

US, EU and UK Sanctions Against Russia and Belarus 2022Key Sanctioned Entities as of March 22, 2022[#]

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
Alfa Bank	New debt and equity restrictions through <u>Directive 3</u> under EO 14024	Prohibition under <u>Decision 2022/327 / Regulation 2022/328</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly dealing with transferable securities and money-market instruments issued by Alfa Bank after April 12, 2022, or any legal person, entity or body: <ul style="list-style-type: none"> Established outside the EU whose proprietary rights are directly or indirectly owned more than 50 % by the above Acting on behalf or at the direction of the above 	Not designated*
Almaz-Antey	<u>SDN</u>	Prohibition under <u>Decision 2022/430 / Regulation 2022/428</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly engaging in any transaction with Almaz-Antey, or any legal person, entity or body: <ul style="list-style-type: none"> Established outside the EU whose proprietary rights are directly or 	<u>Asset freeze [Pre-2022]</u>

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p>indirectly owned more than 50 % by the above</p> <ul style="list-style-type: none"> Acting on behalf or at the direction of the above <p>Exception for certain fossil fuels and energy-related transactions</p> <p>Prohibition under <u>Decision 2022/327 / Regulation 2022/328</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly dealing with transferable securities and money-market instruments issued by Almaz-Antey after April 12, 2022, or any legal person, entity or body:</p> <ul style="list-style-type: none"> Established outside the EU whose proprietary rights are directly or indirectly owned more than 50 % by the above Acting on behalf or at the direction of the above 	
Alrosa	New debt and equity restrictions through <u>Directive 3</u> under E0 14024	Not designated	Not designated
Bank Otkritie	<p>SDN subject to:</p> <ul style="list-style-type: none"> <u>General License 9A</u> authorizes transactions incident to dealings in debt or equity issued prior to 	SWIFT removal under <u>Decision 2022/346 / Regulation 2022/345</u> (amending <u>Regulation 833/2014</u>)	Asset freeze, subject to a <u>General License</u> permitting the wind-down of transactions with Otkritie and its Subsidiaries ** until April 3, 2022

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	<p>February 24, 2022 before May 25, 2022</p> <ul style="list-style-type: none"> General License 10 authorizes the wind down of derivative contracts entered into before February 24, 2022 before May 25, 2022 <p>General License No. 11 authorizes the wind down of all other transactions before March 26, 2022</p>	<p>Prohibition under <u>Decision 2022/327 / Regulation 2022/328 (amending Regulation 833/2014)</u> on directly or indirectly dealing with transferable securities and money-market instruments issued by Bank Otkritie after April 12, 2022, or any legal person, entity or body:</p> <ul style="list-style-type: none"> Established outside the EU whose proprietary rights are directly or indirectly owned more than 50 % by the above Acting on behalf or at the direction of the above 	
Bank Rossiya	SDN	<p>SWIFT removal under <u>Decision 2022/346 / Regulation 2022/345 (amending Regulation 833/2014)</u></p> <p>Prohibition under <u>Decision 2022/327 / Regulation 2022/328 (amending Regulation 833/2014)</u> on directly or indirectly dealing with transferable securities and money-market instruments issued by Bank Rossiya after April 12, 2022, or any legal person, entity or body:</p> <ul style="list-style-type: none"> Established outside the EU whose proprietary rights are directly or 	Asset freeze, subject to a <u>General License</u> permitting the wind-down of transactions with Bank Rossiya and its <u>Subsidiaries</u> **Error! Bookmark not defined. until April 3, 2022

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p>indirectly owned more than 50 % by the above</p> <ul style="list-style-type: none"> Acting on behalf or at the direction of the above <p>Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing <u>Regulation 269/2014</u>)</p>	
Black Sea Bank for Development and Reconstruction	<u>SDN</u>	Not designated	<u>Asset freeze</u>
Central Bank of Russia	<p>Russian sovereign debt restrictions through <u>Directive 1A</u> under E0 14024</p> <p>Restrictions on transactions through <u>Directive 4</u> under E0 14024, subject to:</p> <ul style="list-style-type: none"> <u>General License 8A</u> allowing certain energy-related transactions until June 24, 2022, though not transactions otherwise prohibited by E0 14066 <u>General License 9A</u> allowing before May 25, 2022, transactions ordinarily incident and necessary to the receipt of interest, dividend, or maturity payments in connection with debt or equity of <u>Directive 4</u> entities 	<p>Prohibition under <u>Decision 2022/335 / Regulation 2022/334</u> (amending <u>Regulation 833/2014</u>) on 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</p> <p>By way of derogation from the above, a transaction may be authorized provided that it is strictly necessary to ensure the financial stability of the Union as a whole or of a Member State</p> <p>Amended by <u>Decision 2022/395 / Regulation 2022/394</u> to clarify that the</p>	<p><u>Financial services restriction (foreign exchange reserves and asset management)</u></p> <p>Exemptions for humanitarian assistance activity, activities conducted by or on behalf of financial regulators for the purposes of their regulatory functions, actions taken in consultation with the Bank of England to protect the U.K.'s financial stability, promoting the safety and soundness of a U.K.-regulated firm and anything done to deal with an "extraordinary situation"</p>

