

US, EU and UK Sanctions Against Russia and Belarus

Key Sanctioned Entities as of August 10, 2022[#]

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
AEROFLOT	Not designated, but note <u>US airspace restrictions</u> on Russian aircraft	Not designated, but airline added to EU Air Safety List.	<u>Asset freeze</u> subject to a <u>General License</u> permitting U.K. nationals or companies to purchase tickets from Aeroflot or its Subsidiaries for flights originating in or within Russian until 23 May 2023.
ALFA BANK	<p><u>SDN</u> subject to:</p> <ul style="list-style-type: none"> <u>General License 8C</u> allowing certain energy-related transactions involving certain Russian banks until December 5, 2022, though not transactions otherwise prohibited by EO 14066 <p>New debt and equity restrictions through <u>Directive 3</u> under EO 14024</p>	<p>Prohibition under <u>Decision 2022/327</u> / <u>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:</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 	<p><u>Asset freeze</u>, subject to:</p> <ul style="list-style-type: none"> <u>General License</u> allowing funds controlled by Alfa Bank to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and non-government controlled Ukrainian territory <u>General License</u> permitting, until May 12, 2023: (i) Alfa Bank's

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<ul style="list-style-type: none"><li data-bbox="1189 256 1574 376">• Acting on behalf or at the direction of the above	subsidiary, Amsterdam Trade Bank N.V. ("ATB") to make payments for its basic needs (e.g., remuneration of employees, pension payments, tax and payments to suppliers); (ii) permitting any person, including ATB and its Subsidiaries, to make, receive or process payments for the purposes of insolvency proceedings relating to ATB; and (iii) permitting any person other than ATB or its Subsidiaries to wind-down transactions involving ATB or its Subsidiaries, all subject to certain notification and record keeping requirements

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
ALMAZ-ANTEY	SDN	<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 Almaz-Antey, 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 securities</p>	<u>Asset freeze</u> [Pre-2022]

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		and money-market instruments issued by Almaz-Antey 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 	
ALROSA	<u>SDN</u> subject to: New debt and equity restrictions through <u>Directive 3</u> under EO 14024	Not designated	<u>Asset freeze</u>
AVANGARD JSC	<u>SDN</u>	Not designated	<u>Asset freeze</u>
BANK DABRABYT	<u>SDN</u>	Prohibition under <u>Decision 2022/218</u> / <u>Regulation 2022/212</u> (amending <u>Regulation 765/2006</u>) on directly or indirectly dealing with transferable securities	<u>Asset freeze</u>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p>and money-market instruments with a maturity exceeding 90 days issued by Bank Dabrabyt after June 29, 2021, 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>or making new loans or credit with a maturity exceeding 90 days after June 29, 2021 available to those persons</p>	
BANK OTKRITIE	<p><u>SDN</u> subject to:</p> <ul style="list-style-type: none"> • <u>General License 8C</u> allowing certain energy-related transactions involving certain Russian banks until December 5, 2022, though not 	<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</p>	<p><u>Asset freeze</u>, subject to <u>General License</u> allowing funds controlled by Bank Otkritie to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and non-</p>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	<p>transactions otherwise prohibited by EO 14066</p>	<p>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 <p>Asset freeze under <u>Decision 2022/582 / Implementing Regulation 2022/581</u> (implementing <u>Regulation 269/2014</u>)</p>	<p>government controlled Ukrainian territory</p>
BANK ROSSIYA	<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</u></p>	<p><u>Asset freeze</u>, subject to <u>General License</u> allowing funds controlled by Bank Rossiya to be used to support the delivery of humanitarian assistance in relation to the</p>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p><u>2022/328</u> (amending <u>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 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</u> / <u>Implementing Regulation 2022/260</u> (implementing <u>Regulation 269/2014</u>)</p>	conflict in Ukraine and non-government controlled Ukrainian territory
BELARUSBANK	Not designated	Prohibition under <u>Decision 2022/218</u> / <u>Regulation 2022/212</u> (amending <u>Regulation 765/2006</u>) on	Not designated

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p>directly or indirectly dealing with transferable securities and money-market instruments with a maturity exceeding 90 days issued by Belarusbank after June 29, 2021, 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>or making new loans or credit with a maturity exceeding 90 days after June 29, 2021 available to those persons</p>	
BELINVESTBANK	<u>SDN</u>	Prohibition under <u>Decision 2022/218 / Regulation 2022/212</u> (amending <u>Regulation 765/2006</u>) on directly or indirectly dealing with transferable securities	Not designated

