

Bird & Bird

EU and UK sanctions regarding Russia and Belarus

Status update

7 October 2022 – 9:00 (CEST)



EU/UK sanctions update

EU/UK sanctions against Russia and Belarus

EUROPEAN UNION		
RUSSIA		
Date	Description of imposed sanctions	Entities and individuals being sanctioned
21 February 2022	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals.	<ul style="list-style-type: none"> • Aleksei Yurievich Cherniak • Leonid Ivanovic Babashov • Tatiana Georgievna Lobach • Nina Sergeevna Faustova • Aleksandr Evgenevich Chmyhalov
23 February 2022	Possibility for EU Member State competent authorities to authorise the release of certain frozen funds or economic resources belonging to the entities listed under entry numbers 53, 54 and 55 in Annex I.	<ul style="list-style-type: none"> • Bank Rossiya (Банк «Россия») • PROMSVYAZBANK (ПАО Промсвязьбанк") • VEB.RF (a.k.a. Vnesheconombank; VEB) (ВЭБ.РФ)
23 February 2022	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals and entities.	<p>Several high-profile individuals and entities, who have played a role in undermining or threatening the territorial integrity, sovereignty and independence of Ukraine.</p> <p>Entities:</p> <ul style="list-style-type: none"> • Internet Research Agency (Агентство интернет-исследований) • Bank Rossiya (Банк «Россия») • PROMSVYAZBANK (ПАО Промсвязьбанк") • VEB.RF (a.k.a. Vnesheconombank; VEB) (ВЭБ.РФ)

<u>23 February 2022</u>	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals.	Members of the Russian State Duma
<u>23 February 2022</u>	Sectoral prohibition to finance the Russian Federation, its government and Central Bank, or a legal person, entity or body acting on behalf or at the direction of the Russian Federation, its government and Central Bank.	N/A
<u>24 February 2022</u>	<ul style="list-style-type: none"> • Import ban on goods from the non-government controlled areas of the Donetsk and Luhansk oblasts (including prohibition to provide, directly or indirectly, financing or financial assistance, as well as insurance and reinsurance, related to the import of goods originating in the non-government controlled areas of Donetsk oblast or in non-government controlled areas of Luhansk oblast); • Restrictions on trade and investments related to certain economic sectors in the Donetsk and Luhansk oblasts; • A prohibition to supply tourism services; and • Sale, supply, transfer and export bans for certain listed goods and technologies. 	N/A
<u>25 February 2022</u>	<ul style="list-style-type: none"> • Extension of scope in view of targeting parties with asset freezes that are involved in or associated with parties involved in the relevant activities in Ukraine 	<ul style="list-style-type: none"> • N/A
<u>25 February 2022</u>	<ul style="list-style-type: none"> • Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals and entities 	Contains amongst others: Vladimir Vladimirovich PUTIN (Владимир Влади́мирович ПУ́ТИН) – number 669
<u>25 February 2022</u>	<ul style="list-style-type: none"> • Partial suspension of the application of the Agreement between the European Community and the Russian Federation on the facilitation of the issuance of visas to the citizens of the European Union and the Russian Federation 	<ul style="list-style-type: none"> • N/A
<u>26 February 2022</u>	<ul style="list-style-type: none"> • Prohibition to sell, supply, transfer or export, directly or indirectly, dual-use goods and technology, whether or not originating in the Union, to any natural or legal person, entity or body in Russia or for use in Russia • Prohibition to provide technical assistance, brokering services, other services or financing or financial assistance related to dual-use goods and technology to any natural or legal person, entity or body in Russia or for use in Russia • Prohibition to sell, supply, transfer or export, directly or indirectly, specific listed “cutting-edge” goods and technology which might contribute to Russia’s military and technological enhancement, or the development of the defence and security sector • Prohibition to provide technical assistance, brokering services, other services or financing or financial assistance which might contribute to Russia’s military and 	<p>Contains amongst others the following parties:</p> <ul style="list-style-type: none"> • Almaz-Antey • Kamaz • Novorossiysk Commercial Sea Port • Rostec (Russian Technologies State Corporation) • Russian Railways • JSC PO Sevmash • Sovcomflot • United Shipbuilding Corporation

	<p>technological enhancement, or the development of the defence and security sector</p> <ul style="list-style-type: none"> • Prohibition to provide public financing or financial assistance for trade with, or investment in, Russia • Prohibition to sell, supply, transfer or export, directly or indirectly, goods and technology suited for use in oil refining to any natural or legal person, entity or body in Russia or for use in Russia • Prohibition to provide technical assistance, brokering services, other services or financing or financial assistance relating to goods and technology suited for use in oil refining to any natural or legal person, entity or body in Russia or for use in Russia • Prohibited to sell, supply, transfer or export, directly or indirectly, goods, technology or services suited for use in aviation or the space industry to any natural or legal person, entity or body in Russia or for use in Russia • Ban relating to bank deposits from Russian entities, nationals and parties located in Russia • Prohibition to provide certain financial services to Russian entities, nationals and parties located in Russia 	
<u>28 February 2022</u>	<ul style="list-style-type: none"> • Prohibition for any aircraft operated by Russian air carriers, including as a marketing carrier in code-sharing or blocked-space arrangements, or for any Russian registered aircraft, or for any non-Russian-registered aircraft which is owned or chartered, or otherwise controlled by any Russian natural or legal person, entity or body, to land in, take off from or overfly the territory of the Union • Prohibition to conduct transactions related to the management of reserves as well as of assets of the Central Bank of Russia, including transactions with any legal person, entity or body acting on behalf of, or at the direction of, the Central Bank of Russia 	<ul style="list-style-type: none"> • N/A
<u>28 February 2022</u>	<ul style="list-style-type: none"> • Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals and entities 	<ul style="list-style-type: none"> • Contains several individuals; and • Gas Industry Insurance Company SOGAZ
<u>2 March 2022</u>	<ul style="list-style-type: none"> • Prohibition – as of 12 March 2022 – to provide specialised financial messaging services, which are used to exchange financial data, to specific sanctioned parties or to any legal person, entity or body established in Russia whose proprietary rights are directly or indirectly owned for more than 50 % by specific sanctioned parties (“SWIFT related sanctions”); • Prohibition to sell, supply, transfer or export euro denominated banknotes to Russia or to any natural or legal person, entity or body in Russia, including the government and the Central Bank of Russia, or for use in Russia; 	<p>SWIFT related sanctions are targeted at:</p> <ul style="list-style-type: none"> • Bank Otkritie • Novikombank • Promsvyazbank • Bank Rossiya • Sovcombank • VNESHECONOMBANK (VEB)

	<ul style="list-style-type: none"> Prohibition to invest, participate or otherwise contribute to projects co-financed by the Russian Direct Investment Fund 	<ul style="list-style-type: none"> VTB BANK
<u>2 March 2022</u>	<ul style="list-style-type: none"> Prohibition for operators to broadcast or to enable, facilitate or otherwise contribute to broadcast, any content by specific listed sanctioned parties, 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; Suspension of any broadcasting licence or authorisation, transmission and distribution arrangement with the specific listed sanctioned parties 	<ul style="list-style-type: none"> RT- Russia Today English RT- Russia Today UK RT - Russia Today Germany RT - Russia Today France RT- Russia Today Spanish Sputnik
<u>2 March 2022</u>	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals.	<ul style="list-style-type: none"> Contains several individuals
<u>4 March 2022</u>	<p>Amendment of the remarks relating to the rights of defence and the right to effective judicial protection of natural persons targeted with asset freezes (i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals).</p> <p>The listed natural persons have been identified by the EU Council as being responsible for the misappropriation of Ukrainian State funds, and persons responsible for human rights violations in Ukraine, and natural or legal persons, entities or bodies associated with them.</p>	No new listings
<u>9 March 2022</u>	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals.	Contains several individuals such as members of the Russian Federation Council as well as oligarchs and prominent business people involved in key economic sectors providing a substantial source of revenue to the Russian Federation - notably in the metallurgical, agriculture, pharmaceutical, telecom and digital industries -, as well as their family members.
<u>10 March 2022</u>	<ul style="list-style-type: none"> The prohibitions and restrictions regarding “transferable securities” cover also crypto-assets Prohibition to sell, supply, transfer or export, directly or indirectly, specific listed maritime navigation goods and technology, to any natural or legal person, entity 	<ul style="list-style-type: none"> Russian Maritime Register of Shipping

	<p>or body in Russia, for use in Russia, or for the placing on board of a Russian-flagged vessel</p> <ul style="list-style-type: none"> • Prohibition to provide technical assistance, brokering services, other services or financing or financial assistance related to specific listed maritime navigation goods and technology or to the provision, manufacture, maintenance and use of those items • Russian Maritime Register of Shipping added to the list of state-owned enterprises subject to financing restrictions 	
<u>12 March 2022</u>	<p>Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals.</p>	<ul style="list-style-type: none"> • State Unitary Enterprise of the 'Republic of Crimea' 'Chernomorneftegaz' (formerly known as PJSC 'Chernomorneftegaz') • Federal state budget institution for science and research 'All-Russia national scientific research institute for wine growing and wine making "Magarach" Russian Academy of Sciences' • Joint-stock company 'Sparkling wine plant "Novy Svet"' • Public movement 'Peace to Luhansk Region' • Public movement 'Free Donbass' (a.k.a. 'Free Donbas', 'Svobodny Donbass') • Prizrak brigade
<u>15 March 2022</u>	<p>Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals and entities.</p>	<p>Contains amongst others the following parties:</p> <ul style="list-style-type: none"> • ROSNEFT AERO (RN AERO) (Роснефть-Аэро / PH-Аэро) • JSC ROSOBORONEXPORT (АО Рособоронэкспорт) • JSC NPO High Precision Systems (АО НПО Высокоточные комплексы) • SC Kurganmashzavod (ПАО Курганмашзавод) • JSC Russian Helicopters (АО Вертолеты России) • PJSC United Aircraft Corporation (ПАО Объединённая авиастроительная корпорация) • JSC United Shipbuilding Corporation (АО Объединённая Судостроительная Корпорация) • JSC Research and Production Corporation URALVAGONZAVOD (АО "Научно-производственная корпорация УралВагонЗавод"