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	<p>issued before March 1, 2022, provided that any divestment or transfer of covered debt or equity be to a non-US person</p> <ul style="list-style-type: none"> • General License 10A allowing before May 25, 2022, transactions ordinarily incident and necessary to the wind down of derivative contracts, repurchase agreements, or reverse repurchase agreements entered into prior to March 1, 2022 with Directive 4 entities, provided that any payments to a blocked person are made to a blocked account • General License 13 allowing payment of taxes, fees, and import duties or receipt of permits, licenses, registrations or certifications by U.S. persons, provided that such transactions are ordinarily incident and necessary to U.S. persons' day-to-day operations in Russia (effective before June 24, 2022) 	<p>prohibition extends to the Russian National Wealth Fund</p>	

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	<ul style="list-style-type: none"> • General License 14 allowing certain clearing and settlement transactions 		
Credit Bank of Moscow	New debt and equity restrictions through Directive 3 under E0 14024	Not designated	Not designated
Gazprom Neft	New debt and equity restrictions through Directive 3 under E0 14024	<p>Prohibition under Decision 2022/430 / Regulation 2022/428 (amending Regulation 833/2014) on directly or indirectly engaging in any transaction with Gazprom Neft, or any legal person, entity or body:</p> <ul style="list-style-type: none"> • Established outside the EU whose proprietary rights are directly or indirectly owned more than 50 % by the above • Acting on behalf or at the direction of the above <p>Exception for certain fossil fuels and energy-related transactions</p>	Investment ban [Pre-2022]
Gazprombank	New debt and equity restrictions through Directive 3 under E0 14024	Existing restrictions on dealings in transferable securities and money-market instruments under Regulation (EU) 833/2014	Investment ban [Pre-2022]
Genbank	SDN	Not designated	Asset freeze

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
Geopolitica	<u>SDN</u>	Not designated	<u>Asset freeze</u>
Integral	<u>SDN</u>	Not designated	<u>Asset freeze</u>
Internet Research Agency	<u>SDN</u>	Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze</u>
IS Bank	<u>SDN</u>	Not designated	<u>Asset freeze</u>
Kamaz	Not designated	<p>Prohibition under <u>Decision 2022/430 / Regulation 2022/428</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly engaging in any transaction with Kamaz, or any legal person, entity or body:</p> <ul style="list-style-type: none"> Established outside the EU whose proprietary rights are directly or indirectly owned more than 50 % by the above Acting on behalf or at the direction of the above <p>Exception for certain fossil fuels and energy-related transactions</p> <p>Prohibition under <u>Decision 2022/327 / Regulation 2022/328</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly dealing with transferable</p>	Not designated

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		securities and money-market instruments issued by Kamaz after April 12, 2022, or any legal person, entity or body: <ul style="list-style-type: none"> • Established outside the EU whose proprietary rights are directly or indirectly owned more than 50 % by the above • Acting on behalf or at the direction of the above 	
Lakhta Park / Lakhta Park Premium / Lakhta Plaza	<u>SDN / SDN / SDN</u>	Not designated	Not designated
Management Company of the Russian Direct Investment Fund (MC RDIF)	<u>SDN</u>	Not designated	Not designated
Nemchinovo Investments	<u>SDN</u>	Not designated	Not designated
Nord Stream 2 AG	<u>SDN</u> , subject to <u>General License 4</u> permitting the winding down of transactions before March 2, 2022	Not designated	Not designated
Novikombank	<u>SDN</u> Previously imposed restrictions on dealings in new debt and equity through <u>Directive 3</u> under E0 13662	SWIFT removal under <u>Decision 2022/346 / Regulation 2022/345</u> (amending <u>Regulation 833/2014</u>)	Not designated

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
Oboronprom	Previously imposed restrictions on dealings in new debt and equity through <u>Directive 3</u> under EO 13662	<p>Prohibition under <u>Decision 2022/430 / Regulation 2022/428</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly engaging in any transaction with Gazprom Neft, or any legal person, entity or body:</p> <ul style="list-style-type: none"> • Established outside the EU whose proprietary rights are directly or indirectly owned more than 50 % by the above • Acting on behalf or at the direction of the above <p>Exception for certain fossil fuels and energy-related transactions</p>	<u>Investment ban [Pre-2022]</u>
Promsvyazbank	<u>SDN</u>	<p>SWIFT removal under <u>Decision 2022/346 / Regulation 2022/345</u> (amending <u>Regulation 833/2014</u>)</p> <p>Prohibition under <u>Decision 2022/327 / Regulation 2022/328</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly dealing with transferable securities and money-market instruments issued by Promsvyazbank after April 12, 2022, or any legal person, entity or body:</p>	<u>Asset freeze, subject to a General License permitting the wind-down of transactions with Promsvyazbank and its *Subsidiaries until April 3, 2022</u>

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<ul style="list-style-type: none"> Established outside the EU whose proprietary rights are directly or indirectly owned more than 50 % by the above Acting on behalf or at the direction of the above <p>Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing <u>Regulation 269/2014</u>)</p>	
Rosneft	<p>Previously imposed restrictions on dealings in new debt through <u>Directive 2</u> under <u>EO 13662</u></p> <p>Previously imposed restrictions on export of U.S. goods, services, or technology for oil projects through <u>Directive 4</u> under <u>EO 13662</u></p>	<p>Prohibition under <u>Decision 2022/430 / Regulation 2022/428</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly engaging in any transaction with Rosneft, or any legal person, entity or body:</p> <ul style="list-style-type: none"> Established outside the E.U. whose proprietary rights are directly or indirectly owned more than 50 % by the above Acting on behalf or at the direction of the above <p>Exception for certain fossil fuels and energy-related transactions</p>	Investment ban [Pre-2022]