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p>and money-market instruments with a maturity exceeding 90 days issued by Belinvestbank after June 29, 2021, 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 	
BELAGROPROMBANK	Not designated	Prohibition under <u>Decision 2022/218 / Regulation 2022/212</u> (amending <u>Regulation 765/2006</u>) on directly or indirectly dealing with transferable securities and money-market instruments with a maturity exceeding 90 days issued by Belagroprombank after June 29, 2021, or any legal person, entity or body:	Not designated

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		<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>or making new loans or credit with a maturity exceeding 90 days after June 29, 2021 available to those persons</p>	
BITRIVER AG	<u>SDN</u>	Not designated	Not designated
BLACK SEA BANK FOR DEVELOPMENT AND RECONSTRUCTION	<u>SDN</u>	Not designated	<u>Asset freeze</u> , subject to <u>General License</u> allowing funds controlled by Black Sea Bank to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and non-government controlled Ukrainian territory
BM BANK JSC	<u>SDN</u>	Not designated	Not designated

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
CENTRAL BANK OF RUSSIA	<p>Russian sovereign debt restrictions through <u>Directive 1A</u> under EO 14024</p> <p>Restrictions on transactions through <u>Directive 4</u> under EO 14024, subject to:</p> <ul style="list-style-type: none"> • <u>General License 8C</u> allowing certain energy-related transactions involving certain Russian banks until December 5, 2022, though not transactions otherwise prohibited by EO 14066 • <u>General License 14</u> allowing certain clearing and settlement transactions 	<p>Prohibition under <u>Decision 2022/335</u> / <u>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</u> / <u>Regulation 2022/394</u> to clarify that the prohibition extends to the Russian National Wealth Fund</p>	<p><u>Financial services restriction (foreign exchange reserves and asset management)</u>, subject to 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
CREDIT BANK OF MOSCOW	New debt and equity restrictions through <u>Directive 3</u> under EO 14024	Not designated	<u>Asset freeze</u> , subject to <u>General License</u> allowing funds controlled by Credit Bank of Moscow to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and non-government controlled Ukrainian territory
DEVELOPMENT BANK OF THE REPUBLIC OF BELARUS	<u>SDN</u>	Prohibition under <u>Decision 2022/218 / Regulation 2022/212</u> (amending <u>Regulation 765/2006</u>) on directly or indirectly dealing with transferable securities and money-market instruments with a maturity exceeding 90 days issued by Development Bank of the Republic of Belarus after June 29, 2021, or any legal person, entity or body: <ul style="list-style-type: none"> • Established outside the EU whose proprietary 	Not designated

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p>rights are 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>or making new loans or credit with a maturity exceeding 90 days after June 29, 2021 available to those persons</p>	
EUROCHEM GROUP	Not designated – OFAC has <u>confirmed</u> that EuroChem is not subject to US sanctions	<p>Not designated (in the sense of this company being itself sanctioned as a designated person), although Andrey Melnichenko, founder of EuroChem, and his wife Aleksandra Melnichenko are subject to EU sanctions</p> <p>EuroChem has denied that it is subject to EU sanctions – see <u>statement</u></p>	Not designated (in the sense of this company being itself sanctioned as a designated person), although Andrey Melnichenko, founder of EuroChem, is subject to UK sanctions
EVRAZ PLC[#]	Not designated	Evraz PLC is mentioned in the asset freeze designation of	<u>Asset freeze</u> subject to a <u>General License</u> permitting

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		<p>Roman Abramovich (under <u>Decision 2022/429 / Implementing Regulation 2022/427 (implementing Regulation 269/2014)</u>).</p> <p><u>EU FAQs on assets freezes following sanctions adopted in view of Russia's military aggression against Ukraine and Belarus' involvement in it</u> state that where entities associated with designated individuals or entities are mentioned in the identifying information and/or reasons column of the relevant Regulation, operators should exercise the highest caution when dealing with these associated entities as they may be deemed to be owned or controlled by listed persons or entities, and their assets must be frozen as well.</p>	<p>continuation of business operations involving Evraz's North American subsidiaries (namely Evraz North America plc, Evraz Inc. NA, and Evraz Inc, NA – Canada) until September 2, 2022. "Business operations" include payments to or from the North American subsidiaries under any obligations or contracts, payment to or from a third party under any obligations or contracts and receipt of payments made by the North American subsidiaries for audit services.</p>
GARANTEK	<u>SDN</u>	Not designated	<u>Asset freeze</u>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
GAZPROM NEFT	New debt and equity restrictions through <u>Directive 3</u> under EO 14024	Prohibition under <u>Decision 2022/430</u> / <u>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: <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 Exception for certain fossil fuels and energy-related transactions	<u>Investment ban</u> [Pre-2022]
GAZPROMBANK	New debt and equity restrictions through <u>Directive 3</u> under EO 14024	Existing restrictions on dealings in transferable securities and money-market instruments under <u>Regulation (EU) 833/2014</u>	<u>Investment ban</u> [Pre-2022] <u>Asset freeze</u> , subject to: <ul style="list-style-type: none"> • <u>General License</u> allowing funds controlled by

