

Bird & Bird

# EU and UK sanctions

Status update

*24 July 2025 – 12:00 (CEST)*



## EU/UK sanctions update Table of Contents

|   |                              |     |
|---|------------------------------|-----|
| ➤ | EU sanctions against Russia  | 3   |
| ➤ | EU sanctions against Belarus | 55  |
| ➤ | UK sanctions against Russia  | 66  |
| ➤ | UK sanctions against Belarus | 113 |

# Bird & Bird

## EU sanctions against Russia

| EUROPEAN UNION                   |  |   |
|----------------------------------|--|---|
| RUSSIA                           |  |   |
| Date                             | Description of imposed sanctions   | Entities and individuals being sanctioned   |
| <a href="#">21 February 2022</a> | 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"> <li>• Aleksei Yurievich Cherniak</li> <li>• Leonid Ivanovic Babashov</li> <li>• Tatiana Georgievna Lobach</li> <li>• Nina Sergeevna Faustova</li> <li>• Aleksandr Evgenevich Chmyhalov</li> </ul>  |
| <a href="#">23 February 2022</a> | 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"> <li>• Bank Rossiya (Банк «Россия»)</li> <li>• PROMSVYAZBANK (ПАО Промсвязьбанк")</li> <li>• VEB.RF (a.k.a. Vnesheconombank; VEB) (ВЭБ.РФ)</li> </ul>   |
| <a href="#">23 February 2022</a> | 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"> <li>• Internet Research Agency (Агентство интернет-исследований)</li> <li>• Bank Rossiya (Банк «Россия»)</li> <li>• PROMSVYAZBANK (ПАО Промсвязьбанк")</li> <li>• VEB.RF (a.k.a. Vnesheconombank; VEB) (ВЭБ.РФ)</li> </ul> |
| <a href="#">23 February 2022</a> | 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   |

# Bird & Bird

|                         |   |  |
|-------------------------|---|--|
| <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"> <li>• 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);</li> <li>• Restrictions on trade and investments related to certain economic sectors in the Donetsk and Luhansk oblasts;</li> <li>• A prohibition to supply tourism services; and</li> <li>• Sale, supply, transfer and export bans for certain listed goods and technologies.</li> </ul>  | N/A  |
| <u>25 February 2022</u> | 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   | N/A  |
| <u>25 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 and entities   | Contains amongst others: Vladimir Vladimirovich PUTIN (Владимир Влади́ мирович ПУ ТИН) – number 669  |
| <u>25 February 2022</u> | 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  | N/A  |
| <u>26 February 2022</u> | <ul style="list-style-type: none"> <li>• 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</li> <li>• 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</li> <li>• 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</li> <li>• 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</li> </ul> | <p>Contains amongst others the following parties:</p> <ul style="list-style-type: none"> <li>• Almaz-Antey</li> <li>• Kamaz</li> <li>• Novorossiysk Commercial Sea Port</li> <li>• Rostec (Russian Technologies State Corporation)</li> <li>• Russian Railways</li> <li>• JSC PO Sevmash</li> <li>• Sovcomflot</li> <li>• United Shipbuilding Corporation</li> </ul> |

# Bird & Bird

|                         |  |   |
|-------------------------|--|---|
|                         | <ul style="list-style-type: none"> <li>• Prohibition to provide public financing or financial assistance for trade with, or investment in, Russia</li> <li>• 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</li> <li>• 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</li> <li>• 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</li> <li>• Ban relating to bank deposits from Russian entities, nationals and parties located in Russia</li> <li>• Prohibition to provide certain financial services to Russian entities, nationals and parties located in Russia</li> </ul> |   |
| <u>28 February 2022</u> | <ul style="list-style-type: none"> <li>• 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</li> <li>• 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</li> </ul>   | N/A   |
| <u>28 February 2022</u> | <ul style="list-style-type: none"> <li>• 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</li> </ul>  | <ul style="list-style-type: none"> <li>• Contains several individuals; and</li> <li>• Gas Industry Insurance Company SOGAZ</li> </ul>   |
| <u>2 March 2022</u>     | <ul style="list-style-type: none"> <li>• 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 (“<b>SWIFT related sanctions</b>”);</li> <li>• 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;</li> </ul>  | <p><b>SWIFT related sanctions</b> are targeted at:</p> <ul style="list-style-type: none"> <li>• Bank Otkritie</li> <li>• Novikombank</li> <li>• Promsvyazbank</li> <li>• Bank Rossiya</li> <li>• Sovcombank</li> <li>• VNESHECONOMBANK (VEB)</li> </ul> |

# Bird & Bird

|                               |  |  |
|-------------------------------|--|--|
|                               | <ul style="list-style-type: none"> <li>Prohibition to invest, participate or otherwise contribute to projects co-financed by the Russian Direct Investment Fund</li> </ul>   | <ul style="list-style-type: none"> <li>VTB BANK</li> </ul>   |
| <a href="#">2 March 2022</a>  | <ul style="list-style-type: none"> <li>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;</li> <li>Suspension of any broadcasting licence or authorisation, transmission and distribution arrangement with the specific listed sanctioned parties</li> </ul>  | <ul style="list-style-type: none"> <li>RT- Russia Today English</li> <li>RT- Russia Today UK</li> <li>RT - Russia Today Germany</li> <li>RT - Russia Today France</li> <li>RT- Russia Today Spanish</li> <li>Sputnik</li> </ul>  |
| <a href="#">2 March 2022</a>  | 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"> <li>Contains several individuals</li> </ul>   |
| <a href="#">4 March 2022</a>  | <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  |
| <a href="#">9 March 2022</a>  | 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. |
| <a href="#">10 March 2022</a> | <ul style="list-style-type: none"> <li>The prohibitions and restrictions regarding “transferable securities” cover also crypto-assets</li> <li>Prohibition to sell, supply, transfer or export, directly or indirectly, specific listed maritime navigation goods and technology, to any natural or legal person, entity or body in Russia, for use in Russia, or for the placing on board of a Russian-flagged vessel</li> </ul>  | <ul style="list-style-type: none"> <li>Russian Maritime Register of Shipping</li> </ul>  |

# Bird & Bird

|                      |   |  |
|----------------------|---|--|
|                      | <ul style="list-style-type: none"> <li>• 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</li> <li>• Russian Maritime Register of Shipping added to the list of state-owned enterprises subject to financing restrictions</li> </ul> |  |
| <u>12 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"> <li>• State Unitary Enterprise of the 'Republic of Crimea' 'Chernomorneftegaz' (formerly known as PJSC 'Chernomorneftegaz')</li> <li>• 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'</li> <li>• Joint-stock company 'Sparkling wine plant "Novy Svet"</li> <li>• Public movement 'Peace to Luhansk Region'</li> <li>• Public movement 'Free Donbass' (a.k.a. 'Free Donbas', 'Svobodny Donbass')</li> <li>• Prizrak brigade</li> </ul>   |
| <u>15 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.  | <p>Contains amongst others the following parties:</p> <ul style="list-style-type: none"> <li>• ROSNEFT AERO (RN AERO) (Роснефть-Аэро / PH-Аэро)</li> <li>• JSC ROSOBORONEXPORT (АО Рособоронэкспорт)</li> <li>• JSC NPO High Precision Systems (АО НПО Высокоточные комплексы)</li> <li>• SC Kurganmashzavod (ПАО Курганмашзавод)</li> <li>• JSC Russian Helicopters (АО Вертолеты России)</li> <li>• PJSC United Aircraft Corporation (ПАО Объединённая авиастроительная корпорация)</li> <li>• JSC United Shipbuilding Corporation (АО Объединённая Судостроительная Корпорация)</li> <li>• JSC Research and Production Corporation URALVAGONZAVOD (АО "Научно-производственная корпорация УралВагонЗавод")</li> </ul> |

# Bird & Bird

|                             |   |   |
|-----------------------------|---|---|
|                             |   | <ul style="list-style-type: none"> <li>• JSC Zelenodolsk Shipyard [A.M. Gorky Zelenodolsk Plant] (АО “Зеленодольский завод имени А. М. Горького”)</li> </ul>  |
| <p><u>16 March 2022</u></p> | <ul style="list-style-type: none"> <li>• 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</li> <li>• 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</li> <li>• 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</li> <li>• Prohibition to grant or be part of any arrangement to finance a legal person, entity or body operating in the energy sector in Russia</li> <li>• 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</li> <li>• Import ban on iron and steel products originating in or exported from Russia</li> <li>• Prohibition to purchase iron and steel products located or originating in Russia</li> <li>• Prohibition to transport, to any destination, iron and steel products originating in or exported from Russia</li> <li>• 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</li> <li>• 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</li> <li>• 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</li> <li>• 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</li> </ul> | <p>Prohibition to engage in any transaction with:</p> <ul style="list-style-type: none"> <li>• OPK OBORONPROM</li> <li>• UNITED AIRCRAFT CORPORATION</li> <li>• URALVAGONZAVOD</li> <li>• ROSNEFT</li> <li>• TRANSNEFT</li> <li>• GAZPROM NEFT</li> <li>• ALMAZ-ANTEY</li> <li>• KAMAZ</li> <li>• ROSTEC (RUSSIAN TECHNOLOGIES STATE CORPORATION)</li> <li>• JSC PO SEVMASH</li> <li>• SOVCOMFLOT</li> <li>• UNITED SHIPBUILDING CORPORATION</li> </ul> |
| <p><u>8 April 2022</u></p>  | <p>Introduces amongst others the possibility for EU Member State competent authorities to authorise the release of certain frozen funds or economic resources belonging to</p>  | <ul style="list-style-type: none"> <li>• Bank Rossiya (Банк «Россия»)</li> <li>• PROMSVYAZBANK (ПАО Промсвязьбанк“)</li> <li>• VEB.RF (a.k.a. Vnesheconombank; VEB) (ВЭБ.РФ)</li> </ul>   |



# Bird & Bird

|                            |   |   |
|----------------------------|---|---|
|                            | <p>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.</p>   | <ul style="list-style-type: none"> <li>• Otkritie FC Bank (formerly known as NOMOS Bank)</li> <li>• Novikombank (Новикомбанк)</li> <li>• Sovcombank (formerly known as Бууcombank)</li> <li>• VTB Bank ВТБ/Внешторгбанк</li> </ul>  |
| <p><u>8 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 and entities.</p>   | <p>Contains amongst others the following entities:</p> <ul style="list-style-type: none"> <li>• Otkritie FC Bank (formerly known as NOMOS Bank)</li> <li>• Novikombank (Новикомбанк)</li> <li>• Sovcombank (formerly known as Бууcombank)</li> <li>• VTB Bank ВТБ/Внешторгбанк</li> <li>• JSC Arzamas Machine-Building Plant (АО "Арзамасский машиностроительный завод")</li> <li>• JSC Ruselectronics (АО "Росэлектроника")</li> <li>• JSC Tactical Missiles Corporation (KTRV) "(АО "Корпорация Тактическое Ракетное Вооружение", КТРВ)"</li> <li>• JSC Kalashnikov Concern (АО Концерн "Калашников")</li> <li>• JSC UEC Klimov (АО "ОДК-Климов")</li> <li>• LLC Military Industrial Company (ООО Военно-промышленная компания)"</li> </ul> |
| <p><u>9 April 2022</u></p> | <ul style="list-style-type: none"> <li>• Prohibition to sell, supply, transfer or export, directly or indirectly, specific listed jet fuel and fuel additives</li> <li>• Possibility for EU Member State competent authorities to authorise the execution of an aircraft financial lease concluded before 26 February 2022</li> <li>• 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</li> <li>• 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</li> <li>• Import ban on various goods such as chemicals, caviar and fertilisers originating in or exported from Russia</li> </ul> | <p>N/A</p>  |

# Bird & Bird

|                      |  |   |
|----------------------|--|---|
|                      | <ul style="list-style-type: none"> <li>• Import ban on coal originating in or exported from Russia</li> <li>• 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</li> <li>• Prohibition for any road transport undertaking established in Russia to transport goods by road within the territory of the EU, including in transit</li> <li>• 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</li> <li>• 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;</li> <li>• 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</li> <li>• 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</li> <li>• 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</li> </ul> |   |
| <u>14 April 2022</u> | 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.  | N/A   |
| <u>21 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.  | <ul style="list-style-type: none"> <li>• Serhiy Vitaliyovich KURCHENKO</li> <li>• Yevgeniy Viktorovich PRIGOZHIN</li> </ul> |
| <u>5 May 2022</u>    | Removal of Russia from the destination lists of Union general export authorisations EU003, EU004 and EU005.  | N/A   |

# Bird & Bird

|                           |  |   |
|---------------------------|--|---|
| <p><u>3 June 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 and entities.</p>  | <p>Contains amongst others the following parties:</p> <ul style="list-style-type: none"> <li>• JSC GARNIZON</li> <li>• JSC OBORONENERGO</li> <li>• OJSC Ulyanovsk Automobile Plant (UAZ)</li> <li>• JSC VOENTELCOM</li> <li>• JSC VOENTORG</li> </ul>   |
| <p><u>4 June 2022</u></p> | <ul style="list-style-type: none"> <li>• Prohibition to advertise products or services in any content produced or broadcast by certain listed parties</li> <li>• 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</li> <li>• 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</li> <li>• Introduction of exemptions relating to crypto-assets</li> <li>• Extension of SWIFT related sanctions to specific listed parties</li> <li>• 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</li> <li>• 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</li> <li>• 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</li> <li>• 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</li> <li>• 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</li> </ul> | <p>Contains amongst others the following parties:</p> <ul style="list-style-type: none"> <li>• Sberbank</li> <li>• Credit Bank of Moscow</li> <li>• Joint Stock Company Russian Agricultural Bank, JSC Rosselkhozbank</li> <li>• 46th TSNII Central Scientific Research Institute</li> <li>• Alagir Resistor Factory</li> </ul> |

# Bird & Bird

|                     |   |  |
|---------------------|---|--|
|                     | <ul style="list-style-type: none"> <li>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</li> </ul>   |  |
| <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"> <li>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;</li> <li>Suspension of any broadcasting licence or authorisation, transmission and distribution arrangement with the specific listed sanctioned parties</li> </ul>   | <ul style="list-style-type: none"> <li>Rossiya RTR / RTR Planeta</li> <li>Rossiya 24 / Russia 24</li> <li>TV Centre International</li> </ul>   |
| <u>21 July 2022</u> | <ul style="list-style-type: none"> <li>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;</li> <li>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;</li> <li>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;</li> <li>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 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</li> </ul> | <ul style="list-style-type: none"> <li>Bank Rossiya</li> <li>PROMSVYAZBANK</li> <li>VEB.RF (a.k.a. Vnesheconombank; VEB)</li> <li>Otkritie FC Bank</li> <li>Novikombank</li> <li>Sovcombank</li> <li>VTB Bank</li> <li>Sberbank</li> </ul> |

# Bird & Bird

|                            |  |   |
|----------------------------|--|---|
| <p><u>21 July 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 and entities.</p>  | <p>Several parties</p>  |
| <p><u>21 July 2021</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 and entities.</p>  | <p>Contains amongst others the following parties:</p> <ul style="list-style-type: none"> <li>• Nightwolves MC</li> <li>• The Alexander Gorchakov Public Diplomacy Fund</li> <li>• The Federal Agency for the Commonwealth of Independent States Affairs, Compatriots Living Abroad and International Humanitarian Cooperation</li> <li>• Russkiy Mir Foundation</li> <li>• JSC Research and Production Association Kvant</li> <li>• Sberbank</li> <li>• FORSS Group of Companies</li> <li>• All-Russia Young Army Military Patriotic Social Movement</li> </ul> |
| <p><u>22 July 2022</u></p> | <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• Possibility to request and obtain authorisations for Russian vessels related restrictions;</li> <li>• Possibility to request and obtain an authorisation for trade with Russia in specific listed goods in view of medical or pharmaceutical purposes;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> </ul> | <ul style="list-style-type: none"> <li>• 'Federal Center for Dual-Use Technology (FTsDT) Soyuz</li> <li>• Turayev Machine Building Design Bureau Soyuz</li> <li>• Zhukovskiy Central Aerohydrodynamics Institute (TsAGI)</li> <li>• Rosatomflot</li> </ul>  |

# Bird & Bird

|  |   |  |
|--|---|--|
|  | <ul style="list-style-type: none"> <li>• 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;</li> <li>• Possibility to request and obtain an authorisation for trade in pharmaceutical, medical, agricultural and food products, including wheat and fertilisers;</li> <li>• 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.</li> </ul> |  |
| <a href="#"><u>4 August 2022</u></a>     | 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"> <li>• Contains several individuals</li> </ul>                               |
| <a href="#"><u>1 September 2022</u></a>  | 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"> <li>• Contains several individuals</li> </ul>                               |
| <a href="#"><u>16 September 2022</u></a> | 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  |
| <a href="#"><u>6 October 2022</u></a>    | <ul style="list-style-type: none"> <li>• Expansion of the listing criteria of designated parties</li> <li>• Possibility to request and obtain authorisations for payments to the Crimean Sea Ports for certain services provided at those ports;</li> <li>• 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.</li> </ul>   | <ul style="list-style-type: none"> <li>• PJSC KAMAZ</li> <li>• National Settlement Depository (NSD)</li> </ul> |
| <a href="#"><u>6 October 2022</u></a>    | 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"> <li>• Contains several parties</li> </ul>                                   |
| <a href="#"><u>7 October 2022</u></a>    | 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  |

# Bird & Bird

|                              |  |            |
|------------------------------|--|------------|
| <p><u>7 October 2022</u></p> | <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• Expansion of the prohibition to sell, supply, transfer or export, directly or indirectly, specific listed “cutting-edge” goods and technology to semiconductors;</li> <li>• Prohibition to provide access after 8 April 2023 to any vessel certified by the Russian Maritime Register of Shipping;</li> <li>• 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;</li> <li>• 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</li> <li>• 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;</li> <li>• Possibility to request and obtain authorisations to purchase, import or transfer specific listed iron and steel products necessary for certain nuclear related activities;</li> <li>• Expansion of the import ban on various goods such as chemicals, caviar and fertilisers originating in or exported from Russia</li> <li>• Possibility to request and obtain authorisations to import various goods such as chemicals, caviar and fertilisers for necessary for certain nuclear related activities;</li> <li>• 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;</li> </ul> | <p>N/A</p> |
|------------------------------|--|------------|

# Bird & Bird

|   |   |  |
|---|---|--|
|   | <ul style="list-style-type: none"> <li>• Possibility to request and obtain authorisations to sell, supply, transfer or export, directly or indirectly, specific listed goods for certain nuclear related activities;</li> <li>• 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;</li> <li>• 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 ("<b>price cap on Russian oil</b>");</li> <li>• Prohibition to hold any posts in the governing bodies of specific listed legal persons, entities or bodies;</li> <li>• 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;</li> <li>• 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;</li> <li>• Possibility to request and obtain authorisations to provide architectural and engineering services, legal advisory services or IT consultancy services for specific purposes</li> </ul> |  |
| <a href="#"><u>20 October 2022</u></a>  | 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"> <li>• Contains several individuals</li> </ul> |
| <a href="#"><u>14 November 2022</u></a> | 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"> <li>• Contains several individuals</li> </ul> |
| <a href="#"><u>4 December 2022</u></a>  | <ul style="list-style-type: none"> <li>• Prohibition to provide, directly or indirectly, technical assistance, brokering services or financing or financial assistance, related to the trading, brokering or transport, including through ship-to-ship transfers, to third countries of specific listed crude oil or petroleum products which originate in Russia or which have been exported from Russia;</li> </ul>   | N/A  |



# Bird & Bird

|                                  |  |  |
|----------------------------------|--|--|
|                                  | <ul style="list-style-type: none"> <li>• Prohibition to trade, broker or transport, including through ship-to-ship transfers, to third countries, specific listed crude oil falling under CN code 2709 00, as of 5 December 2022, or specific listed petroleum products falling under CN code 2710, as of 5 February 2023, which originate in Russia or which have been exported from Russia;</li> <li>• Introduction of a 90-day winddown period in the event that the price cap on Russian oil is adjusted;</li> <li>• Exemptions from the relevant prohibitions relating to Russian oil transport to and from third countries are the following:             <ul style="list-style-type: none"> <li>○ the price of the relevant Russian oil does not exceed the price cap (currently 60 USD);</li> <li>○ non-Russian oil being loaded in, departing from or transiting through Russia, provided that both the origin and the owner of those goods are non-Russian;</li> <li>○ the transport by vessel to Japan, the technical assistance, brokering services, financing or financial assistance related to such transport, of crude oil falling under CN 2709 00 commingled with condensate, originating in the Sakhalin-2 (Сахалин-2) Project, located in Russia;</li> <li>○ relevant Russian oil exported from Russia and purchased above the price laid down in Annex XXVIII which is loaded onto a vessel at the port of loading prior to 5 December 2022 and unloaded at the final port of destination prior to 19 January 2023</li> </ul> </li> </ul> |  |
| <a href="#">4 December 2022</a>  | <p>Introduction of the price cap on Russian oil classified under commodity code 2709 00 at USD 60</p>  | <p>N/A</p>   |
| <a href="#">16 December 2022</a> | <ul style="list-style-type: none"> <li>• 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 an ongoing sale and transfer of proprietary rights directly or indirectly owned by that entity in a legal person, entity or body established in the Union. That deadline does not retroactively validate divestments not compliant with the necessary requirements under Regulation 269/2014;</li> <li>• 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 126 and 127 if necessary for the termination by 17 June 2023, of operations, contracts, or other agreements, including correspondent banking relations, concluded with those entities before 16 December 2022;</li> <li>• Expansion of deadline from 31 December 2022 to 28 February 2023 in view of the possibility to EU Member State competent authorities to authorise the release of certain frozen funds or economic resources of listed parties necessary for the</li> </ul>   | <ul style="list-style-type: none"> <li>• Sberbank</li> <li>• CREDIT BANK OF MOSCOW</li> <li>• JSC 'DALNEVOSTOCHNIY BANK' (JSC 'Far Eastern Bank')</li> <li>• Bank Rossiya</li> <li>• PROMSVYAZBANK</li> <li>• VEB.RF (a.k.a. Vnesheconombank; VEB)</li> <li>• Otkritie FC Bank</li> <li>• Novikombank</li> <li>• Sovcombank</li> <li>• VTB Bank</li> </ul> |

# Bird & Bird

|   |   |  |
|---|---|--|
|   | <p>sale and transfer of proprietary rights in a legal person, entity or body established in the EU where those proprietary rights are directly or indirectly owned by a natural or legal person, entity or body listed in Annex I</p> <ul style="list-style-type: none"> <li>• 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, 108, 126 and 127 in Annex I if necessary for the purchase, import or transport of agricultural and food products, including wheat and fertilisers;</li> <li>• Possibility for EU Member State competent authorities to authorise the release of certain frozen funds or economic resources belonging to parties listed in Annex I if necessary for the sale, supply, transfer or export of agricultural and food products, including wheat and fertilisers, to third countries in order to address food security.</li> </ul>   |  |
| <a href="#"><u>16 December 2022</u></a> | <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>   | <ul style="list-style-type: none"> <li>• Contains several parties</li> </ul> |
| <a href="#"><u>17 December 2022</u></a> | <ul style="list-style-type: none"> <li>• 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 mining and quarrying sector in Russia;</li> <li>• Prohibition to grant or be part of any arrangement to finance a legal person, entity or body operating in the mining and quarrying sector in Russia</li> <li>• 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 mining and quarrying sector in Russia;</li> <li>• Above prohibitions relating to the mining and quarrying sector in Russia do not relate in view of certain minerals such as palladium, nickel and cobalt</li> <li>• Expansion of 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;</li> <li>• Possibility for EU Member State competent authorities to authorise the provision of technical assistance relating to goods, technology or services suited for use in aviation or the space industry if necessary for avoiding collision between satellites, or their unintended re-entry into the atmosphere;</li> <li>• Possibility for EU Member State competent authorities to authorise the sale, supply, transfer or export of the goods falling under CN codes 8517 71 00, 8517 79 00 and 9026 00 00 listed in Part B of Annex XI, or related technical assistance, brokering services, financing or financial assistance, if necessary for medical or pharmaceutical purposes, or for humanitarian purposes, such as delivering or facilitating the delivery of assistance, including medical supplies,</li> </ul> | <ul style="list-style-type: none"> <li>• Contains several parties</li> </ul> |

# Bird & Bird

|  |   |  |
|--|---|--|
|  | <p>food, or the transfer of humanitarian workers and related assistance or for evacuations;</p> <ul style="list-style-type: none"><li>• Expansion of wind-down period in view of import ban for goods falling under CN code 2905 11 as listed in Part B of Annex XXI to 18 June 2023;</li><li>• Possibility for EU Member State competent authorities to authorise the sale, supply, transfer or export of the goods falling under CN codes 8417 20, 8419 81 80 and 8438 10 10, or the provision of related technical or financial assistance, if necessary for personal household use of natural persons;</li><li>• Possibility for the competent authority of Bulgaria, Hungary and Slovakia to authorise the sale, supply, transfer or export of certain specific listed certain petroleum products to Ukraine;</li><li>• Introduction or reporting obligation relating to the import of natural gas condensates of subheading CN 2709 00 10 from liquefied natural gas production plants, originating in or exported from Russia;</li><li>• Prohibition to admit to trading as of 29 January 2023, on trading venues registered or recognised in the Union, the transferable securities of any legal person, entity or body established in Russia and with over 50 % public ownership;</li><li>• Expansion of the prohibition to hold any posts in the governing bodies of Russian companies;</li><li>• Possibility for EU Member State competent authorities to authorise prohibited transactions necessary for the divestment and withdrawal by 30 June 2023, of specific listed entities or their EU subsidiaries from a legal person, entity or body established in the EU;</li><li>• Obligation for credit institutions to a list of deposits exceeding 100 000 EUR held by a legal person, entity or body established outside the EU and whose proprietary rights are directly or indirectly owned for more than 50 % by Russian nationals or natural persons residing in Russia;</li><li>• Prohibition to provide market research and public opinion polling services, technical testing and analysis services and advertising services to the Government of Russia or legal persons, entities or bodies established in Russia;</li><li>• Possibility for EU Member State competent authorities to authorise the import, sale, supply or transfer of specific listed goods and technologies until 30 September 2023, where such sale, supply or transfer is strictly necessary for the divestment from Russia or the wind-down of business activities in Russia;</li><li>• Expansion of export ban in view of various goods, including certain electrical items and certain aircraft engines;</li><li>• Expansion of the specific list of parties linked to the defence and security sector in view of the dual-use and “cutting-edge technology” related restrictions</li></ul> |  |
|--|---|--|

# Bird & Bird

|                         |   |  |
|-------------------------|---|--|
| <u>30 January 2023</u>  | Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed party are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed party.   | <ul style="list-style-type: none"> <li>• Aircraft Manufacturing Industries Corporation (HESA) (شرکت صنایع هواپیماسازی ایران)</li> </ul>  |
| <u>5 February 2023</u>  | <ul style="list-style-type: none"> <li>• Introduction of a winddown period for specific listed petroleum products classified under commodity code 2710 that are purchased above the price cap on Russian petroleum products and which:               <ul style="list-style-type: none"> <li>○ originate in Russia or which have been exported from Russia</li> <li>○ are loaded onto a vessel at the port of loading prior to 5 February 2023; and,</li> <li>○ are unloaded at the final port of destination prior to 1 April 2023</li> </ul> </li> </ul>   | N/A  |
| <u>5 February 2023</u>  | <ul style="list-style-type: none"> <li>• Introduction of the price cap on Russian petroleum products classified under commodity code 2710 at USD 45 (e.g. motor oil) and 100 (e.g. diesel, gasoline and kerosine)</li> </ul>  | N/A  |
| <u>25 February 2023</u> | Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed party are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed party.   | <ul style="list-style-type: none"> <li>• Contains several parties</li> </ul>   |
| <u>25 February 2023</u> | <ul style="list-style-type: none"> <li>• 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 198, 199 and 200 if necessary for the termination by 26 August 2023 of operations, contracts, or other agreements, including correspondent banking relations, concluded with those entities before 25 February 2023, or, with respect to the entity listed under entry number 198, for transactions for the disbursement of funds by the Jewish Claims Conference to beneficiaries in the Russian Federation by 26 November 2023, irrespective of when the operations, contracts or other agreements were concluded.</li> <li>• 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 101 if:               <ul style="list-style-type: none"> <li>○ necessary for the disposal or the transfer of securities by an entity established in the EU, currently or previously controlled by the entity listed under entry number 82;</li> <li>○ such disposal or transfer is completed by 24 July 2023; and,</li> <li>○ such disposal or transfer is carried out on the basis of operations, contracts or other agreements concluded with, or otherwise involving, the entity listed under entry number 101 before 3 June 2022</li> </ul> </li> </ul> | <ul style="list-style-type: none"> <li>• Alfa-Bank JSC</li> <li>• Public joint-stock company Rosbank</li> <li>• Tinkoff Bank JSC</li> <li>• National Settlement Depository (NSD)</li> <li>• VTB Bank</li> <li>• Limited Liability Company “Commercial Vehicles – GAZ Group”</li> </ul> |