		<ul style="list-style-type: none"> JSC Zelenodolsk Shipyard [A.M. Gorky Zelenodolsk Plant] (АО “Зеленодольский завод имени А. М. Горького”)
<u>16 March 2022</u>	<ul style="list-style-type: none"> Prohibition to sell, supply, transfer or export, directly or indirectly, specific listed goods or technology suited for the energy sector to any natural or legal person, entity or body in Russia, or for use in Russia Prohibition to provide technical assistance, brokering services, other services or financing or financial assistance related to specific listed goods or technology suited for the energy sector or to the provision, manufacture, maintenance and use of those items Prohibition to acquire any new or extend any existing participation in, or create a joint venture with, a legal person, entity or body operating in the energy sector in Russia Prohibition to grant or be part of any arrangement to finance a legal person, entity or body operating in the energy sector in Russia Prohibition to provide investment services directly related to (new) participations, joint ventures or finance arrangements in view of a legal person entity or body operating in the energy sector in Russia Import ban on iron and steel products originating in or exported from Russia Prohibition to purchase iron and steel products located or originating in Russia Prohibition to transport, to any destination, iron and steel products originating in or exported from Russia Prohibition to provide, directly or indirectly, technical assistance, brokering services, financing or financial assistance, including financial derivatives, as well as insurance and re-insurance, related to imports, purchases or transport of Russian iron and steel products Prohibition to sell, supply, transfer or export, directly or indirectly, specific listed luxury goods, to any natural or legal person, entity or body in Russia or for use in Russia Prohibition to engage in any transaction, directly or indirectly, with specific listed parties or a legal person, entity or body acting on behalf or at the direction those parties Prohibition to provide credit rating services to any Russian national or natural person residing in Russia or any legal person, entity or body established in Russia 	<p>Prohibition to engage in any transaction with:</p> <ul style="list-style-type: none"> OPK OBORONPROM UNITED AIRCRAFT CORPORATION URALVAGONZAVOD ROSNEFT TRANSNEFT GAZPROM NEFT ALMAZ-ANTEY KAMAZ ROSTEC (RUSSIAN TECHNOLOGIES STATE CORPORATION) JSC PO SEVMASH SOVCOMFLOT UNITED SHIPBUILDING CORPORATION
<u>8 April 2022</u>	Introduces amongst others the possibility for EU Member State competent authorities to authorise the release of certain frozen funds or economic resources belonging to	<ul style="list-style-type: none"> Bank Rossiya (Банк «Россия») PROMSVYAZBANK (ПАО Промсвязьбанк“) VEB.RF (a.k.a. Vnesheconombank; VEB) (ВЭБ.РФ)

	the entities listed under entry numbers 53, 54 and 55 under heading "B. Entities" in Annex I and the entities listed under numbers 79, 80, 81 and 82 in Annex I.	<ul style="list-style-type: none"> • Otkritie FC Bank (formerly known as NOMOS Bank) • Novikombank (Новикомбанк) • Sovcombank (formerly known as Бууcombank) • VTB Bank ВТБ/Внешторгбанк
<u>8 April 2022</u>	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals and entities.	<p>Contains amongst others the following entities:</p> <ul style="list-style-type: none"> • Otkritie FC Bank (formerly known as NOMOS Bank) • Novikombank (Новикомбанк) • Sovcombank (formerly known as Бууcombank) • VTB Bank ВТБ/Внешторгбанк • JSC Arzamas Machine-Building Plant (АО "Арзамасский машиностроительный завод") • JSC Ruselectronics (АО "Росэлектроника") • JSC Tactical Missiles Corporation (KTRV) "(АО "Корпорация Тактическое Ракетное Вооружение", КТРВ)" • JSC Kalashnikov Concern (АО Концерн "Калашников") • JSC UEC Klimov (АО "ОДК-Климов") • LLC Military Industrial Company (ООО Военно-промышленная компания)"
<u>9 April 2022</u>	<ul style="list-style-type: none"> • Prohibition to sell, supply, transfer or export, directly or indirectly, specific listed jet fuel and fuel additives • Possibility for EU Member State competent authorities to authorise the execution of an aircraft financial lease concluded before 26 February 2022 • Prohibition to sell transferable securities denominated in any official currency of a Member State issued after 12 April 2022 or units in collective investment undertaking providing exposure to such securities, to any Russian national or natural person residing in Russia or any legal person, entity or body established in Russia • Prohibition to provide access after 16 April 2022 to ports in the territory of the EU to any vessel registered under the flag of Russia • Import ban on various goods such as chemicals, caviar and fertilisers originating in or exported from Russia 	N/A

	<ul style="list-style-type: none"> • Import ban on coal originating in or exported from Russia • Prohibition to provide technical assistance, brokering services, other services or financing or financial assistance related to imports of coal or various goods such as chemicals, caviar and fertilisers • Prohibition for any road transport undertaking established in Russia to transport goods by road within the territory of the EU, including in transit • Prohibition to provide crypto-asset wallet, account or custody services to Russian nationals or natural persons residing in Russia, or legal persons, entities or bodies established in Russia, if the total value of crypto-assets of the natural or legal person, entity or body per wallet, account or custody provider exceeds EUR 10 000 • Prohibition to sell, supply, transfer or export banknotes denominated in any official currency of a Member State to Russia or to any natural or legal person, entity or body in Russia, including the government and the Central Bank of Russia, or for use in Russia; • Prohibition to award or continue the execution of any public or concession contract falling within the scope of the relevant public procurement Directives to or with a Russian national, or a natural or legal person, entity or body established in Russia • Prohibition to provide direct or indirect support, including financing and financial assistance or any other benefit under a Union, Euratom or Member State national programme and contracts within the meaning of Regulation (EU, Euratom) 2018/1046, to any legal person, entity or body established in Russia with over 50 % public ownership or public control • Prohibition to register, provide a registered office, business or administrative address as well as management services to, a trust or any similar legal arrangement having as a trustor or a beneficiary a Russian party or a party located in Russia 	
<p><u>14 April 2022</u></p>	<p>Introduction of the possibility to request and obtain a licence to release certain frozen funds or economic resources or to make available certain funds or economic resources in view of humanitarian purposes in Ukraine.</p>	<p>N/A</p>
<p><u>21 April 2022</u></p>	<p>Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals.</p>	<ul style="list-style-type: none"> • Serhiy Vitaliyovich KURCHENKO • Yevgeniy Viktorovich PRIGOZHIN

<u>5 May 2022</u>	Removal of Russia from the destination lists of Union general export authorisations EU003, EU004 and EU005.	N/A
<u>3 June 2022</u>	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals and entities.	<p>Contains amongst others the following parties:</p> <ul style="list-style-type: none"> • JSC GARNIZON • JSC OBORONENERGO • OJSC Ulyanovsk Automobile Plant (UAZ) • JSC VOENTELECOM • JSC VOENTORG
<u>4 June 2022</u>	<ul style="list-style-type: none"> • Prohibition to advertise products or services in any content produced or broadcast by certain listed parties • Prohibition – with certain exemptions – to purchase, import or transfer, directly or indirectly, crude oil or petroleum products, if they originate in Russia or are exported from Russia • Prohibition – with certain exemptions – to provide, directly or indirectly, 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 which originate in Russia or which have been exported from Russia • Introduction of exemptions relating to crypto-assets • Extension of SWIFT related sanctions to specific listed parties • The prohibition to register, provide a registered office, business or administrative address as well as management services to, a trust or any similar legal arrangement having as a trustor or a beneficiary a Russian party or a party located in Russia, is extended to parties owned, controlled or acting on behalf or at the direction of Russian parties or parties located in Russia • Prohibition to provide, directly or indirectly, accounting, auditing, including statutory audit, bookkeeping or tax consulting services, or business and management consulting or public relations services to the Government of Russia or legal persons, entities or bodies established in Russia • Prohibition to sell, supply, transfer or export, directly or indirectly, dual-use goods and technology, whether or not originating in the Union, to any natural or legal person, entity or body in Russia or for use in Russia is extended to newly listed parties • Prohibition to provide technical assistance, brokering services, other services or financing or financial assistance related to dual-use goods and technology to any natural or legal person, entity or body in Russia or for use in Russia is extended to newly listed parties 	<p>Contains amongst others the following parties:</p> <ul style="list-style-type: none"> • Sberbank • Credit Bank of Moscow • Joint Stock Company Russian Agricultural Bank, JSC Rosselkhozbank • 46th TSNII Central Scientific Research Institute • Alagir Resistor Factory