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
Rosneft Aero	Not designated	Asset freeze under <u>Decision 2022/429 / Implementing Regulation 2022/427</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze</u>
Rosselkhozbank (Russian Agricultural Bank)	New debt and equity restrictions through <u>Directive 3</u> under E0 14024 Previously imposed restrictions on dealings in new debt and equity through <u>Directive 1A</u> under E0 13662	Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing <u>Regulation 269/2014</u>) Existing restrictions on dealings in transferable securities and money-market instruments under <u>Regulation (EU) 833/2014</u> [Pre-2022]	<u>Investment ban</u> [Pre-2022]
Rostec (Russian Technologies State Corporation)	Previously imposed restrictions on dealings in new debt and equity through <u>Directive 3</u> under E0 13662	Prohibition under <u>Decision 2022/430 / Regulation 2022/428</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly engaging in any transaction with Rostec, or any legal person, entity or body: <ul style="list-style-type: none"> Established outside the E.U. whose proprietary rights are directly or indirectly owned more than 50 % by the above Acting on behalf or at the direction of the above Exception for certain fossil fuels and energy-related transactions	<u>Asset freeze</u> , subject to a <u>General License</u> applicable to Novikombank (a subsidiary of Rostec) permitting the wind-down of transactions with Novikombank until April 3, 2022

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p>Prohibition under <u>Decision 2022/327 / Regulation 2022/328 (amending Regulation 833/2014)</u> on directly or indirectly dealing with transferable securities and money-market instruments issued by Rostec after April 12, 2022, or any legal person, entity or body:</p> <ul style="list-style-type: none"> Established outside the E.U. whose proprietary rights are directly or indirectly owned more than 50 % by the above Acting on behalf or at the direction of the above 	
Rostelecom	New debt and equity restrictions through <u>Directive 3</u> under E0 14024	Not designated	Not designated
RusHydro	New debt and equity restrictions through <u>Directive 3</u> under E0 14024	Not designated	Not designated
Russian Direct Investment Fund	<u>SDN</u>	<p>Investment ban under <u>Decision 2022/346 / Regulation 2022/345 (amending Regulation 833/2014)</u></p> <p>Exception for investment participation or contributions due under contracts concluded before March 2, 2022 or ancillary contracts</p>	<u>Asset freeze</u>

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
Russian Ministry of Finance	<p>Russian sovereign debt restrictions through <u>Directive 1A</u> under EO 14024</p> <ul style="list-style-type: none"> • <u>General License 8A</u> allowing certain energy-related transactions with the Central Bank <u>until June 24, 2022</u>, though not transactions otherwise prohibited by EO 14066 • <u>General License 9A</u> allowing <u>before May 25, 2022</u>, transactions ordinarily incident and necessary to the receipt of interest, dividend, or maturity payments in connection with debt or equity of Directive 4 entities issued before March 1, 2022, provided that any divestment or transfer of covered debt or equity be to a non-US person • <u>General License 10A</u> allowing <u>before May 25, 2022</u>, transactions ordinarily incident and necessary to the wind down of derivative contracts, repurchase agreements, or reverse repurchase agreements entered into prior to March 1, 	Not designated	<u>Financial services restriction (foreign exchange reserves and asset management)</u>

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	<p>2022 with Directive 4 entities, provided that any payments to a blocked person are made to a blocked account</p> <ul style="list-style-type: none"> • <u>General License 13</u> allowing payment of taxes, fees, and import duties or receipt of permits, licenses, registrations, or certifications by U.S. persons, provided that such transactions are ordinarily incident and necessary to U.S. persons' day-to-day operations in Russia (effective before June 24, 2022) • <u>General License 14</u> allowing certain clearing and settlement transactions 		
Russian National Wealth Fund	<p>Russian sovereign debt restrictions through <u>Directive 1A</u> under EO 14024</p> <ul style="list-style-type: none"> • <u>General License 8A</u> allowing certain energy-related transactions with the Central Bank until June 24, 2022, though not transactions otherwise prohibited by EO 14066 	See Central Bank of Russia	<u>Financial services restriction (foreign exchange reserves and asset management)</u>

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	<ul style="list-style-type: none"> • General License 9A allowing before May 25, 2022, transactions ordinarily incident and necessary to the receipt of interest, dividend, or maturity payments in connection with debt or equity of Directive 4 entities issued before March 1, 2022, provided that any divestment or transfer of covered debt or equity be to a non-US person • General License 10A allowing before May 25, 2022, transactions ordinarily incident and necessary to the wind down of derivative contracts, repurchase agreements, or reverse repurchase agreements entered into prior to March 1, 2022 with Directive 4 entities, provided that any payments to a blocked person are made to a blocked account • General License 13 allowing payment of taxes, fees, and import duties or receipt of permits, licenses, registrations, or certifications by U.S. persons, 		