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			<p>Gazprombank to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and non-government controlled Ukrainian territory</p> <ul style="list-style-type: none"> • <u>General License</u> permitting, until October 31, 2022, payments to Gazprombank and its Subsidiaries** under contracts for gas available for use in the EU entered into prior to April 21, 2022
GENBANK	<u>SDN</u>	Not designated	<u>Asset freeze</u> , subject to <u>General License</u> allowing funds controlled by Genbank to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and non-government controlled Ukrainian territory

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
GEOPOLITICA	<u>SDN</u>	Not designated	<u>Asset freeze</u>
HYDRA MARKET	<u>SDN</u>	Not designated	Not designated
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>
INVESTTRADEBANK JSC	<u>SDN</u>	Not designated	Not designated
IS BANK	<u>SDN</u>	Not designated	<u>Asset freeze</u> , subject to allowing funds controlled by IS Bank to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and non-government controlled Ukrainian territory

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
KAMAZ	SDN	<p>Asset freeze under <u>Council Decision 2022/883 / Implementing Regulation 2022/878</u> (amending <u>Implementing Regulation 269/2014</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 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>	<u>Asset freeze</u>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		Prohibition under <u>Decision 2022/327</u> / <u>Regulation 2022/328</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly dealing with transferable 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 	
KOLMAR GROUP	Not designated	Not designated	<u>Asset freeze</u>
KRONSHADT	<u>SDN</u>	Asset freeze under <u>Decision 2022/883</u> / <u>Implementing Regulation 2022/878</u> (amending <u>Implementing Regulation 269/2014</u>)	<u>Asset freeze</u>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
LAKHTA PARK / LAKHTA PARK PREMIUM / LAKHTA PLAZA	<u>SDN</u> / <u>SDN</u> / <u>SDN</u>	Not designated	Not designated
LETTERONE	Not designated	Not designated (in the sense of this company being itself sanctioned as a designated person), although LetterOne founders Peter Aven, Mikhail Fridman and business associate German Khan are subject to EU sanctions (see table of sanctioned individuals, below) LetterOne has denied that it is subject EU sanctions – see LetterOne <u>statement</u>	Not designated (in the sense of this company being itself sanctioned as a designated person), although LetterOne founders Peter Aven, Mikhail Fridman and business associate German Khan are subject to UK sanctions (see table of sanctioned individuals, below)
LUKOIL	Previously imposed restrictions on export of U.S. goods, services, or technology for oil projects through <u>Directive 4</u> under EO 13662	Not designated	Not designated
MANAGEMENT COMPANY OF THE RUSSIAN DIRECT INVESTMENT FUND (MC RDIF)	<u>SDN</u>	Not designated	Not designated
MARSHAL.GLOBAL	<u>SDN</u>	Not designated	<u>Asset freeze</u>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
MOSCOW INDUSTRIAL BANK	<u>SDN</u>	Not designated	<u>Asset freeze</u>
NEMCHINOVO INVESTMENTS	<u>SDN</u>	Not designated	Not designated
NORD STREAM 2 AG	<u>SDN</u>	Not designated	Not designated
NOVIKOMBANK	<u>SDN</u> Previously imposed restrictions on dealings in new debt and equity through <u>Directive 3</u> under EO 13662	SWIFT removal under <u>Decision 2022/346 / Regulation 2022/345</u> (amending <u>Regulation 833/2014</u>) Asset freeze under <u>Decision 2022/582 / Implementing Regulation 2022/581</u> (implementing <u>Regulation 269/2014</u>)	Not designated but likely to be indirectly sanctioned by virtue of Rostec ownership <u>General Licence</u> allowing funds controlled by Novikombank to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and non-government controlled Ukrainian territory
OBORONPROM	Previously imposed restrictions on dealings in new debt and equity through <u>Directive 3</u> under EO 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 Gazprom Neft, or any legal person, entity or body:	<u>Investment ban</u> [Pre-2022]

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>Exception for certain fossil fuels and energy-related transactions</p>	
PROMSVYAZBANK	<u>SDN</u>	<p>SWIFT removal under <u>Decision 2022/346 / Regulation 2022/345</u> (amending Regulation 833/2014)</p> <p>Prohibition under <u>Decision 2022/327 / Regulation 2022/328</u> (amending Regulation 833/2014) 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>	<p><u>Asset freeze</u>, subject to <u>General License</u> allowing funds controlled by Promsvyazbank to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and non-government controlled Ukrainian territory</p>