	<ul style="list-style-type: none"> • Prohibition to sell, supply, transfer or export, directly or indirectly, specific listed “cutting-edge” goods and technology which might contribute to Russia’s military and technological enhancement, or the development of the defence and security sector is extended to newly listed parties • Prohibition to provide technical assistance, brokering services, other services or financing or financial assistance which might contribute to Russia’s military and technological enhancement, or the development of the defence and security sector is extended to newly listed parties 	
<u>4 June 2022</u>	Introduction of an exemption relating to an asset freeze or a prohibition to make available economic resources allowing the provision of electronic communication services by EU telecommunication operators, the provision of associated facilities and services necessary for the operation, maintenance and security of such electronic communication services, in Russia, in Ukraine, in the EU, between Russia and the EU, and between Ukraine and the EU, and the provision of data centre services in the EU	N/A
<u>25 June 2022</u>	<ul style="list-style-type: none"> • Prohibition for operators to broadcast or to enable, facilitate or otherwise contribute to broadcast, any content by specific listed sanctioned parties, 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; • Suspension of any broadcasting licence or authorisation, transmission and distribution arrangement with the specific listed sanctioned parties 	<ul style="list-style-type: none"> • Rossiya RTR / RTR Planeta • Rossiya 24 / Russia 24 • TV Centre International
<u>21 July 2022</u>	<ul style="list-style-type: none"> • Possibility for EU Member State competent authorities to authorise the release of certain frozen funds or economic resources belonging to the entity listed under entry number 108 in Annex I in view of pending operations such as correspondent banking relations or ongoing sales transactions; • Possibility for EU Member State competent authorities to authorise the release of certain frozen funds or economic resources belonging to the listed parties in view of urgent prevention or mitigation of an event likely to have a serious and significant impact on human health and safety or the environment; • Possibility for EU Member State competent authorities to authorise the release of certain frozen funds or economic resources belonging to the entities listed under entry numbers 53, 54, 55, 79, 80, 81, 82 and 108 in Annex I in view of the purchase, import or transport of agricultural and food products, including wheat and fertilisers; • Parties listed in Annex I must report before 1 September 2022 or within 6 weeks from the date of listing their funds or economic resources within the jurisdiction of a Member State belonging to, owned, held or controlled by them, to the competent authority of the Member State where those funds or economic 	<ul style="list-style-type: none"> • Bank Rossiya • PROMSVYAZBANK • VEB.RF (a.k.a. Vnesheconombank; VEB) • Otkritie FC Bank • Novikombank • Sovcombank • VTB Bank • Sberbank

	resources are located. Non-compliance with this obligation is regarded as circumvention of the asset freeze or the prohibition to make available funds or economic resources	
<u>21 July 2022</u>	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals and entities.	Several parties
<u>21 July 2021</u>	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals and entities.	Contains amongst others the following parties: <ul style="list-style-type: none"> • Nightwolves MC • The Alexander Gorchakov Public Diplomacy Fund • The Federal Agency for the Commonwealth of Independent States Affairs, Compatriots Living Abroad and International Humanitarian Cooperation • Russkiy Mir Foundation • JSC Research and Production Association Kvant • Sberbank • FORSS Group of Companies • All-Russia Young Army Military Patriotic Social Movement
<u>22 July 2022</u>	<ul style="list-style-type: none"> • Possibility to request and obtain an authorisation for trade in dual-use items or cutting-edge technology items with Russia intended for ensuring cyber-security and information security; • Allowed to exchange goods and technology suited for use in aviation or the space industry, and jet fuel and fuel additives aimed at establishing technical standards in the framework of the International Civil Aviation Organization; • Possibility to request and obtain authorisations for Russian vessels related restrictions; • Possibility to request and obtain an authorisation for trade with Russia in specific listed goods in view of medical or pharmaceutical purposes; • Prohibition to purchase, import, or transfer, directly or indirectly, gold if it originates in Russia and it has been exported from Russia into the EU or to any third country; • Prohibition to purchase, import, or transfer, directly or indirectly gold when processed in a third country incorporating gold originating in Russia and having been exported from Russia; 	<ul style="list-style-type: none"> • 'Federal Center for Dual-Use Technology (FTsDT) Soyuz • Turayev Machine Building Design Bureau Soyuz • Zhukovskiy Central Aerohydrodynamics Institute (TsAGI) • Rosatomflot

	<ul style="list-style-type: none"> • Prohibition to provide technical assistance, brokering services, or other services related to gold originating in Russia and exported from Russia and to the provision, manufacture, maintenance and use of those goods; • Prohibition to provide financing or financial assistance related to gold originating in Russia and exported from Russia for any purchase, import or transfer of those goods, or for the provision of related technical assistance, brokering services or other services, directly or indirectly in relation to the gold related prohibitions; • Possibility to request and obtain an authorisation for trade in pharmaceutical, medical, agricultural and food products, including wheat and fertilisers; • Expansion of ban relating to bank deposits from Russian entities, nationals and parties located in Russia to non-EU subsidiaries held for more than 50% by Russian parties. 	
<u>4 August 2022</u>	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals and entities.	<ul style="list-style-type: none"> • Contains several individuals
<u>1 September 2022</u>	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals and entities.	<ul style="list-style-type: none"> • Contains several individuals
<u>16 September 2022</u>	Amendments and deletions of parties targeted with asset freezes (i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals).	No new listings
<u>6 October 2022</u>	<ul style="list-style-type: none"> • Expansion of the listing criteria of designated parties • Possibility to request and obtain authorisations for payments to the Crimean Sea Ports for certain services provided at those ports; • Possibility for EU Member State competent authorities to authorise the release of certain frozen funds or economic resources belonging to the entities listed under entry numbers 91 and 101 in Annex I. 	<ul style="list-style-type: none"> • PJSC KAMAZ • National Settlement Depository (NSD)
<u>6 October 2022</u>	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources	<ul style="list-style-type: none"> • Contains several parties

	can be made available, directly or indirectly, to the relevant listed individuals and entities.	
<u>7 October 2022</u>	Extension of the restrictions targeted at the non-government controlled areas of the Donetsk and Luhansk oblasts to the non-government controlled areas in the oblasts of Kherson and Zaporizhzhia.	N/A
<u>7 October 2022</u>	<ul style="list-style-type: none"> • Prohibition to sell, supply, transfer or export, directly or indirectly, firearms, their parts and essential components and ammunition as listed in Annex I to Regulation (EU) No 258/2012 to any natural or legal person, entity or body in Russia or for use in Russia; • Prohibition to provide technical assistance, brokering services, other services or financing or financial assistance related to firearms, their parts and essential components and ammunition as listed in Annex I to Regulation (EU) No 258/2012 to any natural or legal person, entity or body in Russia or for use in Russia; • Expansion of the prohibition to sell, supply, transfer or export, directly or indirectly, goods, technology or services suited for use in aviation or the space industry to any natural or legal person, entity or body in Russia or for use in Russia; • Possibility to request and obtain authorisations to sale, supply, transfer or export goods, or related technical assistance, brokering services, financing or financial assistance, that is necessary for the production of titanium goods required in the aeronautic industry, for which no alternative supply is available; • Expansion of the prohibition to sell, supply, transfer or export, directly or indirectly, specific listed “cutting-edge” goods and technology to semiconductors; • Prohibition to provide access after 8 April 2023 to any vessel certified by the Russian Maritime Register of Shipping; • Possibility to request and obtain authorisations to provide access to a vessel certified by the Russian Maritime Register of Shipping for specified purposes or under specified conditions; • Import ban on specific listed iron and steel products when processed in a third country incorporating specific listed iron and steel products originating in Russia • Prohibition to provide, directly or indirectly, technical assistance, brokering services, financing or financial assistance, including financial derivatives, as well as insurance and re-insurance, related to imports or purchases of iron and steel products when processed in a third country incorporating specific listed iron and steel products originating in Russia; • Possibility to request and obtain authorisations to purchase, import or transfer specific listed iron and steel products necessary for certain nuclear related activities; 	<ul style="list-style-type: none"> • OPK OBORONPROM • UNITED AIRCRAFT CORPORATION • URALVAGONZAVOD • ROSNEFT • TRANSNEFT • GAZPROM NEFT • ALMAZ-ANTEY • KAMAZ • ROSTEC (RUSSIAN TECHNOLOGIES STATE CORPORATION) • JSC PO SEVMASH • SOVCOMFLOT • UNITED SHIPBUILDING CORPORATION • RUSSIAN MARITIME REGISTER of SHIPPING (RMRS)

	<ul style="list-style-type: none"> • Expansion of the import ban on various goods such as chemicals, caviar and fertilisers originating in or exported from Russia • Possibility to request and obtain authorisations to import various goods such as chemicals, caviar and fertilisers for necessary for certain nuclear related activities; • Expansion of the prohibition to sell, supply, transfer or export, directly or indirectly, specific listed goods to any natural or legal person, entity or body in Russia or for use in Russia; • Possibility to request and obtain authorisations to sell, supply, transfer or export, directly or indirectly, specific listed goods for certain nuclear related activities; • Prohibition to transport, including through ship-to-ship transfers, to third countries, crude oil falling under CN code 2709 00, as of 5 December 2022, or petroleum products falling under CN code 2710, as of 5 February 2023, which originate in Russia or which have been exported from Russia; • Introduction of the possibility to transport, or the 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 which originate in Russia or which have been exported from Russia, provided that the price per barrel is not exceed by a specified amount ("<u>price cap on Russian oil</u>"); • Prohibition to hold any posts in the governing bodies of specific listed legal persons, entities or bodies; • Prohibition to provide crypto-asset wallet, account or custody services to Russian nationals or natural persons residing in Russia, or legal persons, entities or bodies established in Russia; • Prohibition to provide directly or indirectly, architectural and engineering services, legal advisory services and IT consultancy services to the Government of Russia and legal persons, entities or bodies established in Russia; • Possibility to request and obtain authorisations to provide architectural and engineering services, legal advisory services or IT consultancy services for specific purposes 	
--	--	--

