# U.S., EU and U.K. Sanctions Against Russia and Belarus

## Key Sanctioned Entities as of September 5, 2023<sup>[#]</sup>

ENTITY			
PJSC AEROFLOT	Not designated, but note <u>U.S. airspace</u> restrictions on Russian aircraft	Not designated, but airline added to EU Air Safety List	Asset freeze subject to:      General License permitting U.K. nationals or companies to purchase tickets from Aeroflot or its Subsidiaries for flights originating in or within Russian until May 23, 2024  Trust Services Sanctions, subject to:      General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
			designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
ALFA-BANK JSC	<ul> <li>SDN subject to:</li> <li>General License 8G allowing certain energy-related transactions involving certain Russian banks until November 1, 2023</li> <li>New debt and equity restrictions through Directive 3 under EO 14024</li> </ul>	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 Alfa Bank after April 12, 2022, or any legal person, entity or body:  Established outside the EU whose proprietary rights are directly or indirectly	<ul> <li>Asset freeze subject to:</li> <li>General License allowing funds controlled by Alfa Bank to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and nongovernment controlled Ukrainian territory</li> <li>General License permitting, until May 12, 2025: (i) Alfa Bank's subsidiary,</li> </ul>

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
		owned more than 50% by the above  • Acting on behalf or at the direction of the above  Asset freeze under Decision 2023/432 / Regulation 2023/429 (implementing Regulation 269/2014) subject to a Derogation which permits national competent authorities to authorize the release of certain frozen funds or economic resources which are necessary for:  • the termination by August 26, 2023, of operations, contracts or other agreements with this bank, concluded before February 25, 2023; or	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

ENTITY	U.S. <sup>[1]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
		transactions for the disbursement of funds by the Jewish Claims Conference to beneficiaries in the Russian Federation by November 26, 2023, irrespective of when the operations, contracts or other agreements were concluded	notification and record keeping requirements  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
ALL-RUSSIA STATE TELEVISION AND RADIO BROADCASTING COMPANY (VGTRK)	Not designated	Asset freeze under Decision 2022/2477 /	Asset freeze

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
		Regulation 2022/2476 (implementing Regulation 269/2014)	Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
ALMAZ-ANTEY	SDN	Prohibition under  Decision 2022/430 /  Regulation 2022/428 (amending Regulation 833/2014) on directly or indirectly engaging in	Asset freeze [Pre-2022]  Trust Services Sanctions, subject to:  General License applicable to trust

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
		any transaction with Almaz-Antey, or any legal person, entity or body:  • 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  Exceptions including for certain fossil fuels and energy-related transactions	services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
		Prohibition under <u>Decision 2022/327</u> / <u>Regulation 2022/328</u> (amending <u>Regulation</u> <u>833/2014</u> ) on directly or indirectly dealing with transferable securities and money-market	

ENTITY	U.S. <sup>[1]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
		<ul> <li>instruments issued by Almaz-Antey after April 12, 2022, or any legal person, entity or body:</li> <li>Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above</li> <li>Acting on behalf or at the direction of the above</li> </ul>	
ALROSA	SDN  New debt and equity restrictions through Directive 3 under EO 14024	Not designated	Asset freeze  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
			services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
ANO TV-NOVOSTI	Not designated	Asset freeze under  Decision 2022/2477 /  Regulation 2022/2476 (implementing  Regulation 269/2014)	Asset freeze  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
			of payments in connection with such services, until the expiry of the license 90 days from the date of designation Internet Services Sanctions
AO IZUMRUD	Not designated	Not directly designated but likely to be indirectly sanctioned by virtue of being a subsidiary of Morinformsystem Agat JSC, which is sanctioned under Decision 2023/432 / Regulation 2023/429 (implementing Regulation 269/2014)	Asset freeze  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
			services, until the expiry of the license 90 days from the date of designation
AVANGARD JSC	SDN	Not designated	Asset freeze Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
BANK DABRABYT	SDN	Prohibition under Decision 2022/218 / Regulation 2022/212 (amending Regulation 765/2006) on directly or indirectly dealing with transferable securities 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:  • 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  or making new loans or credit with a maturity	Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
		exceeding 90 days after June 29, 2021, available to those persons	
BANK OTKRITIE	SDN subject to:  • General License 8G allowing certain energy-related transactions involving certain Russian banks until November 1, 2023	SWIFT removal under  Decision 2022/346 / Regulation 2022/345 (amending Regulation 833/2014)  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 Bank Otkritie after April 12, 2022, or any legal person, entity or body:  Established outside the EU whose proprietary rights are directly or indirectly	Asset freeze, subject to:  General License allowing funds controlled by Bank Otkritie to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and nongovernment controlled Ukrainian territory  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
		owned more than 50% by the above  • Acting on behalf or at the direction of the above  Asset freeze under Decision 2022/582 / Implementing Regulation 2022/581 (implementing Regulation 269/2014)	provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
BANK ROSSIYA	SDN	SWIFT removal under  Decision 2022/346 /  Regulation 2022/345 (amending Regulation 833/2014)  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	Asset freeze subject to:  • General License allowing funds controlled by Bank Rossiya to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and nongovernment controlled Ukrainian territory