# Bird & Bird

|                                |   |  |
|--------------------------------|---|--|
|                                | <ul style="list-style-type: none"> <li>• Possibility for EU Member State competent authorities to authorise the release of certain frozen funds or economic resources belonging to the entity listed under number 190 if necessary for the termination by 26 August 2023 of operations, contracts or other agreements concluded with, or otherwise involving, that entity before 25 February 2023</li> <li>• The date of “28 February 2023” is replaced by the date “31 May 2023” in view of potential licences for the divestment of entities owned or controlled by listed parties</li> <li>• Reporting requirements are enhanced. It is now also required to:             <ul style="list-style-type: none"> <li>○ Report funds and economic resources owned or controlled by listed parties that are incorrectly not frozen;</li> <li>○ Report funds and economic resources owned or controlled by listed parties that have been subject to any move, transfer, alteration, use of, access to, or dealing in the two weeks preceding the listing of those parties;</li> <li>○ For central securities depositories to report the above information within two weeks of acquiring it and every three months thereafter.</li> </ul> </li> </ul>  |  |
| <p><u>26 February 2023</u></p> | <ul style="list-style-type: none"> <li>• Expansion of specific listed parties that support Russia’s military and industrial complex;</li> <li>• Prohibition to transit via the territory of Russia dual-use items that are exported from the EU;</li> <li>• Possibility for EU Member State competent authorities to authorise the transit via the territory of Russia of dual-use items if intended for specific purposes;</li> <li>• Prohibition to transit via the territory of Russia firearms, their parts and essential components and ammunition that are exported from the EU;</li> <li>• Expansion of export ban in view of items suited for use in aviation or the space industry;</li> <li>• Introduction of a wind-down period in view of the export ban relating to items suited for use in aviation or the space industry as listed in Part D of Annex XI to 27 March 2023;</li> <li>• Notification requirement (48 hours in advance) for non-scheduled flights between Russia and the EU, operated directly or via a third country;</li> <li>• Expansion of import ban relating to specific listed products including synthetic rubber;</li> <li>• Introduction of a wind-down period in view of the import ban relating to specific listed products including synthetic rubber;</li> <li>• Expansion of export ban relating to specific listed products including flat-rolled products of iron or non-alloy steel;</li> <li>• Introduction of a wind-down period in view of the export ban relating to specific listed products including flat-rolled products of iron or non-alloy steel;</li> </ul> | <ul style="list-style-type: none"> <li>• Contains several parties</li> </ul> |

# Bird & Bird

- Possibility for EU Member State competent authorities to authorise the export, supply, transfer or related technical assistance, brokering services, financing or financial assistance to specific listed products including flat-rolled products of iron or non-alloy steel if:
  - strictly necessary for the production of titanium goods required in the aeronautic industry, for which no alternative supply is available; or,
  - necessary for personal household use of natural persons
- Reporting requirements are introduced. It is required for parties in the financial sector to report the assets and reserves they hold or are a counterparty to of the following parties:
  - 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
  - Russian National Wealth Fund
- Expansion of wind-down period in view of joint-ventures with specific listed parties to 31 December 2023;
- The prohibition to conduct any transaction with specific listed parties does not apply in view of pilot services to vessels in innocent passage necessary for maritime safety;
- The date of “30 June 2023” is replaced by the date “31 December 2023” in view of potential licences for the divestment of specific listed entities targeted by a transactions ban;
- Prohibition to allow Russian nationals or natural persons residing in Russia to hold any posts in the governing bodies of the owners or operators of critical infrastructures, European critical infrastructures and critical entities;
- Prohibition to provide storage capacity to:
  - Russian national, a natural person residing in Russia, or a legal person, entity or body established in Russia;
  - a legal person, entity or body directly or indirectly owned for more than 50% by a party referred to above;
  - a party acting on behalf or at the direction of a party referred to above
- Introduction of a wind-down period in view of the prohibition to provide storage capacity until 27 March 2023;
- Possibility for EU Member State competent authorities to authorise the provision of storage capacity if necessary for ensuring critical energy supply within the EU;
- Possibility for EU Member State competent authorities to authorise the provision of prohibited services in view of a divestment from Russia or the wind-down of business activities in Russia;
- Introduction of a provision to allow technical assistance in view of the provision of pilot services to vessels in innocent passage necessary for maritime safety;

# Bird & Bird

|                      |   |   |
|----------------------|---|---|
|                      | <ul style="list-style-type: none"> <li>• Introduction of a provision to indicate that goods imported before the introduction of an import ban can be released by the competent customs authorities in the EU</li> </ul>   |   |
| <u>15 March 2023</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 parties).  | <ul style="list-style-type: none"> <li>• No new listings</li> </ul>   |
| <u>4 April 2023</u>  | Application of prohibitions for operators to broadcast or to enable, facilitate or otherwise contribute to broadcast, any content by RT Arabic or Sputnik Arabic applies as from 10 April 2023.   | <ul style="list-style-type: none"> <li>• RT Arabic</li> <li>• Sputnik Arabic</li> </ul>   |
| <u>13 April 2023</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.   | <ul style="list-style-type: none"> <li>• Wagner Group</li> <li>• RIA FAN (Federal News Agency LLC)</li> </ul>   |
| <u>15 April 2023</u> | Amendments 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 parties).  | <ul style="list-style-type: none"> <li>• No new listings</li> </ul>   |
| <u>30 May 2023</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.   | <ul style="list-style-type: none"> <li>• Aleksandr Kalinin</li> <li>• Grigore CARAMALAC</li> </ul>  |
| <u>7 June 2023</u>   | <p>Amendment of the listing criteria. The following parties can be designated as sanctioned parties:</p> <ul style="list-style-type: none"> <li>• Leading businesspersons operating in Russia and their immediate family members;</li> <li>• Other natural persons, benefitting from businesspersons operating in Russia;</li> <li>• Businesspersons, legal persons, entities or bodies involved in economic sectors providing a substantial source of revenue to the Government of the Russian Federation</li> </ul> | N/A   |
| <u>23 June 2023</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.   | <p>Contains amongst others the following parties:</p> <ul style="list-style-type: none"> <li>• MRB Bank</li> <li>• CMRBank</li> <li>• Joint Stock Company DUKS</li> </ul> |

# Bird & Bird

|                            |  |   |
|----------------------------|--|---|
|                            |  | <ul style="list-style-type: none"> <li>• JSC Murom InstrumentMaking Plant</li> <li>• Zala Aero Group</li> </ul> |
| <p><u>24 June 2023</u></p> | <ul style="list-style-type: none"> <li>• Amendment of the listing criteria in order to have the ability to designate the following parties as EU-sanctioned:             <ul style="list-style-type: none"> <li>○ parties facilitating sanctions circumvention or otherwise significantly frustrate the EU-Russia sanctions;</li> <li>○ legal persons, entities or bodies operating in the Russian IT-sector with a license administered by the Federal Security Service of the Russian Federation (FSB) Center for Licensing, Certification, and Protection of State Secrets or a “weapons and military equipment” license administered by the Russian Ministry of Industry and Trade</li> </ul> </li> <li>• 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 82 or 101 in Annex I in view of certain transfers of securities;</li> <li>• Possibility for EU Member State competent authorities to authorise the conversion by EU parties of a depositary receipt with Russian underlying security held with the entity listed under entry number 101 for the purpose of selling the underlying security, and the making available of funds linked to the conversion of the depositary receipt and to the sale of the underlying security directly or indirectly to that entity in Russia;</li> <li>• Possibility for EU Member State competent authorities to authorise the release of certain frozen funds or economic resources belonging to the natural persons listed under entry number 695 in view of the completion of transactions, including sales, which are strictly necessary for the wind-down of a joint venture or similar legal arrangement established in Russia with this natural person or an entity owned by this natural;</li> <li>• Possibility for EU Member State competent authorities to authorise the release of certain frozen funds or economic resources belonging to, owned, held or controlled by a sanctioned party or the provision of services to such a party if is strictly necessary for the setting-up, certification or evaluation of a firewall which:             <ul style="list-style-type: none"> <li>○ removes the control by the sanctioned party over the assets of a non-listed legal person, entity or body incorporated or constituted under the law of a Member State and which is owned or controlled by the former; and,</li> <li>○ ensures that no further funds or economic resources accrue for the benefit of the listed party</li> </ul> </li> <li>• 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, 108, 126, 127, 198, 199, 200, 214 and 215, or the making available of certain funds or economic resources to those</li> </ul> | <p>N/A</p>  |



# Bird & Bird

|                            |   |   |
|----------------------------|---|---|
|                            | <p>entities if such funds or economic resources are necessary for the purchase, import or transport of agricultural and food products, including wheat and fertilisers;</p> <ul style="list-style-type: none"> <li>• Introduction of an exemption to indicate that funds or economic resources are not frozen and can be made available if needed for the provision of pilot services to vessels in innocent passage as defined by international law which are necessary for reasons of maritime safety;</li> <li>• Reporting requirement related article is amended to reflect that such reporting must be consistent with respect for the confidentiality of communications between lawyers and their clients guaranteed in Article 7 of the Charter of Fundamental Rights of the EU;</li> <li>• Clarification of a reference to competent authorities that are to share relevant information in view of sanctions compliance, including a specific reference to the customs authorities.</li> </ul>  |   |
| <p><u>24 June 2023</u></p> | <ul style="list-style-type: none"> <li>• Prohibition to sell, license or transfer in any other way – other than through e.g. technical assistance or brokering services – intellectual property rights or trade secrets as well as grant rights to access or re-use any material or information protected by means of intellectual property rights or constituting trade secrets related to dual-use items and to the provision, manufacture, maintenance and use of dual-use items, directly or indirectly to any natural or legal person, entity or body in Russia or for use in Russia;</li> <li>• Prohibition to transit via the territory of Russia of 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, as listed in Annex VII, that are exported from the EU;</li> <li>• Exemption allowing transit via the territory of Russia specific listed “cutting-edge” goods and technology, as listed in Annex VII, that are exported from the EU if intended for specific purposes;</li> <li>• Possibility for EU Member State competent authorities to authorise the sale, supply, transfer or export of specific listed “cutting-edge” goods and technology, as listed in Annex VII, intended for the exclusive use and under the full control of the authorising Member State and in order to fulfil its maintenance obligations in areas which are under a long-term lease agreement between that Member State and Russia;</li> <li>• Possibility for EU Member State competent authorities to authorise the transit via the territory of Russia of specific listed “cutting-edge” goods and technology, as listed in Annex VII, that are exported from the EU if intended for specific purposes;</li> </ul> | <ul style="list-style-type: none"> <li>•</li> </ul> |

# Bird & Bird

- Prohibition to sell, supply, transfer or export, directly or indirectly, specific listed firearms and other arms to any natural or legal person, entity or body in Russia or for use in Russia;
- Prohibition to sell, license or transfer in any other way – other than through e.g. technical assistance or brokering services – intellectual property rights or trade secrets as well as grant rights to access or re-use any material or information protected by means of intellectual property rights or constituting trade secrets related to specific listed firearms and other arms and to the provision, manufacture, maintenance and use of specific listed firearms and other arms, directly or indirectly to any natural or legal person, entity or body in Russia or for use in Russia;
- Information exchange requirement between the EU Member State competent authorities and the Commission to prevent forum shopping or other cases as appropriate, such as on licence applications and denied licences;
- Prohibition to sell, license or transfer in any other way – other than through e.g. technical assistance or brokering services – intellectual property rights or trade secrets as well as grant rights to access or re-use any material or information protected by means of intellectual property rights or constituting trade secrets related to specific listed items and to the provision, manufacture, maintenance and use of specific listed items, directly or indirectly to any natural or legal person, entity or body in Russia or for use in Russia;
- Prohibition to transit via the territory of Russia specific listed items suited for use in aviation or the space industry, that are exported from the EU;
- Prohibition to sell, license or transfer in any other way – other than through e.g. technical assistance or brokering services – intellectual property rights or trade secrets as well as grant rights to access or re-use any material or information protected by means of intellectual property rights or constituting trade secrets related to specific listed items suited for use in aviation or the space industry and to the provision, manufacture, maintenance and use of specific listed items suited for use in aviation or the space industry, directly or indirectly to any natural or legal person, entity or body in Russia or for use in Russia;
- Possibility for EU Member State competent authorities to authorise the transit via the territory of Russia of specific listed items suited for use in aviation or the space industry, that are exported from the EU if intended for specific purposes;
- Possibility for EU Member State competent authorities to authorise the sale, supply, transfer or export of specific listed items suited for use in aviation or the space industry, intended for the exclusive use and under the full control of the authorising Member State and in order to fulfil its maintenance obligations in areas which are under a long-term lease agreement between that Member State and Russia;

# Bird & Bird

- Prohibition to provide access to ports and locks in the EU, to any vessel performing ship-to-ship transfers, at any point of the voyage to a Member State's ports or locks, if the competent authority has reasonable cause to suspect that the vessel is in breach of the prohibitions set out in Article 3m(1) and (2) and Article 3n(1) and (4) of Regulation 833/2014;
- EU competent authorities shall not grant access if a vessel does not notify the competent authority at least 48 hours in advance about a ship-to-ship transfer occurring within the Exclusive Economic Zone of a Member State or within 12 nautical miles from the baseline of that Member State's coast;
- Prohibition to provide access to ports and locks in the territory of the EU to any vessel which the competent authority has reasonable cause to suspect of illegally interfering with, switching off or otherwise disabling its shipborne automatic identification system at any point of the voyage to a Member State's ports or locks, in breach of SOLAS Regulation V/19, point 2.4, when transporting crude oil or petroleum products subject to the prohibitions set out in Article 3m(1) and (2) and Article 3n(1) and (4) of Regulation 833/2014.
- Exemption allowing access for vessels in need of assistance in view of emergencies if such vessels conducted suspected and prohibited ship-to-ship transfers, failed to notify a relevant ship-to-ship transfer, or interfered or switched off their shipborne automatic identification system;
- Possibility for EU Member State competent authorities to authorise a vessel to access a port or lock in the territory of the EU if necessary for humanitarian purposes;
- Prohibition to sell, license or transfer in any other way – other than through e.g. technical assistance or brokering services – intellectual property rights or trade secrets as well as grant rights to access or re-use any material or information protected by means of intellectual property rights or constituting trade secrets related to specific listed maritime navigation goods and technology and to the provision, manufacture, maintenance and use of specific listed maritime navigation goods and technology, directly or indirectly to any natural or legal person, entity or body in Russia or for use in Russia;
- Obligation to demonstrate the country of origin upon import in the EU in view of imported specific listed steel products that are processed in a third country and that incorporate specific listed iron and steel products originating in Russia;
- Prohibition of the following activities relating to specific listed luxury goods:
  - the provision of technical assistance, brokering services or other services;
  - the provision of financing or financial assistance;
  - selling, licensing or transferring in any other way intellectual property rights or trade secrets as well as grant rights to access or re-use any material or information protected by means of intellectual property

# Bird & Bird

|  |   |  |
|--|---|--|
|  | <p>rights or constituting trade secrets related to the specific listed luxury goods and to the provision, manufacture, maintenance and use of those goods, directly or indirectly to any natural or legal person, entity or body in Russia or for use in Russia;</p> <ul style="list-style-type: none"><li>• Possibility for EU Member State competent authorities to authorise the sale or supply of a vessel falling under CN code 8901 10 00 or 8901 90 00, or the provision of related technical or financial assistance to a legal person, entity or body in Russia or for use in Russia;</li><li>• Possibility for EU Member State competent authorities to authorise the purchase, import or transfer of goods falling under CN codes 7007, 8479, 8481, 8487, 8504, 8517, 8525, 8531, 8536, 8537, 8538, 8542, 8543, 8603 as listed in Annex XXI, or the provision of related technical and financial assistance, if necessary for the operation, maintenance or repair of Budapest metro line 3 cars delivered in 2018, in execution of a guarantee provided by Metrowagonmash;</li><li>• Prohibition to sell, license or transfer in any other way – other than through e.g. technical assistance or brokering services – intellectual property rights or trade secrets as well as grant rights to access or re-use any material or information protected by means of intellectual property rights or constituting trade secrets related to specific listed goods which could contribute in particular to the enhancement of Russian industrial capacities and to the provision, manufacture, maintenance and use of specific listed goods which could contribute in particular to the enhancement of Russian industrial capacities, directly or indirectly to any natural or legal person, entity or body in Russia or for use in Russia;</li><li>• Exemption allowing the wind-down of contracts in view of certain specific listed goods which could contribute in particular to the enhancement of Russian industrial capacities;</li><li>• Prohibition for road transport undertakings to transport goods within the EU by means of trailers or semi-trailers registered in Russia, including if those trailers or semi-trailers are hauled by trucks registered in other countries;</li><li>• Exemption relating to Russian oil imported through pipelines will no longer apply to Germany and Poland;</li><li>• Prohibition to sell transferable securities denominated in any currency – other than the official currency of a Member State – issued after 6 August 2023, or units in collective investment undertakings 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;</li><li>• Possibility for EU Member State competent authorities to authorise the provision of prohibited 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 to legal persons,</li></ul> |  |
|--|---|--|

# Bird & Bird

|  |   |  |
|--|---|--|
|  | <p>entities or bodies established in Russia if necessary for the setting-up, certification or evaluation of a firewall which:</p> <ul style="list-style-type: none"><li>○ removes the control by the sanctioned party over the assets of a non-listed legal person, entity or body incorporated or constituted under the law of a Member State and which is owned or controlled by the former; and,</li><li>○ ensures that no further funds or economic resources accrue for the benefit of the listed party</li></ul> <ul style="list-style-type: none"><li>• Possibility for EU Member State competent authorities to authorise the sale, supply, transfer, export or transit through Russia of specific listed items, or the provision of related technical assistance, brokering services or other services, or financing or financial assistance, for the operation and maintenance of the Caspian Pipeline Consortium (CPC) pipelines and associated infrastructure necessary for the transport of goods falling under CN 2709 00 originating in Kazakhstan and which are only being loaded in, departing from or transiting through Russia;</li><li>• Possibility for EU Member State competent authorities to authorise the provision of auditing services, engineering services, legal advisory services, technical testing and analysis services for the operation and maintenance of the CPC pipelines and associated infrastructure necessary for the transport of goods falling under CN 2709 00 originating in Kazakhstan and which are only being loaded in, departing from or transiting through Russia</li><li>• Reporting requirement related article is amended to reflect that such reporting must be consistent with respect for the confidentiality of communications between lawyers and their clients guaranteed in Article 7 of the Charter of Fundamental Rights of the EU;</li><li>• Possibility for EU Member State competent authorities to authorise prohibited transactions, if strictly necessary for the divestment from Russia or the wind-down of business activities in Russia. Depending on the prohibitions concerned, the wind-down periods runs until:<ul style="list-style-type: none"><li>○ 31 December 2023;</li><li>○ 31 March 2024</li></ul></li><li>• Prohibition to conduct business with a third country listed in Annex XXXIII in view of specific listed items. Annex XXXIII shall only include third countries that have been identified by the Council as having systematically and persistently failed to prevent the sale, supply, transfer or export to Russia of goods and technology, as listed in that Annex, exported from the EU;</li><li>• Addition of parties to sanctions list on which tighter export restrictions regarding dual-use items, as well as items which might contribute to the technological enhancement of Russia's defence and security sector, are imposed;</li></ul> |  |
|--|---|--|

# Bird & Bird

|                                   |  |  |
|-----------------------------------|--|--|
|                                   | <ul style="list-style-type: none"> <li>• Addition of Switzerland to the list of partner countries which are applying a set of trade restrictions substantially equivalent to those in the relevant EU sanctions.</li> </ul>  |  |
| <a href="#">20 July 2023</a>      | 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.  | Contains various parties.  |
| <a href="#">28 July 2023</a>      | 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.  | Contains various parties.  |
| <a href="#">15 September 2023</a> | 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 parties).   | No new listings.   |
| <a href="#">30 September 2023</a> | Application as of 1 October 2023 of the broadcasting related sanctions in respect of all entities referred to in Annex IV to Regulation (EU) 2023/1214.  | <ul style="list-style-type: none"> <li>• RT Balkan</li> <li>• Oriental Review</li> <li>• Tsargrad</li> <li>• New Eastern Outlook</li> <li>• Katehon</li> </ul> |
| <a href="#">18 December 2023</a>  | 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.  | Contains various parties.  |
| <a href="#">19 December 2023</a>  | <ul style="list-style-type: none"> <li>• Amendment of the listing criteria. The following parties can be designated as sanctioned parties: <ul style="list-style-type: none"> <li>○ entities established in Russia, previously owned or controlled by entities established in the Union, ownership or control of which has been compulsorily transferred by the Government of the Russian Federation</li> <li>○ parties that have benefitted from such a compulsorily transfer,</li> <li>○ natural persons who have been appointed to the governing bodies of entities that have benefitted from such a compulsorily transfer</li> </ul> </li> <li>• Introduction of the possibility to retain the names of deceased persons on a sanctions list;</li> <li>• Introduction of a derogation to allow for the release of frozen funds or economic resources to deprive in the public interest a listed party of funds or economic resources belonging to, owned by or controlled by that party, and for making</li> </ul> | N/A  |

# Bird & Bird

|  |   |  |
|--|---|--|
|  | <p>funds and economic resources available to such party in order for compensation to be paid, provided that such compensation is frozen;</p> <ul style="list-style-type: none"><li>• Introduction of a derogation from the asset freeze and the prohibition on making funds and economic resources available to allow for the sale or use of shares in, or assets of, an entity established in Russia where the ownership or control by an EU legal person of that entity has been compulsorily transferred by the Russian Government. That derogation would enable, inter alia, the payment of agreed adequate compensation to EU legal persons;</li><li>• Extension of the deadline applicable to the existing derogation allowing the processing of payments by the Jewish Claims Conference through a listed bank;</li><li>• Possibility to authorise the release of certain frozen funds or economic resources belonging to, or the making available of certain funds or economic resources to Alfa Insurance, being the entity listed under entry number 270;</li><li>• Possibility to authorise the release of certain frozen funds or economic resources, or the making available of certain funds or economic resources to the individuals listed under entry numbers 92, 674, 675, 694, 880, 882, 909 and 920 under the heading 'Persons' in Annex I and entities listed under entry numbers 38 and 39 under the heading 'Entities' for the sale of EU entities:<ul style="list-style-type: none"><li>○ Arkady Rotenberg</li><li>○ Petr Aven</li><li>○ Mikhail Fridman</li><li>○ Gennady Timchenko</li><li>○ German Khan</li><li>○ Igor Kesaev</li><li>○ Boris Rotenberg</li><li>○ OAO 'VO Technopromexport'</li><li>○ OOO 'VO Technopromexport'</li></ul></li><li>• Possibility to authorise the release of certain frozen funds or economic resources belonging to JSC "Alabuga" – the entity listed under entry number 333 under the heading 'Entities' in Annex I, or the making available of certain funds or economic resources to that entity, after having determined that such funds or economic resources are necessary for the termination by 20 June 2024 of contracts concluded with that entity before 19 December 2023;</li><li>• Amendment of reporting obligations by including a reference to national legislation and by ensuring the confidentiality of communications between clients and professionals other than lawyers;</li><li>• Introduction of an obligation for the EU Member States to designate by 31 October 2024 the national authorities competent to identify and trace, where appropriate, the funds and economic resources belonging to, or owned, held or</li></ul> |  |
|--|---|--|

# Bird & Bird

|                                |  |            |
|--------------------------------|--|------------|
|                                | <p>controlled by listed parties in view of preventing or detecting instances of a breach or circumvention, or attempts at a breach or circumvention.</p>   |            |
| <p><u>19 December 2023</u></p> | <ul style="list-style-type: none"> <li>• Addition of new parties to the list of parties directly supporting Russia’s military and industrial complex;</li> <li>• Expansion of existing export and import bans;</li> <li>• Exemption until 20 June 2024 for the provision of insurance or reinsurance in view of certain activities outside of the energy sector in Russia and possibility to obtain a licence for such activities after 20 June 2024;</li> <li>• Possibility to authorise certain activities necessary to ensure the operation of a deep-water offshore gas project in the Mediterranean Sea;</li> <li>• Clarifications that the exemptions and derogations concerning civil nuclear projects are fully applicable to the Hungarian Paks II project;</li> <li>• Prohibition to import certain iron and steel to be introduced as of 1 October 2028 for CN codes 7207 12 10 and 7224 90;</li> <li>• Exemption to demonstrate country of origin for certain iron and steel imported from a partner country for importation of iron and steel:             <ul style="list-style-type: none"> <li>○ Switzerland</li> <li>○ Norway</li> </ul> </li> <li>• Possibility to authorise to the import of certain prohibited goods for personal use, such as automobiles;</li> <li>• Introduction or extension of a wind-down period for the import or export of certain prohibited goods or for certain prohibited activities;</li> <li>• Prohibition to transit via Russia specific listed items already covered by an export ban as well as a possibility to authorise such transit under specific circumstances;</li> <li>• Introduction of an obligation to share itemised price information for ancillary costs, such as insurance and freight, throughout the supply chain of Russian oil trade in view of the price cap on Russian oil;</li> <li>• Prohibition to purchase, import, or transfer, directly or indirectly, specific listed diamonds and products incorporating diamonds as of 1 January 2024 from Russia;</li> <li>• Prohibition to purchase, import, or transfer, directly or indirectly, specific listed products processed in a third country and incorporating specific Russian diamonds as of 1 March 2024 and 1 September 2024;</li> <li>• Prohibition to provide technical assistance, brokering services, financing, financial assistance or other services relating to specific listed diamonds and products incorporating diamonds from Russia;</li> <li>• Obligation to demonstrate the origin for imports of specific listed products processed in a third country and incorporating specific Russian diamonds as of 1 March 2024 and 1 September 2024;</li> </ul> | <p>N/A</p> |



# Bird & Bird

- Prohibition to sell or transfer, directly or indirectly, specific listed tankers for the transport of crude oil or petroleum products to a party in Russia or for use in Russia;
- Possibility to authorise the sale or transfer of specific listed tankers for the transport of crude oil or petroleum products;
- Notification requirement for:
  - sales or transfers of specific listed tankers for the transport of crude oil or petroleum products to any third country other than Russia;
  - sales or transfers of specific listed tankers for the transport of crude oil or petroleum products after 5 December 2022 and prior to 19 December 2023 to Russia or to any other third country.
- Prohibition for Russian nationals and persons residing in Russia to own, control or hold any posts in governing bodies in companies providing crypto-asset wallet, account or custody services;
- Nationals of and temporary resident card holders in EU Member States, the European Economic Area or Switzerland are exempt from the prohibition to own, control or hold any posts in governing bodies in companies providing crypto-asset wallet, account or custody services;
- Prohibition to sell, supply, transfer, export, or provide, directly or indirectly, specific listed software for the management of enterprises and software for industrial design and manufacture to the Russian government or to legal persons, entities or bodies established in Russia;
- Prohibition to provide technical assistance, brokering services, financing, financial assistance or other services relating to prohibited services;
- Limiting the exemption to provide prohibited services to subsidiaries owned by entities located in EU Member States or certain partner countries until 20 June 2024;
- Possibility to authorise the provision of prohibited services to subsidiaries owned by entities located in EU Member States or certain partner countries;
- Obligation for EU entities directly or indirectly owned more than 40% by Russian parties to report as of 1 May 2024 any transfer of funds exceeding EUR 100.000 to non-EU destinations during a quarter;
- Notification obligation for banks to report fund transfers exceeding EUR 100.000 made by EU entities owned more than 40% by Russian parties as of 1 July 2024;
- Extension period for authorising divestment from Russia or the wind-down of business activities in Russia;
- Obligation for exporters to contractually prohibit re-exportation to Russia and re-exportation for use in Russia in view of specific listed items and to include adequate remedies in the event of a breach of a contractual obligation;