EUROPEAN UNION

BELARUS

Date	Description of imposed sanctions	
<u>19 February 2022</u>	<ul style="list-style-type: none"> • Prohibition to provide directly or indirectly, technical assistance or brokering services related to dual-use goods and technology, or related to the provision, manufacture, maintenance and use of such goods or technology, to any natural or legal person, entity or body in Belarus or for use in Belarus, if the items are or may be intended, in their entirety or in part, for military use or for a military end-user • Prohibition to provide directly or indirectly, financing or financial assistance related to the dual-use goods and technology, including in particular grants, loans and export credit insurance, for any sale, supply, transfer or export of such items, or for any provision of related technical assistance to any natural or legal person, entity or body in Belarus or for use in Belarus, if the items are or may be intended, in their entirety or in part, for military use or for a military end-user • Prohibition to import or transport petroleum and gaseous hydrocarbon products if they originate in Belarus or have been exported from Belarus • Prohibition to purchase petroleum and gaseous hydrocarbon products if they are located or originate in Belarus • Prohibition to provide, directly or indirectly, technical assistance, brokering services, financing or financial assistance, including financial derivatives, as well as insurance and re-insurance in view of petroleum and gaseous hydrocarbon products if they originate in Belarus or have been exported from Belarus • Prohibition to finance the Republic of Belarus, its Government, its public bodies, corporations or agencies, certain major credit institutions and its subsidiaries, or a legal person, entity or body acting on behalf or at the direction of those parties. 	
<u>26 February 2022</u>	<ul style="list-style-type: none"> • Renewal of existing measures (asset freezes, i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals and entities) until 28 February 2023 • Amendment of statements of reasons or the information for 27 natural and seven legal persons included in the list of natural and legal persons. 	No new listings.
<u>3 March 2022</u>	<ul style="list-style-type: none"> • Prohibition to sell, supply, transfer or export, directly or indirectly, dual-use goods and technology, whether or not originating in the Union, to any natural or legal person, entity or body in Belarus or for use in Belarus 	Specifically listed as military end-user:

	<ul style="list-style-type: none"> • Prohibition to provide technical assistance, brokering services, other services or financing or financial assistance related to dual-use goods and technology to any natural or legal person, entity or body in Belarus or for use in Belarus • Prohibition to sell, supply, transfer or export, directly or indirectly, specific listed “cutting-edge” goods and technology which might contribute to Belarus’ military and technological enhancement, or the development of the defence and security sector • Prohibition to provide technical assistance, brokering services, other services or financing or financial assistance which might contribute to Belarus’ military and technological enhancement, or the development of the defence and security sector • Prohibition to provide directly or indirectly technical assistance, brokering services, financing or financial assistance, including financial derivatives, as well as insurance and re-insurance, relating to trade in tobacco, mineral and potassium chloride ("potash") related products in connection with Belarus • Prohibition to import or transport (commodity code listed) mineral products if they originate in Belarus or have been exported from Belarus • Prohibition to purchase (commodity code listed) mineral products if they are located or originate in Belarus; • Prohibition to provide, directly or indirectly, technical assistance, brokering services, financing or financial assistance, including financial derivatives, as well as insurance and re-insurance in view of (commodity code listed) mineral products if they originate in Belarus or have been exported from Belarus; • Trade prohibitions – including import prohibitions – related to wood, cement iron, steel, rubber products and certain machinery. 	<ul style="list-style-type: none"> • Belarus Ministry of Defence
<p><u>10 March 2022</u></p>	<ul style="list-style-type: none"> • The prohibitions and restrictions regarding “transferable securities” cover also crypto-assets • Prohibition to conduct transactions related to the management of reserves as well as of assets of the Central Bank of Belarus, including transactions with any legal person, entity or body acting on behalf of, or at the direction of, the Central Bank of Belarus • Prohibition to provide certain financial services to Belarussian entities, nationals and parties located in Belarus • Ban relating to bank deposits from Belarussian entities, nationals and parties located in Belarus • Prohibition to sell, supply, transfer or export euro denominated banknotes 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 • Prohibition – as of 20 March 2022 – to provide specialised financial messaging services, which are used to exchange financial data, to specific sanctioned parties or to any legal person, entity or body established in Belarus whose proprietary 	<p><u>SWIFT related sanctions</u> are targeted at:</p> <ul style="list-style-type: none"> • Belagroprombank • Bank Dabrabyt • Development Bank of the Republic of Belarus

	rights are directly or indirectly owned for more than 50 % by specific sanctioned parties (" SWIFT related sanctions ")	
9 April 2022	<ul style="list-style-type: none"> Prohibition to sell transferable securities denominated in any official currency of a Member State issued after 12 April 2022 or units in collective investment undertakings providing exposure to such securities, to any Belarusian national or natural person residing in Belarus or any legal person, entity or body established in Belarus Prohibition to sell, supply, transfer or export banknotes denominated in any official currency of a Member State 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 Prohibition for any road transport undertaking established in Belarus to transport goods by road within the territory of the Union, including in transit 	N/A
3 June 2022	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed parties.	<p>Contains amongst others the following parties:</p> <ul style="list-style-type: none"> Open Joint Stock Company "Belaruskali" Joint Stock Company "Belarusian Potash Company" "Inter Tobacco" LLC Open Joint Stock Company "Naftan" Open Joint Stock Company "Grodno Tobacco Factory Neman"
4 June 2022	Extension of SWIFT related sanctions to Belinvestbank (Belarusian Bank for Development and Reconstruction)	<ul style="list-style-type: none"> Belinvestbank (Belarusian Bank for Development and Reconstruction)
4 June 2022	<ul style="list-style-type: none"> Prohibition to sell, supply, transfer or export, directly or indirectly, dual-use goods and technology, whether or not originating in the Union, to any natural or legal person, entity or body in Belarus or for use in Belarus is extended to newly listed parties Prohibition to provide technical assistance, brokering services, other services or financing or financial assistance related to dual-use goods and technology to any natural or legal person, entity or body in Belarus or for use in Belarus is extended to newly listed parties Prohibition to sell, supply, transfer or export, directly or indirectly, specific listed "cutting-edge" goods and technology which might contribute to Belarus' military and technological enhancement, or the development of the defence and security sector is extended to newly listed parties 	<p>Contains amongst others the following entities:</p> <ul style="list-style-type: none"> 140 Repair Plant JSC 558 Aircraft Repair Plant JSC 2566 Radioelectronic Armament Repair Plant JSC AGAT - Control Systems - Managing Company of Geoinformation Control Systems Holding, JSC AGAT - Electromechanical Plant OJSC

	<ul style="list-style-type: none"> Prohibition to provide technical assistance, brokering services, other services or financing or financial assistance which might contribute to Belarus' military and technological enhancement, or the development of the defence and security sector is extended to newly listed parties 	
<p><u>20 July 2022</u></p>	<p>Deletion of party targeted with asset freezes (i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals).</p>	<ul style="list-style-type: none"> Cham Wings Airlines

THE UNITED KINGDOM		
RUSSIA		
Date	Description	Entities and individuals being sanctioned
10 February 2022	The UK amended the designation criteria of The Russia (Sanctions) (EU Exit) Regulations 2019 for identifying and listing of sanctioned entities and individuals related to Russia. In short, the designation criteria now include those who have been involved in obtaining a benefit from or supporting the Government of Russia which can include among others the designation of companies linked to the Russian state, individuals and companies of strategic or economic interest to the Russian state, companies operating in sectors of strategic significance to the Russian state, and those who own or control such companies.	N/A
18 February 2022	The relevant individuals which were already listed as sanctioned entities have been amended. The relevant entities are subject to asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals.	<ul style="list-style-type: none"> • Oleksandr Viktorovych YANUKOVYCH • Petr Grigorievich JAROSH • Andrii SHYPITSYN
22 February 2022	The relevant entities which were already listed as sanctioned entities have been amended. The relevant entities are subject to asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed entities.	<ul style="list-style-type: none"> • BANK ROSSIYA • BLACK SEA BANK FOR DEVELOPMENT AND RECONSTRUCTION
22 February 2022	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals and entities.	<ul style="list-style-type: none"> • Gennadiy Nikolayevich TIMCHENKO • Boris Romanovich ROTENBERG • Igor Arkadyevich ROTENBERG • BANK ROSSIYA • Black Sea Bank for Development And Reconstruction • JOINT STOCK COMPANY GENBANK • IS Bank • Public Joint Stock Company Promsvyazbank
24 February 2022	The relevant entities which were already listed as sanctioned entities have been amended. The relevant entities are subject to UK financial and investment restrictions.	<ul style="list-style-type: none"> • United Aircraft Corporation • UralVagonZavod • VTB Bank
24 February 2022	The entities have been amended and are still subject to asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are	<ul style="list-style-type: none"> • IS BANK • JOINT STOCK COMPANY GENBANK

	to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant entities.	
<u>24 February 2022</u>	The UK CAA removed Aeroflot's foreign carrier permit on 24 February. This had the effect that Aeroflot cannot take on board or discharge any commercial passengers or cargo in the United Kingdom.	<ul style="list-style-type: none"> • Aeroflot
<u>25 February 2022</u> <u>25 February 2022</u>	No aircraft which is owned, chartered or operated by a person connected with Russia, or which is registered in Russia shall fly in United Kingdom airspace, including in the airspace above the United Kingdom's territorial sea.	N/A
<u>25 February 2022</u>	General licence in view of winding down any transactions to which it is a party, involving the VTB Bank or the UK Subsidiary (i.e. VTB Capital plc and any entity owned or controlled by VTB Capital plc incorporated in the United Kingdom) including the closing out of any positions, and a Person, Relevant Institution, or the VTB Bank or the UK Subsidiary can carry out any activity reasonably necessary to effect this. This licence takes effect from 25 February 2022 and expires on 27 March 2022.	N/A
<u>28 February 2022</u>	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed entities are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed entities.	<ul style="list-style-type: none"> • VEB.RF • BANK OTKRITIE FINANCIAL CORPORATION PJSC • PJSC SOVOCOMBANK
<u>28 February 2022</u>	<ul style="list-style-type: none"> • The Secretary of State for International Trade has suspended all extant export licences for dual-use items to Russia. This will include licences with Russia as a final destination; • Suspension of the approval of new export licences for dual-use items to Russia. 	N/A
<u>1 March 2022</u>	<p>3 General Licences INT/2022/1277777, INT/2022/1277778, and INT/2022/1277877 which relate to:</p> <ul style="list-style-type: none"> • A 7 day wind down period in respect of sovereign debt, loans and money market instruments measures (INT/2022/1277777); • A 30 day wind down period in respect of the clearing and correspondent banking prohibitions (INT/2022/1277778); and 	N/A