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
		Bank Rossiya after April 12, 2022, or any legal person, entity or body:  • 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  Asset freeze under Decision 2022/265 / Implementing Regulation 2022/260 (implementing Regulation 269/2014)	Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
BANK SAINT-PETERSBURG PJSC	SDN	Not designated	Asset freeze subject to:  • General License allowing funds controlled by Bank Saint-Petersburg to

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
			be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and non- government controlled Ukrainian territory
			Trust Services Sanctions, subject to:
			General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of     designated persons,     and the processing
			of payments in connection with such services, until the

ENTITY	U.S. <sup>[1]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
			expiry of the license 90 days from the date of designation
BANK URALSIB PJSC	SDN	Not designated	Asset freeze subject to:  • General License allowing funds controlled by Bank Uralsib PJSC to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and non-
			government controlled Ukrainian territory  Trust Services Sanctions, subject to:  General License applicable to trust
			services providers enabling them to wind down such services by allowing

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
			for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
BANK ZENIT PJSC	SDN	Not designated	Asset freeze subject to:  • General License allowing funds controlled by Bank Zenit PJSC to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and nongovernment

ENTITY	U.S. <sup>[1]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
			controlled Ukrainian territory  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
BELARUSBANK	Not designated	Prohibition under <u>Decision 2022/218</u> / <u>Regulation 2022/212</u>	Not designated

ENTITY	U.S. <sup>[1]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
		(amending Regulation 765/2006) on 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:	
		<ul> <li>Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above</li> <li>Acting on behalf or</li> </ul>	
		at the direction of the above	
		or making new loans or credit with a maturity exceeding 90 days after	

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
		June 29, 2021, available to those persons	
BELINVESTBANK	SDN	Prohibition under  Decision 2022/218 /  Regulation 2022/212 (amending Regulation 765/2006) on directly or indirectly dealing with transferable securities and money-market instruments with a maturity exceeding 90 days issued by Belinvestbank after June 29, 2021, or any legal person, entity or body:	Not designated
		Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above	

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
		Acting on behalf or at the direction of the above	
BELAGROPROMBANK	Not designated	Prohibition under  Decision 2022/218 / Regulation 2022/212 (amending Regulation 765/2006) 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:  Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above	Not designated

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
		Acting on behalf or at the direction of the above	
		or making new loans or credit with a maturity exceeding 90 days after June 29, 2021, available to those persons	
BITRIVER AG	SDN	Not designated	Not designated
BLACK SEA BANK FOR DEVELOPMENT AND RECONSTRUCTION	SDN	Not designated	Asset freeze subject to:  • General License allowing funds controlled by Black Sea Bank for Development and Reconstruction to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and nongovernment

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
			controlled Ukrainian territory  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
BM BANK JSC	SDN	Not designated	Not designated

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
CENTRAL ELECTION COMMISSION OF THE RUSSIAN FEDERATION (CEC)	SDN	Asset freeze under  Decision 2022/1907 /  Regulation 2022/1906 (implementing  Regulation 269/2014)	Not designated
CENTRAL BANK OF RUSSIA	Russian sovereign debt restrictions through  Directive 1A under  EO 14024  Restrictions on transactions through  Directive 4 under  EO 14024, subject to:  General License 8G  allowing certain energy-related transactions involving certain  Russian banks until November 1, 2023  General License 13F  allowing certain administrative	Prohibition under  Decision 2022/335 / Regulation 2022/334 (amending Regulation 833/2014) 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  By way of derogation from the above, a transaction may be authorized provided	Financial services restriction (foreign exchange reserves and asset management), 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.Kregulated firm and anything done to deal

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
	transactions until November 8, 2023  • General License 14 allowing certain clearing and settlement transactions	that it is strictly necessary to ensure the financial stability of the Union as a whole or of a Member State  Amended by <u>Decision</u> 2022/395 / <u>Regulation</u> 2022/394 to clarify that the prohibition extends to the Russian National Wealth Fund	with an "extraordinary situation"
COMMERCIAL BANK SOLIDARNOST	<ul> <li>SDN subject to:</li> <li>General License 71         authorizing the wind         down of transactions         involving certain         entities until         October 18, 2023</li> </ul>	Not designated	Not designated
COMMERCIAL VEHICLES – GAZ GROUP	Not designated	Asset freeze under Decision 2023/432 / Implementing Regulation 2023/429 (implementing Regulation 269/2014)	Not designated

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
CREDIT BANK OF MOSCOW	SDN	SWIFT removal under Decision 2022/884 / Council Regulation 2022/879 (amending Regulation 833/2014) Asset freeze under Decision 2022/2477 / Implementing Regulation 2022/2476 (implementing Regulation 269/2014)	Asset freeze subject to:  • General License 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 nongovernment controlled Ukrainian territory
			General License     permitting, until     August 14, 2025,     payments to the     bank and its     subsidiaries for the     purpose of making     energy available in     Mongolia and any     activities reasonably

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
			necessary to effect this  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
JSC 'DALNEVOSTOCHNIY BANK' (JSC 'FAR EASTERN BANK')	<u>SDN</u>	Asset freeze under <u>Decision 2022/2477</u> / <u>Implementing</u>	Not designated