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	<p>provided that such transactions are ordinarily incident and necessary to U.S. persons' day-to-day operations in Russia (effective before June 24, 2022)</p> <ul style="list-style-type: none"> • <u>General License 14</u> allowing certain clearing and settlement transactions 		
Russian Railways	<p>New debt and equity restrictions through <u>Directive 3</u> under E0 14024</p>	<p>Prohibition under <u>Decision 2022/327 / Regulation 2022/328</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly dealing with transferable securities and money-market instruments issued by Russian Railways after April 12, 2022, or any legal person, entity or body:</p> <ul style="list-style-type: none"> • Established outside the E.U. whose proprietary rights are directly or indirectly owned more than 50 % by the above • Acting on behalf or at the direction of the above 	Not designated
Sberbank	<p>Correspondent and payable-through account (CAPTA) restrictions through <u>Directive 2</u> under E0 14024</p>	<p>Existing restrictions on dealings in transferable securities and money-market instruments under <u>Regulation (EU) 833/2014</u> [Pre-2022]</p>	<p><u>Financial services restriction (correspondence banking relationship)</u> subject to:</p>

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	<p>New debt and equity restrictions through <u>Directive 3</u> under E0 14024, subject to:</p> <ul style="list-style-type: none"> • <u>General License 9A</u> authorizes transactions incident to dealings in debt or equity issued prior to February 24, 2022 before May 25, 2022 • <u>General License 10</u> authorizes the wind down of derivative contracts entered into before February 24, 2022 before May 25, 2022 		<ul style="list-style-type: none"> • <u>General License</u> allowing U.K. credit or financial institutions to process sterling payments to, from or via Sberbank or U.K. or non-U.K. credit or financial institutions owned or controlled by Sberbank in order to make crude oil, petroleum products or gas available for use in the U.K until June 24, 2022 • <u>General License</u> allowing U.K. credit or financial institutions to: (1) continue banking relationships with Sberbank; and (2) process sterling payments to, from or via Sberbank or U.K. or non-U.K. credit or financial institutions owned or controlled by Sberbank until March 31, 2022 <p>In addition, U.K.-regulated firms may process GBP payments made in accordance with activities conducted under each of these <u>General License Financial services restriction (foreign exchange reserves and asset management activities)</u> by virtue of Sberbank being owned or controlled</p>

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
			<p>directly or indirectly by the Central Bank, the National Wealth Fund or the Ministry of Finance, subject to <u>General License</u> applicable to PJSC Sberbank and *Subsidiaries of PJSC Sberbank permitting wind-down of transactions with the named Sberbank entities until April 3, 2022</p> <p><u>Investment ban [Pre-2022]</u></p>
Sevmash	Not designated	<p>Prohibition under <u>Decision 2022/430 / Regulation 2022/428</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly engaging in any transaction with Sevmash, or any legal person, entity or body:</p> <ul style="list-style-type: none"> • Established outside the E.U. whose proprietary rights are directly or indirectly owned more than 50 % by the above • Acting on behalf or at the direction of the above <p>Exception for certain fossil fuels and energy-related transactions</p> <p>Prohibition under <u>Decision 2022/327 / Regulation 2022/328</u> (amending <u>Regulation 833/2014</u>) on directly or</p>	Not designated

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p>indirectly dealing with transferable securities and money-market instruments issued by Sevmash after April 12, 2022, or any legal person, entity or body:</p> <ul style="list-style-type: none"> Established outside the E.U. whose proprietary rights are directly or indirectly owned more than 50 % by the above Acting on behalf or at the direction of the above 	
SMP Bank	<u>SDN</u>	Not designated	Not designated
SOGAZ	Not designated	Asset freeze under <u>Decision 2022/337 / Implementing Regulation 2022/336</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze</u>
Sovcombank	<p><u>SDN</u>, subject to:</p> <ul style="list-style-type: none"> <u>General License 9A</u> authorizes transactions incident to dealings in debt or equity issued prior to February 24, 2022 before May 25, 2022 <u>General License 10</u> authorizes the wind down of derivative contracts entered into before February 24, 2022 before May 25, 2022 	SWIFT removal under <u>Decision 2022/346 / Regulation 2022/345</u> , amending <u>Regulation 833/2014</u>	Asset freeze , subject to a <u>General License</u> permitting the wind-down of transactions with Sovcombank and its Subsidiaries** until April 3, 2022

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	<ul style="list-style-type: none"> • General License No. 11 authorizes the wind down of all other transactions before March 26, 2022 		
Sovcomflot	<p>New debt and equity restrictions through Directive 3 under E0 14024</p>	<p>Prohibition under Decision 2022/430 / Regulation 2022/428 (amending Regulation 833/2014) on directly or indirectly engaging in any transaction with Sovcomflot, or any legal person, entity or body:</p> <ul style="list-style-type: none"> • Established outside the E.U. whose proprietary rights are directly or indirectly owned more than 50 % by the above • Acting on behalf or at the direction of the above <p>Exception for certain fossil fuels and energy-related transactions</p> <p>Prohibition under Decision 2022/327 / Regulation 2022/328 (amending Regulation 833/2014) on directly or indirectly dealing with transferable securities and money-market instruments issued by Sovcomflot after April 12, 2022, or any legal person, entity or body:</p>	Not designated