	<ul style="list-style-type: none"> A wind down period until 24 June (additional days to INT/2022/1277778) in respect of the clearing and correspondent banking prohibition where the payments relate to Relevant Energy Products (crude oil, petroleum, gas) (INT/2022/1277877). 	
<u>1 March 2022</u>	<ul style="list-style-type: none"> Investment ban 	<ul style="list-style-type: none"> PJSC SBERBANK
<u>1 March 2022</u>	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals and entities.	<ul style="list-style-type: none"> Victor Gulevich Andrei Burdyko Sergei Simonenko Andrey Zhuk JSC 558 Aircraft Repair Plant JSC Integral
<u>1 March 2022</u>	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed parties.	<ul style="list-style-type: none"> Kirill Alexandrovich Dmitriev Russian Direct Investment Fund
<u>1 March 2022</u>	<ul style="list-style-type: none"> Existing restrictions on dealing with certain financial instruments and providing loans and credit are amended to extend the sanctions prohibitions to a broader range of transferable securities and money market instruments and loans and credit Further restrictions on correspondent banking relationships and processing of sterling payments are introduced Providing the Secretary of State the power to prevent designated banks from accessing and processing sterling 	<ul style="list-style-type: none"> Sberbank
<u>1 March 2022</u>	<ul style="list-style-type: none"> Prohibitions on the export, supply and delivery and making available of dual-use items and critical-industry items, in sectors including electronics, telecommunications and aerospace Related prohibitions on the provision of technical assistance, financial services, funds and brokering services in relation to dual-use items and critical-industry items, in sectors including electronics, telecommunications and aerospace 	N/A
<u>1 March 2022</u>	<ul style="list-style-type: none"> Prohibition for Russian ships, and other ships specified by the Secretary of State, from entering ports in the United Kingdom The Secretary of State has a power to control the movement of Russian ships or specified ships by requiring them to leave or enter specified ports, proceed to a specified place or remain where they are 	N/A

	<ul style="list-style-type: none"> The registration of ships on the UK Ship Register is prohibited where they are owned, controlled, chartered or operated by a designated person or persons connected with Russia, or where they are a specified ship. 	
1 March 2022	<p>2 General Licences INT/2022/1280876 and INT/2022/1280976 which relate to VTB Capital and its UK subsidiaries allowing:</p> <ul style="list-style-type: none"> VTB Capital and its UK subsidiaries to make payments, including for basic needs, reasonable fees or service charges arising from routine holding and maintenance of its frozen funds and economic resources, and reasonable professional fees for the provision of legal services (INT/2022/1280876); relevant financial authorities to do anything with regard to VTB Capital and its UK subsidiaries related to prudential supervision, or protecting, maintaining or enhancing the financial stability of the UK (INT/2022/1280976) 	N/A
1 March 2022	<p>Prohibit a UK individual or entity from providing financial services for the purpose of foreign exchange reserve and asset management to:</p> <ul style="list-style-type: none"> the Central Bank of the Russian Federation; the National Wealth Fund of the Russian Federation; the Ministry of Finance of the Russian Federation; a person owned or controlled directly or indirectly by any of the persons above; or a person acting on behalf of or at the direction of any of the persons above 	N/A
3 March 2022	<p>Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals.</p>	<ul style="list-style-type: none"> Igor Ivanovich SHUVALOV Alisher Burkhanovich USMANOV
4 March 2022	<p>General licence INT/2022/1295476 authorises parties to wind down any transactions to which it is a party, involving the Bank Otkritie, Promsvyazbank, Bank Rossiya Sovcombank, Vnesheconombank (Veb), Novikombank including the closing out of any positions and any activity reasonably necessary to effect this.</p>	<ul style="list-style-type: none"> Bank Otkritie Promsvyazbank Bank Rossiya Sovcombank Vnesheconombank (Veb) Novikombank
4 March 2022	<p>General licence INT/2022/1298776 authorises parties to provide financial services to Sberbank or a subsidiary for the purposes of winding down that activity, including any activity reasonably necessary to effect this.</p>	<ul style="list-style-type: none"> Sberbank
7 March 2022	<p>Amendment of General Licence NT/2022/1272278 in view of winding down any transactions to which it is a party, involving the VTB Bank or the UK Subsidiary. This</p>	N/A

	licence took effect from 25 February 2022 and expires on 27 March 2022. The amendments involve updating the references to UK legislation and expanding the definition of a subsidiary	
<u>8 March 2022</u>	<ul style="list-style-type: none"> • Prohibition for Russian aircraft from overflying or landing in the UK • The Secretary of State has the power to issue directions to air traffic control and airport operators for the purpose of preventing Russian aircraft from entering the airspace over the UK or from landing in the UK, or requiring aircraft to leave the UK airspace • The CAA has the power to refuse, suspend or revoke permissions in respect of Russian aircraft. The registration of aircraft on the register kept by the CAA is prohibited where they are owned, operated or chartered by demise by a designated person. • Prohibitions on the export, supply and delivery and making available of new categories of aviation and space goods and technology, based on items falling within chapter 88 of the UK Customs Tariff • Prohibitions on insurance and reinsurance services relating to aviation and space goods and technology, based on items falling within chapter 88 of the UK Customs Tariff • General Licence permitting for a time-limited period the provision of certain insurance and reinsurance services relating to aviation and space goods and technology. 	N/A
<u>10 March 2022</u>	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals.	<ul style="list-style-type: none"> • Roman Arkadyevich Abramovich • Igor Ivanovich Sechin • Oleg Vladimirovich Deripaska • Dmitri Alekseevich Lebedev • Alexei Borisovich Miller • Andrei Leonidovich Kostin • Nikolai Petrovich Tokarev
<u>10 March 2022</u>	General Licence INT/2022/1327076 allows for the payments essential to the continuation of the operation of Chelsea Football Club	N/A
<u>11 March 2022</u>	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals	Members of the Russian State Duma

11 March 2022	Amendment of General Licence INT/2022/1277778 in view providing a wind down period in respect of the clearing and correspondent banking prohibitions	N/A
15 March 2022	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed parties	Contains amongst others the following parties: <ul style="list-style-type: none"> • GAS INDUSTRY INSURANCE COMPANY SOGAZ • GEOPOLITICA • INTERNET RESEARCH AGENCY • NEW EASTERN OUTLOOK • ORIENTAL REVIEW
15 March 2022	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed parties	Contains amongst others the following parties: <ul style="list-style-type: none"> • ROSNEFT AERO • JSC ZELENODOLSK SHIPYARD
15 March 2022	<ul style="list-style-type: none"> • Introduction of the possibility to publicly name companies that have breached financial sanctions, but have not been fined • Introduction of strict liability for breaches of financial sanctions. This means that if a party breaches UK financial sanctions legislation, any requirement imposed by or under that legislation for the person to have known, suspected or believed any matter is to be ignored 	N/A
22 March 2022	General Licence INT/2022/1381276 allows a period of until 2 May 2022 for winding down any derivatives, repurchase, and reverse repurchase transactions involving certain entities	<ul style="list-style-type: none"> • Central Bank of the Russian Federation (CBR) • National Wealth Fund of the Russian Federation (NWF) • Ministry of Finance of the Russian Federation (MF)
22 March 2022	OFSI has updated its general guidance by adding a paragraph to Chapter 4 on ownership and control. The new paragraph (4.14) clarifies OFSI's position on aggregation.	N/A
24 March 2022	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources	Several individuals and entities

	can be made available, directly or indirectly, to the relevant listed individuals and entities	
24 March 2022	General Licence INT/2022/1424276 allows parties to wind down any transactions to which it is party including the closing out of positions. This licence takes effect on 24 March 2022 and expires on 23 April 2022.	<ul style="list-style-type: none"> • Alfa Bank JSC • GazPromBank • Rosselkhozbank • SMP Bank • Ural Bank for Reconstruction and Development • Subsidiaries of the above
25 March 2022	General Licence INT/2022/1438977 allows parties to continue existing business operations involving GEFCO, a Joint Venture owned by Russian Railways and Stellantis. This licence takes effect from 25 March 2022 and expires on 23 May 2022.	<ul style="list-style-type: none"> • GEFCO • GEFCO UK Ltd • GEFCO Forwarding UK • Auto XP Limited • XP Tech Limited
29 March 2022	General Licence INT/2022/14369378 allows a party to wind down any transactions to which it is party involving the Sovcomflot or a subsidiary including the closing out of any positions. This licence takes effect from 29 March 2022 and expires on 15 May 2022	<ul style="list-style-type: none"> • Sovcomflot
31 March 2022	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals and entities	Several individuals and entities
31 March 2022	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals	<ul style="list-style-type: none"> • PHOTON PRO LLP • MAJORY LLP • DJECO GROUP LP
1 April 2022	General Licence INT/2022/1495176 allows a party to provide financial services for the purposes of the receipt and onward transfer of non-rouble denominated interest/coupon or maturity/principal payments from the Central Bank of the Russian Federation, the National Wealth Fund of the Russian Federation, or the Ministry of	<ul style="list-style-type: none"> • Central Bank of the Russian Federation (CBR) • National Wealth Fund of the Russian Federation (NWF) • Ministry of Finance of the Russian Federation (MF)

