NO
Russian Universal Bank	YES	NO	NO
Ruski Regionalny Bank	YES	NO	NO

<sup>458</sup> The UK removed Rosbank from its asset freeze list on 7 March 2025.



Entity	US Regime	EU Regime	UK Regime
Saint Petersburg Exchange	YES	NO	YES
Sberbank	YES	YES	YES
SDM Bank	YES	NO	NO
Signal Invest OOO	YES	NO	NO
Sinko Bank	YES	NO	NO
SMP Bank	YES	NO	YES
SNCO Metallurg	YES	NO	YES
SOGAZ	YES	YES	YES
Solidarnost	YES	NO	NO
<b>Solid Bank</b>	NO	<b>NO</b>	<b>YES</b>
Sovcombank (Buycombank)	YES	YES	YES
Spetsializirovannyi Depozitarii Depo Plaza (Specialized Depository Depot Plaza)	YES	NO	YES
Spetsializirovannyi Registrator Rekom (Specialized Registrar Recom)	YES	NO	YES
Surgutneftegasbank	YES	YES <sup>459</sup>	YES <sup>460</sup>
Timer Bank	YES	NO	NO
Tinkoff Bank (currently known as T-Bank)	YES	YES	YES
Tochka Bank	YES	NO	NO
TransKapitalBank	YES	NO	NO
<b>Transstroibank</b>	NO	<b>NO</b>	<b>YES</b>
Tsentr Ucheta i Registratsii (Centre of the Accounting and Registration)	YES	NO	YES
TSMRBank	YES	YES <sup>461</sup>	NO
Unistream Bank	YES	NO	NO
Ural Bank for Reconstruction and Development	YES	NO	YES
Bank Uralsib	YES	NO	YES
Vitabank PJSC	YES	NO	NO
Vnesheconombank (VEB)	YES	YES	YES
VTB Bank	YES	YES	YES
Waybank JSC	YES	NO	NO
Yuzhno Regionalnyi Registrator (Yuzhno Regional Registrar)	YES	NO	YES
Zakrytoe Aktsionernoe Obshchestvo Pervyi Spetsializirovannyi Depozitarii (First Specialized Depository)	YES	NO	YES
Zenit Bank	YES	NO	YES
<b>TOTAL:</b>	<b>171</b>	<b>25</b>	<b>87</b>

<sup>459</sup> Surgutneftegasbank is not designated on the EU asset freeze list, but it is majority owned by the designated Surgutneftegas.

<sup>460</sup> Surgutneftegasbank is not designated on the UK asset freeze list, but it is majority owned by the designated Surgutneftegas.

<sup>461</sup> Designated as "CMRBank."

## Annex C

### KEY POLITICAL FIGURES AND ENTITIES BY SECTOR—BLOCKING SANCTIONS OR ASSET FREEZE DESIGNATIONS

This table is a non-exhaustive list of key political figures and entities that are the target of blocking sanctions or asset freeze designations.

Name	Category	US	EU	UK
Bitriver AG	Crypto-Service Providers	Yes	No <sup>462</sup>	No
Garantex	Crypto-Service Providers	Yes	Yes	Yes
Grinex	Crypto-Service Providers	Yes	Yes	Yes
Aerospace Defense Concern Almaz-Antey JSC	Defense & Aerospace	Yes	Yes <sup>463</sup>	Yes
Russian Helicopters JSC	Defense & Aerospace	Yes	Yes	No
United Shipbuilding Corporation JSC	Defense & Aerospace	Yes	Yes <sup>464</sup>	Yes
United Engine Corporation JSC	Defense & Aerospace	Yes	Yes	No
Kalashnikov Concern JSC	Defense & Aerospace	Yes	Yes	Yes
KBP Instrument Design Bureau JSC	Defense & Aerospace	Yes	No	No
NPK Tekhmash JSC	Defense & Aerospace	Yes	No	No
NPP Salyut JSC	Defense & Aerospace	Yes	Yes	Yes
Promtekhlogiya LLC	Defense & Aerospace	Yes	Yes	Yes
United Aircraft Corporation PJSC	Defense & Aerospace	Yes	Yes <sup>465</sup>	Yes
Rosoboronexport JSC	Defense & Aerospace	Yes	Yes	No
State Corporation Rostec	Defense & Aerospace	Yes	No <sup>466</sup>	Yes
Tactical Missiles Corporation JSC	Defense & Aerospace	Yes	Yes	Yes
UralVagonZavod JSC <sup>467</sup>	Defense & Aerospace	Yes	Yes	Yes
Private Military Company Redut	Paramilitary & Private Defense	Yes	Yes	Yes
Private Military Company Wagner	Paramilitary & Private Defense	Yes	Yes	Yes
Task Force Rusich	Paramilitary & Private Defense	Yes	Yes	Yes
RSB-Group	Paramilitary & Private Defense	Yes	Yes	Yes
Gazprom Neft PJSC	Energy & Natural Resources	Yes	No	Yes
Foreign Economic Association Almazvirexport JSC	Energy & Natural Resources	Yes	No	No
Rusgazdobycha JSC	Energy & Natural Resources	No	No	Yes
SUEK JSC	Energy & Natural Resources	Yes	No	No

<sup>462</sup> BitRiver LLC is subject to a prohibition to enter into “any transactions” with it under Article 5ag of Regulation 833/2014.