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<ul style="list-style-type: none"> Established outside the E.U. whose proprietary rights are directly or indirectly owned more than 50 % by the above Acting on behalf or at the direction of the above 	
Transneft	New debt and equity restrictions through <u>Directive 3</u> under E0 14024	Prohibition under <u>Decision 2022/430 / Regulation 2022/428</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly engaging in any transaction with Transneft, or any legal person, entity or body: <ul style="list-style-type: none"> Established outside the E.U. whose proprietary rights are directly or indirectly owned more than 50 % by the above Acting on behalf or at the direction of the above Exception for certain fossil fuels and energy-related transactions	<u>Investment ban [Pre-2022]</u>
United Aircraft Corporation	Previously listed on the State Department's <u>CAATSA Section 231(e) List Regarding the Defense Sector of the Government of the Russian Federation</u>	Asset freeze under <u>Decision 2022/429 / Implementing Regulation 2022/427</u> (implementing <u>Regulation 269/2014</u>) Prohibition under <u>Decision 2022/430 / Regulation 2022/428</u> (amending	<u>Asset freeze</u> <u>Investment ban [Pre-2022]</u>

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p>Regulation 833/2014) on directly or indirectly engaging in any transaction with United Aircraft Corporation, or any legal person, entity or body:</p> <ul style="list-style-type: none"> • Established outside the E.U. whose proprietary rights are directly or indirectly owned more than 50 % by the above • Acting on behalf or at the direction of the above <p>Exception for certain fossil fuels and energy-related transactions</p>	
<p>United Shipbuilding Corporation</p>	<p><u>SDN</u></p>	<p>Prohibition under <u>Decision 2022/430 / Regulation 2022/428 (amending Regulation 833/2014)</u> on directly or indirectly engaging in any transaction with United Shipbuilding Corporation, or any legal person, entity or body:</p> <ul style="list-style-type: none"> • Established outside the E.U. whose proprietary rights are directly or indirectly owned more than 50 % by the above • Acting on behalf or at the direction of the above 	<p><u>Asset freeze</u></p>

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p>Exception for certain fossil fuels and energy-related transactions</p> <p>Asset freeze under <u>Decision 2022/429 / Implementing Regulation 2022/427</u> (implementing <u>Regulation 269/2014</u>)</p> <p>Prohibition under <u>Decision 2022/327 / Regulation 2022/328</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly dealing with transferable securities and money-market instruments issued by Rostec after April 12, 2022, or any legal person, entity or body:</p> <ul style="list-style-type: none"> Established outside the E.U. whose proprietary rights are directly or indirectly owned more than 50 % by the above Acting on behalf or at the direction of the above 	
UralVagonZavod	<u>SDN</u>	<p>Prohibition under <u>Decision 2022/430 / Regulation 2022/428</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly engaging in any transaction with UralVagonZavod, or any legal person, entity or body:</p> <ul style="list-style-type: none"> Established outside the E.U. whose proprietary rights are 	<p><u>Asset freeze</u></p> <p><u>Investment ban [Pre-2022]</u></p>

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p>directly or indirectly owned more than 50 % by the above</p> <ul style="list-style-type: none"> • Acting on behalf or at the direction of the above <p>Exception for certain fossil fuels and energy-related transactions</p> <p>Asset freeze under <u>Decision 2022/429 / Implementing Regulation 2022/427</u> (implementing <u>Regulation 269/2014</u>)</p>	
VEB (Vneshekonombank)	<p><u>SDN</u>, subject to:</p> <ul style="list-style-type: none"> • <u>General License 2</u> authorizes transactions incident to the servicing of bonds issued before March 1, 2022 • <u>General License 3</u> authorizes the wind down of transactions through March 24, 2022 • <u>General License 9A</u> authorizes transactions incident to dealings in debt or equity issued prior to February 24, 2022 before May 25, 2022 • <u>General License 10</u> authorizes the wind down of derivative contracts 	<p><u>SWIFT removal under Decision 2022/346 / Regulation 2022/345</u> (amending <u>Regulation 833/2014</u>)</p> <p>Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing <u>Regulation 269/2014</u>)</p> <p>Existing restrictions on dealings in transferable securities and money-market instruments under <u>Regulation (EU) 833/2014</u> [Pre-2022]</p>	<p>Asset freeze, subject to a <u>General License</u> permitting the wind-down of transactions with VEB and its Subsidiaries** until April 3, 2022</p> <p><u>Investment ban</u> [Pre-2022]</p>

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	<p>entered into before February 24, 2022 before May 25, 2022</p> <p>Previously imposed restrictions on dealings in new debt and equity through <u>Directive 1A</u> under EO 13662</p>		
VTB Bank	<p><u>SDN</u>, subject to:</p> <ul style="list-style-type: none"> • <u>General License 9A</u> authorizes transactions incident to dealings in debt or equity issued prior to February 24, 2022 before May 25, 2022 • <u>General License 10</u> authorizes the wind down of derivative contracts entered into before February 24, 2022 before May 25, 2022 • <u>General License 11</u> authorizes the wind down of all other transactions before March 26, 2022 <p>Previously imposed restrictions on dealings in new debt and equity through <u>Directive 1A</u> under EO 13662</p>	<p><u>SWIFT removal</u> under <u>Decision 2022/346 / Regulation 2022/345</u>, amending <u>Regulation 833/2014</u></p> <p>Existing restrictions on dealings in transferable securities and money-market instruments under <u>Regulation (EU) 833/2014 [Pre-2022]</u></p>	<p><u>Asset freeze</u>, subject to:</p> <ul style="list-style-type: none"> • <u>General License</u> applicable to VTB Capital and U.K. entities owned or controlled by VTB Capital permitting them to pay for basic needs e.g. insurance premiums, remuneration or pensions of employees and rent and utility payments, as well as reasonable fees for holding and maintenance of frozen funds and reasonable professional fees for legal services until March 1, 2023; • <u>General License</u> applicable to U.K. financial regulators (including the FCA, FSCS, PRA and Bank of England) to do anything with regard to VTB Capital and U.K. entities owned or controlled by VTB Capital related to prudential regulation, or protecting, maintaining or