	Finance of the Russian Federation in connection with debt issued by them before 1 March 2022. This licence takes effect from 1 April 2022 and expires on 30 June 2022.	
1 April 2022	Amendment of General Licence INT/2022/1280876 to allow any payments in connection with the Insolvency Proceedings of the UK subsidiary of VTB. Any person, including any subsidiary of VTB incorporated in the UK, may make, receive or process any payments, or take any other action, in connection with any Insolvency Proceedings relating to the UK Subsidiary. This General Licence took effect on 01 March 2022 and expires on 01 March 2023.	<ul style="list-style-type: none"> • VTB
4 April 2022	Amendment of General Licence INT/2022/1438977 on 4 April 2022 to permit parties to process payments or transactions related to the sale and transfer of GEFCO's shares. This General Licence took effect on 25 March 2022 and expires on 23 May 2022.	<ul style="list-style-type: none"> • GEFCO
6 April 2022	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed parties	<ul style="list-style-type: none"> • CREDIT BANK OF MOSCOW • PJSC SBERBANK
6 April 2022	General Licence INT/2022/1544176 allows for a 30-day wind down period of positions involving Credit Bank of Moscow. This General Licence takes effect from 06 April 2022 and expires on 06 May 2022.	<ul style="list-style-type: none"> • CREDIT BANK OF MOSCOW
6 April 2022	Amendment of General Licence INT/2022/1277877 to ensure that energy related payments may continue to take place	<ul style="list-style-type: none"> • PJSC SBERBANK
8 April 2022	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals	<ul style="list-style-type: none"> • Katerina Vladimirovna Tikhonova • Maria Vladimirovna Vorontsova • Yekaterina Sergejevna Vinokurova
12 April 2022	OFSI has revoked General Licence INT/2022/1438977. This is following the sale of Russian Railways' stake in GEFCO to non-designated persons, meaning GEFCO is no longer impacted by UK sanctions.	<ul style="list-style-type: none"> • GEFCO

13 April 2022	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals	Several individuals
14 April 2022	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed individuals	<ul style="list-style-type: none"> • Eugene Tenenbaum • David Davidovich
14 April 2022	<p>The Russia (Sanctions) (EU Exit) (Amendment) (No. 8) Regulations 2022 introduce trade prohibitions relating to:</p> <ul style="list-style-type: none"> • oil refining goods and technology (as specified in new Schedule 2D), • quantum computing and advanced materials goods and technology (as specified in new Schedule 2E) • luxury goods (as specified in new Schedule 3A), and • iron and steel goods (as specified in new Schedule 3B) 	N/A
21 April 2022	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed parties	<p>Contains amongst others the following parties:</p> <ul style="list-style-type: none"> • ALEKSANDROV SCIENTIFIC RESEARCH TECHNOLOGICAL INSTITUTE NITI • CENTRAL RESEARCH INSTITUTE OF MACHINE BUILDING JSC • FEDERAL STATE UNITARY ENTERPRISE DUKHOV AUTOMATICS RESEARCH INSTITUTE • JSC ARZAMAS MACHINE-BUILDING PLANT • JSC GTLK
21 April 2022	<p>OFSI has amended the notice for General licence INT/2022/1424276 under Regulation 64 of the Russia (Sanctions) (EU Exit) Regulations 2019.</p> <p>General Licence INT/2022/1424276 allows a person (other than the designated parties or a subsidiary) to wind down any transactions to which it is a party involving the designated parties or a subsidiary including the closing out of any positions.</p>	<ul style="list-style-type: none"> • Alfa Bank JSC • GazPromBank • Rosselkhozbank • SMP Bank • Ural Bank for Reconstruction and Development

21 April 2022	OFSI has issued General Licence INT/2022/1630477 under Regulation 64 of the Russia (Sanctions) (EU Exit) Regulations 2019 to allow payments to Gazprombank or a Subsidiary for the purpose of making Gas available in the European Union.	<ul style="list-style-type: none"> • Gazprombank
22 April 2022	OFSI has amended General licence INT/2022/1280876 under Regulation 64 of the Russia (Sanctions) (EU Exit) Regulations 2019. General Licence INT/2022/1280876 was amended to also include Sberbank CIB (UK) Ltd.	<ul style="list-style-type: none"> • Sberbank CIB (UK) Ltd
26 April 2022	Listings are corrected and parties are still subject to asset freeze.	Several parties
27 April 2022	OFSI has issued General Licence INT/2022/1679676 under Regulation 21 of the Global Anti-Corruption Sanctions Regulations 2021 and Regulation 64 of the Russia (Sanctions) (EU Exit) Regulations 2019. Under General Licence INT/2022/1679676, subject to the conditions set out in that licence, an officer of a Non-Crown Relevant Organisation is permitted to carry out their duties including through making use of powers available to them under UK legislation or common law for Asset Recovery Purposes.	N/A
29 April 2022	The Russia (Sanctions) (EU Exit) (Amendment) (No. 9) Regulations 2022 requires providers of social media services, internet access services (i.e. internet service providers) and application stores to take reasonable steps to prevent their users in the UK from encountering or accessing online content generated by designated persons	N/A
4 May 2022	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed parties	<p>Contains amongst others the following parties:</p> <ul style="list-style-type: none"> • KAMAZ • VOLGA GROUP
5 May 2022	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed parties	<ul style="list-style-type: none"> • Evraz PLC
5 May 2022	General Licence INT/2022/1710676 allows for the continuation of business operations of the North American Subsidiaries of Evraz.	<ul style="list-style-type: none"> • Evraz North America plc • Evraz Inc. NA • Evraz Inc. NA – Canada
9 May 2022	Listings are corrected and parties are still subject to asset freeze.	Several parties

12 May 2022	General Licence INT/2022/1678476 allows payments and other permitted activities to take place in relation to winding down activities, basic needs and insolvency proceedings associated with the Amsterdam Trade Bank N.V or a subsidiary of the same.	<ul style="list-style-type: none"> • Amsterdam Trade Bank N.V. • Subsidiaries of Amsterdam Trade Bank N.V.
13 May 2022	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed parties	Several parties
13 May 2022	Extension of General Licence INT/2022/1469378 to 30 June 2022 which allows for a wind down period for any transactions to which it is party involving Sovcomflot or a subsidiary including the closing out of any positions.	<ul style="list-style-type: none"> • Sovcomflot • Subsidiaries of Sovcomflot
19 May 2022	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed parties	<ul style="list-style-type: none"> • JSC Rossiya Airlines • JSC Ural Airlines • PJSC Aeroflot
23 May 2022	General Licence INT/2022/1839676 allows UK nationals to purchase tickets for flights or rail journeys originating in, or within, Russia from PJSC Aeroflot, JSC Rossiya Airlines, JSC Ural Airlines or Russian Railways. The licence takes effect on 23 May 2022 and expires on 23 May 2023	<ul style="list-style-type: none"> • JSC Aeroflot • JSC Rossiya Airlines • JSC Ural Airlines • Russian Railways
24 May 2022	Listings are corrected and parties are still subject to asset freeze.	Several parties
27 May 2022	Listings are corrected and parties are still subject to asset freeze.	Several parties
30 May 2022	General licence INT/2022/1875276 allows business operations involving the provision of Civilian Telecommunication Services that include ZAO TransTeleCom Company. The licence also permits business operations related to News Media Services to continue subject to certain conditions. The licence takes effect from 30 May 2022 and expires on 30 May 2024.	<ul style="list-style-type: none"> • ZAO TransTeleCom Company
30 May 2022	Under General Licence INT/2022/1834876 an Interim Manager or trustee may allow for: <ul style="list-style-type: none"> • the basic needs of operation of charities and routine holding and maintenance of frozen funds or economic resources and the payment of legal fees, by Interim Managers and Trustees • the receipt and disbursement of Charitable Funds 	N/A

	<ul style="list-style-type: none"> the payments associated with the wind up of a charity <p>The licence takes effect from 30 May 2022 and expires on 30 May 2023.</p>	
30 May 2022	General Licence INT/2022/1875276 allows certain activities related to the provision of Civilian Telecommunications Services and News Media Services. The licence takes effect from 30 May 2022 and expires on 30 May 2024.	N/A
10 June 2022	General Licence INT/2022/1919908 allows parties to make use of the retail banking services of a designated credit or financial institution provided that the payments made or received are intended for personal use. This licence takes effect from 10 June 2022 and expires on 10 September 2022.	Designated credit and financial institutions
16 June 2022	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed parties	Several individuals
23 June 2022	<p>The Russia (Sanctions) (EU Exit) (Amendment) (No. 10) Regulations 2022 introduces new restrictions on in relation to trade in:</p> <ul style="list-style-type: none"> maritime goods and maritime technology in certain circumstances (regulation 5) military goods and technology with non-government controlled Ukrainian territory (as specified in new Chapter 2A of Part 5) defence and security goods and technology (as specified in Parts 2 to 4 of new Schedule 3C) interception and monitoring services banknotes jet fuel and fuel additives (as specified in an addition to Part 8 of Schedule 2A) goods which generate significant revenues for Russia (as specified in new Schedule 3D) 	N/A
24 June 2022	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed parties	Several parties
29 June 2022	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed parties	Several parties