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</u> / <u>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 EO 13662</p> <p>Previously imposed restrictions on export of U.S. goods, services, or technology for oil projects through <u>Directive 4</u> under EO 13662</p>	<p>Prohibition under <u>Decision 2022/430</u> / <u>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 EU whose proprietary rights are directly or 	<u>Investment ban</u> [Pre-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>Exception for certain fossil fuels and energy-related transactions</p>	
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)	<p>New debt and equity restrictions through <u>Directive 3</u> under EO 14024</p> <p>Previously imposed restrictions on dealings in new debt and equity through <u>Directive 1A</u> under EO 13662</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><u>Investment ban</u> [Pre-2022]</p> <p><u>Asset freeze</u>, subject to <u>General License</u> allowing funds controlled by Russian Agricultural Bank to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and non-government controlled Ukrainian territory</p>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
ROSSIYA AIRLINES	Not designated, but note <u>US airspace restrictions</u> on Russian aircraft	Not designated, but airline added to EU Air Safety List.	<u>Asset freeze</u> subject to a <u>General License</u> permitting U.K. nationals or companies to purchase tickets from Rossiya Airlines or its Subsidiaries for flights originating in or within Russian until 23 May 2023.
ROSTEC (RUSSIAN TECHNOLOGIES STATE CORPORATION)	<u>SDN</u> Previously imposed restrictions on dealings in new debt and equity through <u>Directive 3</u> under EO 13662	Prohibition under <u>Decision 2022/430</u> / <u>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 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 	<u>Asset freeze</u>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p>Exception for certain fossil fuels and energy-related transactions</p> <p>Prohibition under <u>Decision 2022/327</u> / <u>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 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 	
ROSTELECOM	New debt and equity restrictions through <u>Directive 3</u> under EO 14024	Not designated	Not designated

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
R-STYLE SOFTLAB	Not designated	Not designated	<u>Asset freeze</u>
RUSHYDRO	New debt and equity restrictions through <u>Directive 3</u> under EO 14024	Not designated	<u>Asset freeze</u>
RUSSIAN DIRECT INVESTMENT FUND	<u>SDN</u>	Investment ban under <u>Decision 2022/346 / Regulation 2022/345</u> (amending <u>Regulation 833/2014</u>) Exception for investment participation or contributions due under contracts concluded before March 2, 2022 or ancillary contracts	<u>Asset freeze</u>
RUSSIAN MINISTRY OF FINANCE	Russian sovereign debt restrictions through <u>Directive 1A</u> under EO 14024 <ul style="list-style-type: none"> • <u>General License 14</u> allowing certain clearing and settlement transactions 	Not designated	<u>Financial services restriction (foreign exchange reserves and asset management)</u>
RUSSIAN NATIONAL COMMERCIAL BANK	<u>SDN</u>	Asset freeze under <u>Council Decision 2021/448 / Implementing Regulation</u>	<u>Asset freeze [pre-2022]</u>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<u>2021/446</u> (amending Regulation <u>269/2014</u>)	
RUSSIAN NATIONAL WEALTH FUND	Russian sovereign debt restrictions through <u>Directive 1A</u> under EO 14024 <ul style="list-style-type: none"> • <u>General License 14</u> allowing certain clearing and settlement transactions 	See Central Bank of Russia	<u>Financial services restriction (foreign exchange reserves and asset management)</u>
RUSSIAN RAILWAYS	New debt and equity restrictions through <u>Directive 3</u> under EO 14024	Prohibition under <u>Decision 2022/327</u> / <u>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: <ul style="list-style-type: none"> • Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above 	<u>Asset freeze</u> subject to a <u>General License</u> permitting U.K. nationals or companies to purchase tickets from Russian Railways or its Subsidiaries for flights or rail journeys originating in or within Russian until 23 May 2023. (Note the sale of GEFCO, formerly owned by Russian Railways, means it is no longer subject to U.K. sanctions)

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<ul style="list-style-type: none"> Acting on behalf or at the direction of the above 	
SBERBANK	<p>SDN subject to:</p> <ul style="list-style-type: none"> General License 8C allowing certain energy-related transactions involving certain Russian banks until December 5, 2022, though not transactions otherwise prohibited by EO 14066 <p>Correspondent and payable-through account (CAPTA) restrictions through <u>Directive 2</u> under EO 14024</p> <p>New debt and equity restrictions through <u>Directive 3</u> under EO 14024</p>	<p>Asset freeze under <u>Council Decision 2022/1272 / Implementing Regulation 2022/1270</u> (amending <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:</p> <ul style="list-style-type: none"> <u>General License</u> allowing funds controlled by Sberbank to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and non-government controlled Ukrainian territory <u>General License</u> applicable to Sberbank CIB (UK) Ltd and U.K. entities owned or controlled by Sberbank CIB (UK) Ltd incorporated in the U.K. permitting them to pay for basic needs e.g., insurance premiums, remuneration or pensions of employees