# Bird & Bird

|                                  |   |   |
|----------------------------------|---|---|
|                                  | <ul style="list-style-type: none"> <li>Reporting requirement in the event that contractual re-exportation obligation is breached by third-country counterparty.</li> </ul>  |   |
| <a href="#">3 January 2024</a>   | 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.   | <ul style="list-style-type: none"> <li>Pavel Alekseevich MARINYCHEV</li> <li>PJSC Alrosa</li> </ul>                                   |
| <a href="#">15 February 2024</a> | <ul style="list-style-type: none"> <li>Central securities depositories should account for and manage cash balances accumulating due to the immobilisation of assets and reserves of the Central Bank of Russia separately from their other activities, and should also keep the revenues generated separate;</li> <li>In a second step, the Council should be able to decide how those net profits should be directed to support Ukraine and its recovery and reconstruction, consistent with applicable contractual obligations, and in accordance with EU and international law, in coordination with partners.</li> </ul>  | N/A   |
| <a href="#">23 February 2024</a> | 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.   | Contains various parties.   |
| <a href="#">24 February 2024</a> | <ul style="list-style-type: none"> <li>Expansion of products covered by an export ban by e.g. adding components for the development and production of unmanned aerial vehicles;</li> <li>Introduction of wind-down period for contracts executed until 25 May 2024 in view of contracts concluded before 24 February 2024 in view of certain products classified under 8504;</li> <li>Expanding the list of parties subject to export related restrictions;</li> <li>UK added as partner country in view of exemption to demonstrate country of origin for certain iron and steel imported from partner countries.</li> </ul> | Contains various parties.   |
| <a href="#">14 March 2024</a>    | 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 parties).  | No new listings.  |
| <a href="#">18 May 2024</a>      | Imposition of broadcast related prohibitions to specific listed parties as from 25 June 2024, provided that the Council, having examined the respective cases of those entities, so decides by implementing act.  | <ul style="list-style-type: none"> <li>Voice of Europe</li> <li>RIA Novosti</li> <li>Izvestija</li> <li>Rossiiskaja Gazeta</li> </ul> |

# Bird & Bird

|                              |   |   |
|------------------------------|---|---|
| <a href="#">23 May 2024</a>  | Imposition of a net profit allocation by central securities depositories hold assets and reserves of the Central Bank of Russia that is to be directed to support Ukraine and its recovery and reconstruction.  | N/A   |
| <a href="#">27 May 2024</a>  | 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.   | Contains various parties.   |
| <a href="#">27 May 2024</a>  | Introduction of new sanctions regime in view of the situation in Russia and internal repression. The new sanctions regime imposes export prohibitions of specific listed items and provides for the possibility to impose asset freezes.  | N/A   |
| <a href="#">27 May 2024</a>  | 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.   | Contains various parties.   |
| <a href="#">24 June 2024</a> | 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.   | Contains various parties.   |
| <a href="#">24 June 2024</a> | <ul style="list-style-type: none"> <li>• Possibility to authorise the release of certain frozen funds if a bank targeted with an asset freeze acted as intermediary bank in fund transfers from Russia to the EU;</li> <li>• Possibility to authorise the release of certain frozen funds in view of payments initiated by a party targeted with an asset freeze;</li> <li>• Amendment of anti-circumvention provision to clarify that knowledge and intent criteria are also met where a party participates in circumvention and is aware that such participation may have the object or effect of circumvention and accepts that possibility;</li> <li>• Provide EU parties the possibility to claim compensation from damages caused by Russian companies due to sanctions implementation and expropriation;</li> <li>• Formal clarification that EU Member States may take into account the voluntary self-disclosure ("VSD") of EU sanctions as a mitigating factor, in accordance with their national law;</li> <li>• Requirement for the EU Member States to have the competence to confiscate the proceeds of EU sanctions violations.</li> </ul> | N/A   |
| <a href="#">25 June 2024</a> | Imposition of broadcast related prohibitions to specific listed parties by Council implementing ac as from 25 June 2024.  | <ul style="list-style-type: none"> <li>• Voice of Europe</li> <li>• RIA Novosti</li> <li>• Izvestija</li> </ul> |

# Bird & Bird

|                            |  |  |
|----------------------------|--|--|
|                            |  | <ul style="list-style-type: none"> <li>Rossiiskaja Gazeta</li> </ul> |
| <p><u>25 June 2024</u></p> | <ul style="list-style-type: none"> <li>Expansion of investment ban in Russia's energy sector whereby projects under construction for the production of liquified natural gas are to be included;</li> <li>Possibility to authorise the export and transfer of specific listed items under CN code 9026 or 8414 90 that are physically located in the EU as of 25 June 2024 and that are strictly necessary for the functioning of the Sakhalin-2 (Сахалин-2) Project to ensure Japan's energy security;</li> <li>Exemption from the prohibition for Russian aircraft from overflying or landing in the EU for aircraft that have a maximum seating capacity of 4 persons and a maximum take-off mass of no more than 2000 kg when used for private, non-corporate, flights carried out within the EU;</li> <li>Obligation for aircraft operators of non-scheduled flights to provide ultimate beneficial ownership information on the aircraft as well as information relating to the passengers and crew members;</li> <li>Possibility to authorise vessels that have changed their Russian flag to the flag of any other State prior to 16 April 2022, to access a port or a lock;</li> <li>Possibility to authorise the import or transfer of items with CN codes 8471, 8523, 8536 and 9027 or the provision of related technical and financial assistance, if such items are components of medical devices and are brought into the EU for the purpose of maintenance, repair or returning of defective components;</li> <li>Expansion of import prohibition relating to specific listed items, including a wind-down period until 26 September 2024 for contacts concluded before 25 June 2024;</li> <li>Expansion of export prohibition relating to specific listed items, including several wind-down periods for contacts concluded before 25 June 2024;</li> <li>Introduction of an exemption from an export ban relating to specific items in view of non-military use and for a non-military end-user, intended for health emergencies, the urgent prevention or mitigation of an event likely to have a serious and significant impact on human health and safety or the environment, or a response to natural disasters;</li> <li>Possibility to authorise the export or transfer of specific listed items under CN codes 3917, 8421, 8471, 8523, 8536 and 8544, or the provision of related technical or financial assistance, if necessary for the purposes of maintenance or repair of medical devices;</li> <li>Possibility to authorise the export or transfer of specific listed items under CN codes 8481 80, 7411, or 7412, or the provision of related technical or financial assistance, if necessary for personal household use of natural persons in Russia;</li> <li>Possibility to authorise the export or transfer of a specific listed item under CN code 3917 10, or the provision of related technical or financial assistance, if necessary for the production of food items for human consumption in Russia;</li> </ul> | <p>N/A</p>   |

# Bird & Bird

- Prohibition relating to Russian road undertakings expanded to EU established undertakings that are owned 25% or more by a Russian party;
- The import of certain diamonds is not covered by the import ban until the Council decides otherwise;
- Traceability-based evidence is required for certain diamonds as from 1 March 2025 and not from 1 September 2024;
- Exemptions introduced for certain diamonds if e.g. imported from Russia prior to 1 January 2024;
- Prohibition to provide services in view of the re-export of Russian liquified natural gas (“LNG”), including technical assistance, brokering services, financing or financial assistance related to such LNG;
- Introduction of certain exemptions as well as a wind-down period until 26 March 2025 for the execution of contracts concluded before 25 June 2024 in view of services relating to the re-export of Russian LNG;
- Introduction of an EU entry and services ban of specific listed vessels in view of conducting activities such as the transport of military equipment for Russia, the transport of stolen Ukrainian grain, or support in the development of Russia’s energy sector;
- Prohibition to provide goods or services to Russian parties for the completion of LNG projects, such as terminals and plants;
- Prohibition to purchase, import or transfer, directly or indirectly, LNG originating in Russia or exported from Russia, through LNG terminals in the EU that are not connected to the interconnected natural gas system;
- Prohibition to purchase, import, transfer, sell, supply or export, directly or indirectly, Ukrainian cultural property goods and other goods of archaeological, historical, cultural, rare scientific or religious importance, where there are reasonable grounds to suspect that the goods have been removed from Ukraine without the consent of their legitimate owner or have been removed in breach of Ukrainian law or international law;
- Prohibition to directly or indirectly engage in any transaction with specific listed Russian parties that lodged a claim before a Russian court against an EU party to obtain an injunction, order, relief, judgment or other Court decision pursuant to Article 248 of the Arbitration Procedure Code of the Russian Federation or equivalent Russian legislation, in connection with any contract or transaction the performance of which has been affected, directly or indirectly, in whole or in part, by the measures imposed under Regulations 269/2014 or 833/2014;
- Prohibition for EU parties to directly connect to the System for Transfer of Financial Messages (SPFS) of the Central Bank of Russia or equivalent specialised financial messaging services set up by the Central Bank of Russia;

# Bird & Bird

- Prohibition to engage, directly or indirectly, in any transaction with a specific listed party that makes use of SPFS or equivalent specialised financial messaging services;
- Prohibition to engage, directly or indirectly, in any transaction with a specific listed bank or crypto asset service provider that facilitate certain transactions that support Russia's defence-industrial base;
- Expansion of prohibition relating to EU financing or financial assistance to companies established in Russia or companies owned more than 50% by parties established in Russia;
- Expanding the exemption to provide prohibited services to subsidiaries owned by entities located in EU Member States or partner countries from 20 June 2024 to 30 September 2024;
- Inclusion of Liechtenstein and Iceland as "partner countries" in Annex VIII
- Exemption for the provision of prohibited services by nationals of an EU Member State that were formerly resident in Russia and are employed by subsidiaries owned by entities located in EU Member States or partner countries;
- Prohibition for intellectual property offices in the EU to accept new applications or any requests or submissions filed by Russian parties;
- Ban on Russian funding of political parties, non-governmental organisations, certain media outlets and think-tanks;
- Formal clarification that EU Member States may take into account the voluntary self-disclosure ("VSD") of EU sanctions as a mitigating factor, in accordance with their national law;
- Requirement for the EU Member States to have the competence to confiscate the proceeds of EU sanctions violations;
- Obligation for EU companies to undertake their best efforts to ensure that any non-EU entity that they own or control does not participate in activities that undermine the restrictive measures provided for in Regulation 833/2014;
- Possibility to authorise the satisfaction of a claim made by Russian parties if strictly necessary for the divestment from Russia or the wind-down of business activities in Russia;
- Provide EU parties the possibility to claim compensation from damages caused by Russian companies in view of activities that are illegal under international customary law or under a bilateral investment treaty entered between a Member State and Russia;
- EU Member States shall not be liable for compensation granted by a court in view of activities that are illegal under international customary law or under a bilateral investment treaty entered between a Member State and Russia;
- EU Member States cannot enforce judgments in view of judicial procedures initiated by Russian parties that are illegal under international customary law or under a bilateral investment treaty entered between a Member State and Russia;

# Bird & Bird

|  |  |  |
|--|--|--|
|  | <ul style="list-style-type: none"> <li>• Amendment of anti-circumvention provision to clarify that knowledge and intent criteria are also met where a party participates in circumvention and is aware that such participation may have the object or effect of circumvention and accepts that possibility;</li> <li>• Exemption to the obligation for exporters to contractually prohibit re-exportation to Russia and re-exportation for use in Russia in view of specific items;</li> <li>• Extension of the deadline for authorising divestment from Russia or the wind-down of business activities in Russia from 30 June 2024 to 31 December 2024;</li> <li>• Obligation for exporters to contractually prohibit re-exportation to Russia and re-exportation for use in Russia is extended to intellectual property rights or trade secrets related to specific listed items;</li> <li>• Obligation for EU companies and non-EU companies owned or controlled by EU companies to implement controls and procedures to assess and mitigate the risks of exports to Russia in view of specific listed items as of 26 December 2024.</li> <li>• Addition of new parties to the list of parties directly supporting Russia's military and industrial complex.</li> </ul> |  |
| <a href="#"><u>28 June 2024</u></a>      | 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.  | Contains various parties.  |
| <a href="#"><u>14 September 2024</u></a> | 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 parties).   | No new listings.   |
| <a href="#"><u>10 October 2024</u></a>   | Introduction of new sanctions regime in view of Russia's destabilizing activities. The new sanctions regime provides for the possibility to impose asset freezes.  | N/A  |
| <a href="#"><u>29 October 2024</u></a>   | Designation of the Ukraine Loan Cooperation Mechanism as the EU spending instrument in Annex XLI to Regulation (EU) No 833/2014 for which the financial contribution due to the EU budget is used.   | N/A  |
| <a href="#"><u>16 December 2024</u></a>  | <ul style="list-style-type: none"> <li>• Possibility for EU Member State competent authorities to authorise the release of certain frozen funds or economic resources or the making available of certain funds or economic resources in view of divestment of EU entities is limited to the parties listed under entry numbers 92, 694 and 920;</li> <li>• Possibility for EU Member State competent authorities to authorise the release of cash balances frozen by a central securities depository within the meaning of Regulation (EU) No 909/2014 and attributable to the entity listed under entry</li> </ul>  | <ul style="list-style-type: none"> <li>• Arkady Rotenberg</li> <li>• Gennady Nikolayevich Timchenko</li> <li>• Boris Romanovich Rotenberg</li> <li>• National Settlement Depository (NSD)</li> </ul> |

# Bird & Bird

|   |  |                           |
|---|--|---------------------------|
|   | <p>number 101 or to another entity listed under that heading, after having determined that:</p> <ul style="list-style-type: none"> <li>○ the central securities depository concerned maintains an account or accounts with the entity listed under entry number 101 under the heading “Entities”;</li> <li>○ the entity listed under entry number 101 under the heading “Entities” or another entity listed under that heading maintains an account or accounts with the central securities depository holding the cash balance to be released;</li> <li>○ the entity listed under entry number 101 under the heading “Entities” has debited an amount from the account or the accounts referred to in the first point above, pursuant to a law, decree, regulation, judicial or administrative decision or any other measure, directly or indirectly attributable to the Russian Federation, without the prior consent of the central securities depository concerned;</li> <li>○ the released cash balance is to be used by the central securities depository concerned to meet its legal obligations towards its participants and does not exceed the debited amount referred to in the third point above; and</li> <li>○ the released cash balance is not made available in breach of Article 2(2) of EU Regulation 269/2014.</li> </ul> |                           |
| <a href="#"><u>16 December 2024</u></a> | 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.  | Contains various parties. |
| <a href="#"><u>16 December 2024</u></a> | 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.  | Contains various parties. |
| <a href="#"><u>17 December 2024</u></a> | <ul style="list-style-type: none"> <li>• Expansion of the deadline for EU Member State competent authorities to authorise – in view of specific transactions – the <ul style="list-style-type: none"> <li>○ purchase, import or transfer, directly or indirectly, of crude oil or petroleum products, if they originate in Russia or are exported from Russia; or,</li> <li>○ to provision, directly or indirectly, of technical assistance, brokering services or financing or financial assistance, related to the transport, including through ship-to-ship transfers, to third countries of crude oil or petroleum products which originate in Russia or which have been exported from Russia</li> </ul> </li> <li>• Introduction of a non-liability clause for central security depositories stipulating that its actions conducted in good faith in view of article 5a paragraphs (4) to (12)</li> </ul>   | N/A                       |



# Bird & Bird

|                                |   |                                  |
|--------------------------------|---|----------------------------------|
|                                | <p>of EU Regulation 833/2014 shall not give rise to liability of any kind on the part of that depository, or of its directors or employees, unless it is proved that the action was a result of negligence;</p> <ul style="list-style-type: none"> <li>• Expansion of the deadline for EU Member State competent authorities to authorise transactions which are strictly necessary for the:             <ul style="list-style-type: none"> <li>○ wind-down, by 31 December 2025, of a joint venture or similar legal arrangement concluded before 16 March 2022, involving a party confronted with a transaction ban;</li> <li>○ the divestment and withdrawal by 31 December 2025, by parties confronted with a transaction ban or their subsidiaries in the EU from a legal person, entity or body established in the EU</li> </ul> </li> <li>• Expansion of the deadline for EU Member State competent authorities to authorise the satisfaction of a claim made by Russian parties if strictly necessary for the divestment from Russia or the wind-down of business activities in Russia;</li> <li>• Injunctions, orders, reliefs, judgments or other court decisions in view of Article 248 of the Arbitration Procedure Code of the Russian Federation or equivalent Russian legislation shall not be recognised, given effect or enforced in the EU;</li> <li>• Requests for assistance during an investigation or other criminal proceedings, punishment or other sanction pursuant to the Russian Criminal Code based on an alleged violation of an injunction, order, relief, judgment or other court decision pursuant or derived from Article 248 of the Arbitration Procedure Code of the Russian Federation or equivalent Russian legislation shall not be recognised, given effect or enforced in the EU;</li> <li>• Expansion of the deadline for EU Member State competent authorities to authorise the divestment from Russia or the wind-down of business activities in Russia to 31 December 2025;</li> <li>• Expansion of specific listed parties that support Russia’s military and industrial complex;</li> <li>• Expansion of specific listed vessels relating to the EU entry and services ban in view of conducting activities such as the transport of military equipment for Russia, the transport of stolen Ukrainian grain, or support in the development of Russia’s energy sector.</li> </ul> |                                  |
| <p><u>24 February 2025</u></p> | <ul style="list-style-type: none"> <li>• Additional listing criteria for parties:             <ul style="list-style-type: none"> <li>○ that own, control, manage or operate vessels that transport crude oil or petroleum products, originating in Russia or exported from Russia, while practicing irregular and high-risk shipping practices as set out in the International Maritime Organisation General Assembly resolution A.1192(33), or that otherwise provide material, technical or financial support to the operations of such vessels</li> </ul> </li> </ul>  | <p>Contains various parties.</p> |

# Bird & Bird

|                                |  |                                  |
|--------------------------------|--|----------------------------------|
|                                | <ul style="list-style-type: none"> <li>○ forming part of, supporting, materially or financially, or benefitting from Russia's military and industrial complex, including by being involved in the development, production or supply of military technology and equipment</li> <li>• Possibility for EU Member State competent authorities to authorise payment to the entity listed under number 265 in view of goods and services that can only be provided by that entity and that are necessary for the operation, maintenance or repair of Budapest metro line 3 cars delivered by Metrowagonmash in 2018</li> <li>• Possibility to authorise the release of certain frozen funds or economic resources, or the making available of certain funds or economic resources to the individuals listed under entry numbers 92, 694, 719, 721, 881 and 920 under the heading 'Persons' in Annex I for the sale of EU entities.</li> <li>• Possibility for the Commission to exchange data with the competent authorities of a partner country as listed in Annex VIII to Regulation 833/2014 information concerning third-country trade, transactions and operators for the purpose of preventing circumvention of the prohibitions set forth in Regulation 269/2014;</li> <li>• Possibility for the Commission to process data, including data relating to criminal convictions;</li> <li>• Possibility for EU parties to recover damages in court incurred as a consequence of claims lodged with courts in third countries by EU-sanctioned parties or non-sanctioned parties acting through or on behalf of EU-sanctioned parties, in connection with any contract or transaction the performance of which has been affected, directly or indirectly, in whole or in part, by Regulation 269/2014, provided that the party concerned does not have effective access to the remedies under the relevant jurisdiction;</li> <li>• Information exchange obligation introduced between the Commission and the EU Member States to inform each other on detected instances of breach, circumvention and attempts at breach or circumvention of the prohibitions set forth in Regulation 269/2014, including through the use of crypto-assets;</li> <li>• Obligation for EU companies to undertake their best efforts to ensure that any non-EU entity that they own or control does not participate in activities that undermine the restrictive measures provided for in Regulation 269/2014.</li> </ul> |                                  |
| <p><u>24 February 2025</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>Contains various parties.</p> |
| <p><u>25 February 2025</u></p> | <ul style="list-style-type: none"> <li>• Limiting exemptions to prohibited dual-use and advanced industry item exports to humanitarian and pharmaceutical purposes;</li> <li>• Prohibition to sell, supply, transfer or export, directly or indirectly, dual-use or advanced industry items to parties listed in Annex IV of Regulation 833/2014;</li> </ul>   |                                  |

# Bird & Bird

- Prohibition to provide technical assistance, brokering services, other services, financing or financial assistance or to sell, license or transfer in any other way intellectual property rights or trade secrets as well as grant rights to access or re-use any material or information protected by means of intellectual property rights or constituting trade secrets related to dual-use or advanced industry items in view of parties listed in Annex IV of Regulation 833/2014;
- Introduction of limited licensing possibilities to authorise prohibited activities relating to parties listed in Annex IV of Regulation 833/2014;
- Prohibition to sell, supply, transfer, export or provide, directly or indirectly, specific listed software to any natural or legal person, entity or body in Russia, including its Exclusive Economic Zone and Continental Shelf, or for use in Russia, including its Exclusive Economic Zone and Continental Shelf;
- Prohibition to provide technical assistance, brokering services, other services, financing or financial assistance or to sell, license or transfer in any other way intellectual property rights or trade secrets as well as grant rights to access or re-use any material or information protected by means of intellectual property rights or constituting trade secrets related to specific listed software;
- Introduction of a wind-down period for the sale, supply, transfer, export or provision of specific listed software;
- Possibility to authorise mining and quarrying activities that yield their highest value from, or have as their primary objective, the production of rare earths and similar products;
- Air carriers operating domestic flights within Russia or selling, supplying, transferring or exporting, directly or indirectly, aircraft, or any of the items classified in Chapter 88 of the EU customs tariff (aircraft, spacecraft, and parts thereof) to a Russian air carrier or for flights within Russia, as listed in Annex XLVI, as well as for any entity owned or controlled by such air carrier are prohibited to land in, take off from or overfly the EU territory;
- Specific exemptions in view of specified amounts for the import, purchase or transport, or related technical or financial assistance of goods falling under CN code 7601;
- Possibility to authorise certain imports in view of the Druzhba pipeline;
- Expansion of list of prohibited goods and corresponding licence possibilities;
- Possibility to authorise certain exports of specific goods in view of article 3k of Regulation 833/2014;
- Prohibition for any party established in the EU before 8 April 2022 and that is already a road transport undertaking which transports goods by road within the EU territory, to make any changes to its capital structure that would increase the percentage share owned by a Russian natural or legal person, entity or body, unless that percentage share remains below 25 % following such a change;

# Bird & Bird

|                                |  |  |
|--------------------------------|--|--|
|                                | <ul style="list-style-type: none"> <li>• Possibility to authorise certain imports of oil products from Russia for Slovakia and Hungary;</li> <li>• Prohibition to place under temporary storage or free zone procedure specific listed oil products that originate or are exported from Russia;</li> <li>• Prohibition to sell, supply, transfer, or export, directly or indirectly, goods and technology and to provide, directly or indirectly, services to any natural or legal person, entity or body in Russia when such goods, technology and services are for the completion of crude oil projects in Russia, such as exploration and production projects;</li> <li>• Possibility to authorise certain activities relating to crude oil projects in Russia under specific circumstances;</li> <li>• Prohibition to engage in any transaction with specific listed ports in Russia;</li> <li>• Inclusion of construction services in the services ban;</li> <li>• Prohibition to sell, license or transfer in any other way intellectual property rights or trade secrets as well as grant rights to access or re-use any material or information protected by means of intellectual property rights or constituting trade secrets related to specific listed software and to the provision, manufacture, maintenance and use of specific listed software, directly or indirectly to the Government of Russia or to any legal person, entity or body established in Russia;</li> <li>• Possibility for the Commission to exchange data with the competent authorities of a partner country as listed in Annex VIII to Regulation 833/2014 information concerning third-country trade, transactions and operators for the purpose of preventing circumvention of the prohibitions set forth in Regulation 833/2014;</li> <li>• Possibility for EU parties to initiate a claim for damages in court if the party concerned does not have effective access to the remedies under the relevant jurisdiction;</li> <li>• Parties included on specific lists confronting them with restrictions such as those relating to the SWIFT ban, dual-use and advanced industry items and vessels allegedly used for sanctions circumvention.</li> </ul> |  |
| <p><u>25 February 2025</u></p> | <ul style="list-style-type: none"> <li>• Exemption from import prohibition of goods originating from the non-government controlled areas of Ukraine in the oblasts of Donetsk, Kherson, Luhansk and Zaporizhzhia (“the specified territories”) if made available to the Ukrainian authorities for examination, for which compliance with the conditions conferring entitlement to preferential origin has been verified and for which a certificate of origin has been issued in accordance with the Association Agreement between the European Union and its Member States, of the one part, and Ukraine, of the other part;</li> <li>• Prohibition to sell, supply, transfer or export banknotes denominated in any official currency of a Member State to the specified territories or to any natural or</li> </ul>   |  |

# Bird & Bird

|  |   |  |
|--|---|--|
|  | <p>legal person, entity or body in the specified territories, or for use in the specified territories;</p> <ul style="list-style-type: none"><li>• Prohibition to provide, directly or indirectly, accounting services, auditing services, including statutory audit, bookkeeping services, tax consulting services, business and management consulting services, public relations services, construction services, architectural and engineering services, legal advisory services, IT consultancy services, market research and public opinion polling services, technical testing and analysis services and advertising services to legal persons, entities or bodies in the specified territories;</li><li>• Prohibition to sell, supply, transfer, export, or provide, directly or indirectly, software for the management of enterprises and software for industrial design and manufacture to legal persons, entities or bodies in the specified territories;</li><li>• Prohibition to provide technical assistance, brokering services or other services and financing or financial assistance related to accounting services, auditing services, including statutory audit, bookkeeping services, tax consulting services, business and management consulting services, public relations services, construction services, architectural and engineering services, legal advisory services, IT consultancy services, market research and public opinion polling services, technical testing and analysis services and advertising services to legal persons, entities or bodies in the specified territories;</li><li>• Prohibition to provide technical assistance, brokering services or other services and financing or financial assistance related to software for the management of enterprises and software for industrial design and manufacture to legal persons, entities or bodies in the specified territories;</li><li>• Prohibition to sell, license or transfer in any other way intellectual property rights or trade secrets as well as grant rights to access or re-use any material or information protected by means of intellectual property rights or constituting trade secrets related to software for the management of enterprises and software for industrial design and manufacture and to the provision, manufacture, maintenance and use of that software, directly or indirectly to any natural or legal person, entity or body in the specified territories or for use in the specified territories;</li><li>• Possibility to authorise newly introduced prohibitions under specific conditions;</li><li>• Clarification to indicate that it is prohibited to participate, knowingly and intentionally, in activities the object or effect of which is to circumvent the relevant sanctions prohibitions, including by participating in such activities without deliberately seeking that object or effect but being aware that the participation may have that object or effect and accepting that possibility;</li><li>• Expansion of the prohibition to satisfy any claims made by:</li></ul> <p>a) any person, entity or body in the specified territories;</p> |  |
|--|---|--|