30 June 2022	General licence - INT/2022/1968500 allows for a 30 day wind down period of positions involving Rosbank PJSC (Rosbank) or any entity owned or controlled by Rosbank. This licence takes effect from 30 June 2022 and expires on 30 July 2022.	<ul style="list-style-type: none"> • Rosbank • Entities owned or controlled by Rosbank
5 July 2022	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed parties	Several parties
7 July 2022	General licence INT/2022/1947936 allows parties to: <ul style="list-style-type: none"> • perform activities to ensure the timely delivery of humanitarian assistance activity in relation to the conflict in Ukraine and non-government controlled Ukrainian territory • carry out other activities that support basic human needs in relation to the conflict in Ukraine and non-government controlled Ukrainian territory 	N/A
12 July 2022	The relevant parties which were already listed as sanctioned have been amended. The relevant parties are subject to asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant parties.	Several parties
12 July 2022	“Red Alert” issued by – amongst others OFSI and the National Crime Agency (NCA) relating to financial sanctions evasion and typologies of Russian elites and enablers	N/A
15 July 2022	<ul style="list-style-type: none"> • Removal of parties from asset freezes • Listing is amended/corrected and parties are still subject to asset freeze. 	Several parties
15 July 2022	The Russia (Sanctions) (EU Exit) (Amendment) (No. 11) Regulations 2022 amends the Russia (Sanctions) (EU Exit) Regulations 2019 and: <ul style="list-style-type: none"> • introduces new restrictions on in relation to trade in: <ul style="list-style-type: none"> ○ maritime goods and maritime technology in certain circumstances (regulation 5); ○ military goods and technology with non-government controlled Ukrainian territory (as specified in new Chapter 2A of Part 5); ○ defence and security goods and technology (as specified in Parts 2 to 4 of new Schedule 3C); ○ interception and monitoring services; 	N/A

	<ul style="list-style-type: none"> ○ banknotes; ○ jet fuel and fuel additives (as specified in an addition to Part 8 of Schedule 2A); and ○ goods which generate significant revenues for Russia (as specified in new Schedule 3D). • As a result of those amendments: <ul style="list-style-type: none"> ○ regulation 3 amends the definitions of “critical-industry goods”, “critical-industry technology”, “restricted goods” and “restricted technology” for the purposes of Part 5 of the 2019 Regulations; ○ regulation 7 inserts additional prohibitions in Chapter 4C of Part 5 of the 2019 Regulations relating to trade in ancillary services relating to iron and steel goods and makes consequential amendments; ○ regulation 9 extends prohibitions in Part 5 of the 2019 Regulations in relation to trade in certain items with non-government controlled Ukrainian territory; ○ regulation 12(6) adds further things to the list of oil and refining goods and technology in Schedule 2D and regulation 12(7) adds further things to the list of energy-related goods in Schedule 3 in respect of which trade is prohibited. • Regulation 10 amends Part 7 of the 2019 Regulations to create exceptions to some of the new prohibitions. • Regulation 11 makes consequential amendments in relation to offences. • Regulation 13 revokes the Russia (Sanctions) (EU Exit) (Amendment) (No. 10) Regulations 2022 (S.I. 2022/689). 	
<p><u>18 July 2022</u></p>	<p>The Russia (Sanctions) (EU Exit) (Amendment) (No. 13) Regulations 2022 amends the Russia (Sanctions) (EU Exit) Regulations 2019:</p> <ul style="list-style-type: none"> • Amends in Part 2 the designation criteria in regulation 6 of the 2019 Regulations by specifying additional activities for which a person may be designated and by making minor amendments to the definition of “being involved in obtaining a benefit from or supporting the Government of Russia”; and by broadening the interpretation of being “associated with” a designated person; • Provides in Part 3 for a new exception from trade sanctions measures for humanitarian assistance activity in non-government controlled areas of the Donetsk and Luhansk oblasts; • Provides in Part 4 a revised definition of ownership in relation to ships and aircraft and a correction of drafting errors or omissions in regulations 76, 78 and 94. 	<p>N/A</p>

<p><u>19 July 2022</u></p>	<p>The Russia (Sanctions) (EU Exit) (Amendment) (No. 12) Regulations 2022 amends the Russia (Sanctions) (EU Exit) Regulations 2019:</p> <ul style="list-style-type: none"> • Amends Part 3 by restricting investments (and services directly related to those investments) in respect of land located in Russia, persons connected with Russia, relevant entities, joint ventures, opening a representative office or establishing a branch or subsidiary located in Russia; • Provides exceptions to, and licensing powers in relation to, these new restrictions. 	<p>N/A</p>
<p><u>19 July 2022</u></p>	<p>General licence INT/2022/2002560 allows parties to invest (and provide services directly related to those investments) in respect of land located in Russia, persons connected with Russia, relevant entities, joint ventures, opening a representative office or establishing a branch or subsidiary located in Russia.</p> <p>This licence takes effect from 19 July 2022 and expires on 26 July 2022.</p>	<p>N/A</p>
<p><u>20 July 2022</u></p>	<p>The relevant parties which were already listed as sanctioned have been amended. The relevant parties are subject to asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant parties.</p>	<p>Several parties</p>
<p><u>21 July 2022</u></p>	<p>The Russia (Sanctions) (EU Exit) (Amendment) (No. 14) Regulations 2022 amends the Russia (Sanctions) (EU Exit) Regulations 2019 and:</p> <ul style="list-style-type: none"> • introduces new restrictions on trade in relation to: <ul style="list-style-type: none"> ○ professional and business services (as specified in new regulation 54B); ○ miscellaneous essential goods required for the functioning of the Russian economy (as specified in new Schedule 3E); ○ oil and oil products means (as specified in new Schedule 3F); ○ gold (as specified in new Schedule 3G); ○ coal and coal products (as specified in new Schedule 3H). • allows the provision of technical assistance in relation to an aircraft owned, chartered or operated by a person connected with Russia, at a UK airport, provided the assistance is not for the purposes of facilitating a change in ownership or operator; • introduces exceptions in relation to Energy-related Goods. 	<p>N/A</p>

<p>22 July 2022</p>	<p>General licence INT/2022/2009156 allows designated parties to make payments to UK insurers from a frozen UK bank account and allows UK insurers to receive such payments.</p> <p>This licence is of indefinite duration and applies to all UK sanctions regimes as listed in Annex I of the licence, including the UK-Russia sanctions.</p>	<p>N/A</p>
<p>26 July 2022</p>	<p>Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed parties are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed parties</p>	<p>Several parties</p>
<p>29 July 2022</p>	<p>Amendment of general licence INT/2022/1968500. This licence allows for a 30 day wind down period of positions involving Rosbank PJSC (Rosbank) or any entity owned or controlled by Rosbank.</p> <p>This licence initially expired on 30 July 2022 but is extended and expires on 30 September 2022</p>	<ul style="list-style-type: none"> • Rosbank • Entities owned or controlled by Rosbank
<p>2 August 2022</p>	<p>Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed parties are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed parties.</p> <p>Removal of a designated party from the UK sanctions list. This party is no longer subject to an asset freeze.</p>	<p>Several parties</p>
<p>9 August 2022</p>	<p>The relevant parties which were already listed as sanctioned have been amended. The relevant parties are subject to asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant parties.</p>	<p>Several parties</p>
<p>15 August 2022</p>	<p>General licence INT/2022/2085212 allows payments to a sanctioned bank or any of its subsidiaries for the purpose of making energy available for use in Mongolia.</p> <p>This licence takes effect from 15 August 2022 and expires on 14 August 2023.</p>	<ul style="list-style-type: none"> • Credit Bank of Moscow • Gazprombank • Sberbank • Rosbank PJSC • Entities owned or controlled by the above banks

<u>17 August 2022</u>	<p>Amendment of general licence INT/2022/2009156. This licence allows designated parties to make payments to UK insurers from a frozen UK bank account and allows UK insurers to receive such payments.</p> <p>This licence was amended on 17 August 2022 to include the following:</p> <ul style="list-style-type: none"> - Terrorism insurance; - Property owners' liability insurance <p>Claims preparation costs insurance</p>	N/A
<u>18 August 2022</u>	<p>Amendment of general licence INT/2022/1710676. This licence allows for the continuation of business operations of the North American Subsidiaries of Evraz.</p> <p>This licence is extended and expires on 31 March 2023</p>	<ul style="list-style-type: none"> • Evraz North America plc • Evraz Inc. NA • Evraz Inc. NA – Canada
<u>19 August 2022</u>	<p>General licence INT-2022-1845976 allows Crown Servants, contractors, & their family members to carry out activities in their personal capacity which would otherwise be prohibited.</p> <p>This licence takes effect from 11:59 GMT on 19 August 2022.</p>	N/A
<u>22 August 2022</u>	<p>Amendment of General licence INT/2022/1280876. General licence INT/2022/1280876 was amended to also include Guernsey subsidiary VTBC Asset Management International Limited and EU subsidiary VTB Bank (Europe) SE and any entity owned or controlled by this entity that is incorporated in Germany.</p>	<ul style="list-style-type: none"> • VTBC Asset Management International Limited • VTB Bank (Europe) SE and any entity owned or controlled by this entity
<u>22 August 2022</u>	<p>General Licence INT/2022/2104808 allows a bank to take payment of bank fees from frozen accounts.</p> <p>This licence takes effect from 22 August 2022 and is of indefinite duration.</p>	N/A
<u>23 August 2022</u>	<p>The relevant parties which were already listed as sanctioned have been amended. The relevant parties are subject to asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant parties.</p>	Several parties