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
			<p>and rent and utility payments, as well as reasonable fees for holding and maintenance of frozen funds and reasonable professional fees for legal services, as well as payments related to insolvency proceedings, until April 3, 2023;</p> <p><u>Financial services restriction (correspondent banking relationships)</u> subject to <u>General License</u> applicable to Sberbank CIB (UK) Ltd and U.K. entities owned or controlled by Sberbank CIB (UK) Ltd incorporated in the U.K. 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</p>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
			<p>frozen funds and reasonable professional fees for legal services, as well as payments related to insolvency proceedings, until April 3, 2023.</p> <p>In addition, U.K.-regulated firms may process GBP payments made in accordance with activities conducted under each of these General Licenses</p> <p><u>Financial services restriction (foreign exchange reserves and asset management activities)</u> by virtue of Sberbank being owned or controlled directly or indirectly by the Central Bank, the National Wealth Fund or the Ministry of Finance</p> <p><u>Investment ban</u> [Pre-2022]</p>

SEVMASH	SDN	<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 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 securities and money-market instruments issued by Sevmash after</p>	Not designated
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ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p>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 	
SMP BANK	<u>SDN</u>	Not designated	<u>Asset freeze</u> , subject to <u>General License</u> allowing funds controlled by SMP Bank to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and non-government controlled Ukrainian territory
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>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
SOVCOMBANK	<p><u>SDN</u>, subject to:</p> <ul style="list-style-type: none"> • General License 8C allowing certain energy-related transactions involving certain Russian banks until December 5, 2022, though not transactions otherwise prohibited by EO 14066 	<p>SWIFT removal under <u>Decision 2022/346 / Regulation 2022/345</u>, amending <u>Regulation 833/2014</u></p> <p>Asset freeze under <u>Decision 2022/582 / Implementing Regulation 2022/581</u> (implementing <u>Regulation 269/2014</u>)</p>	<p><u>Asset freeze</u>, subject to <u>General License</u> allowing funds controlled by Sovcombank to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and non-government controlled Ukrainian territory</p>
SOVCOMFLOT	<p>New debt and equity restrictions through <u>Directive 3</u> under EO 14024</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 Sovcomflot, 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 	<p><u>Asset freeze</u></p>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<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</u> / <u>Regulation 2022/328</u> (amending <u>Regulation 833/2014</u>) 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> <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 	

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
THE WAGNER GROUP	<u>SDN</u>	Asset freeze under <u>Decision 2021/2197 / Implementing Regulation 2021/2195</u> (implementing <u>Regulation 2020/1998</u>) [Pre-2022]	<u>Asset freeze</u>
TRANSKAPITALBANK PJSC	<u>SDN</u> subject to: <u>General License 28</u> authorizes until October 20, 2022 all transactions ultimately destined for or originating from Afghanistan involving TKB or its subsidiaries.	Not designated	Not designated
TRANSNEFT	New debt and equity restrictions through <u>Directive 3</u> under EO 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 EU whose proprietary rights are directly or 	<u>Investment ban</u> [Pre-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>Exception for certain fossil fuels and energy-related transactions</p>	
UNITED AIRCRAFT CORPORATION	Previously listed on the State Department's <u>CAATSA Section 231(e) List</u> Regarding the Defense Sector of the Government of the Russian Federation	<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 2022/430 / Regulation 2022/428</u> (amending <u>Regulation 833/2014</u>) 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 EU whose proprietary rights are directly or 	<p><u>Asset freeze</u></p> <p><u>Investment ban</u> [Pre-2022]</p>

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>	
UNITED SHIPBUILDING CORPORATION	<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 United Shipbuilding Corporation, 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 	<u>Asset freeze</u>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<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> <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 EU whose proprietary rights are directly or 	

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		indirectly owned more than 50% by the above <ul style="list-style-type: none"> Acting on behalf or at the direction of the above 	
URAL AIRLINES	Not designated, but note <u>US airspace restrictions</u> on Russian aircraft	Not designated, but airline added to EU Air Safety List.	<u>Asset freeze</u> subject to a <u>General License</u> permitting U.K. nationals or companies to purchase tickets from Ural Airlines or its Subsidiaries for flights originating in or within Russian until 23 May 2023.
URAL BANK FOR RECONSTRUCTION AND DEVELOPMENT	Not designated	Not designated	<u>Asset freeze</u> , subject to <u>General License</u> allowing funds controlled by Ural Bank for Reconstruction and Development to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and non-government controlled Ukrainian territory
URALVAGONZAVOD	<u>SDN</u>	Prohibition under <u>Decision 2022/430</u> / <u>Regulation</u>	<u>Asset freeze</u>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p><u>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 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>Asset freeze under <u>Decision 2022/429</u> / <u>Implementing Regulation 2022/427</u> (implementing <u>Regulation 269/2014</u>)</p>	<p><u>Investment ban</u> [Pre-2022]</p>
VEB (VNESHEKONOMBANK)	SDN, subject to:	SWIFT removal under <u>Decision 2022/346</u> / <u>Regulation</u>	Asset freeze, subject to <u>General License</u> allowing funds controlled by VEB to be