# Bird & Bird

|  |   |  |
|--|---|--|
|  | <p>b) any Russian person, entity or body;<br/>c) any person, entity or body acting through or on behalf of the persons, entities or bodies referred to above.</p> <ul style="list-style-type: none"><li>• Possibility for EU parties to recover damages in court incurred as a consequence of claims lodged with courts in third countries in connection with any contract or transaction the performance of which has been affected, directly or indirectly, in whole or in part, by Regulation 2022/263, provided that the party concerned does not have effective access to the remedies under the relevant jurisdiction, lodged by:<ul style="list-style-type: none"><li>(a) EU-sanctioned parties;</li><li>(b) any natural person who, or legal person, entity or body which, has been found by an arbitral, judicial or administrative decision to have infringed the prohibitions in Regulation 2022/263;</li><li>(c) any natural or legal person, entity or body, if the claim relates to goods the import of which is prohibited under the import prohibition of goods originating from the specified territories;</li><li>(d) any person, entity or body in the specified territories;</li><li>(e) any Russian person, entity or body;</li><li>(f) any person, entity or body acting through or on behalf of one of the persons, entities or bodies referred to above</li></ul></li><li>• Possibility for EU parties to initiate a claim for damages in court if the party concerned does not have effective access to the remedies under the relevant jurisdiction.</li><li>• Information exchange requirement between the EU Member State competent authorities and the Commission to prevent forum shopping or other cases as appropriate, such as on licence applications and denied licences;</li><li>• Clarification of a reference to competent authorities that are to share relevant information in view of sanctions compliance, including a specific reference to the customs authorities;</li><li>• Formal clarification that EU Member States may take into account the VSD of EU sanctions as a mitigating factor, in accordance with their national law;</li><li>• Obligation for EU companies to undertake their best efforts to ensure that any non-EU entity that they own or control does not participate in activities that undermine the restrictive measures provided for in Regulation 2022/263;</li><li>• Expansion of goods subject to import ban.</li></ul> |  |
|--|---|--|

# Bird & Bird

25 February 2025

- Exemption from import prohibition of goods originating from Crimea or Sevastopol if made available to the Ukrainian authorities for examination, for which compliance with the conditions conferring entitlement to preferential origin has been verified and for which a certificate of origin has been issued in accordance with the Association Agreement between the European Union and its Member States, of the one part, and Ukraine, of the other part;
- Prohibition to sell, supply, transfer or export banknotes denominated in any official currency of a Member State to Crimea or Sevastopol or to any natural or legal person, entity or body in Crimea or Sevastopol, or for use in Crimea or Sevastopol;
- Prohibition to provide, directly or indirectly, accounting services, auditing services, including statutory audit, bookkeeping services, tax consulting services, business and management consulting services, public relations services, construction services, architectural and engineering services, legal advisory services, IT consultancy services, market research and public opinion polling services, technical testing and analysis services and advertising services to legal persons, entities or bodies in Crimea or Sevastopol;
- Prohibition to sell, supply, transfer, export, or provide, directly or indirectly, software for the management of enterprises and software for industrial design and manufacture to legal persons, entities or bodies in Crimea or Sevastopol;
- Prohibition to provide technical assistance, brokering services or other services and financing or financial assistance related to accounting services, auditing services, including statutory audit, bookkeeping services, tax consulting services, business and management consulting services, public relations services, construction services, architectural and engineering services, legal advisory services, IT consultancy services, market research and public opinion polling services, technical testing and analysis services and advertising services to legal persons, entities or bodies in Crimea or Sevastopol;
- Prohibition to provide technical assistance, brokering services or other services and financing or financial assistance related to software for the management of enterprises and software for industrial design and manufacture to legal persons, entities or bodies in Crimea or Sevastopol;
- Prohibition to sell, license or transfer in any other way intellectual property rights or trade secrets as well as grant rights to access or re-use any material or information protected by means of intellectual property rights or constituting trade secrets related to software for the management of enterprises and software for industrial design and manufacture and to the provision, manufacture, maintenance and use of that software, directly or indirectly to any natural or legal person, entity or body in Crimea or Sevastopol or for use in Crimea or Sevastopol;
- Possibility to authorise newly introduced prohibitions under specific conditions;

# Bird & Bird

|  |  |  |
|--|--|--|
|  | <ul style="list-style-type: none"><li>• Clarification to indicate that it is prohibited to participate, knowingly and intentionally, in activities the object or effect of which is to circumvent the relevant sanctions prohibitions, including by participating in such activities without deliberately seeking that object or effect but being aware that the participation may have that object or effect and accepting that possibility;</li><li>• Expansion of the prohibition to satisfy any claims made by:<ul style="list-style-type: none"><li>d) any person, entity or body in Crimea or Sevastopol;</li><li>e) any Russian person, entity or body;</li><li>f) any person, entity or body acting through or on behalf of the persons, entities or bodies referred to above.</li></ul></li><li>• Possibility for EU parties to recover damages in court incurred as a consequence of claims lodged with courts in third countries in connection with any contract or transaction the performance of which has been affected, directly or indirectly, in whole or in part, by Regulation 692/2014, provided that the party concerned does not have effective access to the remedies under the relevant jurisdiction, lodged by:<ul style="list-style-type: none"><li>(g) EU-sanctioned parties;</li><li>(h) any natural person who, or legal person, entity or body which, has been found by an arbitral, judicial or administrative decision to have infringed the prohibitions in Regulation 692/2014;</li><li>(i) any natural or legal person, entity or body, if the claim relates to goods the import of which is prohibited under the import prohibition of goods originating from Crimea or Sevastopol;</li><li>(j) any person, entity or body in Crimea or Sevastopol;</li><li>(k) any Russian person, entity or body;</li><li>(l) any person, entity or body acting through or on behalf of one of the persons, entities or bodies referred to above</li></ul></li><li>• Possibility for EU parties to initiate a claim for damages in court if the party concerned does not have effective access to the remedies under the relevant jurisdiction.</li><li>• Information exchange requirement between the EU Member State competent authorities and the Commission to prevent forum shopping or other cases as appropriate, such as on licence applications and denied licences;</li><li>• Clarification of a reference to competent authorities that are to share relevant information in view of sanctions compliance, including a specific reference to the customs authorities;</li></ul> |  |
|--|--|--|



# Bird & Bird

|                               |   |                           |
|-------------------------------|---|---------------------------|
|                               | <ul style="list-style-type: none"> <li>• Formal clarification that EU Member States may take into account the VSD of EU sanctions as a mitigating factor, in accordance with their national law;</li> <li>• Obligation for EU companies to undertake their best efforts to ensure that any non-EU entity that they own or control does not participate in activities that undermine the restrictive measures provided for in Regulation 692/2014;</li> <li>• Expansion of goods subject to import ban.</li> </ul>   |                           |
| <a href="#">9 April 2025</a>  | Application as of 9 April 2025 of the broadcasting related sanctions in respect of all entities referred to in Annex V to Regulation (EU) 2025/395.   | Contains various parties. |
| <a href="#">16 March 2025</a> | 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 parties).  | No new listings.          |
| <a href="#">15 May 2025</a>   | <p>Amendment of the listing criteria. The following parties can be designated as sanctioned parties:</p> <ul style="list-style-type: none"> <li>• natural or legal persons, entities or bodies that have participated in or enabled transfers of ownership, control or economic benefit of the business interests of leading businesspersons who are subject to Union restrictive measures pursuant to the criterion set out in point (g) of this paragraph and listed in Annex I to this Regulation, thereby significantly frustrating those measures, with the exception of transfers expressly permitted pursuant to derogations and exemptions laid down in this Regulation or Regulation (EU) No 833/2014;</li> <li>• Leading businesspersons operating in Russia listed in Annex I pursuant to article 3(1)(g) of Regulation 269/2014, who claim to have transferred ownership, control or economic benefit of their business interests on or after 24 February 2022 shall continue to be considered as leading businesspersons and maintained in the list set out in Annex I, unless sufficient, recent and reliable information demonstrates that they no longer meet the criterion set out in article 3(1)(g) of Regulation 269/2014.</li> </ul> | N/A                       |
| <a href="#">20 May 2025</a>   | 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.   | Contains various parties. |

# Bird & Bird

|                           |  |                                  |
|---------------------------|--|----------------------------------|
| <p><u>20 May 2025</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>Contains various parties.</p> |
| <p><u>20 May 2025</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>Contains various parties.</p> |
| <p><u>21 May 2025</u></p> | <ul style="list-style-type: none"> <li>• Expansion of specific listed parties that support Russia’s military and industrial complex;</li> <li>• Expansion of prohibited goods in view of export ban;</li> <li>• extension of the duration of an exemption from the oil price cap which allows, in view of energy security concerns, the transport, by vessel, of crude oil originating in the Sakhalin-2 Project in Russia to Japan;</li> <li>• Expansion of specific listed vessels relating to the EU entry and services ban in view of conducting activities such as the transport of military equipment for Russia, the transport of stolen Ukrainian grain, or support in the development of Russia’s energy sector.</li> </ul>   |                                  |
| <p><u>21 May 2025</u></p> | <ul style="list-style-type: none"> <li>• Prohibition to engage, directly or indirectly, in any transaction relating to or involving any specific listed tangible asset, such as vessels, aircraft, real estate, ports, airports, and physical elements of digital and communication networks;</li> <li>• Prohibition to engage directly or indirectly, in any transaction with specific listed parties;</li> <li>• Introduction of exceptions to above prohibitions;</li> <li>• 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;</li> <li>• Suspension of any broadcasting licence or authorisation, transmission and distribution arrangement with the specific listed sanctioned parties</li> <li>• Prohibition to advertise products or services in any content produced or broadcast by certain listed parties;</li> <li>• Expansion of listing criteria;</li> <li>• Expansion of applicability of the “no claims clause” to parties owned directly or indirectly more than 50% by listed parties and to parties acting on behalf of such parties.</li> </ul> |                                  |

# Bird & Bird

|                            |  |                                 |
|----------------------------|--|---------------------------------|
| <p><u>22 May 2025</u></p>  | <p>Amendment of party targeted with asset freezes (i.e. all funds and economic resources belonging to, owned, held or controlled by the listed party are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed party).</p>   | <p>No new listing.</p>          |
| <p><u>18 July 2025</u></p> | <ul style="list-style-type: none"> <li>• Addition of definition of “partner country for importation of petroleum products”;</li> <li>• Introduction of a lowered price cap for crude oil from 60 USD to 47.6 USD per barrel, effective from 3 September 2025, as set out in Annex XXVIII to Regulation (EU) 833/2014;</li> <li>• Introduction of an authorisation for the export of goods and technology which might contribute to Russia’s military and technological enhancement, or the development of the defence and security sector, to any third country other than Russia, if the exporter has been informed that they may be intended for parties in Russia or for use in Russia;</li> <li>• Introduction of temporary exceptions to Article 3k(1) and Article 3k(2) of Regulation (EU) 833/2014 for goods included in the new annexes XXIII E and XXIII F;</li> <li>• Possibility for EU Member State competent authorities to authorise the sale, supply, transfer or export of the goods falling under CN codes 7615 10, 8414 60, 8422 30 and 3916 20, or the provision of related technical or financial assistance, if necessary for personal household use of natural persons in Russia;</li> <li>• Possibility for EU Member State competent authorities to authorise the sale, supply, transfer or export of the goods falling under CN code 8422 30, or the provision of related technical or financial assistance, if necessary for the packaging of food, beverages and pharmaceuticals;</li> <li>• Possibility for EU Member State competent authorities to authorise the sale, supply, transfer or export of the goods falling under CN code 3402 90, or the provision of related technical or financial assistance, if necessary for the execution of contracts concluded before 1 January 2025 until 1 January 2028 or until their expiry date, whichever is earlier;</li> <li>• Termination of the exemption under Article 3m(3) of Regulation (EU) 833/2014 for oil imports from Russia to the Czech Republic as of 1 July 2025;</li> <li>• Prohibition, effective from 21 January 2026, on the purchase, import or transfer into the EU of petroleum products falling under CN code 2710, obtained from crude oil falling under CN code 2709 00, originating in Russia. Importers of these products will be obliged to provide evidence of the country of origin of the crude oil used for the refining of the product in a third country;</li> <li>• Prohibition to provide technical assistance, brokering services, financing or financial assistance, as well as insurance and re-insurance related to the purchase, import or transfer into the EU of petroleum products falling under CN</li> </ul> | <p>Contains various parties</p> |

# Bird & Bird

|  |   |  |
|--|---|--|
|  | <p>code 2710, obtained from crude oil falling under CN code 2709 00, originating in Russia;</p> <ul style="list-style-type: none"><li>• Introduction of an exemption to the trade prohibitions regarding crude oil and petroleum products in view of the changing oil price cap. This exemption consists of a 90-day transition period for contracts that comply with the existing oil price cap, to ensure a consistent implementation of the price cap by all operators;</li><li>• Introduction of an automatic and dynamic mechanism for the European Commission to monitor Russian crude oil prices to ensure that the oil price cap will be always 15% lower than the average market price for Russian crude oil in the previous period of six months;</li><li>• Possibility for competent authorities of EU Member States that are not directly connected to the interconnected natural gas system of any other EU Member State, and which received their first commercial supply of its first long-term natural gas supply contract after 20 July 2025, to authorise the purchase, import or transfer of liquefied natural gas falling under CN code 2711 11 00, originating in Russia or exported from Russia, if it this is necessary to ensure their energy supply;</li><li>• Prohibition to sell, supply, transfer or export the goods and technology listed in the EU Common Military List to any natural or legal person, entity or body in Russia or for use in Russia;</li><li>• Prohibition to provide financing or financial assistance related to military activities or to the sale, supply, transfer or export of the goods and technology listed in the EU Common Military List, or the provision of related technical assistance, brokering services or other services, to any natural or legal person, entity or body in Russia or for use in Russia;</li><li>• Prohibition to purchase, import or transport the goods and technology listed in the EU Common Military List into the EU if they originate in Russia or are exported from Russia;</li><li>• Introduction of exemptions to the prohibition to directly or indirectly engage in transaction with parties listed in Annex XIX to Regulation (EU) 833/2014, parties whose proprietary rights are directly or indirectly owned for more than 50% by a party listed in this annex or parties acting on behalf or at the direction of a party listed in this annex;</li><li>• Prohibition to directly or indirectly engage in any transaction with a legal person, entity or body established outside the EU that is not a credit or financial institution or an entity providing crypto assets services and is listed in part C of Annex XLV to Regulation (EU) 833/2014;</li><li>• Exemptions to the prohibition to engage in any transaction, directly or indirectly, with ports and locks in Russia listed in Part A of Annex XLVII to Regulation (EU) 833/2014;</li></ul> |  |
|--|---|--|

# Bird & Bird

- Exemption to the prohibition to engage in any transaction, directly or indirectly, with airports listed in Part B of Annex XLVII if strictly necessary for the establishment, operation, maintenance, fuel supply and retreatment and safety of civil nuclear capabilities, and the continuation of design, construction and commissioning required for the completion of civil nuclear facilities;
- Prohibition to engage directly or indirectly in any transaction in connection with:
  - the natural gas pipelines Nord Stream and Nord Stream 2, with regard to the completion, operation, maintenance or use of the pipelines; and
  - the financing concerning the completion, operation or use of the natural gas pipelines Nord Stream and Nord Stream 2;
- Exemption to the above prohibitions regarding the Nord Stream and Nord Stream 2 pipelines;
- Possibility for competent authorities of EU Member States to authorise certain necessary transactions in connection with the Nord Stream and Nord Stream 2 pipelines;
- Prohibition to directly or indirectly engage in any transaction with (a) the Russian Direct Investment Fund (“RDIF”), (b) a party controlled by the RDIF, (c) a party listed in Annex XLIX to Regulation (EU) 833/2014, (d) a party listed in Annex L to Regulation (EU) 833/2014 or (e) a party acting on behalf or at the direction of a party referred to in point (a), (b), (c) or (d);
- Possibility for competent authorities of EU Member States to authorise certain necessary transactions with (a) the Russian Direct Investment Fund (“RDIF”), (b) a party controlled by the RDIF, (c) a party listed in Annex XLIX to Regulation (EU) 833/2014, (d) a party listed in Annex L to Regulation (EU) 833/2014 or (e) a party acting on behalf or at the direction of a party referred to in point (a), (b), (c) or (d);
- The prohibition on providing specialised financial messaging services to the parties listed in Annex XIV to Regulation (EU) 833/2014 (i.e. various Russian banks) is amended to include a full ban on directly or indirectly engaging in any transaction with these parties.
- Exemption to the prohibition to engage directly or indirectly in any transaction with parties listed in Annex XIV to Regulation (EU) 833/2014;
- Possibility for competent authorities of EU Member States to authorise certain necessary transactions in connection with the prohibition to engage directly or indirectly in any transaction with parties listed in Annex XIV to Regulation (EU) 833/2014;
- Prohibition to sell, supply, transfer, export or provide, directly or indirectly, software with certain uses in the banking and financial sector as listed in Annex XXXIX of Regulation (EU) 833/2014 to the Government of Russia or legal parties established in Russia;

# Bird & Bird

|                                     |  |                                 |
|-------------------------------------|--|---------------------------------|
|                                     | <ul style="list-style-type: none"> <li>• Exemption to the prohibition regarding the provision of software with certain uses in the banking and financial sector as listed in Annex XXXIX of Regulation (EU) 833/2014 if this provision is necessary for the execution until 30 September 2025 of contracts concluded before 20 July 2025, or of ancillary contracts necessary for the execution of such contract;</li> <li>• Introduction of measures to protect EU Member States from illegitimate Bilateral Investment Treaty (“BIT”) arbitration proceedings;</li> <li>• Extension of the possibility for EU parties to initiate a claim for damages in court if the party concerned does not have effective access to the remedies under the relevant jurisdiction;</li> <li>• Extension of the forum necessitates;</li> <li>• Possibility for EU Member States to take appropriate measures to recover or be entitled to recover, in judicial proceedings before the competent courts of a Member State, any direct or indirect damages, including legal costs, incurred by that Member State as a consequence of investor-State dispute settlement proceedings brought against a Member State in connection with measures imposed under Regulation (EU) 833/2014 or Regulation (EU) 269/2014;</li> <li>• Possibility for EU Member States to raise any available objection to the recognition and enforcement of arbitral awards that were rendered against them in investor-State dispute settlement proceedings in connection with measures imposed under Regulation (EU) 833/2014 or Regulation (EU) 269/2014.</li> </ul> |                                 |
| <p><a href="#">18 July 2025</a></p> | <ul style="list-style-type: none"> <li>• 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.</li> </ul>  | <p>Contains various parties</p> |

# Bird & Bird

## EU sanctions against Belarus

| EUROPEAN UNION                          |   |                  |
|---|---|------------------|
| BELARUS                                 |   |                  |
| Date                                    | Description of imposed sanctions  |                  |
| <a href="#"><u>19 February 2022</u></a> | <ul style="list-style-type: none"> <li>• 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</li> <li>• 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</li> <li>• Prohibition to import or transport petroleum and gaseous hydrocarbon products if they originate in Belarus or have been exported from Belarus</li> <li>• Prohibition to purchase petroleum and gaseous hydrocarbon products if they are located or originate in Belarus</li> <li>• 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</li> <li>• 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.</li> </ul> |                  |
| <a href="#"><u>26 February 2022</u></a> | <ul style="list-style-type: none"> <li>• 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</li> <li>• Amendment of statements of reasons or the information for 27 natural and seven legal persons included in the list of natural and legal persons.</li> </ul>  | No new listings. |

# Bird & Bird

|                             |   |  |
|-----------------------------|---|--|
| <p><u>3 March 2022</u></p>  | <ul style="list-style-type: none"> <li>• 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</li> <li>• 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</li> <li>• 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</li> <li>• 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</li> <li>• 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</li> <li>• Prohibition to import or transport (commodity code listed) mineral products if they originate in Belarus or have been exported from Belarus</li> <li>• Prohibition to purchase (commodity code listed) mineral products if they are located or originate in Belarus;</li> <li>• 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;</li> <li>• Trade prohibitions – including import prohibitions – related to wood, cement iron, steel, rubber products and certain machinery.</li> </ul> | <p>Specifically listed as military end-user:</p> <ul style="list-style-type: none"> <li>• Belarus Ministry of Defence</li> </ul>   |
| <p><u>10 March 2022</u></p> | <ul style="list-style-type: none"> <li>• The prohibitions and restrictions regarding “transferable securities” cover also crypto-assets</li> <li>• 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</li> <li>• Prohibition to provide certain financial services to Belarussian entities, nationals and parties located in Belarus</li> <li>• Ban relating to bank deposits from Belarussian entities, nationals and parties located in Belarus</li> <li>• 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</li> </ul>   | <p><b>SWIFT related sanctions</b> are targeted at:</p> <ul style="list-style-type: none"> <li>• Belagroprombank</li> <li>• Bank Dabrabyt</li> <li>• Development Bank of the Republic of Belarus</li> </ul> |



# Bird & Bird

|                              |  |   |
|------------------------------|--|---|
|                              | <ul style="list-style-type: none"> <li>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 rights are directly or indirectly owned for more than 50 % by specific sanctioned parties (“<b>SWIFT related sanctions</b>”)</li> </ul>  |   |
| <a href="#">9 April 2022</a> | <ul style="list-style-type: none"> <li>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</li> <li>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</li> <li>Prohibition for any road transport undertaking established in Belarus to transport goods by road within the territory of the Union, including in transit</li> </ul> | N/A   |
| <a href="#">3 June 2022</a>  | 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"> <li>Open Joint Stock Company “Belaruskali”</li> <li>Joint Stock Company “Belarusian Potash Company”</li> <li>“Inter Tobacco” LLC</li> <li>Open Joint Stock Company “Naftan”</li> <li>Open Joint Stock Company “Grodno Tobacco Factory Neman”</li> </ul>                            |
| <a href="#">4 June 2022</a>  | Extension of SWIFT related sanctions to Belinvestbank (Belarusian Bank for Development and Reconstruction)   | <ul style="list-style-type: none"> <li>Belinvestbank (Belarusian Bank for Development and Reconstruction)</li> </ul>  |
| <a href="#">4 June 2022</a>  | <ul style="list-style-type: none"> <li>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</li> <li>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</li> </ul>  | <p>Contains amongst others the following entities:</p> <ul style="list-style-type: none"> <li>140 Repair Plant JSC</li> <li>558 Aircraft Repair Plant JSC</li> <li>2566 Radioelectronic Armament Repair Plant JSC</li> <li>AGAT - Control Systems - Managing Company of Geoinformation Control Systems Holding, JSC</li> <li>AGAT - Electromechanical Plant OJSC</li> </ul> |

# Bird & Bird

|                                  |   |   |
|----------------------------------|---|---|
|                                  | <ul style="list-style-type: none"> <li>• 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</li> <li>• 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</li> </ul>  |   |
| <a href="#">20 July 2022</a>     | 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).  | <ul style="list-style-type: none"> <li>• Cham Wings Airlines</li> </ul> |
| <a href="#">28 February 2023</a> | <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>  | Several parties   |
| <a href="#">3 August 2023</a>    | 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   |
| <a href="#">4 August 2023</a>    | <ul style="list-style-type: none"> <li>• Prohibition to sell, supply, transfer or export, directly or indirectly, specific listed arms, firearms, their parts and essential components and ammunition to any natural or legal person, entity or body in Belarus or for use in Belarus;</li> <li>• Prohibition to provide technical assistance, brokering services or other services related to specific listed arms, firearms, their parts and essential components and ammunition to any natural or legal person, entity or body in Belarus or for use in Belarus;</li> <li>• Prohibition to provide financing or financial assistance related to specific listed arms, firearms, their parts and essential components and ammunition to any natural or legal person, entity or body in Belarus or for use in Belarus;</li> <li>• Prohibition to sell, supply, transfer or export, directly or indirectly, specific listed items for use in aviation or the space industry to any natural or legal person, entity or body in Belarus or for use in Belarus;</li> <li>• Prohibition to provide (re-)insurance, directly or indirectly, in relation to specific listed items for use in aviation or the space industry to any natural or legal person, entity or body in Belarus or for use in Belarus;</li> </ul> | N/A   |

# Bird & Bird

|  |  |                        |
|--|--|------------------------|
|  | <ul style="list-style-type: none"> <li>• Prohibition to provide activities relating to the overhaul, repair, inspection, replacement, modification or defect rectification of an aircraft or component, directly or indirectly, in relation to specific listed items for use in aviation or the space industry to any natural or legal person, entity or body in Belarus or for use in Belarus;</li> <li>• Prohibition to provide technical assistance, brokering services or other services related to specific listed items for use in aviation or the space industry to any natural or legal person, entity or body in Belarus or for use in Belarus;</li> <li>• Prohibition to provide financing or financial assistance related to specific listed items for use in aviation or the space industry to any natural or legal person, entity or body in Belarus or for use in Belarus;</li> <li>• Expansion of dual-use related prohibitions;</li> <li>• Expansion of the list with 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.</li> </ul>   |                        |
| <p><a href="#"><u>28 February 2024</u></a></p> | <p>Amendments 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).</p>  | <p>Several parties</p> |
| <p><a href="#"><u>1 July 2024</u></a></p>      | <ul style="list-style-type: none"> <li>• Expansion of dual-use related prohibitions;</li> <li>• Expansion of the list with 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;</li> <li>• Prohibition to transit via the territory of Belarus firearms, their parts and essential components, ammunition, dual-use items or specific listed “cutting-edge” goods and technology that are exported from the EU;</li> <li>• Prohibition to sell, license or transfer in any other way intellectual property rights or trade secrets as well as grant rights to access or re-use any material or information protected by means of intellectual property rights or constituting trade secrets related to firearms, their parts and essential components, ammunition, dual-use, specific listed “cutting-edge” goods and technology items or specific listed aviation and space items and to the provision, manufacture, maintenance and use of such items, directly or indirectly to any natural or legal person, entity or body in Belarus or for use in Belarus;</li> <li>• Prohibition to sell, supply, transfer or export specific listed maritime navigation goods and technology, luxury goods or goods and technology suited for use in oil refining to any natural or legal person, entity or body in Belarus or for use in Belarus;</li> </ul> | <p>N/A</p>             |

# Bird & Bird

- Prohibition to provide technical assistance, brokering services, other services, financing, financial assistance, or to sell license, or transfer in any other way intellectual property rights or trade secrets as well as grant rights to access or re-use any material or information protected by means of intellectual property rights or constituting trade secrets related to specific listed maritime navigation goods and technology, luxury goods or goods and technology suited for use in oil refining;
- 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 Belarus;
- Prohibition to grant or be part of any arrangement to finance a legal person, entity or body operating in the energy sector in Belarus;
- 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 Belarus;
- Expansion of import ban to crude oil;
- Prohibition to provide, directly or indirectly, accounting, auditing, including statutory audit, bookkeeping, tax consulting services, business and management consulting, public relations services, architectural and engineering services, legal advisory services and IT consultancy services, market research and public opinion polling services, technical testing and analysis services or advertising services to the Republic of Belarus, its Government, its public bodies, corporations or agencies, or any natural or legal person, entity or body acting on behalf or at the direction of the Republic of Belarus, its Government, its public bodies, corporations or agencies;
- Prohibition to sell, supply, transfer, export, or provide, directly or indirectly, specific listed software for the management of enterprises and software for industrial design and manufacture to the Republic of Belarus, its Government, its public bodies, corporations or agencies, or any natural or legal person, entity or body acting on behalf or at the direction of the Republic of Belarus, its Government, its public bodies, corporations or agencies;
- Prohibition to provide technical assistance, brokering services, other services, financing or financial assistance relating to accounting, auditing, including statutory audit, bookkeeping, tax consulting services, business and management consulting, public relations services, architectural and engineering services, legal advisory services and IT consultancy services, market research and public opinion polling services, technical testing and analysis services or advertising services;
- Amendment of anti-circumvention provision to clarify that knowledge and intent criteria are also met where a party participates in circumvention and is aware that such participation may have the object or effect of circumvention and accepts that possibility;
- Prohibition to import specific listed items which allow Belarus to diversify its sources of revenue;