	Removal of a designated party from the UK sanctions list. this party is no longer subject to an asset freeze.	
<u>30 August 2022</u>	Extension of reporting obligations to crypto-asset exchange providers and custodian wallet providers	
<u>2 September 2022</u>	The relevant parties which were already listed as sanctioned have been amended. The relevant parties are subject to asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant parties.	<ul style="list-style-type: none"> • MCST JSC • OOO VOLGA GROUP
<u>6 September 2022</u>	The relevant parties which were already listed as sanctioned have been amended. The relevant parties are subject to asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant parties.	<ul style="list-style-type: none"> • Pavel Ezoubov • Mikhail Razvozhaev
<u>16 September 2022</u>	The relevant parties which were already listed as sanctioned have been amended. The relevant parties are subject to asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant parties.	Several parties
<u>26 September 2022</u>	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed parties are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed parties.	Several parties
<u>28 September 2022</u>	The relevant parties which were already listed as sanctioned have been amended. The relevant parties are subject to asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant parties.	Several parties

<p><u>30 September 2022</u></p>	<p>Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed parties are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed parties.</p> <p>Amendment of parties targeted with asset freeze.</p>	<p>Several parties</p>
<p><u>4 October 2022</u></p>	<p>The relevant party is subject to asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed person are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant party.</p>	<ul style="list-style-type: none"> • Sergei Vladimirovich YELISEYEV
<p><u>6 October 2022</u></p>	<p>Amendment of General licence INT/2022/1280876. General licence INT/2022/1280876 was amended to include payments related to Insolvency Proceedings under the German Banking Act.</p>	<ul style="list-style-type: none"> • VTBC Asset Management International Limited • VTB Bank (Europe) SE and any entity owned or controlled by this entity

THE UNITED KINGDOM		
BELARUS		
Date	Description	Entities and individuals being sanctioned
8 February 2022	The relevant entity which was already listed as sanctioned entity has been amended. The relevant entity is subject to asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant entity.	<ul style="list-style-type: none"> DANA HOLDINGS A.K.A DANA ASTRA
16 February 2022	The relevant individuals and entity which were already listed as sanctioned have been amended. The relevant entities and individual are subject to asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant individuals and entity.	<ul style="list-style-type: none"> Natallia Mikalaeuna EISMONT Andrey Evgenievich KRIVOSHEYEV Andrei Nikolaevich MUKOVOZCHIK OPEN JOINT STOCK COMPANY "BELARUSKALI"
18 February 2022	The relevant individuals which were already listed as sanctioned have been amended. The relevant individuals are subject to asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant individuals.	<ul style="list-style-type: none"> Mikhail Alexandrovich DAMARNACKI Natallia Mikalaeuna EISMONT
9 March 2022	General Licence INT/2022/1322576 authorises: <ul style="list-style-type: none"> a flight data provider to make payment(s) directly or via a relevant institution to Belaeronavigatsia for aeronautical information publication data Belaeronavigatsia to provide aeronautical information publication data to flight data providers for the purposes of flight safety concerning civilian aircraft and authorises the flight data providers to use this data 	<ul style="list-style-type: none"> Belaeronavigatsia
15 March 2022	Introduction of the possibility to publicly name companies that have breached financial sanctions, but have not been fined Introduction of strict liability for breaches of financial sanctions. This means that if a party breaches UK financial sanctions legislation, any requirement imposed by or under that legislation for the person to have known, suspected or believed any matter is to be ignored	<ul style="list-style-type: none"> N/A
24 March 2022	Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed persons are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed parties	<ul style="list-style-type: none"> BANK DABRABYT JOINT STOCK COMPANY CJSC BELBIZNESLIZING

		<ul style="list-style-type: none"> INDUSTRIAL-COMMERCIAL PRIVATE UNITARY ENTERPRISE MINOTOR-SERVICE JSC TRANSVIAEXPORT AIRLINES LIMITED LIABILITY COMPANY BELINVEST-ENGINEERING OJSC KB RADAR-MANAGING COMPANY HOLDING RADAR SYSTEM
24 March 2022	General Licence INT/2022/1424277 allows a person to wind down any transactions to which it is party including the closing out of positions with Bank Dabrabyt Joint Stock Company or its subsidiaries. This licence also takes effect on 24 March 2022 and expires on 23 April 2022.	<ul style="list-style-type: none"> BANK DABRABYT JOINT STOCK COMPANY
21 April 2022	Listing is corrected and individual is still subject to asset freeze.	<ul style="list-style-type: none"> Lidzia Mihailauna YARMOSHINA
27 May 2022	Listings are corrected and parties are still subject to asset freeze.	Several parties
5 July 2022	General licence - INT/2022/1976332 allows for a 7-day wind down period in respect of, category C loans (as defined by Regulation 15B (5)) as well as transferable securities and money market instruments (as defined by Regulation 15A (2C)). This licence takes effect from 05 July 2022 and expired at 23:59 on 12 July 2022.	Several parties
5 July 2022	General licence - INT/2022/1976232 allows provide financial services for the purpose of winding down any derivatives, repurchase, and reverse repurchase transactions entered into prior to 05 July 2022 involving designated parties. This licence takes effect from 05 July 2022 and expires on 04 August 2022.	<p>Contains amongst others:</p> <ul style="list-style-type: none"> National Bank of Belarus (NBB) Ministry of Finance of Belarus (MF)
5 July 2022	<p>The Republic of Belarus (Sanctions) (EU Exit) (Amendment) Regulations 2022 amends the Republic of Belarus (Sanctions) (EU Exit) Regulations 2019:</p> <ul style="list-style-type: none"> Part 2 adds new purposes and designation criteria, targeting role of the Government of Belarus in supporting Russia's actions in respect of Ukraine and introduces a power to designate persons by description and makes related changes to designation provisions; Part 3 widens existing restrictions on dealing with financial instruments and providing loans, and introduces a new prohibition on providing financial services for the purpose of foreign exchange reserve and asset management of the Central Bank of Belarus and the Ministry of Finance of Belarus and related persons; Part 4 imposes new restrictions on mineral products, arms and related materiel, iron and steel. Part 4 also widens trade sanctions in view of critical industry items, quantum computing and oil refining items, and luxury goods, and dual-use goods 	<ul style="list-style-type: none"> National Bank of Belarus (NBB) Ministry of Finance of Belarus (MF)

	<p>items. New import restrictions are imposed on mineral products, arms and related materiel, iron and steel;</p> <ul style="list-style-type: none"> • Part 5 introduces new vessel related sanctions and widens the aircraft related sanctions. 	
<u>7 July 2022</u>	Listing is amended and entity is still subject to asset freeze.	<ul style="list-style-type: none"> • LLC SYNESIS
<u>12 July 2022</u>	Listing is amended and entities are still subject to asset freeze.	<ul style="list-style-type: none"> • BANK DABRABYT JOINT STOCK COMPANY • CJSC BELBIZNESLIZING • KB RADAR • LIMITED LIABILITY COMPANY BELINVEST-ENGINEERING • MINOTOR-SERVICE ENTERPRISE • TRANSAVIAEXPORT AIRLINES JSC



Brian Mulier

Partner

+31703538896
brian.mulier@twobirds.com



Jonathon Ellis

Partner

+61292269819
jonathon.ellis@twobirds.com



Goran Danilović

Associate

+31703538878
goran.danilovic@twobirds.com



Dick Ignacio

Associate

+31703538917
dick.ignacio@twobirds.com

twobirds.com

Abu Dhabi • Amsterdam • Beijing • Bratislava • Brussels • Budapest • Casablanca • Copenhagen • Dubai • Dublin • Dusseldorf
• Frankfurt • The Hague • Hamburg • Helsinki • Hong Kong • London • Luxembourg • Lyon • Madrid • Milan • Munich • Paris
• Prague • Rome • San Francisco • Shanghai • Singapore • Stockholm • Sydney • Warsaw

The information given in this document concerning technical legal or professional subject matter is for guidance only and does not constitute legal or professional advice. Always consult a suitably qualified lawyer on any specific legal problem or matter. Bird & Bird assumes no responsibility for such information contained in this document and disclaims all liability in respect of such information.

This document is confidential. Bird & Bird is, unless otherwise stated, the owner of copyright of this document and its contents. No part of this document may be published, distributed, extracted, re-utilised, or reproduced in any material form.

Bird & Bird is an international legal practice comprising Bird & Bird LLP and its affiliated and associated businesses.

Bird & Bird LLP is a limited liability partnership, registered in England and Wales with registered number OC340318 and is authorised and regulated by the Solicitors Regulation Authority (SRA) with SRA ID497264. Its registered office and principal place of business is at 12 New Fetter Lane, London EC4A 1JP. A list of members of Bird & Bird LLP and of any non-members who are designated as partners, and of their respective professional qualifications, is open to inspection at that address.