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	<ul style="list-style-type: none"> • <u>General License 8C</u> allowing certain energy-related transactions involving certain Russian banks until December 5, 2022, though not transactions otherwise prohibited by EO 14066 <p>Previously imposed restrictions on dealings in new debt and equity through <u>Directive 1A</u> under EO 13662</p>	<p><u>2022/345</u> (amending <u>Regulation 833/2014</u>)</p> <p>Asset freeze under <u>Decision 2022/265</u> / <u>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>used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and non-government controlled Ukrainian territory</p> <p><u>Investment ban</u> [Pre-2022]</p>
VTB BANK	<p>SDN, subject to:</p> <ul style="list-style-type: none"> • <u>General License 8C</u> allowing certain energy-related transactions involving certain Russian banks until December 5, 2022, though not transactions otherwise prohibited by EO 14066 <p>Previously imposed restrictions on dealings in new debt and</p>	<p>SWIFT removal under <u>Decision 2022/346</u> / <u>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</u> [Pre-2022]</p> <p>Asset freeze under <u>Decision 2022/582</u> / <u>Implementing Regulation 2022/581</u></p>	<p><u>Asset freeze</u>, subject to:</p> <ul style="list-style-type: none"> • <u>General License</u> allowing funds controlled by VTB Bank to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and non-government controlled Ukrainian territory • <u>General License</u> applicable to VTB

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	equity through <u>Directive 1A</u> under EO 13662	(implementing <u>Regulation 269/2014</u>)	<p>Capital and U.K. entities owned or controlled by VTB Capital incorporated in the U.K. 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, as well as payments related to insolvency proceedings, until April 3, 2023;</p> <ul style="list-style-type: none"> • <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

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
			Capital and U.K. entities owned or controlled by VTB Capital related to prudential regulation, or protecting, maintaining or enhancing the financial stability of the U.K. until March 1, 2023 <u>Investment ban</u> [Pre-2022]