# Bird & Bird

- Prohibition to provide technical assistance, brokering services, other services, financing or financial assistance relating to specific listed items which allow Belarus to diversify its sources of revenue;
- Introduction of an import ban relating to specific listed gold as well as diamonds from Belarus, including in view of related technical assistance, brokering services, other services, financing or financial assistance;
- Prohibition to transit via the territory of Belarus specific listed machinery or specific listed aviation and space items that are exported from the EU;
- Prohibition for road transport undertakings to transport goods within the EU by means of trailers or semi-trailers registered in Belarus, including if those trailers or semi-trailers are hauled by trucks registered in other countries;
- Prohibition relating to Belarussian road undertakings expanded to EU established undertakings that are owned 25% or more by a Belarussian party;
- Possibility for EU Member State competent authorities to authorise the release of certain frozen funds or economic resources belonging to, owned, held or controlled by a sanctioned party or the provision of services to such a party if is strictly necessary for the setting-up, certification or evaluation of a firewall which:
  - removes the control by the sanctioned party over the assets of a non-listed legal person, entity or body incorporated or constituted under the law of a Member State and which is owned or controlled by the former; and,
  - ensures that no further funds or economic resources accrue for the benefit of the listed party
- Introduction of the possibility to authorise divestment from Belarus or the wind-down of business activities in Belarus to 31 December 2024;
- Information exchange requirement between the EU Member State competent authorities and the Commission to prevent forum shopping or other cases as appropriate, such as on licence applications and denied licences;
- Clarification of a reference to competent authorities that are to share relevant information in view of sanctions compliance, including a specific reference to the customs authorities;
- Obligation for exporters to contractually prohibit re-exportation to Belarus and re-exportation for use in Belarus in view of specific listed items and to include adequate remedies in the event of a breach of a contractual obligation;
- Reporting requirement in the event that contractual re-exportation obligation is breached by third-country counterparty;
- Obligation for EU companies and non-EU companies owned or controlled by EU companies to implement controls and procedures to assess and mitigate the risks of exports to Belarus in view of specific listed items as of 2 January 2025;
- Provide EU parties the possibility to claim compensation from damages incurred as a consequence of claims lodged with courts in third countries by Belarussian

# Bird & Bird

|                                  |   |                 |
|----------------------------------|---|-----------------|
|                                  | <p>parties in connection with any contract or transaction the performance of which has been affected, directly or indirectly, in whole or in part, by the relevant EU-Belarus sanctions;</p> <ul style="list-style-type: none"> <li>• Formal clarification that EU Member States may take into account the voluntary self-disclosure (“VSD”) of EU sanctions as a mitigating factor, in accordance with their national law;</li> <li>• Obligation for EU companies to undertake their best efforts to ensure that any non-EU entity that they own or control does not participate in activities that undermine the restrictive measures provided for in EU-Belarus sanctions regulation 765/2006.</li> </ul>  |                 |
| <a href="#">5 August 2024</a>    | 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 |
| <a href="#">16 December 2024</a> | 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 |
| <a href="#">25 February 2025</a> | <ul style="list-style-type: none"> <li>• Limiting exemptions to prohibited dual-use and advanced industry item exports to humanitarian and pharmaceutical purposes;</li> <li>• Prohibition to sell, supply, transfer or export, directly or indirectly, dual-use or advanced industry items to parties listed in Annex Va of Regulation 765/2006;</li> <li>• Prohibition to provide technical assistance, brokering services, other services, financing or financial assistance or to sell, license or transfer in any other way intellectual property rights or trade secrets as well as grant rights to access or re-use any material or information protected by means of intellectual property rights or constituting trade secrets related to dual-use or advanced industry items in view of parties listed in Annex Va of Regulation 765/2006;</li> <li>• Introduction of limited licensing possibilities to authorise prohibited activities relating to parties listed in Annex Va of Regulation 765/2006;</li> <li>• Prohibition to sell, supply, transfer, export, or provide, directly or indirectly, specific listed software used in oil and gas exploration to legal persons, entities or bodies in Belarus;</li> <li>• Prohibition to provide technical assistance, brokering services or other services and financing or financial assistance related to specific listed software used in oil and gas exploration to legal persons, entities or bodies in Belarus;</li> <li>• Prohibition to sell, license or transfer in any other way intellectual property rights or trade secrets as well as grant rights to access or re-use any material or information protected by means of intellectual property rights or constituting trade secrets related to specific listed software used in oil and gas exploration and to the</li> </ul> |                 |

# Bird & Bird

|   |   |                        |
|---|---|------------------------|
|   | <p>provision, manufacture, maintenance and use of that software, directly or indirectly to any natural or legal person, entity or body in Belarus or for use in Belarus;</p> <ul style="list-style-type: none"> <li>• Introduction of a wind-down period for the sale, supply, transfer, export or provision of specific listed software used in oil and gas exploration;</li> <li>• Inclusion of construction services in the services ban;</li> <li>• Prohibition to sell, license or transfer in any other way intellectual property rights or trade secrets as well as grant rights to access or re-use any material or information protected by means of intellectual property rights or constituting trade secrets related to specific listed software and to the provision, manufacture, maintenance and use of specific listed software, directly or indirectly to the Government of Belarus or to any legal person, entity or body established in Belarus;</li> <li>• Prohibition for any party established in the EU before 8 April 2022 and that is already a road transport undertaking which transports goods by road within the EU territory, to make any changes to its capital structure that would increase the percentage share owned by a Belarussian natural or legal person, entity or body, unless that percentage share remains below 25 % following such a change;</li> <li>• Parties forming part of, supporting, materially or financially, or benefitting from the military and industrial complex of Belarus, including by being involved in the development, production or supply of military technology and equipment can also be listed on a sanctions list;</li> <li>• Possibility to authorise the release of certain frozen funds if a bank targeted with an asset freeze acted as intermediary bank in fund transfers from Belarus to the EU;</li> <li>• Possibility for the Commission to exchange data with the competent authorities of a partner country as listed in Annex Vba to Regulation 765/2006 information concerning third-country trade, transactions and operators for the purpose of preventing circumvention of the prohibitions set forth in Regulation 765/2006;</li> <li>• Possibility for EU parties to initiate a claim for damages in court if the party concerned does not have effective access to the remedies under the relevant jurisdiction.</li> <li>• Expansion of list of prohibited goods and corresponding licence possibilities.</li> </ul> |                        |
| <p><a href="#">26 February 2025</a></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><a href="#">27 March 2025</a></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> |

# Bird & Bird

|                            |   |                        |
|----------------------------|---|------------------------|
| <p><u>18 July 2025</u></p> | <ul style="list-style-type: none"> <li>• Prohibition to purchase, import or transfer, directly or indirectly, the goods and technology listed in the EU Common Military List into the EU if they originate in Belarus or are exported from Belarus;</li> <li>• Prohibition to sell, supply, transfer or export, directly or indirectly, the goods and technology listed in the EU Common Military List, whether or not originating in the EU, to any natural or legal person, entity or body in Belarus or for use in Belarus;</li> <li>• Exemptions to the prohibition to sell, supply, transfer or export, directly or indirectly, the goods and technology listed in the EU Common Military List, whether or not originating in the EU, to any natural or legal person, entity or body in Belarus or for use in Belarus;</li> <li>• Extension of the trade prohibition included in Article 1b(1) of Regulation (EU) 765/2006 regarding goods and technology listed in the EU Common Military List and equipment which might be used for internal repression as listed in Annex III to this regulation;</li> <li>• Exemption to the trade prohibition regarding goods and technology which could contribute in particular to the enhancement of Belarusian industrial capacities for certain goods falling in Annex XVIII to Regulation (EU) 765/2006;</li> <li>• Possibility for EU Member State competent authorities to authorise the sale, supply, transfer or export of goods falling under CN code 8414 60 or 3916 20, or the provision of related technical or financial assistance, if necessary for personal household use of natural persons in Belarus;</li> <li>• Introduction of an authorisation for the export of goods and technology which might contribute to Belarus's military and technological enhancement, or the development of the defence and security sector, to any third country other than Belarus, if the exporter has been informed that they may be intended for parties in Belarus or for use in Belarus;</li> <li>• The prohibition on providing specialised financial messaging services to the parties listed in Annex XV to Regulation (EU) 765/2006 (i.e. various Belarusian banks) is amended to include a full ban on directly or indirectly engaging in any transaction with these parties;</li> <li>• Exemption to the prohibition to engage directly or indirectly in any transaction with parties listed in Annex XV to Regulation (EU) 765/2006;</li> <li>• Introduction of measures to protect EU Member States from illegitimate Bilateral Investment Treaty ("BIT") arbitration proceedings;</li> <li>• Extension of the possibility for EU parties to initiate a claim for damages in court if the party concerned does not have effective access to the remedies under the relevant jurisdiction;</li> <li>• Extension of the forum necessitates;</li> <li>• Possibility for EU Member States to take appropriate measures to recover or be entitled to recover, in judicial proceedings before the competent courts of a Member State, any direct or indirect damages, including legal costs, incurred by that</li> </ul> | <p>Several parties</p> |
|----------------------------|---|------------------------|



# Bird & Bird

|  |   |  |
|--|---|--|
|  | <p>Member State as a consequence of investor-State dispute settlement proceedings brought against a Member State in connection with measures imposed under Regulation (EU) 765/2006;</p> <ul style="list-style-type: none"><li>• Possibility for EU Member States to raise any available objection to the recognition and enforcement of arbitral awards that were rendered against them in investor-State dispute settlement proceedings in connection with measures imposed under Regulation (EU) 765/2006.</li></ul> |  |
|--|---|--|

# Bird & Bird

## UK sanctions against Russia

| THE UNITED KINGDOM               |  |  |
|----------------------------------|--|--|
| RUSSIA                           |  |  |
| Date                             | Description  | Entities and individuals being sanctioned  |
| <a href="#">10 February 2022</a> | 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  |
| <a href="#">18 February 2022</a> | 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"> <li>• Oleksandr Viktorovych YANUKOVYCH</li> <li>• Petr Grigorievich JAROSH</li> <li>• Andrii SHYPITSYN</li> </ul>   |
| <a href="#">22 February 2022</a> | 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"> <li>• BANK ROSSIYA</li> <li>• BLACK SEA BANK FOR DEVELOPMENT AND RECONSTRUCTION</li> </ul>  |
| <a href="#">22 February 2022</a> | 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"> <li>• Gennadiy Nikolayevich TIMCHENKO</li> <li>• Boris Romanovich ROTENBERG</li> <li>• Igor Arkadyevich ROTENBERG</li> <li>• BANK ROSSIYA</li> <li>• Black Sea Bank for Development And Reconstruction</li> <li>• JOINT STOCK COMPANY GENBANK</li> <li>• IS Bank</li> <li>• Public Joint Stock Company Promsvyazbank</li> </ul> |
| <a href="#">24 February 2022</a> | 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"> <li>• United Aircraft Corporation</li> <li>• UralVagonZavod</li> <li>• VTB Bank</li> </ul>  |
| <a href="#">24 February 2022</a> | 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"> <li>• IS BANK</li> <li>• JOINT STOCK COMPANY GENBANK</li> </ul>   |

# Bird & Bird

|  |   |  |
|--|---|--|
|  | 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"> <li>• Aeroflot</li> </ul>   |
| <u>25 February 2022</u><br><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"> <li>• VEB.RF</li> <li>• BANK OTKRITIE FINANCIAL CORPORATION PJSC</li> <li>• PJSC SOVOCOMBANK</li> </ul> |
| <u>28 February 2022</u>                            | <ul style="list-style-type: none"> <li>• 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;</li> <li>• Suspension of the approval of new export licences for dual-use items to Russia.</li> </ul>   | 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"> <li>• A 7 day wind down period in respect of sovereign debt, loans and money market instruments measures (INT/2022/1277777);</li> <li>• A 30 day wind down period in respect of the clearing and correspondent banking prohibitions (INT/2022/1277778); and</li> </ul>   | N/A  |

# Bird & Bird

|                     |  |   |
|---------------------|--|---|
|                     | <ul style="list-style-type: none"> <li>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).</li> </ul>  |   |
| <u>1 March 2022</u> | <ul style="list-style-type: none"> <li>Investment ban</li> </ul>   | <ul style="list-style-type: none"> <li>PJSC SBERBANK</li> </ul>   |
| <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"> <li>Victor Gulevich</li> <li>Andrei Burdyko</li> <li>Sergei Simonenko</li> <li>Andrey Zhuk</li> <li>JSC 558 Aircraft Repair Plant</li> <li>JSC Integral</li> </ul> |
| <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"> <li>Kirill Alexandrovich Dmitriev</li> <li>Russian Direct Investment Fund</li> </ul>   |
| <u>1 March 2022</u> | <ul style="list-style-type: none"> <li>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</li> <li>Further restrictions on correspondent banking relationships and processing of sterling payments are introduced</li> <li>Providing the Secretary of State the power to prevent designated banks from accessing and processing sterling</li> </ul> | <ul style="list-style-type: none"> <li>Sberbank</li> </ul>  |
| <u>1 March 2022</u> | <ul style="list-style-type: none"> <li>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</li> <li>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</li> </ul>  | N/A   |
| <u>1 March 2022</u> | <ul style="list-style-type: none"> <li>Prohibition for Russian ships, and other ships specified by the Secretary of State, from entering ports in the United Kingdom</li> <li>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</li> </ul>   | N/A   |

# Bird & Bird

|                              |   |  |
|------------------------------|---|--|
|                              | <ul style="list-style-type: none"> <li>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.</li> </ul>  |  |
| <a href="#">1 March 2022</a> | <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"> <li>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);</li> <li>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)</li> </ul> | N/A  |
| <a href="#">1 March 2022</a> | <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"> <li>the Central Bank of the Russian Federation;</li> <li>the National Wealth Fund of the Russian Federation;</li> <li>the Ministry of Finance of the Russian Federation;</li> <li>a person owned or controlled directly or indirectly by any of the persons above;</li> <li><b>or</b></li> <li>a person acting on behalf of or at the direction of any of the persons above</li> </ul>  | N/A  |
| <a href="#">3 March 2022</a> | <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"> <li>Igor Ivanovich SHUVALOV</li> <li>Alisher Burkhanovich USMANOV</li> </ul>  |
| <a href="#">4 March 2022</a> | <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"> <li>Bank Otkritie</li> <li>Promsvyazbank</li> <li>Bank Rossiya</li> <li>Sovcombank</li> <li>Vnesheconombank (Veb)</li> <li>Novikombank</li> </ul> |
| <a href="#">4 March 2022</a> | <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"> <li>Sberbank</li> </ul>   |
| <a href="#">7 March 2022</a> | <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.</p>   | N/A  |

# Bird & Bird

|                               |   |   |
|-------------------------------|---|---|
|                               | This 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  |   |
| <a href="#">8 March 2022</a>  | <ul style="list-style-type: none"> <li>• Prohibition for Russian aircraft from overflying or landing in the UK</li> <li>• 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</li> <li>• 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.</li> <li>• 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</li> <li>• 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</li> <li>• General Licence permitting for a time-limited period the provision of certain insurance and reinsurance services relating to aviation and space goods and technology.</li> </ul> | N/A   |
| <a href="#">10 March 2022</a> | 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"> <li>• Roman Arkadyevich Abramovich</li> <li>• Igor Ivanovich Sechin</li> <li>• Oleg Vladimirovich Deripaska</li> <li>• Dmitri Alekseevich Lebedev</li> <li>• Alexei Borisovich Miller</li> <li>• Andrei Leonidovich Kostin</li> <li>• Nikolai Petrovich Tokarev</li> </ul> |
| <a href="#">10 March 2022</a> | General Licence INT/2022/1327076 allows for the payments essential to the continuation of the operation of Chelsea Football Club  | N/A   |
| <a href="#">11 March 2022</a> | 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   |

# Bird & Bird

|                               |   |  |
|-------------------------------|---|--|
| <a href="#">11 March 2022</a> | 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  |
| <a href="#">15 March 2022</a> | 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"> <li>• GAS INDUSTRY INSURANCE COMPANY SOGAZ</li> <li>• GEOPOLITICA</li> <li>• INTERNET RESEARCH AGENCY</li> <li>• NEW EASTERN OUTLOOK</li> <li>• ORIENTAL REVIEW</li> </ul> |
| <a href="#">15 March 2022</a> | 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"> <li>• ROSNEFT AERO</li> <li>• JSC ZELENODOLSK SHIPYARD</li> </ul>  |
| <a href="#">15 March 2022</a> | <ul style="list-style-type: none"> <li>• Introduction of the possibility to publicly name companies that have breached financial sanctions, but have not been fined</li> <li>• Introduction of <b>strict liability</b> 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</li> </ul> | N/A  |
| <a href="#">22 March 2022</a> | 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"> <li>• Central Bank of the Russian Federation (CBR)</li> <li>• National Wealth Fund of the Russian Federation (NWF)</li> <li>• Ministry of Finance of the Russian Federation (MF)</li> </ul>                               |
| <a href="#">22 March 2022</a> | 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  |
| <a href="#">24 March 2022</a> | 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   |

# Bird & Bird

|                               |  |   |
|-------------------------------|--|---|
|                               | can be made available, directly or indirectly, to the relevant listed individuals and entities   |   |
| <a href="#">24 March 2022</a> | 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"> <li>• Alfa Bank JSC</li> <li>• GazPromBank</li> <li>• Rosselkhozbank</li> <li>• SMP Bank</li> <li>• Ural Bank for Reconstruction and Development</li> <li>• Subsidiaries of the above</li> </ul> |
| <a href="#">25 March 2022</a> | 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"> <li>• GEFCO</li> <li>• GEFCO UK Ltd</li> <li>• GEFCO Forwarding UK</li> <li>• Auto XP Limited</li> <li>• XP Tech Limited</li> </ul>  |
| <a href="#">29 March 2022</a> | 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.<br><br>This licence takes effect from 29 March 2022 and expires on 15 May 2022  | <ul style="list-style-type: none"> <li>• Sovcomflot</li> </ul>  |
| <a href="#">31 March 2022</a> | 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  |
| <a href="#">31 March 2022</a> | 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"> <li>• PHOTON PRO LLP</li> <li>• MAJORY LLP</li> <li>• DJECO GROUP LP</li> </ul>  |
| <a href="#">1 April 2022</a>  | 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"> <li>• Central Bank of the Russian Federation (CBR)</li> <li>• National Wealth Fund of the Russian Federation (NWF)</li> <li>• Ministry of Finance of the Russian Federation (MF)</li> </ul>      |



# Bird & Bird

|                               |   |  |
|-------------------------------|---|--|
|                               | 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.  |  |
| <a href="#">1 April 2022</a>  | 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.<br><br>This General Licence took effect on 01 March 2022 and expires on 01 March 2023. | <ul style="list-style-type: none"> <li>• VTB</li> </ul>  |
| <a href="#">4 April 2022</a>  | 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.<br><br>This General Licence took effect on 25 March 2022 and expires on 23 May 2022.  | <ul style="list-style-type: none"> <li>• GEFCO</li> </ul>  |
| <a href="#">6 April 2022</a>  | 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"> <li>• CREDIT BANK OF MOSCOW</li> <li>• PJSC SBERBANK</li> </ul>   |
| <a href="#">6 April 2022</a>  | General Licence INT/2022/1544176 allows for a 30-day wind down period of positions involving Credit Bank of Moscow.<br><br>This General Licence takes effect from 06 April 2022 and expires on 06 May 2022.   | <ul style="list-style-type: none"> <li>• CREDIT BANK OF MOSCOW</li> </ul>  |
| <a href="#">6 April 2022</a>  | Amendment of General Licence INT/2022/1277877 to ensure that energy related payments may continue to take place   | <ul style="list-style-type: none"> <li>• PJSC SBERBANK</li> </ul>  |
| <a href="#">8 April 2022</a>  | 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"> <li>• Katerina Vladimirovna Tikhonova</li> <li>• Maria Vladimirovna Vorontsova</li> <li>• Yekaterina Sergejevna Vinokurova</li> </ul> |
| <a href="#">12 April 2022</a> | 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"> <li>• GEFCO</li> </ul>  |

# Bird & Bird

|                             |   |   |
|-----------------------------|---|---|
| <p><u>13 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>   | <p>Several individuals</p>  |
| <p><u>14 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"> <li>• Eugene Tenenbaum</li> <li>• David Davidovich</li> </ul>  |
| <p><u>14 April 2022</u></p> | <p>The Russia (Sanctions) (EU Exit) (Amendment) (No. 8) Regulations 2022 introduce trade prohibitions relating to:</p> <ul style="list-style-type: none"> <li>• oil refining goods and technology (as specified in new Schedule 2D),</li> <li>• quantum computing and advanced materials goods and technology (as specified in new Schedule 2E)</li> <li>• luxury goods (as specified in new Schedule 3A), and</li> <li>• iron and steel goods (as specified in new Schedule 3B)</li> </ul> | <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 parties</p>   | <p>Contains amongst others the following parties:</p> <ul style="list-style-type: none"> <li>• ALEKSANDROV SCIENTIFIC RESEARCH TECHNOLOGICAL INSTITUTE NITI</li> <li>• CENTRAL RESEARCH INSTITUTE OF MACHINE BUILDING JSC</li> <li>• FEDERAL STATE UNITARY ENTERPRISE DUKHOV AUTOMATICS RESEARCH INSTITUTE</li> <li>• JSC ARZAMAS MACHINE-BUILDING PLANT</li> <li>• JSC GTLK</li> </ul> |
| <p><u>21 April 2022</u></p> | <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"> <li>• Alfa Bank JSC</li> <li>• GazPromBank</li> <li>• Rosselkhozbank</li> <li>• SMP Bank</li> <li>• Ural Bank for Reconstruction and Development</li> </ul>  |

# Bird & Bird

|                               |  |  |
|-------------------------------|--|--|
| <a href="#">21 April 2022</a> | 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"> <li>• Gazprombank</li> </ul>  |
| <a href="#">22 April 2022</a> | 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"> <li>• Sberbank CIB (UK) Ltd</li> </ul>  |
| <a href="#">26 April 2022</a> | Listings are corrected and parties are still subject to asset freeze.  | Several parties  |
| <a href="#">27 April 2022</a> | 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  |
| <a href="#">29 April 2022</a> | 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  |
| <a href="#">4 May 2022</a>    | 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"> <li>• KAMAZ</li> <li>• VOLGA GROUP</li> </ul> |
| <a href="#">5 May 2022</a>    | 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"> <li>• Evraz PLC</li> </ul>  |
| <a href="#">5 May 2022</a>    | 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"> <li>• Evraz North America plc</li> <li>• Evraz Inc. NA</li> <li>• Evraz Inc. NA – Canada</li> </ul> |
| <a href="#">9 May 2022</a>    | Listings are corrected and parties are still subject to asset freeze.  | Several parties  |

# Bird & Bird

|                             |   |   |
|-----------------------------|---|---|
| <a href="#">12 May 2022</a> | 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"> <li>• Amsterdam Trade Bank N.V.</li> <li>• Subsidiaries of Amsterdam Trade Bank N.V.</li> </ul>                        |
| <a href="#">13 May 2022</a> | 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   |
| <a href="#">13 May 2022</a> | 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"> <li>• Sovcomflot</li> <li>• Subsidiaries of Sovcomflot</li> </ul>  |
| <a href="#">19 May 2022</a> | 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"> <li>• JSC Rossiya Airlines</li> <li>• JSC Ural Airlines</li> <li>• PJSC Aeroflot</li> </ul>                            |
| <a href="#">23 May 2022</a> | 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"> <li>• JSC Aeroflot</li> <li>• JSC Rossiya Airlines</li> <li>• JSC Ural Airlines</li> <li>• Russian Railways</li> </ul> |
| <a href="#">24 May 2022</a> | Listings are corrected and parties are still subject to asset freeze.   | Several parties   |
| <a href="#">27 May 2022</a> | Listings are corrected and parties are still subject to asset freeze.   | Several parties   |
| <a href="#">30 May 2022</a> | 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"> <li>• ZAO TransTeleCom Company</li> </ul>  |
| <a href="#">30 May 2022</a> | Under General Licence INT/2022/1834876 an Interim Manager or trustee may allow for: <ul style="list-style-type: none"> <li>• 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</li> <li>• the receipt and disbursement of Charitable Funds</li> </ul> | N/A   |

# Bird & Bird

|                              |   |  |
|------------------------------|---|--|
|                              | <ul style="list-style-type: none"> <li>the payments associated with the wind up of a charity</li> </ul> <p>The licence takes effect from 30 May 2022 and expires on 30 May 2023.</p>  |  |
| <a href="#">30 May 2022</a>  | 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  |
| <a href="#">10 June 2022</a> | 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 |
| <a href="#">16 June 2022</a> | 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                          |
| <a href="#">23 June 2022</a> | <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"> <li>maritime goods and maritime technology in certain circumstances (regulation 5)</li> <li>military goods and technology with non-government controlled Ukrainian territory (as specified in new Chapter 2A of Part 5)</li> <li>defence and security goods and technology (as specified in Parts 2 to 4 of new Schedule 3C)</li> <li>interception and monitoring services</li> <li>banknotes</li> <li>jet fuel and fuel additives (as specified in an addition to Part 8 of Schedule 2A)</li> <li>goods which generate significant revenues for Russia (as specified in new Schedule 3D)</li> </ul> | N/A  |
| <a href="#">24 June 2022</a> | 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                              |
| <a href="#">29 June 2022</a> | 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                              |

# Bird & Bird

|                              |  |  |
|------------------------------|--|--|
| <a href="#">30 June 2022</a> | 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"> <li>• Rosbank</li> <li>• Entities owned or controlled by Rosbank</li> </ul> |
| <a href="#">5 July 2022</a>  | 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  |
| <a href="#">7 July 2022</a>  | General licence INT/2022/1947936 allows parties to: <ul style="list-style-type: none"> <li>• perform activities to ensure the timely delivery of humanitarian assistance activity in relation to the conflict in Ukraine and non-government controlled Ukrainian territory</li> <li>• carry out other activities that support basic human needs in relation to the conflict in Ukraine and non-government controlled Ukrainian territory</li> </ul>  | N/A  |
| <a href="#">12 July 2022</a> | 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  |
| <a href="#">12 July 2022</a> | “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  |
| <a href="#">15 July 2022</a> | <ul style="list-style-type: none"> <li>• Removal of parties from asset freezes</li> <li>• Listing is amended/corrected and parties are still subject to asset freeze.</li> </ul>   | Several parties  |
| <a href="#">15 July 2022</a> | 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"> <li>• introduces new restrictions on in relation to trade in: <ul style="list-style-type: none"> <li>○ maritime goods and maritime technology in certain circumstances (regulation 5);</li> <li>○ military goods and technology with non-government controlled Ukrainian territory (as specified in new Chapter 2A of Part 5);</li> <li>○ defence and security goods and technology (as specified in Parts 2 to 4 of new Schedule 3C);</li> <li>○ interception and monitoring services;</li> </ul> </li> </ul> | N/A  |

# Bird & Bird

|                            |   |            |
|----------------------------|---|------------|
|                            | <ul style="list-style-type: none"> <li>○ banknotes;</li> <li>○ jet fuel and fuel additives (as specified in an addition to Part 8 of Schedule 2A); and</li> <li>○ goods which generate significant revenues for Russia (as specified in new Schedule 3D).</li> <li>• As a result of those amendments:             <ul style="list-style-type: none"> <li>○ 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;</li> <li>○ 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;</li> <li>○ regulation 9 extends prohibitions in Part 5 of the 2019 Regulations in relation to trade in certain items with non-government controlled Ukrainian territory;</li> <li>○ 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.</li> </ul> </li> <li>• Regulation 10 amends Part 7 of the 2019 Regulations to create exceptions to some of the new prohibitions.</li> <li>• Regulation 11 makes consequential amendments in relation to offences.</li> <li>• Regulation 13 revokes the Russia (Sanctions) (EU Exit) (Amendment) (No. 10) Regulations 2022 (S.I. 2022/689).</li> </ul> |            |
| <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"> <li>• 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;</li> <li>• 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;</li> <li>• 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.</li> </ul>   | <p>N/A</p> |

# Bird & Bird

|                            |  |                        |
|----------------------------|--|------------------------|
| <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"> <li>• 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;</li> <li>• Provides exceptions to, and licensing powers in relation to, these new restrictions.</li> </ul>  | <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"> <li>• introduces new restrictions on trade in relation to: <ul style="list-style-type: none"> <li>○ professional and business services (as specified in new regulation 54B);</li> <li>○ miscellaneous essential goods required for the functioning of the Russian economy (as specified in new Schedule 3E);</li> <li>○ oil and oil products means (as specified in new Schedule 3F);</li> <li>○ gold (as specified in new Schedule 3G);</li> <li>○ coal and coal products (as specified in new Schedule 3H).</li> </ul> </li> <li>• 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;</li> <li>• introduces exceptions in relation to Energy-related Goods.</li> </ul> | <p>N/A</p>             |