Entity	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
			<p>enhancing the financial stability of the U.K. until March 1, 2023; and</p> <ul style="list-style-type: none"> • General License permitting the wind-down of transactions with VTB Bank and *Subsidiaries of VTB Bank, including by closing out any positions until March 27, 2022 (amended on <u>March 7, 2022</u> to expand the definition of “subsidiary of VTB Bank” from VTB Capital plc (and any entity owned or controlled by VTB Capital plc incorporated in the U.K.) to “an entity owned or controlled by VTB Bank” and amended on <u>March 9, 2022</u> with amendments to the publication notice) <p><u>Investment ban [Pre-2022]</u></p>

Key Sanctioned Individuals as of March #, 2022[#]

Individual	Related Entity	US	EU	UK
Abramovich, Roman	Owner of Chelsea FC; shareholder of steel group Evraz	Not designated	Asset freeze under <u>Decision 2022/429 / Implementing Regulation 2022/427</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
Aven, Petr	President of Alfa Bank and founder of LetterOne	Not designated	Asset freeze under <u>Decision 2022/337 / Implementing Regulation 2022/336</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
Bortnikov, Denis	Deputy president and chair of the management board of VTB Bank	<u>SDN</u>	Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
Chemezov, Sergei	CEO of Rostec	<u>SDN</u>	Existing asset freeze under <u>Implementing Regulation 2020/398</u> (implementing <u>Regulation 269/2014</u>) [Pre-2022]	<u>Asset freeze; travel ban</u> [Pre-2022]
Deripaska, Oleg	Founder of Basic Element and Volnoe Delo	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>

Individual	Related Entity	US	EU	UK
Dmitriev, Kirill	CEO of Russian Direct Investment Fund and Management Company of the Russian Direct Investment Fund	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
Fradkov, Petr	CEO of Promsvyazbank	<u>SDN</u>	Asset freeze under <u>Decision 2022/337 / Implementing Regulation 2022/336</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
Fridman, Mikhail	Founder of Alfa Bank, LetterOne	Not designated	Asset freeze under <u>Decision 2022/337 / Implementing Regulation 2022/336</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
Georgieva, Elena	Chair of the board of directors of Novikombank	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
Grigorenko, Dmitry	Deputy prime minister and chief of the government staff and chair of the supervisory council of VTB bank	Not designated	Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
Ivanov, Sergei	CEO of Alrosa, board member of Gazprombank	<u>SDN</u>	Not designated	Not designated

Individual	Related Entity	US	EU	UK
Kerimov, Suleyman	Owner of financial and industrial group Nafta Moscow	<u>SDN</u>	Asset freeze under <u>Decision 2022/429 / Implementing Regulation 2022/427</u> (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>
Khan, German	Business partner of Aven and Fridman in Alfa Bank and LetterOne	Not designated	Asset freeze under <u>Decision 2022/429 / Implementing Regulation 2022/427</u> (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>
Kiriyenko, Vladimir	CEO of VK Group	<u>SDN</u>	Asset freeze under <u>Decision 2022/397 / Implementing Regulation 2022/396</u> (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>
Kostin, Andrei	Chair of the board of directors of VTB Bank	<u>SDN</u>	Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>
Kuzmichev, Alexey	Shareholder of Alfa group of companies, including Alfa Bank	Not designated	Asset freeze under <u>Decision 2022/429 / Implementing Regulation 2022/427</u> (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>

Individual	Related Entity	US	EU	UK
Lavrov, Sergei	Russian Foreign Minister	<u>SDN</u>	Asset freeze under <u>Decision 2022/331 / Regulation 2022/332</u> (amending Regulation 269/2014)	<u>Asset freeze</u>
Lebedev, Dmitri	Chair of the board of directors of Bank Rossiya	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
Melnichenko, Andrey	Founder of EuroChem Group	Not designated	Not designated	<u>Asset freeze; travel ban</u>
Mikheev, Alexander	CEO of Rosoboronexport	<u>SDN</u>	Asset freeze under <u>Decision 2022/429 / Implementing Regulation 2022/427</u> (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>
Miller, Alexei	Chair of the management committee and Deputy Chair of the board of directors of Gazprom	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
Mishustin, Mikhail	Russian Prime Minister	Not designated	Asset freeze under <u>Decision 2022/331 / Regulation 2022/332</u> (amending Regulation 269/2014)	<u>Asset freeze; travel ban</u>
Mordaschov, Alexey	Majority shareholder in steel company Severstal	Not designated	Asset freeze under <u>Decision 2022/337 / Implementing Regulation 2022/336</u>	<u>Asset freeze; travel ban</u>