Key Sanctioned Individuals as of August 10, 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; travel sanctions</u>
ALEKPEROV, VAGIT	President of PJSC Lukoil	Not designated	Not designated	<u>Asset freeze; travel ban; transport sanctions</u>
AKIMOV, ANDREY	CEO of Gazprombank	<u>SDN</u>	Not designated	<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>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
BELOZYOROV, OLEG	CEO of Russian Railways	Not designated	Not designated	<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>
CASIMIRO, DIDIER	First Vice President of Rosneft	<u>SDN</u>	Not designated	<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]
DAVIDOVICH, DAVID	Chairman of Prodo Group	Not designated	Not designated	<u>Asset freeze; travel ban; transport sanctions</u>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
DERIPASKA, OLEG	Founder of Basic Element and Volnoe Delo	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban; transport sanctions</u>
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>
DYUKOV, ALEKSANDER	CEO of Gazprom Neft	Not designated	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>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
GEORGIEVA, ELENA	Chair of the board of directors of Novikombank	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
GRAF, HERMAN	Chief Executive Officer of Sberbank	<u>SDN</u>	Asset freeze under <u>Decision 2022/582 / Implementing Regulation 2002/581</u> (implementing <u>Regulation 269/2014</u>)	<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>
GUNDYAYEV, VLADIMIR (PATRIARCH KIRILL)	Primate of the Russian Orthodox Church	Not designated	Not designated	<u>Asset freeze; travel ban</u>
ISMAILOV, SANJAR ZUNNUROVICH	Nephew of Alisher Usmanov, Businessman and pro-Kremlin oligarch	Not designated	Not designated	<u>Asset freeze</u>
ISMAILOV, SARVAR	Nephew of Alisher Usmanov, Businessman	Not designated	Not designated	<u>Asset freeze</u>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
	and pro-Kremlin oligarch			
IVANOV, SERGEI	CEO of Alrosa, board member of Gazprombank	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
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 <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
KHAN, ANZHELIKA	Wife of German Khan	Not designated	Not designated	<u>Asset freeze; transport sanctions</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 <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
KHOTSENKO, VITALIY	Prime Minister of the so-called Donetsk People's Republic	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
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>
KLISHIN, MIKHAIL	Director of SOGAZ	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
KOGOGIN, SERGEY	Director of Kamaz	<u>SDN</u>	Not designated	<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>
KOVALEVA, POLINA	Stepdaughter of Foreign Minister Sergei Lavrov	Not designated	Not designated	<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>	<u>Asset freeze; travel ban</u>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
			(implementing Regulation 269/2014)	
LAVROV, SERGEI	Russian Foreign Minister	<u>SDN</u>	Asset freeze under Decision 2022/331 / Regulation 2022/332 (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>
LEVIN, OLEGOVICH	Linked to Bank Otkritie	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
MELNICHENKO, ALEKSANDRA	Wife of Andrey Melnichenko and linked to EuroChem Group	Not designated	Asset freeze under Decision 2022/883 / Regulation 2022/878 (amending Regulation 269/2014)	Not designated
MELNICHENKO, ANDREY	Founder of EuroChem Group	<u>SDN</u>	Asset freeze under Decision 2022/397 / Implementing Regulation 2022/396 (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
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	<u>SDN</u>	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	<u>SDN</u>	Asset freeze under <u>Decision 2022/337 / Implementing Regulation 2022/336</u> (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
MOSHKOVICH, VADIM	Chair of the board of directors of Rusagro Group	Not designated	Asset freeze under <u>Decision 2022/397 / Implementing Regulation 2022/396</u> (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>
NESTERENKO, TATYANA	Linked to Bank Otkritie	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
OSEEVSKY, MIKHAIL	President of Rostelecom	Not designated	Asset freeze under <u>Decision 2022/397 / Implementing Regulation 2022/396</u> (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>
PATRUSHEV, ANDREY	Former CEO of Gazprom Neft	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
PESKOV, DMITRY	Kremlin Press Secretary	<u>SDN</u>	Asset freeze under <u>Decision 2022/337 / Implementing Regulation 2022/336</u> (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
POLUBOYARINOV, MIKHAIL	CEO of Aeroflot	Not designated	Asset freeze under <u>Decision 2022/397 / Implementing Regulation 2022/396</u> (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>
POTANIN, VLADIMIR	Shareholder of Norilsk Nickel and controller of Rosbank	Not designated	Not designated	<u>Asset freeze; travel ban; technical assistance related to aircraft; transport sanctions</u> Following Potanin's designation, <u>General Licence</u> permits the wind down of positions involving Rosbank PJSC until 30 September 2022
PRIGOZHIN, YEVGENIY	Russian businessman, associated with following entities: <ul style="list-style-type: none"> • Internet Research Agency 	<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>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
	<ul style="list-style-type: none"> Lakhta companies Wagner Group 			
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 Regulation 269/2014)	
PUMPYANSKY, DMITRY	Owner and chair of the board of directors of Pipe Metallurgical Company (TMK)	Not designated	Asset freeze under Decision 2022/397 / Implementing Regulation 2022/396 (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>
PUMPYANSKAYA, GALINA	Wife of Dmitry Pumpyansky	Not designated	Asset freeze under Decision 2022/397 / Implementing Regulation 2022/396 (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>
PUTIN, MIKHAIL	Deputy Chairman of SOGAZ Insurance and Gazprom; cousin of Vladimir Putin	Not designated	Not designated	<u>Asset freeze; travel ban</u>
PUTIN, VLADIMIR	President of the Russian Federation	<u>SDN</u>	Asset freeze under Decision 2022/331 / Regulation 2022/332 (amending Regulation 269/2014)	<u>Asset freeze</u> [Note that Vladimir Putin's daughters, Katerina Tikhonovna and Maria Vorontsova (below) are subject to

INDIVIDUAL	RELATED ENTITY	US	EU	UK
				asset freezes and travel bans]
RASHNIKOV, VIKTOR	Owner and chair of the board of directors of Magnitogorsk Iron & Steel Works	<u>SDN</u>	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 the supervisory council 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>
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>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
ROTENBERG, IGOR	Chair of the board of directors of National Telematic Systems	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
RUNJE, ZELJKO	Deputy Chairman of the Management Board and First Vice President for Oil, Gas and Offshore Business Development of Rosneft	Not designated	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 Regulation 269/2014)	<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 Regulation 269/2014)	<u>Asset freeze; travel ban</u>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
SHAMALOV, KIRILL	Deputy chair on the management board of PAO SIBUR Holding	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
SHAMALOV, YURI	Director of Gazprombank	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
SHEVCHUK, STANISLAV	Russian Imperial Movement Leader	<u>SDN</u>	Not designated	Not designated
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>
SILUANOV, ANTON	Russian Finance Minister	<u>SDN</u>	Not designated	Not designated