# Bird & Bird

|                                       |   |   |
|---------------------------------------|---|---|
| <p><a href="#">22 July 2022</a></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><a href="#">26 July 2022</a></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><a href="#">29 July 2022</a></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"> <li>• Rosbank</li> <li>• Entities owned or controlled by Rosbank</li> </ul>  |
| <p><a href="#">2 August 2022</a></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><a href="#">9 August 2022</a></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><a href="#">15 August 2022</a></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"> <li>• Credit Bank of Moscow</li> <li>• Gazprombank</li> <li>• Sberbank</li> <li>• Rosbank PJSC</li> <li>• Entities owned or controlled by the above banks</li> </ul> |

# Bird & Bird

|                              |  |   |
|------------------------------|--|---|
| <p><u>17 August 2022</u></p> | <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"> <li>• Terrorism insurance;</li> <li>• Property owners' liability insurance</li> </ul> <p>Claims preparation costs insurance</p> | <p>N/A</p>  |
| <p><u>18 August 2022</u></p> | <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"> <li>• Evraz North America plc</li> <li>• Evraz Inc. NA</li> <li>• Evraz Inc. NA – Canada</li> </ul>  |
| <p><u>19 August 2022</u></p> | <p>General licence INT-2022-1845976 allows Crown Servants, contractors, &amp; 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>  | <p>N/A</p>  |
| <p><u>22 August 2022</u></p> | <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"> <li>• VTBC Asset Management International Limited</li> <li>• VTB Bank (Europe) SE and any entity owned or controlled by this entity</li> </ul> |
| <p><u>22 August 2022</u></p> | <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>   | <p>N/A</p>  |
| <p><u>23 August 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>  |

# Bird & Bird

|  |  |   |
|--|--|---|
|  | Removal of a designated party from the UK sanctions list. this party is no longer subject to an asset freeze.  |   |
| <a href="#"><u>30 August 2022</u></a>    | Extension of reporting obligations to crypto-asset exchange providers and custodian wallet providers   |   |
| <a href="#"><u>2 September 2022</u></a>  | 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"> <li>• MCST JSC</li> <li>• OOO VOLGA GROUP</li> </ul>         |
| <a href="#"><u>6 September 2022</u></a>  | 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"> <li>• Pavel Ezoubov</li> <li>• Mikhail Razvozhaev</li> </ul> |
| <a href="#"><u>16 September 2022</u></a> | 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   |
| <a href="#"><u>26 September 2022</u></a> | 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   |
| <a href="#"><u>28 September 2022</u></a> | 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   |

# Bird & Bird

|  |   |   |
|--|---|---|
| <a href="#"><u>30 September 2022</u></a> | <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>  | Several parties   |
| <a href="#"><u>4 October 2022</u></a>    | <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"> <li>• Sergei Vladimirovich YELISEYEV</li> </ul>  |
| <a href="#"><u>6 October 2022</u></a>    | <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"> <li>• VTBC Asset Management International Limited</li> <li>• VTB Bank (Europe) SE and any entity owned or controlled by this entity</li> </ul> |
| <a href="#"><u>17 October 2022</u></a>   | <p>General Licence INT/2022/1552576 allows for the payment of arbitration costs. This licence takes effect from 17 October 2022 and is of indefinite duration.</p>  | Several parties   |
| <a href="#"><u>20 October 2022</u></a>   | <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 party targeted with asset freeze.</p>  | Several parties   |
| <a href="#"><u>28 October 2022</u></a>   | <p>General Licence INT/2022/2305324 allows for the continued granting of certain loans (referred to as “category 5 loans”) or entering into arrangements to grant category 5 loans with Gazprom Germania and/or its subsidiaries, including its UK subsidiaries. General Licence INT/2022/2305324 also permits persons to carry out any activity necessary for the granting of category 5 loans.</p> <p>General Licence INT/2022/2305324 from effect on 28 October 2022 and expires on 29 October 2023.</p> | <ul style="list-style-type: none"> <li>• Gazprom Germania</li> <li>• Gazprom Germania subsidiaries</li> </ul>   |
| <a href="#"><u>28 October 2022</u></a>   | <p>General Licence INT/2022/2307324 allows for the continued granting of category 5 loans for the 7 days following the issuing of the Licence. This licence takes effect on 28 October 2022 and expires on 05 November 2022.</p>  | Several parties   |

# Bird & Bird

|                               |   |  |
|-------------------------------|---|--|
| <p><u>28 October 2022</u></p> | <p>General Licence INT/2022/2252300 allows payments to be made for legal professional fees and expenses associated with the provision of legal services.</p> <p>This licence takes effect from 28 October 2022 and expires on 28 April 2023.</p>  | <p>Several parties</p>   |
| <p><u>29 October 2022</u></p> | <p>The Russia (Sanctions) (EU Exit) (Amendment) (No. 15) Regulations 2022 amends the Russia (Sanctions) (EU Exit) Regulations 2019 and:</p> <ul style="list-style-type: none"> <li>• introduces new restrictions on trade in relation to: <ul style="list-style-type: none"> <li>○ the provision of certain loans (regulation 3);</li> <li>○ gold jewellery and to certain processed gold (regulation 5);</li> <li>○ imports of liquefied natural gas (“LNG” – regulation 6);</li> <li>○ exports of “Russia’s vulnerable goods” (regulation 6);</li> </ul> </li> <li>• amends various definitions: <ul style="list-style-type: none"> <li>○ relating to the new and revised trade prohibitions (regulation 4);</li> <li>○ minor clarificatory amendments to the lists of critical-industry goods and critical-industry technology, as well as to the list of quantum computing and advanced materials goods and technology (regulations 11(2) to (4), and (6));</li> </ul> </li> <li>• amends relevant lists of restricted goods: <ul style="list-style-type: none"> <li>○ gold and gold products (regulation 11(9));</li> <li>○ oil refining goods and technology (regulation 11(5));</li> <li>○ revenue generating goods (regulation 12(7));</li> <li>○ G7 dependency and further good (regulation 11(8)).</li> </ul> </li> <li>• introduces exceptions relating to the trade restrictions in view of gold jewellery and to certain processed gold</li> </ul> <p>The Russia (Sanctions) (EU Exit) (Amendment) (No. 15) Regulations 2022 enters into force on 29 October 2022, except for the restrictions as set forth in regulation 6 relating to LNG and “Russia’s vulnerable goods”, which enter into force on 1 January 2023.</p> | <p>N/A</p>   |
| <p><u>2 November 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>2 November 2022</u></p> | <p>General Licence INT/2022/2339452 allows Truphone Limited to make or receive or receive payments for the purposes of continuing to provide relevant services under</p>  | <ul style="list-style-type: none"> <li>• Truphone Limited</li> </ul> |

# Bird & Bird

|                                  |   |  |
|----------------------------------|---|--|
|                                  | <p>existing arrangements. The General Licence also allows a party to undertake any activity necessary for the effective termination of the relevant service contracts or obligations.</p> <p>This licence takes effect from 2 November 2022 and expires on 31 January 2023.</p>   |  |
| <a href="#">4 November 2022</a>  | <p>General Licence INT/2022/2349952 allows transactions related to agricultural commodities including the provision of insurance and other services.</p> <p>This licence takes effect on 4 November 2022 and is of indefinite duration.</p>   | N/A  |
| <a href="#">10 November 2022</a> | <p>General Licence INT/2022/1919908 allows parties to make use of the retail banking services of a sanctioned credit or financial institution provided that the payments made or received are intended for the personal use of a non-sanctioned party.</p> <p>This licence takes effect on 10 November 2022 and expires on 10 November 2023.</p>              | Several parties  |
| <a href="#">10 November 2022</a> | <p>Amendment of General Licence INT/2022/2339452. This licence was amended to include subsidiaries of Truphone's subsidiary companies, as existed at the point of listing with the exception of Truphone's Russian subsidiary Cellnetrix Technology LLC. This licence is extended from 31 January 2023 to 28 April 2023.</p>                                  | <ul style="list-style-type: none"> <li>• Truphone's subsidiary companies, excluding Cellnetrix Technology LLC</li> </ul> |
| <a href="#">11 November 2022</a> | <p>The relevant party which was already listed as sanctioned has been amended. 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"> <li>• Eugene Markovich Shvidler</li> </ul>  |
| <a href="#">17 November 2022</a> | <p>Further amendment of General Licence INT/2022/2339452. This licence was amended to confirm that the licence covers certain services.</p>   | <ul style="list-style-type: none"> <li>• Truphone's subsidiary companies, excluding Cellnetrix Technology LLC</li> </ul> |
| <a href="#">30 November 2022</a> | <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>  | <ul style="list-style-type: none"> <li>• Several parties</li> </ul>  |
| <a href="#">5 December 2022</a>  | <p>The Russia (Sanctions) (EU Exit) (Amendment) (No. 16) Regulations 2022 amends the Russia (Sanctions) (EU Exit) Regulations 2019 and:</p>   | N/A  |

# Bird & Bird

|                        |  |     |
|------------------------|--|-----|
|                        | <ul style="list-style-type: none"> <li>introduces new restrictions on trade in relation to maritime transport related services, financial services or brokering services in view of Russian oil transports from and to third countries (regulation 4);</li> <li>brings forward the introduction date for the prohibitions relating to Russian oil transports from and to third countries from 31st December 2022 to 5th December 2022 (regulation 3);</li> <li>introduces exceptions relating to the trade restrictions in view of Russian oil transports from and to third countries (regulation 5 and 6);</li> <li>clarifies that trade licences may not be granted in respect of the new prohibitions (regulation 8);</li> <li>introduces reporting obligations and enhances enforcement (regulations 9, 10, 12, 13, 14, 15 and 16).</li> </ul> |     |
| <u>5 December 2022</u> | <p>General Licence INT/2022/2470156 allows:</p> <ul style="list-style-type: none"> <li>The supply or delivery by Ship of Russian Oil originating in or consigned from the Sakhalin-2 Project from a place in Russia, to a place in Japan;</li> <li>The execution of contracts concluded before 4 June 2022, or of ancillary contracts necessary for the execution of such contracts, for the purchase, import or transfer of Russian oil into Bulgaria;</li> <li>Where there are no alternative supplies of vacuum gas oil available, the purchase, import or transfer of vacuum gas oil falling under commodity code 2710 into Croatia, which is consigned from, or originates in, Russia.</li> </ul> <p>This licence takes effect from 05 December 2022 and is of indefinite duration.</p>   | N/A |
| <u>5 December 2022</u> | <p>General Licence INT/2022/2470056 allows correspondent banks to process, clear, or send payments from any party in connection with the prohibition relating to financial services in view of Russian oil transports from and to third countries as stipulated in regulation 46Z9C of the Russia Regulations.</p> <p>This licence takes effect from 05 December 2022 and is of indefinite duration.</p>   | N/A |
| <u>5 December 2022</u> | <p>General Licence INT/2022/2470256 introduces a wind-down period on oil already loaded on ships before 5 December. The General licence allows contracts to ship Russian oil traded at a price above the price cap (currently 60 USD) which are loaded before 5:01 am GMT on 5 December 2022 and will be delivered and clear customs in a third country before 5:01 am GMT on 19 January 2023.</p>   | N/A |

# Bird & Bird

|                         |   |   |
|-------------------------|---|---|
|                         | This licence takes effect from 05 December 2022 and is of indefinite duration.  |   |
| <u>5 December 2022</u>  | <p>General Licence INT/2022/2469656 allows maritime transport related services, financial services or brokering services in view of Russian oil transports from and to third countries, provided that the relevant oil is to be supplied or delivered, or being supplied or delivered, is or will be at or below the Price Cap (currently 60 USD).</p> <p>This licence takes effect from 05 December 2022 and is of indefinite duration.</p>  | N/A   |
| <u>9 December 2022</u>  | <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>  | Several parties   |
| <u>13 December 2022</u> | <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 party targeted with asset freeze.</p>  | Several parties   |
| <u>16 December 2022</u> | The relevant party which was already listed as sanctioned has been amended. 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.  | <ul style="list-style-type: none"> <li>Said Mikhailovich GUTSERIEV</li> </ul> |
| <u>16 December 2022</u> | <p>The Russia (Sanctions) (EU Exit) (Amendment) (No. 17) Regulations 2022 amends the Russia (Sanctions) (EU Exit) Regulations 2019 and:</p> <ul style="list-style-type: none"> <li>introduces new restrictions relating to the provision of trust services to designated persons or persons connected with Russia (regulation 3);</li> <li>Expansion of restrictions in view of transferable security or money-market instrument issued after 16 December 2022 in view of the restrictions relating to 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 (regulation 4);</li> </ul> | N/A   |



# Bird & Bird

|                                  |   |  |
|----------------------------------|---|--|
|                                  | <ul style="list-style-type: none"> <li>Introduces new restrictions relating to the provision of IT consultancy and design services, advertising services, architectural services, auditing services and engineering services (regulation 10);</li> <li>Amendment of Schedules 2A and 3C to add further items to the lists of goods, trade in which is prohibited under Part 5;</li> <li>Corrections of errors made in previous Regulations amending the 2019 Regulations (regulation 21 and Schedule 4).</li> </ul> |  |
| <a href="#">28 December 2022</a> | The relevant parties which were already listed as sanctioned have been amended/corrected. The relevant parties are subject to an 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 parties.   | <ul style="list-style-type: none"> <li>OJE PARVAZ MADO NAFAR COMPANY</li> <li>Said Mikhailovich GUTSERIEV</li> </ul> |
| <a href="#">3 February 2023</a>  | General Licence INT/2023/2660772 allows contracts to ship Russian oil products traded at a price above the price cap that was loaded before 5:01 a.m. GMT 5 February 2023 and was or will be offloaded in a third country prior to 5:01 a.m., GMT, 1 April 2023   | N/A  |
| <a href="#">3 February 2023</a>  | Amendment of General Licence INT/2022/2469656. This licence was amended to include oil and oil products – classified under commodity code 2710 – under the definition of the Russian oil price cap  | N/A  |
| <a href="#">8 February 2023</a>  | 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  |
| <a href="#">24 February 2023</a> | 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.<br><br>Amendment of party targeted with asset freeze.   | Several parties  |
| <a href="#">28 February 2023</a> | The relevant party which was already listed as sanctioned has been corrected. 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.  | <ul style="list-style-type: none"> <li>Matthias Artur Warnig</li> </ul>  |

# Bird & Bird

|                                      |   |   |
|--------------------------------------|---|---|
| <p><a href="#">17 March 2023</a></p> | <p>The relevant party which was already listed as sanctioned has been corrected. 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> <p>2 parties are removed from the sanctions list and are no longer sanctioned parties.</p>        | <ul style="list-style-type: none"> <li>• Igor Viktorovich Makarov</li> <li>• Brian McDonald</li> <li>• Minsk Wheel Tractor Plant</li> </ul> |
| <p><a href="#">21 March 2023</a></p> | <p>All parties confronted with an asset freeze are all subject to trust services ban.</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 parties 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><a href="#">21 March 2023</a></p> | <p>General licence INT/2023/2589788 allows the wind down of trust services provided to sanctioned persons otherwise prohibited by Regulation 18C of the UK-Russia sanctions. General Licence INT/2023/2589788 takes effect from 00:01 on 21 March 2023 and will expire in respect of each designated person at 23:59 on the 90th day from 00:01 on the date on which they have been designated for the purposes of Regulation 18C.</p>                            | <p>N/A</p>  |
| <p><a href="#">28 March 2023</a></p> | <p>General licence INT/2023/2824812 allows, subject to certain conditions, transactions related to bond amendments and restructurings for non-sanctioned parties. General Licence INT/2023/2824812 takes effect from 28 March 2023. HM Treasury may vary, revoke or suspend this licence at any time.</p>   | <p>N/A</p>  |
| <p><a href="#">12 April 2023</a></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 party targeted with asset freeze.</p>  | <p>Several parties</p>  |
| <p><a href="#">13 April 2023</a></p> | <p>The relevant parties which were already listed as sanctioned have been amended or corrected. The relevant parties are subject to asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed parties are to be frozen</p>   | <p>Several parties</p>  |

# Bird & Bird

|                               |   |  |
|-------------------------------|---|--|
|                               | and no funds or economic resources can be made available, directly or indirectly, to the relevant parties.  |  |
| <a href="#">14 April 2023</a> | <p>General licence INT/2023/2883496 allows Lithuanian Railways to receive from and make payments to sanctioned party Russian Railways in view of the transit of persons between the Kaliningrad Region and other parts of Russia via the passenger rail service operated by Lithuanian Railways.</p> <p>General Licence took effect from 14 April 2023 and expires at 23:59 on 13 April 2025.</p>   | <ul style="list-style-type: none"> <li>• Russian Railways</li> </ul> |
| <a href="#">21 April 2023</a> | <p>The Russia (Sanctions) (EU Exit) (Amendment) Regulations 2023 amends the Russia (Sanctions) (EU Exit) Regulations 2019 and:</p> <ul style="list-style-type: none"> <li>• introduces a new Chapter 4CA which makes specific provision prohibiting the importation of iron and steel products, containing iron or steel originating in Russia, that have been processed in a third-country;</li> <li>• amends Chapter 4G which makes provision for revenue generating goods. In doing so, it recasts the former Schedule 3D, and makes consequential amendments to regulations 46R to 46X;</li> <li>• introduces new trade prohibitions in a new Schedule 3DA which specifies certain revenue generating goods;</li> <li>• introduces remedial amendments to Chapter 4I which relates to oil and oil products. Regulations 7 and 8 make similar provision in relation to gold (Chapter 4J) and coal and coal products (Chapter 4K);</li> <li>• introduces exceptions relating to the acquisition of otherwise prohibited goods for the purpose of the function of a United Kingdom diplomatic mission in Russia, and the acquisition of certain goods by United Kingdom nationals situated in Russia for use in Russia;</li> <li>• Regulations 12 and 13 make provision in relation to enforcement of the 2019 Regulations.</li> </ul> | N/A  |
| <a href="#">21 April 2023</a> | 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  |
| <a href="#">29 April 2023</a> | The new General licence INT/2023/2954852 following the expiry of General licence INT/2022/2252300 allows a UK legal firm or UK counsel who has provided legal advice to a person designated under either the Russia or Belarus regime to receive  | N/A  |

# Bird & Bird

|                    |   |  |
|--------------------|---|--|
|                    | <p>payment from that designated person without an OFSI specific licence, provided that the terms of the General Licence INT/2023/2954852 are met.</p> <p>General licence INT/2023/2954852 takes effect from 00:01 on 29 April 2023 and expires at 23:59 on 28 October 2023 and may be varied, revoked, or suspended by HM Treasury at any time.</p>                     |  |
| <u>5 May 2023</u>  | <p>Amendment of General licence INT/2022/1710676 to make clear that the subsidiaries of <i>Evrax Inc. NA</i> and <i>Evrax Inc. NA – Canada</i> are covered by General licence INT/2022/1710676.</p>   | <ul style="list-style-type: none"> <li>• Evraz Inc. NA</li> <li>• Evraz Inc. NA – Canada</li> </ul>  |
| <u>16 May 2023</u> | <p>The relevant party which was already listed as sanctioned has been corrected. 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"> <li>• Roman Nikolaevich Lepa</li> </ul>   |
| <u>19 May 2023</u> | <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 parties targeted with asset freeze.</p>  | <p>Contains amongst others the following parties:</p> <ul style="list-style-type: none"> <li>• Tinkoff Bank</li> <li>• Russian Regional Development Bank</li> <li>• Rosbank PJSC</li> <li>• AFK Sistema</li> <li>• Atomflot</li> </ul> |
| <u>22 May 2023</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 parties are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant parties.</p> | <ul style="list-style-type: none"> <li>• Ilya Iosifovich Klebanov</li> <li>• Valery Pavlinovich Shantsev</li> <li>• AFK Sistema</li> <li>• Vladimir Nikolaevich Lepin</li> </ul>   |
| <u>22 May 2023</u> | <p>General licence INT/2023/3024200 allows a UK person who is owed funds or economic resources by a UK-sanctioned party, under a contract that was signed before the sanctioned party in question was designated, to receive payment, provided that the terms of the general licence INT/2023/3024200 are met.</p>  | N/A  |

# Bird & Bird

|                              |  |  |
|------------------------------|--|--|
|                              | This licence takes effect from 22 May 2023 and expires at 23:59 on 21 November 2023 and may be varied, revoked, or suspended by HM Treasury at any time.   |  |
| <a href="#">31 May 2023</a>  | 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 parties 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"> <li>• Vladimir Nikolaevich Lepin</li> <li>• Dmitry Vladimirovich Konov</li> </ul> |
| <a href="#">5 June 2023</a>  | Amendment of General Licence INT/2022/1552576 to allow: <ul style="list-style-type: none"> <li>• UK-sanctioned party Representatives to pay funds to the London Court of International Arbitration (LCIA) to cover arbitration costs</li> <li>• UK-sanctioned party Representatives to transfer funds to their legal representatives for onward payment to the LCIA to cover arbitration costs</li> <li>• Non-UK-sanctioned arbitral parties to pay substitute deposit(s) to the LCIA</li> </ul> | N/A  |
| <a href="#">14 June 2023</a> | Revocation of general licence INT/2022/2305324. The nationalisation of Gazprom Germania (renamed Securing Energy for Europe – “SEFE”) means that Gazprom’s UK subsidiaries are no longer in scope of the credit restrictions, which this general licence was designed to lift.   | <ul style="list-style-type: none"> <li>• Gazprom Germania (renamed Securing Energy for Europe – “SEFE”)</li> </ul>   |
| <a href="#">14 June 2023</a> | General licence INT/2023/3074680 allows trading in derivatives and futures in view of Russian oil and oil products that would otherwise be prohibited. This licence takes effect from 14 June 2023 and is of indefinite duration.  | N/A  |
| <a href="#">20 June 2023</a> | Amendment of General licence INT/2022/1947936 to update: <ul style="list-style-type: none"> <li>• the definition of non-government controlled Ukrainian territory to capture Kherson and Zaporizhzhia oblasts; and,</li> <li>• Annex I of Designated Financial Institutions to capture financial institutions that are sanctioned since 7 July 2022.</li> </ul>  | Several parties  |
| <a href="#">20 June 2023</a> | The Russia (Sanctions) (EU Exit) (Amendment) (No. 2) Regulations 2023 amends the Russia (Sanctions) (EU Exit) Regulations 2019 and: <ul style="list-style-type: none"> <li>• introduces a new definition of “non-government controlled areas” and now includes the non-government controlled areas of the Kherson and Zaporizhzhia oblasts;</li> </ul>   | N/A  |

# Bird & Bird

|                              |  |   |
|------------------------------|--|---|
|                              | <ul style="list-style-type: none"> <li>introduces a new purpose of the relevant sanctions by indicating that the relevant sanctions regime is “appropriate for promoting the payment of compensation by Russia for losses suffered by Ukraine as a result of Russia’s full-scale invasion of Ukraine”;</li> <li>extending existing finance, shipping and trade sanctions relating to the Autonomous Republic of Crimea and city of Sevastopol (“Crimea”) and non-government controlled areas of the Donetsk and Luhansk oblasts, and relevant exceptions, to non-government controlled areas of the Kherson and Zaporizhzhia oblasts;</li> <li>introduce a defence to the strict liability offence under section 68(1) of the Customs and Excise Management Act 1979 relating to the prohibition on exportation of certain goods to, or for use in, non-government controlled areas.</li> </ul>  |   |
| <a href="#">23 June 2023</a> | 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 parties 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"> <li>Demetris IOANNIDES</li> <li>Galina Evgenyevna PUMPYANSKAYA</li> <li>Dmitry Alexandrovich PUMPYANSKY</li> </ul>     |
| <a href="#">26 June 2023</a> | General licence INT/2022/1710676 is extended and now expires on 31 March 2024. This licence allows for the continuation of business operations of the North American Subsidiaries of Evraz.  | <ul style="list-style-type: none"> <li>Evraz Inc. NA</li> <li>Evraz Inc. NA – Canada</li> </ul>   |
| <a href="#">26 June 2023</a> | <p>General licence INT/2022/1875276 is clarified as follows:</p> <ol style="list-style-type: none"> <li>PJSC Megafon has been removed as a Civilian Telecommunication DP. OFSI do not have reason to believe that PJSC MegaFon is owned or controlled by a designated person.</li> <li>Mobile TeleSystems PJSC (MTS), PJSC Moscow City Telephone Network (MGTS), and PJSC MegaFon have been removed as News Media Services DPs. OFSI do not have reason to believe that MTS, MGTS, and PJSC Megafon are owned or controlled by designated persons.</li> <li>Rossiya Segodnya has been added as a News Media Services DP.</li> <li>The definition of Civilian Telecommunications DPs has been amended to make clear that certain subsidiaries of ZAO TransTeleCom are covered by General Licence</li> </ol> <p>General licence INT/2022/1875276 allows certain activities related to the provision of Civilian Telecommunications Services and News Media Services.</p> | <ul style="list-style-type: none"> <li>PJSC Megafon</li> <li>Mobile TeleSystems PJSC (MTS)</li> <li>Rossiya Segodnya</li> <li>ZAO TransTeleCom</li> </ul> |

# Bird & Bird

|                            |  |   |
|----------------------------|--|---|
| <p><u>30 June 2023</u></p> | <p>The Russia (Sanctions) (EU Exit) (Amendment) (No. 3) Regulations 2023 amends the Russia (Sanctions) (EU Exit) Regulations 2019 and:</p> <ul style="list-style-type: none"> <li>introduces a new prohibition on the provision of legal advisory services where the legal advisory services are provided in relation to activity which would contravene certain prohibitions in the UK-Russia sanctions regulations if that activity were carried out by a UK person, or in the United Kingdom;</li> <li>introduces new exceptions to the prohibition on the provision of professional and business services to a person connected with Russia for the provision of auditing services, and in relation to the provision of expert evidence in connection with legal proceedings;</li> <li>introduces an exception from the new prohibition on the provision of legal advisory services to ensure that the new prohibition is not contravened by an act done to deal with an emergency;</li> <li>amends regulation 85 so that the offences specified in regulation 85(3B) and (3C) may only be investigated by HM Revenue and Customs following a referral by either a Secretary of State, the Treasury or the Office of Communications, or a decision by the Commissioners for His Majesty's Revenue and Customs to treat a suspected offence as if it had been so referred to them</li> <li>introduces a definition of "legal advisory services".</li> </ul> | <p>N/A</p>  |
| <p><u>6 July 2023</u></p>  | <p>Party is removed from the sanctions list and is no longer a sanctioned party.</p>   | <ul style="list-style-type: none"> <li>Lev Aronovich KHASIS</li> </ul>              |
| <p><u>7 July 2023</u></p>  | <p>The relevant party that was already listed as sanctioned has been amended. The relevant party is subject to asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed party 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"> <li>Dmitrii Vladimirovich OVSYANNIKOV</li> </ul> |
| <p><u>17 July 2023</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>20 July 2023</u></p> | <p>Removal and amendment of parties targeted with asset freeze.</p>  | <p>Several parties</p>  |
| <p><u>21 July 2023</u></p> | <p>Duplicate is removed from the sanctions list.</p>   | <p>N/A</p>  |

# Bird & Bird

|  |   |   |
|--|---|---|
| <a href="#"><u>27 July 2023</u></a>      | General Licence INT/2022/2085212 is extended to 14 August 2025. This licence allows payments to a sanctioned bank or any of its subsidiaries for the purpose of making energy available for use in Mongolia.  | <ul style="list-style-type: none"> <li>• Credit Bank of Moscow</li> <li>• Gazprombank</li> <li>• Sberbank</li> <li>• Rosbank PJSC</li> <li>• Entities owned or controlled by the above banks</li> </ul> |
| <a href="#"><u>28 July 2023</u></a>      | Amendment of parties targeted with asset freeze.  | Several parties   |
| <a href="#"><u>31 July 2023</u></a>      | 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   |
| <a href="#"><u>8 August 2023</u></a>     | 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   |
| <a href="#"><u>17 August 2023</u></a>    | Amendment of individual targeted with asset freeze.   | <ul style="list-style-type: none"> <li>• Igor Viktorovich Makarov</li> </ul>  |
| <a href="#"><u>23 August 2023</u></a>    | General licence INT/2022/1875276 has been amended to clarify that PJSC MegaFon is a designated person operating in the civilian telecommunications and news media service industry.   | <ul style="list-style-type: none"> <li>• ZAO TransTeleCom Company</li> <li>• PJSC MegaFon</li> </ul>  |
| <a href="#"><u>23 August 2023</u></a>    | General licence INT/2023/3263556 has been amended to make clear that STLC Europe Nine Leasing Limited is covered by the licence.  | <ul style="list-style-type: none"> <li>• GTLK companies and their subsidiaries</li> </ul>   |
| <a href="#"><u>31 August 2023</u></a>    | OFSI has updated Section 10 of its Enforcement and Monetary Penalty Guidance to provide further details on how it assesses the severity of breaches.  | N/A   |
| <a href="#"><u>19 September 2023</u></a> | Amendment of parties targeted with asset freeze.  | <ul style="list-style-type: none"> <li>• Mikhail Maratovic FRIDMAN</li> <li>• Zarakh Binsionovich ILIEV</li> <li>• Igor Viktorovich MAKAROV</li> <li>• Iskander Kakhramonovich MAKHMUDOV</li> </ul>     |
| <a href="#"><u>27 September 2023</u></a> | Amendment of individual targeted with asset freeze.   | <ul style="list-style-type: none"> <li>• Alexei Kozlov</li> </ul>   |
| <a href="#"><u>29 September 2023</u></a> | Amendment of parties targeted with asset freeze.  | Several parties   |
| <a href="#"><u>29 September 2023</u></a> | General licence INT/2023/3566356 allows a payment which has, at some point in the chain of payments, been processed by a sanctioned bank acting as an originating,  | N/A   |