Individual	Related Entity	US	EU	UK
			(implementing <u>Regulation 269/2014</u>)	
Moshkovich, Vadim	Chair of the board of directors of Rusagro Group	Not designated	Asset freeze under Decision 2022/397 / Implementing Regulation 2022/396 (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>
Oseevsky, Mikhail	President of Rostelecom	Not designated	Asset freeze under Decision 2022/397 / Implementing Regulation 2022/396 (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>
Patrushev, Andrey	Former CEO of Gazprom Neft	<u>SDN</u>	Not designated	Not designated
Peskov, Dmitry	Kremlin Press Secretary	<u>SDN</u>	Asset freeze under Decision 2022/337 / Implementing Regulation 2022/336 (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>
Poluboyarinov, Mikhail	CEO of Aeroflot	Not designated	Asset freeze under Decision 2022/397 / Implementing Regulation 2022/396 (implementing Regulation 269/2014)	Not designated

Individual	Related Entity	US	EU	UK
Prigozhin, Yevgeniy	Russian businessman, associated with following entities: <ul style="list-style-type: none"> • Internet Research Agency • Lakhta companies • Wagner Group 	<u>SDN</u>	Asset freeze under <u>Decision 2020/1483 / Implementing Regulation 2020/1481</u> [Pre-2022, re. Libya]	<u>Asset freeze; travel ban</u>
Prigozhina, Lyubov	Wife of Yevgeniy Prigozhin; owner of Agat LLC (subsidiary of Concord Management & Consulting LLC)	<u>SDN</u>	Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
Prigozhina, Polina	Daughter of Yevgeniy Prigozhin	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
Prigozhina, Violetta	Mother of Yevgeniy Prigozhin; owner of Concord Management & Consulting LLC	Not designated	Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
Puchkov, Andrey	Executive of VTB Bank	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
Pumpyansky, Alexander	Son of Dmitry Pumpyansky	Not designated	Asset freeze under <u>Decision 2022/397 / Implementing Regulation 2022/396</u>	<u>Asset freeze; travel ban</u>

Individual	Related Entity	US	EU	UK
			(implementing <u>Regulation 269/2014</u>)	
Pumpyansky, Dmitry	Owner and chair of the board of directors of Pipe Metallurgical Company (TMK)	Not designated	Asset freeze under <u>Decision 2022/397 / Implementing Regulation 2022/396</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
Pumpyanskaya, Galina	Wife of Dmitry Pumpyansky	Not designated	Asset freeze under <u>Decision 2022/397 / Implementing Regulation 2022/396</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
Putin, Vladimir	President of the Russian Federation	<u>SDN</u>	Asset freeze under <u>Decision 2022/331 / Regulation 2022/332</u> (amending <u>Regulation 269/2014</u>)	<u>Asset freeze</u>
Rashnikov, Viktor	Owner and chair of the board of directors of Magnitogorsk Iron & Steel Works	Not designated	Asset freeze under <u>Decision 2022/429 / Implementing Regulation 2022/427</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
Reshetnikov, Maxim	Minister of Economic Development and member of	Not designated	Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u>	<u>Asset freeze; travel ban</u>

Individual	Related Entity	US	EU	UK
	the supervisory council of VTB Bank		(implementing <u>Regulation 269/2014</u>)	
Rotenberg, Arkady	Businessperson	<u>SDN</u>	Existing asset freeze under <u>Regulation 2020/1267</u> (implementing <u>Regulation 269/2014</u>) [Pre-2022]	<u>Asset freeze; travel ban</u> [Pre-2022]
Rotenberg, Boris	Board member and shareholder of SMP Bank	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
Rotenberg, Igor	Chair of the board of directors of National Telematic Systems	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
Sechin, Igor	CEO of Rosneft	<u>SDN</u>	Asset freeze under <u>Decision 2022/337 / Implementing Regulation 2022/336</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
Sechina, Marina	Wife of Igor Sechin	Not designated	Asset freeze under <u>Decision 2022/429 / Implementing Regulation 2022/427</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
Shamalov, Kirill	Deputy chair on the management board of PAO SIBUR Holding	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>

Individual	Related Entity	US	EU	UK
Shoigu, Sergei	Russian Defense Minister	<u>SDN</u>	Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
Shuvalov, Igor	Chair of the management board of VEB	<u>SDN</u>	Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
Slyusar, Yury	Director general of United Aircraft Corporation	Not designated	Not designated	<u>Asset freeze; travel ban</u>
Soloviev, Yuriy	First deputy president and chair of the management board of VTB Bank	<u>SDN</u>	Not designated	Not designated
Timchenko, Gennadiy	Major shareholder in Bank Rossiya	<u>SDN</u>	Asset freeze under <u>Decision 2022/337 / Implementing Regulation 2022/336</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
Tokarev, Nikolai	CEO of Transneft	<u>SDN</u>	Asset freeze under <u>Decision 2022/337 / Implementing Regulation 2022/336</u>	<u>Asset freeze; travel ban</u>