INDIVIDUAL	RELATED ENTITY	US	EU	UK
SINELIN, MIKHAIL	Deputy chairman of the Bank for Development and Foreign Economic Activity	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
SLYUSAR, YURY	Director general of United Aircraft Corporation	<u>SDN</u>	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	<u>Asset freeze; travel ban</u>
TENENBAUM, EUGENE	Controller of Ervington Investments Ltd	Not designated	Not designated	<u>Asset freeze; transport sanctions</u>
TIKHONOVA, KATERINA	Daughter of President Vladimir Putin	<u>SDN</u>	Asset freeze under <u>Decision 2022/582 / Implementing Regulation 2022/581</u> (amending <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
TIMCHENKO, GENNADIY	Major shareholder in Bank Rossiya	<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 Regulation 269/2014)	
TOKAREV, NIKOLAI	CEO of Transneft	<u>SDN</u>	Asset freeze under Decision 2022/337 / Implementing Regulation 2022/336 (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</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>
TSIVELEVA, ANNA	Chair of Board of Directors of Kolmar Group	Not designated	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% or more, directly or	Asset freeze under Decision 2022/337 / Implementing Regulation 2022/336 (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
		indirectly, by Usmanov, that does not specifically appear on OFAC's SDN List Private aircraft and superyacht designated as blocked property		
VEDYAKHIN, ALEXANDER	First deputy chair of the executive board of Sberbank	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
VEKSELBERG, VIKTOR	Owner of the Renova Group	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
VINOKUROVA, YEKATERINA	Daughter of Foreign Minister Sergei Lavrov	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
VORONTSOVA, MARIA	Daughter of President Vladimir Putin	<u>SDN</u>	Asset freeze under <u>Decision 2022/582 / Implementing Regulation 2022/581 (amending Regulation 269/2014)</u>	<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
ZADORNOV, MIKHAIL MIKHAYLOVICH	Linked to Bank Otkritie	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
ZHUCHKOVSKY, ALEXANDER	Russian Imperial Movement Leader	<u>SDN</u>	Not designated	Not designated
<i>VARIOUS</i>	Members of Russian State Duma	Various individuals, see <u>OFAC press release</u> for further details	Various individuals, asset freeze under <u>Decision 2022/331 / Regulation 2022/332</u> and <u>Decision 2022/267 / Regulation 2022/261</u> (amending <u>Regulation 269/2014</u>)	Various individuals, see <u>U.K. consolidated financial sanctions targets</u> for further details

The tables provide a snapshot of key entities and individuals subject to sanctions imposed in the U.S., EU and/or U.K. in connection with Russia's invasion of Ukraine and Crimea. Although the table focuses primarily on sanctions imposed since February 21, 2022, the U.S., EU and U.K. sanctions regimes against 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 and have been included in this table to provide broader information. However, **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 may be 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. Certain key companies which are considered controlled by sanctioned persons or businesses are listed here (e.g., Evraz PLC), but on a non-exhaustive basis. Further details of how sanctions are applied in each of the three covered jurisdictions may be found in our client note, "US, EU And UK Expand Russian Sanctions Amid Ongoing Ukraine Conflict."

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- 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 EU, 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. Recent [European Commission FAQs](#) on how ownership should be assessed provide that the interests of sanctioned persons should be aggregated (e.g. if one sanctioned individual owns 30% of a company and another sanctioned individual owns 25% of a company, the company should be considered as jointly owned and controlled by listed persons). Some companies who have such an ownership structure have however asserted that they are not treated as sanctioned entities, citing confirmation by public officials. This particular area of the rules therefore is controversial and requires careful consideration. These entities may not be designated in their own right, and therefore may not appear on the Consolidated List.
- 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. [Guidance](#) from HM Treasury’s Office of Financial Sanctions Implementation (OFSI) provides further details on how ownership and control should be assessed. For U.K. purposes, companies which are sanctioned as a result of the holdings of a sanctioned individual are usually mentioned within the OFSI designation instrument for the relevant individual. Notably Evraz PLC has been deemed effectively controlled by a sanctioned person in the U.K., even though the sanctioned individual only holds a minority shareholding and minority board appointment rights. Its status as a sanctioned entity was confirmed in the relevant text in the HMT sanctioning measure related to the individual controller. A composite list of OFSI general licences that are currently in force can be found [here](#) and expired general licences can be found [here](#). Certain general licences provide exemptions with respect to a broad class of otherwise sanctioned entities (e.g., [General License INT/2022/1919908](#), which permits individual retail clients to use the retail banking services of designated credit or financial institutions). We have not listed these general licences in the table, but have discussed them in our client note, ["US, EU And UK Expand Russian Sanctions Amid Ongoing Ukraine Conflict."](#)