# Bird & Bird

|                                  |  |  |
|----------------------------------|--|--|
|                                  | correspondent or intermediary institution, whilst no other party in the relevant chain is sanctioned. The licence takes effect from the 29 September 2023 and expires at 23.59 on the 1 December 2023  |  |
| <a href="#">10 October 2023</a>  | General Licence INT/2023/3024200 relating to prior obligations was extended, with additional amendments made to its conditions, definitions and annexes.   | N/A  |
| <a href="#">16 October 2023</a>  | Statement of the UK Foreign, Commonwealth and Development Office (“FCDO”) indicating that it is carefully considering the impact of the Court of Appeal’s judgment in <a href="#">Mints &amp; others v PJSC National Bank Trust &amp; another</a> , in particular the Court’s views that PJSC National Bank Trust is ‘controlled’ by sanctioned parties by virtue of their political office. | N/A  |
| <a href="#">26 October 2023</a>  | Amendment of parties targeted with asset freeze.   | <ul style="list-style-type: none"> <li>• Veniamin Ivanovich KONDRATYEV</li> <li>• Nikolai Fyodorovna KONDRATYUK (Group ID: 14961)</li> </ul> |
| <a href="#">27 October 2023</a>  | General Licence INT/2022/1875276 has been extended and amended.  | <ul style="list-style-type: none"> <li>• ZAO TransTeleCom Company</li> <li>• PJSC MegaFon</li> </ul>   |
| <a href="#">29 October 2023</a>  | General licence INT/2023/3744968 replaces General licence INT/2023/2954852 and allows receiving and processing payments made by or on behalf of sanctioned parties in connection with legal services. General licence INT/2023/3744968 takes effect from 00:01 on 29 October 2023 and expires at 23:59 on 28 April 2024 and may be varied, revoked, or suspended by HM Treasury at any time. | N/A  |
| <a href="#">8 November 2023</a>  | 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  |
| <a href="#">9 November 2023</a>  | Removal of party targeted with asset freeze. The relevant party is no longer subject to an asset freeze.   | <ul style="list-style-type: none"> <li>• Sergey Stognienko</li> </ul>  |
| <a href="#">10 November 2023</a> | Amendment of General licence INT/2022/1839676 to make clear that Paragraph 4.1 only permits the purchase of tickets from a UK sanctioned party or any party owned or controlled by such party for passenger rail or passenger air journeys originating in, or within, Russia.  | N/A  |

# Bird & Bird

|                                  |   |   |
|----------------------------------|---|---|
| <a href="#">13 November 2023</a> | Amendment of General licence INT/2022/1552576 to remove the Annex 1 Schedule of Arbitration Costs and to change the definition of Arbitration Costs to reflect the relevant Schedule of Costs for LCIA arbitration available at <a href="https://www.lcia.org/">https://www.lcia.org/</a> .   | N/A   |
| <a href="#">15 November 2023</a> | Amendment of individual targeted with asset freeze.   | <ul style="list-style-type: none"> <li>Irina Anatolievna Kostenko</li> </ul>              |
| <a href="#">17 November 2023</a> | New joint guidance issued by OFSI and FCDO in view of “control” by sanctioned parties by virtue of their political office.  | N/A   |
| <a href="#">24 November 2023</a> | Amendment of General licence INT/2023/3566356 to extend the expiry date to 14 December 2023.  | N/A   |
| <a href="#">30 November 2023</a> | Amendment of individual targeted with asset freeze.   | <ul style="list-style-type: none"> <li>Mihajlo Perencevic</li> </ul>                      |
| <a href="#">6 December 2023</a>  | 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   |
| <a href="#">11 December 2023</a> | Amendment of party targeted with asset freeze.  | <ul style="list-style-type: none"> <li>OOO MVIZION</li> </ul>                             |
| <a href="#">15 December 2023</a> | <p>Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed party are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed party.</p> <p>Amendment of parties targeted with asset freeze.</p>  | <ul style="list-style-type: none"> <li>JOINT-STOCK COMMERCIAL BANK NOVIKOMBANK</li> </ul> |
| <a href="#">15 December 2023</a> | <p>The Russia (Sanctions) (EU Exit) (Amendment) (No. 4) Regulations 2023 amends the Russia (Sanctions) (EU Exit) Regulations 2019 and:</p> <ul style="list-style-type: none"> <li>Amends the prohibitions relating to processing payments to provide that these apply to processing a payment in any currency which is received by a UK credit or financial institution but do not apply to the initial crediting of a payment to an account which is in the name of the credit or financial institution but not in the name of a customer of that credit or financial institution;</li> <li>extends the prohibitions relating to trade in luxury goods;</li> <li>introduces new prohibitions relating to trade in certain metals;</li> <li>introduces new exceptions to the prohibitions on G7 dependency and further goods and expands those for luxury goods where these relate to consumer communication devices and software updates;</li> </ul> | N/A   |

# Bird & Bird

|                         |  |  |
|-------------------------|--|--|
|                         | <ul style="list-style-type: none"> <li>introduces new exceptions for iron and steel products, relevant processed iron and steel products and metals where they were exported from Russia before the prohibition come into force or where they are already in free circulation in the United Kingdom;</li> <li>introduces the possibility to provide licences for certain activities carried out by a UK entity in order to divest itself of assets where those assets are subject to a sanction under the UK-Russia sanctions;</li> <li>introduces new reporting obligations on banks in relation to funds and economic resources held by them for prohibited persons;</li> <li>introduces new reporting obligations on UK-sanctioned parties;</li> <li>expands the export bans.</li> </ul>  |  |
| <u>15 December 2023</u> | <p>OFSI updated the following General Licences to also permit activity that would otherwise breach the prohibitions in Regulation 17A of the Russia Regulations:</p> <ul style="list-style-type: none"> <li>INT/2022/2349952 – Transactions Related to Agricultural Commodities Including the Provision of Insurance and Other Services</li> <li>INT/2022/2300292 – Payments to Utility Companies for Gas and Electricity by UK Designated Persons who Own or Rent Properties in the UK</li> <li>INT/2023/3626884 – Payments to Companies House</li> <li>INT/2022/2009156 – Permitted Payments to UK Insurance Companies</li> <li>INT/2022/1834876 – Charities and Interim Managers and Trustees</li> <li>INT/2022/1839676 – Russia Travel for UK Nationals</li> <li>INT/2022/1322576 – Provision of Navigational Data to Civilian Aircrafts for Flight Safety</li> <li>INT/2023/3024200 – Prior Obligations</li> <li>INT/2022/1552576 – LCIA Payments</li> <li>INT/2023/3179120 – Payment to Water Companies for Water and Sewage</li> <li>INT/2023/3744968 – Legal Services</li> <li>INT/2021/554388 – Emergency Payment(s) Directly or via an Intermediary to Belaeronavigatsia for Air Traffic Services</li> </ul> | N/A  |
| <u>18 December 2023</u> | Amendment of parties targeted with asset freeze.   | <ul style="list-style-type: none"> <li>Alexander Borisovich ARUTYUNOV</li> <li>Sergei Sergeevich TREGUB</li> </ul> |
| <u>21 December 2023</u> | Amendment of party targeted with asset freeze.   | <ul style="list-style-type: none"> <li>Yuri Alekseyevich Soloviev</li> </ul>                                       |

# Bird & Bird

|                                |  |  |
|--------------------------------|--|--|
| <p><u>22 December 2023</u></p> | <p>General licence INT/2022/1710676 - Continuation of Business of Evraz Plc's North American Subsidiaries, was extended and now expires on 30 September 2024.</p>  | <ul style="list-style-type: none"> <li>• Evraz North America plc;</li> <li>• Evraz Inc. NA;</li> <li>• Evraz Inc. NA – Canada; and</li> <li>• Their subsidiary companies.</li> </ul> |
| <p><u>1 January 2024</u></p>   | <p>The Russia (Sanctions) (EU Exit) (Amendment) (No. 5) Regulations 2023 amends the Russia (Sanctions) (EU Exit) Regulations 2019 and:</p> <ul style="list-style-type: none"> <li>• Introduces prohibitions on the import, acquisition and supply and delivery of diamonds and diamond jewellery (as defined in the Schedule inserted by regulation 7(2)) which are located, originate in or are consigned from Russia and on the provision of ancillary services relating to those prohibitions (regulation 3). Regulations 4 and 5 create certain exceptions to those prohibitions.</li> </ul>   | <p>N/A</p>   |
| <p><u>31 January 2024</u></p>  | <p>Amendment of party targeted with asset freeze.</p>  | <ul style="list-style-type: none"> <li>• Vladimir Aleksandrovich Dmitriev</li> </ul>   |
| <p><u>6 February 2024</u></p>  | <p>OFSI has amended General licence INT/2022/2009156 - Permitted Payments to UK Insurance Companies as below:</p> <ul style="list-style-type: none"> <li>• Permitted Payments can only be made for UK properties and UK vehicles;</li> <li>• Insurance Brokers may make all types of Return Payments to a DP's frozen bank account including payments due from successful claims;</li> <li>• The language in 5.2 and 6.5 has been clarified;</li> <li>• The definition of Return Payments was expanded to include other types of refunds;</li> <li>• The reporting and record-keeping requirements also apply to Insurance Brokers;</li> <li>• Those reporting must now report to HM Treasury within 10 working days.</li> </ul> | <p>N/A</p>   |
| <p><u>6 February 2024</u></p>  | <p>Amendment of party targeted with asset freeze.</p>  | <ul style="list-style-type: none"> <li>• Oleg Alexandrovich Mashtalyar</li> </ul>  |
| <p><u>12 February 2024</u></p> | <p>Amendment of party targeted with asset freeze.</p>  | <ul style="list-style-type: none"> <li>• Vladimir Olegovich Potanin</li> </ul>   |
| <p><u>15 February 2024</u></p> | <p>OFSI amended General licence - INT/2022/2009156 to remove reference to frozen UK bank accounts from Permissions 4.1, 4.3.1, and 6.1 to make clear that payments by DPs are not restricted to those made from frozen funds; and the language in permission 5.1 and 6.6 has been clarified.</p>   | <p>N/A</p>   |

# Bird & Bird

|                                  |   |  |
|----------------------------------|---|--|
| <a href="#">22 February 2024</a> | 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.<br><br>Amendment of parties targeted with asset freeze.   | Several parties  |
| <a href="#">23 February 2024</a> | Amendment of party targeted with asset freeze.  | <ul style="list-style-type: none"> <li>Ilya Borisovich BRODSKIY</li> </ul>   |
| <a href="#">29 February 2024</a> | General licence INT/2024/4398024 allows parties who owe monies to a designated person as a result of a Court Order to pay these to the Court Funds Office and for the Court Funds Office to receive these payments. This licence took effect on 29 February 2024.   | N/A  |
| <a href="#">1 March 2024</a>     | Amendment of party targeted with asset freeze.  | <ul style="list-style-type: none"> <li>Vladimir Vladimirovich MIKHEYCHIK</li> </ul>  |
| <a href="#">1 March 2024</a>     | The Russia (Sanctions) (EU Exit) (Amendment) Regulations 2024 amends the Russia (Sanctions) (EU Exit) Regulations 2019 and: <ul style="list-style-type: none"> <li>creates new trade prohibitions in the 2019 Regulations relating to the import of certain diamonds which originate in Russia and are processed in a third country and ancillary activities relating to such imports.</li> </ul> | N/A  |
| <a href="#">5 March 2024</a>     | Removal of party targeted with asset freeze.  | <ul style="list-style-type: none"> <li>Igor Viktorovich MAKAROV</li> </ul>   |
| <a href="#">27 March 2024</a>    | Amendment of party targeted with asset freeze.  | <ul style="list-style-type: none"> <li>Svetlana Alexandrovna Krivonogikh</li> </ul>  |
| <a href="#">28 March 2024</a>    | General licence INT/2024/4576632 allows parties may wind down any transactions to which it is a party, involving Active Denizcilik, the Vessels, Beks, or vessels for which Beks acts as commercial and/or technical manager. This licence took effect on 28 March 2024 and expires on 11 June 2024.  | <ul style="list-style-type: none"> <li>Active Denizcilik ve Gemi Isletmeciligi Anonim Sirketi</li> <li>Beks Gemi Isletmeciligi Ve Ticaret Anonim Sirketi OR Beks Ship Management And Trading Joint Stock Company</li> <li>Vessels for which Active Denizcilik acts as commercial or technical manager</li> </ul> |
| <a href="#">10 April 2024</a>    | General licence INT/2024/4576632 was amended to remove the language prohibiting funds or economic resources from being made available for the benefit of any designated person.   | <ul style="list-style-type: none"> <li>Active Denizcilik ve Gemi Isletmeciligi Anonim Sirketi</li> <li>Beks Gemi Isletmeciligi Ve Ticaret Anonim Sirketi OR Beks Ship Management And Trading Joint Stock Company</li> </ul>  |

# Bird & Bird

|                               |   |   |
|-------------------------------|---|---|
|                               |   | <ul style="list-style-type: none"> <li>Vessels for which Active Denizcilik acts as commercial or technical manager</li> </ul> |
| <a href="#">29 April 2024</a> | General licence INT/2024/4671884 replaces General licence INT/2023/3744968 and allows payments for legal fees from designated parties – subject to specific conditions as indicated in the General licence.   | N/A   |
| <a href="#">3 May 2024</a>    | Amendment of party targeted with asset freeze.  | <ul style="list-style-type: none"> <li>Sarvar Ismailov</li> </ul>   |
| <a href="#">8 May 2024</a>    | Amendment of party targeted with asset freeze.  | <ul style="list-style-type: none"> <li>Said Mikhailovich Gutseriev</li> </ul>   |
| <a href="#">16 May 2024</a>   | General licence NT/2022/1839676 was extended and now expires on 13 May 2026   | N/A   |
| <a href="#">17 May 2024</a>   | 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.   | <ul style="list-style-type: none"> <li>Vostochnaya Stevedore Limited Liability Company</li> </ul>                             |
| <a href="#">28 May 2024</a>   | General licence INT/2024/4761108 allows individuals to make use of the retail banking services of a designated bank provided that the payments made or received are intended for the personal use of an individual.   | N/A   |
| <a href="#">28 May 2024</a>   | <p>The Russia (Sanctions) (EU Exit) (Amendment) (No. 2) Regulations 2024 amends the Russia (Sanctions) (EU Exit) Regulations 2019 and:</p> <ul style="list-style-type: none"> <li>makes amendments to the designation criteria in regulation 6 of the 2019 Regulations to specify additional activities for which a person may be designated;</li> <li>makes amendments to the ship specification criteria in regulation 57F of the 2019 Regulations to specify additional activities for which a ship may be specified.</li> </ul> | N/A   |
| <a href="#">30 May 2024</a>   | Amendment of party targeted with asset freeze.  | <ul style="list-style-type: none"> <li>Tatiana Vladimirovna Evtushenkova</li> </ul>   |
| <a href="#">31 May 2024</a>   | Amendment of party targeted with asset freeze.  | <ul style="list-style-type: none"> <li>Dmitry Vladimirovich Konov</li> </ul>  |
| <a href="#">31 May 2024</a>   | General licence INT/2022/1280876 was amended to allow a scheme of arrangement prepared by the Joint Administrators of VTB Capital plc.  | <ul style="list-style-type: none"> <li>VTB Bank and relevant subsidiaries</li> </ul>  |

# Bird & Bird

|                              |  |  |
|------------------------------|--|--|
| <a href="#">13 June 2024</a> | 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.  | <ul style="list-style-type: none"> <li>• Contains various parties</li> </ul>   |
| <a href="#">14 June 2024</a> | Amendment of parties targeted with asset freeze.   | <ul style="list-style-type: none"> <li>• Central Counterparty National Clearing Centre</li> <li>• LLC Kompaniya AMG</li> </ul>   |
| <a href="#">25 June 2024</a> | Removal of party targeted with asset freeze.   | <ul style="list-style-type: none"> <li>• Aleksei Nikolaevich Filippovskii</li> </ul>   |
| <a href="#">26 June 2024</a> | Amendment of parties targeted with asset freeze.   | Several parties.   |
| <a href="#">28 June 2024</a> | On 28 June 2024, General licence INT/2022/2470156 was amended to extend the expiration date of the Schedule 1 Exempt Projects, Sakhalin-2 Project, to 28 June 2025.  | N/A  |
| <a href="#">3 July 2024</a>  | General licence INT/2024/4919848 allows for the sale, divestment or transfer of financial instruments held at the designated NSD and allows the payment of safe keeping fees.  | <ul style="list-style-type: none"> <li>• NSD</li> </ul>  |
| <a href="#">23 July 2024</a> | Amendment of General Licence INT/2022/1280876 to change Permission 5.2, specifically the Insolvency Proceedings that apply to OWH SE, the EU subsidiary.   | N/A  |
| <a href="#">24 July 2024</a> | General licence INT/2022/1710676 is extended and now expires on 31 March 2025 23:59.   | <ul style="list-style-type: none"> <li>• Evraz North America plc;</li> <li>• Evraz Inc. NA;</li> <li>• Evraz Inc. NA – Canada; and</li> <li>• Their subsidiary companies.</li> </ul> |
| <a href="#">31 July 2024</a> | <p>The Russia (Sanctions) (EU Exit) (Amendment) (No. 3) Regulations 2024 amends the Russia (Sanctions) (EU Exit) Regulations 2019 and:</p> <ul style="list-style-type: none"> <li>• makes amendments to the designation criteria in regulation 6 of the 2019 Regulations to specify additional activities for which a person may be designated;</li> <li>• makes amendments to the ship specification criteria in regulation 57F of the 2019 Regulations to specify additional activities for which a ship may be specified;</li> <li>• revokes and replaces the Russia (Sanctions) (EU Exit) (Amendment) (No. 2) Regulations 2024 as it is anticipated that it will not be possible for those Regulations to be approved by a resolution of each House of Parliament within 28</li> </ul> | N/A  |

# Bird & Bird

|                                   |  |   |
|-----------------------------------|--|---|
|                                   | days of the day on which they were made, and they will therefore cease to have effect.   |   |
| <a href="#">2 August 2024</a>     | General licence INT/2024/4919848 is extended and now expires on 12 October 2024 23:59.   | <ul style="list-style-type: none"> <li>• NSD</li> </ul>                   |
| <a href="#">9 August 2024</a>     | General Licence INT/2024/5028385 allows payments and other permitted activities to take place in relation to the insolvency proceedings associated with East-West United Bank.   | <ul style="list-style-type: none"> <li>• East-West United Bank</li> </ul> |
| <a href="#">6 September 2024</a>  | <p>The Russia (Sanctions) (EU Exit) (Amendment) (No. 4) Regulations 2024 amends the Russia (Sanctions) (EU Exit) Regulations 2019 and:</p> <ul style="list-style-type: none"> <li>• clarifies the knowledge a person must have before the prohibition relating to legal advisory services applies;</li> <li>• introduce an exception to the legal advisory services prohibition to ensure that advice on compliance with e.g. global sanctions and related advice is not caught by the prohibition;</li> <li>• makes an amendment to the definition of legal advisory services by making some textual changes and by indicating that the definition of legal advisory services does not include the provision of legal advice or other services in connection with the management of claims under a contract of insurance or reinsurance.</li> </ul> | N/A   |
| <a href="#">6 September 2024</a>  | Revocation of the legal advisory services general trade licence due to the introduction of an exception to the legal advisory services prohibition.  | N/A   |
| <a href="#">10 September 2024</a> | 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.  | Contains various parties  |
| <a href="#">26 September 2024</a> | 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.  | Contains various parties  |
| <a href="#">10 October 2024</a>   | Introduction of new civil enforcement powers for the Office of Trade Sanctions Implementation (OTSI), within the Department for Business and Trade, in view of trade sanctions enforcement.  | N/A   |



# Bird & Bird

|                                  |  |  |
|----------------------------------|--|--|
| <a href="#">11 October 2024</a>  | Amendment of parties targeted with asset freeze.   | Several parties.   |
| <a href="#">17 October 2024</a>  | Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed party are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed party.              | <ul style="list-style-type: none"> <li>• RusGazDobycha JSC</li> </ul>  |
| <a href="#">17 October 2024</a>  | Removal of party targeted with asset freeze.   | <ul style="list-style-type: none"> <li>• Semyon Mkrtychovich Simonyan</li> </ul>   |
| <a href="#">28 October 2024</a>  | 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.          | Contains various parties   |
| <a href="#">29 October 2024</a>  | General licence INT/2024/5334756 replaces General licence INT/2024/4671884 and allows payments for legal fees from designated parties – subject to specific conditions as indicated in the General licence.  | N/A  |
| <a href="#">7 November 2024</a>  | 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.          | Contains various parties   |
| <a href="#">7 November 2024</a>  | Extension of General licence INT/2022/1710676 to 30 September 2025.  | <ul style="list-style-type: none"> <li>• Evraz North America plc;</li> <li>• Evraz Inc. NA;</li> <li>• Evraz Inc. NA – Canada; and</li> <li>• Their subsidiary companies.</li> </ul> |
| <a href="#">7 November 2024</a>  | General licence INT/2024/5394840 allows financial institutions to process payments made in the year 2022 from or via a UK-sanctioned financial institution, provided that the original sender and original intended recipient are not UK-sanctioned parties. | N/A  |
| <a href="#">15 November 2024</a> | Amendment of parties targeted with asset freeze.   | Several parties.   |
| <a href="#">19 November 2024</a> | 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.          | Contains various parties   |
| <a href="#">5 December 2024</a>  | The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2024 introduces amongst others:   | N/A  |

# Bird & Bird

|                                  |  |   |
|----------------------------------|--|---|
|                                  | <ul style="list-style-type: none"> <li>• A requirement for all UK parties that hold funds or economic resources owned, held, or controlled by a designated party, to provide an annual report to OFSI with the details of these assets;</li> <li>• An amendment to certain asset freeze prohibitions to explicitly apply to parties owned or controlled by named designated parties;</li> <li>• An expansion of the definition of relevant firms subject to financial sanctions reporting obligations to cover additional sectors – high value dealers, art market participants, insolvency practitioners and letting agencies – the only measure to come into force not on 5 December 2024 but on 14 May 2025.</li> </ul> |   |
| <a href="#">9 December 2024</a>  | Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed party are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed party.  | <ul style="list-style-type: none"> <li>• Anto Joseph</li> </ul>                             |
| <a href="#">17 December 2024</a> | 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.  | <ul style="list-style-type: none"> <li>• 2RIVERS DMCC</li> <li>• 2RIVERS PTE LTD</li> </ul> |
| <a href="#">18 December 2024</a> | Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed party are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed party.  | <ul style="list-style-type: none"> <li>• AUTEL ROBOTICS CO., LTD.</li> </ul>                |
| <a href="#">8 January 2025</a>   | Amendment of General Licence INT/2022/1280876 to indicate that Paragraph 5.3 is subject to the condition that no funds or economic resources shall be made available, including the making of any provision with a view to making a payment of funds or a transfer of economic resources at a later date, in each case to VTB Bank PJSC or any person to whom VTB Bank PJSC have transferred, or in the future, transfer their claim in VTB Capital plc's Insolvency Proceedings without first deducting the value of specific assets.   | <ul style="list-style-type: none"> <li>• VTB</li> </ul>                                     |
| <a href="#">9 January 2025</a>   | Amendment of party targeted with asset freeze.   | <ul style="list-style-type: none"> <li>• ZAPCHASTTRADE LLP</li> </ul>                       |
| <a href="#">10 January 2025</a>  | General licence INT/2025/5635700 allows certain business involving Sakhalin-2 and Gazpromneft-Sakhalin LLC as well as any entity owned or controlled, directly or indirectly, by Gazpromneft-Sakhalin LLC.   | <ul style="list-style-type: none"> <li>• Gazpromneft-Sakhalin LLC</li> </ul>                |

# Bird & Bird

|                                  |  |   |
|----------------------------------|--|---|
| <a href="#">10 January 2025</a>  | General licence INT/2025/5635701 allows winding down or divesting from any transactions involving Gazprom Neft or PJSC Surgutneftegas as well as any entity owned or controlled, directly or indirectly, by those entities. This licence takes effect from 10 January 2025 and expires at 05:01 on 27 February 2025. | <ul style="list-style-type: none"> <li>• Gazprom Neft</li> <li>• PJSC Surgutneftegas</li> </ul> |
| <a href="#">10 January 2025</a>  | 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.  | <ul style="list-style-type: none"> <li>• Gazprom Neft</li> <li>• PJSC Surgutneftegas</li> </ul> |
| <a href="#">15 January 2025</a>  | Amendment of party targeted with asset freeze.   | <ul style="list-style-type: none"> <li>• Gazprom Neft</li> </ul>                                |
| <a href="#">15 January 2025</a>  | Amendment of party targeted with investment ban.   | <ul style="list-style-type: none"> <li>• Gazprom Neft</li> </ul>                                |
| <a href="#">29 January 2025</a>  | General licence INT/2024/4423849 provides for the “Oil Price Cap”. This licence was amended to update the commodity code for “Premium to Crude” from 2710 19 43 to 2710 19 42.   | N/A   |
| <a href="#">30 January 2025</a>  | Removal of party targeted with asset freeze.   | <ul style="list-style-type: none"> <li>• Nikolay Ivanovich Bortsov</li> </ul>                   |
| <a href="#">10 February 2025</a> | Removal of party targeted with asset freeze.   | <ul style="list-style-type: none"> <li>• Irina Vladimirovna CHUBAROVA</li> </ul>                |
| <a href="#">13 February 2025</a> | General licence INT/2024/4423849 was amended to add commodity code 2710 19 44, which sits alongside 2710 19 42 under “Premium to Crude”.   | N/A   |
| <a href="#">14 February 2025</a> | 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.  | Contains various parties  |
| <a href="#">21 February 2025</a> | General licence INT/2025/5855272 allows certain International Organisations to receive payments transferred from an account held with Gazprombank.<br><br>This licence takes effect from 00:01 on 21 February 2025 and expires at 11:59 pm 20 February 2030.   | <ul style="list-style-type: none"> <li>• Gazprombank</li> </ul>                                 |
| <a href="#">24 February 2025</a> | 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.  | Contains various parties  |