<sup>463</sup> Almaz-Antey is also subject to a prohibition to enter into “any transaction” with it under Article 5aa of Regulation 833/2014.

<sup>464</sup> United Shipbuilding Corporation is also subject to a prohibition to enter into “any transaction” with it under Article 5aa of Regulation 833/2014.

<sup>465</sup> United Aircraft Corporation is also subject to a prohibition to enter into “any transaction” with it under Article 5aa of Regulation 833/2014.

<sup>466</sup> Rostec is subject to a prohibition to enter into “any transaction” with it under Article 5aa of Regulation 833/2014.

<sup>467</sup> UralVagonZavod is also subject to a prohibition to enter into “any transaction” with it under Article 5aa of Regulation 833/2014.

Name	Category	US	EU	UK
Arctic LNG 2 LLC	Energy & Natural Resources	Yes	No	Yes
Lukoil Oil Company PJSC	Energy & Natural Resources	Yes	No	Yes
Murmansk LNG	Energy & Natural Resources	Yes	No	Yes
Nord Gold PLC	Energy & Natural Resources	Yes	No	Yes
Nord Stream 2 AG	Energy & Natural Resources	Yes	No <sup>468</sup>	No
Rosneft Oil Company PJSC	Energy & Natural Resources	Yes	No <sup>469</sup>	Yes
Alrosa PJSC	Energy & Natural Resources	Yes	Yes	Yes
Polyus PJSC	Energy & Natural Resources	No	Yes	Yes
Rushydro PJSC	Energy & Natural Resources	No	No	Yes
Surgutneftegas PJSC	Energy & Natural Resources	Yes	No	Yes
Evrast PLC	Energy & Natural Resources	No	Yes	Yes
Metallurg-Tulamash LLC	Industrial & Manufacturing	Yes	No	No
Magnitogorsk Iron and Steel Works PJSC	Industrial & Manufacturing	Yes	No	Yes
Severstal PJSC	Industrial & Manufacturing	Yes	No	Yes
Mechel PJSC	Industrial & Manufacturing	Yes	No	No
Transmashholding JSC	Industrial & Manufacturing	Yes	No	No
UMATEX	Industrial & Manufacturing	Yes	No	Yes
All-Russia State Television and Radio Broadcasting Company (VGTRK)	Media & Communications	No	Yes	Yes
Rossiya Segodnya (Russia Today)	Media & Communications	Yes	Yes	Yes
Russian Television and Radio Broadcasting Network	Media & Communications	No	Yes	No
Aleksandr Novak	Political Figures	Yes	No	Yes
Dmitriy Grigorenko	Political Figures	Yes	Yes	Yes
Dmitry Medvedev	Political Figures	Yes	Yes	Yes
Elvira Nabiullina	Political Figures	Yes	No	Yes
Mikhail Mishustin	Political Figures	Yes	Yes	Yes
Olga Skorobogatova	Political Figures	Yes	No	No
Sergei Lavrov	Political Figures	Yes	Yes	Yes
Vladimir Putin	Political Figures	Yes	Yes	Yes
PKK Milandr JSC	Technology & Telecommunications	Yes	Yes	No
Centre of Financial Technologies Group	Technology & Telecommunications	Yes	No	No
Diasoft Ltd	Technology & Telecommunications	Yes	No	No
Data Storage Centre LLC	Technology & Telecommunications	Yes	No	No
Novastream Limited	Technology & Telecommunications	Yes	No	No
Radioavtomatika	Technology & Telecommunications	Yes	No	Yes
FGUE Atomflot	Transport & Logistics	Yes	Yes	Yes
Federal State Budgetary Institution Marine Rescue Service	Transport & Logistics	Yes	No	No
National Aviation Service Company JSC	Transport & Logistics	Yes	No	No
Siberia Airlines JSC	Transport & Logistics	No	No	Yes

<sup>468</sup> Article 5af of Regulation 833/2014 prohibits to engage, directly or indirectly, in any transaction in connection with the natural gas pipelines Nord Stream and Nord Stream 2, with regard to the completion, operation, maintenance or use of the pipelines, or their financing.

<sup>469</sup> Rosneft is subject to a prohibition to enter into “any transaction” with it under Article 5aa of Regulation 833/2014.

Name	Category	US	EU	UK
State Transport Leasing Company JSC	Transport & Logistics	Yes	Yes	Yes
Sovcomflot JSC	Transport & Logistics	Yes	Yes <sup>470</sup>	Yes
Transoil LLC	Transport & Logistics	Yes	No	No
Aeroflot PJSC	Transport & Logistics	No	No	Yes

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<sup>470</sup> Sovcomflot is also subject to a prohibition to enter into “any transaction” with it under Article 5aa of Regulation 833/2014.