Individual	Related Entity	US	EU	UK
			(implementing <u>Regulation 269/2014</u>)	
Tokareva, Galina	Wife and daughter of Nikolai Tokarev	<u>SDN</u> /	Not designated	<u>Asset freeze; travel ban</u>
Tokareva, Maiya	Daughter of Nikolai Tokarev	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
Ulyutina, Galina	Wife of Yuriy Soloviev	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
Usmanov, Alisher	Businessperson and pro-Kremlin oligarch	<u>SDN</u> , subject to <u>General License 15</u> allowing all transactions and unblocking all property of any entity owned 50 percent or more, directly or indirectly, by Usmanov, that does not specifically appear on OFAC's <u>SDN List</u> Private aircraft and superyacht designated as blocked property	Asset freeze under <u>Decision 2022/337</u> / <u>Implementing Regulation 2022/336</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
Vedyakhin, Alexander	First deputy chair of the executive board of Sberbank	<u>SDN</u>	Not designated	Not designated
Vekselberg, Viktor	Owner of the Renova Group	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
Warnig, Matthias	CEO of Nord Stream 2 AG	<u>SDN</u>	Not designated	Not designated

Individual	Related Entity	US	EU	UK
<i>Various</i>	Members of Russian State Duma	12 individuals, see OFAC press release for further details	72 individuals, asset freeze under Decision 2022/331 / Regulation 2022/332 (amending Regulation 269/2014) 336 individuals, asset freeze under Decision 2022/267 and Regulation 2022/261 (amending Regulation 269/2014)	400 individuals, see U.K. consolidated financial sanctions targets for further details Asset freeze; travel ban

The tables provide a snapshot of key entities and individuals subject to sanctions imposed in the U.S., E.U. and/or U.K. since February 21, 2022 in connection with Russia’s invasion of Ukraine. Sanctions in the U.S., E.U. and U.K. on Russian entities and individuals date back to the 2014 annexation of Crimea by Russia and, in some cases, earlier. Certain major companies (e.g., Lukoil) were therefore subject to sanctions and other restrictive measures prior to 2022. As a result, **the information in this table is not a comprehensive list of Russia sanctions and should not be relied on as legal advice.** These measures may change at short notice in light of the evolving situation. Sanctions may apply to entities and individuals that have not been expressly designated on sanctions lists and are listed as “not designated” on this table as: (a) entities owned, held or controlled by a sanctioned entity or individual may also be subject to sanctions; and (b) some sanctions may apply broadly to entities or individuals connected with Russia or the Russian regime more generally. Further details of how sanctions are applied in each of the three covered jurisdictions may be found [here](#) and [here](#).

i In the U.S., the restrictions on entities and individuals listed in the Specially Designated Nationals (“SDNs”) and Blocked Persons List extend by operation of law to any non-listed entities that are majority-owned by a designated SDN. Other restrictions may also extend to non-listed entities that are majority-owned by a sanctioned entity or individual.

ii In the E.U., if a person or entity is designated, their name will be recorded on the [Consolidated List](#). An asset freeze covers all funds and economic resources owned or controlled, directly or indirectly, by designated persons and entities. The criterion for assessing whether a legal person or entity is “owned” by another person or entity is the possession of more than 50% of the proprietary rights of an entity or having a majority interest in it. The criteria for assessing whether a legal person or entity is “controlled” by another person or entity, alone or pursuant to an agreement with another shareholder or other third party, include e.g., having the right to exercise a dominant influence over a legal person or entity. See EU Best Practices for the effective implementation of

restrictive measures, May 2018 (available [here](#)). These entities may not be designated in their own right, and therefore may not appear on the Consolidated List. However, they will still be caught by the relevant restrictions.

- iii In the U.K., if a person or entity is designated, their name will be recorded on the Consolidated List. An asset freeze and some financial services restrictions will apply to entities (meaning a body of persons corporate or unincorporated, or any organisation or association or combination of persons) that are owned or controlled, directly or indirectly, by a designated person. Those entities may not be designated in their own right, so their names may not appear on the Consolidated List. However, those entities are similarly subject to financial sanctions.
- * On March 3, 2022, Mikhail Fridman and Petr Aven resigned from the boards of Alfa Bank and the holding company that owns it, ABH Holdings. Fridman and Aven had been sanctioned in the E.U. the previous day and were sanctioned in the U.K. on March 15, 2022.
- ** “Subsidiaries” are any entity owned or controlled by the Designated Person in the General License.

SHEARMAN & STERLING

ABU DHABI • AUSTIN • BEIJING • BRUSSELS • DALLAS • DUBAI • FRANKFURT • HONG KONG • HOUSTON • LONDON • MENLO PARK • MILAN
MUNICH • NEW YORK • PARIS • RIYADH • ROME • SAN FRANCISCO • SÃO PAULO • SEOUL • SHANGHAI • SINGAPORE • TOKYO • TORONTO • WASHINGTON, DC

Copyright © 2022 Shearman & Sterling LLP is a limited liability partnership organized under the laws of the State of Delaware. Shearman & Sterling (London) LLP is a limited liability partnership organized under the laws of the State of Delaware for the practice of law in the United Kingdom. Shearman & Sterling is a partnership organized under the Hong Kong Partnership Ordinance and registered with the Law Society of Hong Kong for the practice of law in Hong Kong. Shearman & Sterling LLP practices in Italy in association with Studio Legale Associato Shearman & Sterling. Shearman & Sterling LLP operates in association with The Law Firm of Dr. Sultan Almasoud for the practice of law in Saudi Arabia.

Attorney Advertising — Prior results do not guarantee a similar outcome.