# Bird & Bird

|                                  |   |  |
|----------------------------------|---|--|
| <a href="#">26 February 2025</a> | Removal of party targeted with asset freeze.  | <ul style="list-style-type: none"> <li>• Francois Edouard MAURON</li> </ul>  |
| <a href="#">27 February 2025</a> | Amendment of parties targeted with asset freeze.  | Contains various parties   |
| <a href="#">7 March 2025</a>     | Removal of party targeted with asset freeze.  | <ul style="list-style-type: none"> <li>• ACTIVE DENIZCILIK VE GEMI ISLETMECILIGI ANONIM SIRKETI</li> <li>• ROSBANK PJSC</li> </ul> |
| <a href="#">7 March 2025</a>     | Amendment of party targeted with asset freeze.  | <ul style="list-style-type: none"> <li>• TBANK</li> </ul>  |
| <a href="#">14 March 2025</a>    | <p>General licence INT/2025/588686 authorises:</p> <ul style="list-style-type: none"> <li>• UK nationals to purchase petrol from Gazprom Neft at any petrol station in Kyrgyzstan or Tajikistan that is either owned by Gazprom Neft or sells Gazprom Neft's petrol, provided that the petrol is for that UK national's personal vehicle;</li> <li>• UK financial institutions to undertake any activity reasonably necessary to effect the purchase of petrol as indicated above.</li> </ul> | <ul style="list-style-type: none"> <li>• Gazprom Neft and its subsidiaries</li> </ul>  |
| <a href="#">28 March 2025</a>    | <p>General Licence INT/2025/5787748 allows:</p> <ul style="list-style-type: none"> <li>• persons to make payments to arbitration associations and arbitrators to cover fees and expenses for their arbitration services; and</li> <li>• arbitrators and arbitration associations to direct payment of, receive and use such payments to cover Arbitration Costs.</li> </ul>   | N/A  |
| <a href="#">24 April 2025</a>    | <p>The Russia (Sanctions) (EU Exit) (Amendment) Regulations 2025 amends the Russia (Sanctions) (EU Exit) Regulations 2019 and:</p> <ul style="list-style-type: none"> <li>• introduces new definitions;</li> <li>• introduces new prohibitions relating to: <ul style="list-style-type: none"> <li>○ additional goods and technology;</li> <li>○ energy-related technology;</li> <li>○ specific software</li> </ul> </li> <li>• introduces exceptions to the new prohibitions.</li> </ul>     | N/A  |
| <a href="#">20 May 2025</a>      | 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.   | Contains various parties   |

# Bird & Bird

|                            |  |   |
|----------------------------|--|---|
| <p><u>20 May 2025</u></p>  | <p>General licence INT/2025/6275812 allows parties to wind down from any transactions involving UK sanctioned party St Petersburg Currency Exchange or Non-bank Credit Organization Joint-Stock Company Petersburg Settlement Center.</p>  | <ul style="list-style-type: none"> <li>• St. Petersburg Currency Exchange (JSC SPCEX)</li> <li>• Non-bank Credit Organization Joint-Stock Company Petersburg Settlement Center (JSC PSC).</li> </ul>  |
| <p><u>20 May 2025</u></p>  | <p>General licence INT/2025/6279615 allows the payment and processing of payments in view of the UK sanctioned party State Corporation Deposit Insurance Agency.</p>   | <ul style="list-style-type: none"> <li>• State Corporation Deposit Insurance Agency</li> </ul>  |
| <p><u>21 May 2025</u></p>  | <p>Renewal of General Licence INT/2022/1834876 under which an interim manager or trustee may allow for:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• the receipt and disbursement of charitable funds;</li> <li>• the payments associated with the wind up of a charity.</li> </ul> <p>The renewed licence expires on 30 May 2028.</p> | <p>N/A</p>  |
| <p><u>23 May 2025</u></p>  | <p>Amendment of party targeted with asset freeze.</p>  | <ul style="list-style-type: none"> <li>• Michel Litvak</li> </ul>   |
| <p><u>28 May 2025</u></p>  | <p>Amendment of parties targeted with asset freeze and trust services sanctions.</p>   | <ul style="list-style-type: none"> <li>• Igor Borisovich BYSTROV</li> <li>• ATOMA LLC</li> <li>• MT-SYSTEMS LLC</li> <li>• PIONEER TRADE LLC</li> <li>• SHANGHAI NEW CHESS CO., LTD.</li> <li>• SHANGHAI NEW CHESS INT'L LOGISTICS CO., LTD.</li> <li>• LIMITED LIABILITY COMPANY RESPONSIBILITY "MARKET SPECIAL DEPOSITORY"</li> </ul> |
| <p><u>12 June 2025</u></p> | <p>Amendment of General Licence INT/2023/3263556 was amended to:</p> <ul style="list-style-type: none"> <li>• Add regulation 18A of the Russia (Sanctions) (EU Exit) Regulations 2019 to the regulations that are exempt under the General Licence;</li> </ul>   | <ul style="list-style-type: none"> <li>• GTLK companies and its subsidiaries</li> </ul>   |

# Bird & Bird

|                     |   |  |
|---------------------|---|--|
|                     | <ul style="list-style-type: none"> <li>• Add definitions for Notes, Noteholders, Trustee, Relevant non-UK Institution, UK Prohibited Persons and UK Prohibited Persons Account;</li> <li>• Make it clear in Permission 4.2 that any funds made available to designated persons (“DPs”) must be held in a frozen account and any economic resources made available must be treated as frozen;</li> <li>• Add Permission 4.3 which states that financial services for foreign exchange reserve and asset management must not be provided to a UK Prohibited Person unless any resulting payments are credited to a UK Prohibited Person’s Account;</li> <li>• Make corresponding clarificatory changes to Permission 5, the notification requirement and the record-keeping requirement; and</li> <li>• Add a new reporting requirement.</li> </ul> |  |
| <u>13 June 2025</u> | Delisting of a party targeted with asset freeze   | <ul style="list-style-type: none"> <li>• Aleksey Leonidovich FISUN</li> </ul>  |
| <u>13 June 2025</u> | Amendment of General Licence INT/2023/3263556 to make a clarificatory change to Permission 4.2.   | <ul style="list-style-type: none"> <li>• GTLK companies and their subsidiaries</li> </ul>  |
| <u>17 June 2025</u> | Trust service sanctions and 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.   | <ul style="list-style-type: none"> <li>• KARASEV, Yuriy Anatolyevich</li> <li>• KARASEV, Igor Yurievch</li> <li>• PRISTOUPA, Vladimir Grigoryevich</li> <li>• TKACZ, Olech</li> <li>• JSC ATLAS</li> <li>• METALLURG LLC</li> <li>• ORION STAR GROUP LLC</li> <li>• ROSNEFT MARINE (UK) LIMITED</li> <li>• THE MAIN DIRECTORATE OF DEEP-SEA RESEARCH OF THE MINISTRY OF DEFENCE OF THE RUSSIAN FEDERATION</li> <li>• VALEGRO LLC-FZ</li> </ul> |
| <u>17 June 2025</u> | Shipping sanctions i.e. specified ships are prohibited from being provided with access to or having its master or pilot cause it to enter a port in the UK, may have its registration on the UK Ship Register terminated, and a master or pilot of a specified ship may be given a port barring direction, a detention direction, and a port entry direction or a movement direction.   | Contains various ships   |
| <u>26 June 2025</u> | Amendment of parties targeted with asset freeze and trust services sanctions.   | Contains various parties   |

# Bird & Bird

|                              |  |   |
|------------------------------|--|---|
| <a href="#">27 June 2025</a> | Amendment of General Licence INT/2022/2470156 (Oil Price Cap: Exempt Projects and Countries) to extend the permission for certain supplies or deliveries of Russian oil by ship to or between third countries (including the maritime transfer of Russian oil from Sakhalin-2 to Japan). | N/A   |
| <a href="#">27 June 2025</a> | Amendment of General Licence INT/2025/5635700 (Russian Oil Exempt Projects) to extend the “Sakhalin-2 exemption” to continue business operations related to the Sakhalin-2 project with Gazpromneft-Sakhalin LLC (and its subsidiaries).   | <ul style="list-style-type: none"> <li>• Gazpromneft-Sakhalin LLC and its subsidiaries</li> </ul>   |
| <a href="#">1 July 2025</a>  | Amendment of parties targeted with asset freeze and trust services sanctions.  | <ul style="list-style-type: none"> <li>• KARASEV, Yegor Yurievich</li> <li>• Anatoliy Moiseevich</li> <li>• THE MAIN DIRECTORATE OF DEEP-SEA RESEARCH OF THE MINISTRY OF DEFENCE OF THE RUSSIAN FEDERATION</li> </ul> |
| <a href="#">18 July 2025</a> | General Licence INT/2025/6641960 allows non-designated persons who have made investments through designated brokers to transfer their funds to a non-designated broker.  | N/A   |
| <a href="#">18 July 2025</a> | Trust service sanctions and 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           | Contains various parties  |
| <a href="#">18 July 2025</a> | 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                                       | Contains various parties  |
| <a href="#">18 July 2025</a> | Amendment of General Licence INT/2024/4423849 which amends the definition of "price cap" in view of the price of Russian crude oil. The new price cap is set at 47.60 USD per barrel, down from the previous figure of 60 USD.   | N/A   |
| <a href="#">21 July 2025</a> | General Licence INT/2025/6488808 allows persons to wind down from any transactions involving Litasco Middle East DMCC to which that person is a party.   | <ul style="list-style-type: none"> <li>• Litasco Middle East DMCC</li> </ul>  |
| <a href="#">21 July 2025</a> | General Licence NT/2025/6397444 allows a person to wind down or divest from any transaction involving Intershipping Services LLC to which that person is a party,  | <ul style="list-style-type: none"> <li>• Intershipping Services LLC (the authorised representative for Maritime Administration of</li> </ul>  |

# Bird & Bird

|                     |  |  |
|---------------------|--|--|
|                     | including the closing out of any positions, and a person, a relevant UK institution, or Intershipping Services LLP can carry out any activity reasonably necessary to effect this.   | Gabonese Republic worldwide, based in the United Arab Emirates).   |
| <u>21 July 2025</u> | Trust service sanctions and 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 and amendments of parties targeted with asset freeze and trust services sanctions.  | <ul style="list-style-type: none"> <li>• INTERSHIPPING SERVICES LLC</li> <li>• LITASCO MIDDLE EAST DMCC</li> <li>• Yegor Yurievich KARASEV</li> <li>• OJSC KEREMET BANK</li> </ul>                           |
| <u>21 July 2025</u> | Shipping sanctions i.e. specified ships are prohibited from being provided with access to or having its master or pilot cause it to enter a port in the UK, may have its registration on the UK Ship Register terminated, and a master or pilot of a specified ship may be given a port barring direction, a detention direction, and a port entry direction or a movement direction.  | Contains various ships   |
| <u>21 July 2025</u> | General Licence INT/2025/6403704 allows for the continuation of business operations of vessels owned or operated by, or on behalf of, the Government of the Gabonese Republic involving Intershipping Services LLC   | <ul style="list-style-type: none"> <li>• Intershipping Services LLC (the authorised representative for Maritime Administration of Gabonese Republic worldwide, based in the United Arab Emirates)</li> </ul> |
| <u>21 July 2025</u> | <p>General Trade Licence Russia Sanctions – Sectoral Software and Technology allows</p> <ul style="list-style-type: none"> <li>• the transfer of technology of business enterprise software and technology;</li> <li>• the making available of business enterprise software and technology;</li> <li>• ancillary services relating to business enterprise software and technology;</li> </ul> <p>to multinational clients headquartered outside of Russia, with global subsidiaries and affiliates, including in Russia.</p> | N/A  |



# Bird & Bird

## UK sanctions against Belarus

| THE UNITED KINGDOM               |  |   |
|----------------------------------|--|---|
| BELARUS                          |  |   |
| Date                             | Description  | Entities and individuals being sanctioned   |
| <a href="#">8 February 2022</a>  | 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"> <li>• DANA HOLDINGS A.K.A DANA ASTRA</li> </ul>  |
| <a href="#">16 February 2022</a> | 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"> <li>• Natallia Mikalaeuna EISMONT</li> <li>• Andrey Evgenievich KRIVOSHEYEV</li> <li>• Andrei Nikolaevich MUKOVOZCHIK</li> <li>• OPEN JOINT STOCK COMPANY "BELARUSKALI"</li> </ul> |
| <a href="#">18 February 2022</a> | 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"> <li>• Mikhail Alexandrovich DAMARNACKI</li> <li>• Natallia Mikalaeuna EISMONT</li> </ul>   |
| <a href="#">9 March 2022</a>     | General Licence INT/2022/1322576 authorises: <ul style="list-style-type: none"> <li>• a flight data provider to make payment(s) directly or via a relevant institution to Belaeronavigatsia for aeronautical information publication data</li> <li>• 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</li> </ul> | <ul style="list-style-type: none"> <li>• Belaeronavigatsia</li> </ul>   |
| <a href="#">15 March 2022</a>    | Introduction of the possibility to publicly name companies that have breached financial sanctions, but have not been fined<br><br>Introduction of <b>strict liability</b> 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"> <li>• N/A</li> </ul>   |
| <a href="#">24 March 2022</a>    | 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"> <li>• BANK DABRABYT JOINT STOCK COMPANY</li> <li>• CJSC BELBIZNESLIZING</li> <li>• INDUSTRIAL-COMMERCIAL PRIVATE UNITARY ENTERPRISE MINOTOR-SERVICE</li> </ul>                     |

# Bird & Bird

|                               |   |   |
|-------------------------------|---|---|
|                               |   | <ul style="list-style-type: none"> <li>• JSC TRANSVIAEXPORT AIRLINES</li> <li>• LIMITED LIABILITY COMPANY BELINVEST-ENGINEERING</li> <li>• OJSC KB RADAR-MANAGING COMPANY HOLDING RADAR SYSTEM</li> </ul> |
| <a href="#">24 March 2022</a> | 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"> <li>• BANK DABRABYT JOINT STOCK COMPANY</li> </ul>   |
| <a href="#">21 April 2022</a> | Listing is corrected and individual is still subject to asset freeze.   | <ul style="list-style-type: none"> <li>• Lidzia Mihailauna YARMOSHINA</li> </ul>  |
| <a href="#">27 May 2022</a>   | Listings are corrected and parties are still subject to asset freeze.   | Several parties   |
| <a href="#">5 July 2022</a>   | 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   |
| <a href="#">5 July 2022</a>   | 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"> <li>• National Bank of Belarus (NBB)</li> <li>• Ministry of Finance of Belarus (MF)</li> </ul>   |
| <a href="#">5 July 2022</a>   | <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"> <li>• 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;</li> <li>• 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;</li> <li>• 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 items. New import restrictions are imposed on mineral products, arms and related materiel, iron and steel;</li> </ul> | <ul style="list-style-type: none"> <li>• National Bank of Belarus (NBB)</li> <li>• Ministry of Finance of Belarus (MF)</li> </ul>   |

# Bird & Bird

|                                  |  |  |
|----------------------------------|--|--|
|                                  | <ul style="list-style-type: none"> <li>Part 5 introduces new vessel related sanctions and widens the aircraft related sanctions.</li> </ul>  |  |
| <a href="#">7 July 2022</a>      | Listing is amended and entity is still subject to asset freeze.  | <ul style="list-style-type: none"> <li>LLC SYNESIS</li> </ul>  |
| <a href="#">12 July 2022</a>     | Listing is amended and entities are still subject to asset freeze.   | <ul style="list-style-type: none"> <li>BANK DABRABYT JOINT STOCK COMPANY</li> <li>CJSC BELBIZNESLIZING</li> <li>KB RADAR</li> <li>LIMITED LIABILITY COMPANY BELINVEST-ENGINEERING</li> <li>MINOTOR-SERVICE ENTERPRISE</li> <li>TRANSAVIAEXPORT AIRLINES JSC</li> </ul> |
| <a href="#">17 October 2022</a>  | <p>General Licence INT/2022/1552576 allows for the payment of arbitration costs.</p> <p>This licence takes effect from 17 October 2022 and is of indefinite duration.</p>  | Several parties  |
| <a href="#">28 October 2022</a>  | <p>General Licence INT/2022/2252300 allows payments to be made for legal professional fees and expenses associated with the provision of legal services.</p> <p>This licence takes effect from 28 October 2022 and expires on 28 April 2023.</p>   | Several parties  |
| <a href="#">16 December 2022</a> | Listing is amended and party is still subject to asset freeze.   | <ul style="list-style-type: none"> <li>Mikhail Safarbekovich GUTSERIEV</li> </ul>  |
| <a href="#">29 April 2023</a>    | <p>The new General licence INT/2023/2954852 following the expiry of General licence INT/2022/2252300 allows a UK legal firm or UK counsel who has provided legal advice to a person designated under either the Russia or Belarus regime to receive payment from that designated person without an OFSI specific licence, provided that the terms of the General Licence INT/2023/2954852 are met.</p> <p>General licence INT/2023/2954852 takes effect from 00:01 on 29 April 2023 and expires at 23:59 on 28 October 2023 and may be varied, revoked, or suspended by HM Treasury at any time.</p> | N/A  |
| <a href="#">22 May 2023</a>      | General Licence INT/2023/3024200 allows a UK person who is owed funds or economic resources by a UK-sanctioned party, under a contract that was signed before the sanctioned party in question was designated, to receive payment, provided that the terms of the General Licence INT/2023/3024200 are met.  | N/A  |

# Bird & Bird

|                             |  |     |
|-----------------------------|--|-----|
|                             | This licence takes effect from 22 May 2023 and expires at 23:59 on 21 November 2023 and may be varied, revoked, or suspended by HM Treasury at any time.   |     |
| <a href="#">5 June 2023</a> | <p>Amendment of General Licence INT/2022/1552576 to allow:</p> <ul style="list-style-type: none"> <li>• UK-sanctioned party Representatives to pay funds to the London Court of International Arbitration (LCIA) to cover arbitration costs</li> <li>• UK-sanctioned party Representatives to transfer funds to their legal representatives for onward payment to the LCIA to cover arbitration costs</li> </ul> <p>Non-UK-sanctioned arbitral parties to pay substitute deposit(s) to the LCIA</p>  | N/A |
| <a href="#">9 June 2023</a> | <p>The Republic of Belarus (Sanctions) (EU Exit) (Amendment) Regulations 2023 amends the Republic of Belarus (Sanctions) (EU Exit) Regulations 2019:</p> <ul style="list-style-type: none"> <li>• Regulation 3 amends Part 1 of the 2019 Regulations to include a definition of OFCOM (“Office of Communications”);</li> <li>• Regulations 4 and 5 amend Part 2 of the 2019 Regulations. Regulation 4 confers on the Secretary of State the power to designate a person for the purposes of new regulation 27P;</li> <li>• Regulation 5 clarifies when a person may be involved in “conduct destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine” or “obtaining a benefit from or supporting the Government of Belarus through carrying on a relevant business activity” for the purposes of the designation criteria. That regulation also clarifies when a person may be considered to be a member of, or associated with, an involved person for the purposes of the designation criteria. This includes a list of immediate family members;</li> <li>• Regulation 6 amends Part 3 of the 2019 Regulations to limit the funds that Belarus can raise by restricting its access to the UK securities;</li> <li>• Regulations 7 to 10 amend Part 5 of the 2019 Regulations relating to trade, and insert new Schedules. New restrictions are imposed in relation to trade in: <ul style="list-style-type: none"> <li>○ banknotes;</li> <li>○ chemical and biological weapons-related goods and technology (as specified in new Schedule 2H);</li> <li>○ machinery-related goods and technology (as specified in new Schedule 2I);</li> <li>○ gold, gold jewellery and relevant processed gold (as specified in new Schedule 2J);</li> <li>○ cement, rubber and wood products (as specified in new Schedule 2J);</li> <li>○ internet services (as specified in new Chapter 2D of Part 5)</li> </ul> </li> </ul> | N/A |

# Bird & Bird

|                                   |  |  |
|-----------------------------------|--|--|
|                                   | <ul style="list-style-type: none"> <li>• Regulation 7 inserts new definitions of the goods and services listed above for the purposes of Part 5 of the 2019 Regulations;</li> <li>• Regulation 8 extends the prohibitions in Chapter 2 of Part 5 of the 2019 Regulations relating to exports to Belarus and related activities relating to banknotes, chemical and biological weapons-related goods and technology and machinery-related goods and technology and makes consequential amendments;</li> <li>• Regulation 9 extends the prohibitions in Chapter 2B of Part 5 of the 2019 Regulations relating to imports from Belarus and related activities relating to gold, gold jewellery, relevant processed gold, cement, rubber and wood products and makes consequential amendments;</li> <li>• Regulation 10 creates new regulation 27P of the 2019 Regulations and 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 United Kingdom from encountering or accessing online content generated by designated persons. Failure to comply with a requirement imposed under new regulation 27P is a criminal offence.</li> <li>• Regulations 11-14 amend Part 6 of the 2019 Regulations to create exceptions to some of the new prohibitions.</li> <li>• Regulations 15-17 confer on OFCOM the power to request a person to provide information for the purpose of monitoring compliance with or detecting evasion of new regulation 27P and make consequential amendments.</li> <li>• Regulations 18, 19 and 21 confer on OFCOM the power to impose civil monetary penalties, of up to £1,000,000, in relation to a failure to comply with a requirement imposed under new regulation 27P or a failure to comply with any request for information or documents. New regulation 56B sets out the procedure for imposing such a penalty. They also make consequential amendments.</li> <li>• Regulation 20 amends regulation 53 so that certain “relevant offences” may only be investigated by HM Revenue and Customs following a referral by either a Secretary of State, the Treasury or OFCOM.</li> </ul> |  |
| <a href="#">8 August 2023</a>     | 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  |
| <a href="#">31 August 2023</a>    | Amendment of party targeted with asset freeze.   | <ul style="list-style-type: none"> <li>• DANA HOLDINGS A.K.A DANA ASTRA</li> </ul> |
| <a href="#">29 September 2023</a> | General licence INT/2023/3566356 allows a payment which has, at some point in the chain of payments, been processed by a sanctioned bank acting as an originating, correspondent or intermediary institution, whilst no other party in the relevant chain is sanctioned. The licence takes effect from the 29 September 2023 and expires at 23.59 on the 1 December 2023   | N/A  |

# Bird & Bird

|                                  |   |   |
|----------------------------------|---|---|
| <a href="#">10 October 2023</a>  | General Licence INT/2023/3024200 relating to prior obligations was extended, with additional amendments made to its conditions, definitions and annexes.  | N/A   |
| <a href="#">16 October 2023</a>  | Statement of the UK Foreign, Commonwealth and Development Office (“FCDO”) indicating that it is carefully considering the impact of the Court of Appeal’s judgment in <a href="#">Mints &amp; others v PJSC National Bank Trust &amp; another</a> , in particular the Court’s views that PJSC National Bank Trust is ‘controlled’ by sanctioned parties by virtue of their political office.  | N/A   |
| <a href="#">29 October 2023</a>  | General licence INT/2023/3744968 replaces General licence INT/2023/2954852 and allows receiving and processing payments made by or on behalf of sanctioned parties in connection with legal services. General licence INT/2023/3744968 takes effect from 00:01 on 29 October 2023 and expires at 23:59 on 28 April 2024 and may be varied, revoked, or suspended by HM Treasury at any time.  | N/A   |
| <a href="#">13 November 2023</a> | Amendment of General licence INT/2022/1552576 to remove the Annex 1 Schedule of Arbitration Costs and to change the definition of Arbitration Costs to reflect the relevant Schedule of Costs for LCIA arbitration available at <a href="https://www.lcia.org/">https://www.lcia.org/</a> .   | N/A   |
| <a href="#">17 November 2023</a> | New joint guidance issued by OFSI and FCDO in view of “control” by sanctioned parties by virtue of their political office.  | N/A   |
| <a href="#">24 November 2023</a> | Amendment of General licence INT/2023/3566356 to extend the expiry date to 14 December 2023.  | N/A   |
| <a href="#">6 December 2023</a>  | Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed party are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed party.   | <ul style="list-style-type: none"> <li>• JSC Display Design Bureau</li> </ul>                           |
| <a href="#">8 December 2023</a>  | 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   |
| <a href="#">11 December 2023</a> | Amendment of parties targeted with asset freeze.  | <ul style="list-style-type: none"> <li>• Mikhail Ivanovich DOLA</li> <li>• Mikhail KAVALIYOU</li> </ul> |
| <a href="#">6 February 2024</a>  | OFSI has amended General licence INT/2022/2009156 - Permitted Payments to UK Insurance Companies as below: <ul style="list-style-type: none"> <li>• Permitted Payments can only be made for UK properties and UK vehicles;</li> <li>• Insurance Brokers may make all types of Return Payments to a DP’s frozen bank account including payments due from successful claims;</li> <li>• The language in 5.2 and 6.5 has been clarified;</li> <li>• The definition of Return Payments was expanded to include other types of refunds;</li> <li>• The reporting and record-keeping requirements also apply to Insurance Brokers;</li> <li>• Those reporting must now report to HM Treasury within 10 working days.</li> </ul> | N/A   |

# Bird & Bird

|                                  |  |  |
|----------------------------------|--|--|
| <a href="#">15 February 2024</a> | OFSI amended General licence - INT/2022/2009156 to remove reference to frozen UK bank accounts from Permissions 4.1, 4.3.1, and 6.1 to make clear that payments by DPs are not restricted to those made from frozen funds; and the language in permission 5.1 and 6.6 has been clarified.  | N/A  |
| <a href="#">22 February 2024</a> | 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.<br><br>Amendment of parties targeted with asset freeze.  | Several parties  |
| <a href="#">29 April 2024</a>    | General licence INT/2024/4671884 replaces General licence INT/2023/3744968 and allows payments for legal fees from designated parties – subject to specific conditions as indicated in the General licence.  | N/A  |
| <a href="#">9 August 2024</a>    | 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  |
| <a href="#">3 October 2024</a>   | Asset freeze i.e. all funds and economic resources belonging to, owned, held or controlled by the listed party are to be frozen and no funds or economic resources can be made available, directly or indirectly, to the relevant listed party.  | <ul style="list-style-type: none"> <li>• CJSC Alfa Bank Belarus</li> </ul> |
| <a href="#">10 October 2024</a>  | Introduction of new civil enforcement powers for the Office of Trade Sanctions Implementation (OTSI), within the Department for Business and Trade, in view of trade sanctions enforcement.  | N/A  |
| <a href="#">29 October 2024</a>  | General licence INT/2024/5334756 replaces General licence INT/2024/4671884 and allows payments for legal fees from designated parties – subject to specific conditions as indicated in the General licence.  | N/A  |
| <a href="#">5 December 2024</a>  | The Sanctions (EU Exit) (Miscellaneous Amendments) (No. 2) Regulations 2024 introduces amongst others: <ul style="list-style-type: none"> <li>• A requirement for all UK parties that hold funds or economic resources owned, held, or controlled by a designated party, to provide an annual report to OFSI with the details of these assets;</li> <li>• An amendment to certain asset freeze prohibitions to explicitly apply to parties owned or controlled by named designated parties;</li> </ul> | N/A  |

# Bird & Bird

|                                  |   |   |
|----------------------------------|---|---|
|                                  | <ul style="list-style-type: none"> <li>An expansion of the definition of relevant firms subject to financial sanctions reporting obligations to cover additional sectors – high value dealers, art market participants, insolvency practitioners and letting agencies – the only measure to come into force not on 5 December 2024 but on 14 May 2025.</li> </ul>       |   |
| <a href="#">19 December 2024</a> | Amendment of parties targeted with asset freeze.  | <ul style="list-style-type: none"> <li>Mikhail Safarbekovich GUTSERIEV</li> </ul> |
| <a href="#">27 January 2025</a>  | 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   |
| <a href="#">19 March 2025</a>    | 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.   | <ul style="list-style-type: none"> <li>SHAKUTIN, Alexander Vasilevich</li> </ul>  |
| <a href="#">28 March 2025</a>    | <p>General Licence INT/2025/5787748 allows:</p> <ul style="list-style-type: none"> <li>persons to make payments to arbitration associations and arbitrators to cover fees and expenses for their arbitration services; and</li> <li>arbitrators and arbitration associations to direct payment of, receive and use such payments to cover arbitration costs.</li> </ul> | N/A   |
| <a href="#">18 July 2025</a>     | General Licence INT/2025/6641960 allows non-designated persons who have made investments through designated brokers to transfer their funds to a non-designated broker.   | N/A   |





*Brian Mulier*

Partner

+31703538896  
brian.mulier@twobirds.com



*Jonathon Ellis*

Partner

+61292269819  
jonathon.ellis@twobirds.com



*Goran Danilović*

Senior Counsel

+31703538878  
goran.danilovic@twobirds.com



*Dick Ignacio*

Associate

+31703538917  
dick.ignacio@twobirds.com



*Julia Barańska*

Associate

+31703538912  
julia.baranska@twobirds.com

twobirds.com

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