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
		Regulation 2022/2476 (implementing Regulation 269/2014)	
DEVELOPMENT BANK OF THE REPUBLIC OF BELARUS	SDN	Prohibition under  Decision 2022/218 / Regulation 2022/212 (amending Regulation 765/2006) 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:	Not designated
		Established outside     the EU whose     proprietary rights are     directly or indirectly     owned more than     50% by the above	

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
		Acting on behalf or at the direction of the above  or making new loans or credit with a maturity exceeding 90 days after June 29, 2021, available to those persons	
DOM.RF	Not designated	Not designated	Asset freeze  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services, to or for the benefit of designated persons, and the processing of payments in connection with such

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
			services, until the expiry of the license 90 days from the date of designation
ELEKTOPRIBOR JSC	Not designated	Asset freeze under  Decision 2023/432 /  Implementing  Regulation 2023/429  (implementing  Regulation 269/2014)	Not designated
t E	Not designated (OFAC has <u>confirmed</u> that EuroChem is not subject to U.S. sanctions)	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  EuroChem has denied that it is subject to EU sanctions—see	Not designated (in the sense of this company being itself sanctioned as a designated person), although Andrey Melnichenko, founder of EuroChem, is subject to U.K. sanctions

ENTITY	U.S. <sup>[i]</sup>	EU <sup>(ii)</sup>	U.K. <sup>[iii]</sup>
EVRAZ PLC	Not designated	Evraz PLC is mentioned in the asset freeze designation of Roman Abramovich (under Decision 2022/429 / Implementing Regulation 2022/427 (implementing Regulation 269/2014)  EU FAQs on assets freezes following sanctions adopted in view of Russia's military aggression against Ukraine and Belarus' involvement in it 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	Asset freeze subject to:  • General License permitting continuation of business operations involving Evraz's North American subsidiaries (namely Evraz North America plc, Evraz Inc. NA, and Evraz Inc. NA – Canada) until March 31, 2024. "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

ENTITY	U.S. <sup>[1]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
		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	American subsidiaries for audit services  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
FOREIGN INTELLIGENCE SERVICE OF THE RUSSIAN FEDERATION	SDN	Not designated	Not designated

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
GARANTEX	SDN	Not designated	Asset freeze  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
GAZPROM AVTOMATIZATSIYA	SDN	Not designated	Not designated
GAZPROM NEFT	New debt and equity restrictions through	Prohibition under Decision 2022/430 /	Investment ban [Pre- 2022]

ENTITY	U.S. <sup>[1]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
	<u>Directive 3</u> under EO 14024	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:	
		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	
		Exceptions including for certain fossil fuels and energy-related transactions	
GAZPROMBANK	New debt and equity restrictions through Directive 3 under EO 14024	Existing restrictions on dealings in transferable securities and moneymarket instruments	Investment ban [Pre-2022] Asset freeze subject to:

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
		under Regulation (EU) 833/2014	<ul> <li>General License allowing funds controlled by Gazprombank to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and nongovernment controlled Ukrainian territory</li> <li>General License permitting, until August 14, 2025, payments to the bank and its Subsidiaries for the purpose of making energy available in Mongolia and any activities reasonably necessary to effect this</li> </ul>

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
			Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
GENBANK	SDN	Not designated	<ul> <li>Asset freeze subject to:</li> <li>General License allowing funds controlled by Genbank to be used</li> </ul>

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
			to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and nongovernment controlled Ukrainian territory
			<u>Trust Services</u> <u>Sanctions</u> , subject to:
			• General License applicable to trust services providers, enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing
			of payments in connection with such services, until the

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
			expiry of the license 90 days from the date of designation
GEOPOLITICA	SDN	Not designated	Asset freeze  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
HYDRA MARKET	SDN	Not designated	Not designated
INTEGRAL	SDN	Not designated  Not designated	Asset freeze Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license
			90 days from the date of designation
INTERNATIONAL INVESTMENT BANK	SDN	Not designated	Not designated

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
INTERNET RESEARCH AGENCY	SDN	Asset freeze under Decision 2022/265 / Implementing Regulation 2022/260 (implementing Regulation 269/2014)	Asset freeze Trust Services Sanctions, subject to:  General License an applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
INVESTTRADEBANK JSC	SDN	Not designated	Not designated

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
IS BANK	<u>SDN</u>	Not designated	Asset freeze subject to:
			General License     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
			<u>Trust Services</u> <u>Sanctions</u> , subject to:
			General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
			designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
KAMAZ	SDN / SDN / SDN / SDN	Asset freeze under Council Decision 2022/883 / Implementing Regulation 2022/878 (implementing Regulation 269/2014)  Prohibition under Decision 2022/430 / Regulation 2022/428 (amending Regulation 833/2014) on directly or indirectly engaging in any transaction with Kamaz, or any legal person, entity or body:	Asset freeze  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
		Established outside     the EU whose     proprietary rights are     directly or indirectly     owned more than     50% by the above	services, until the expiry of the license 90 days from the date of designation
		Acting on behalf or at the direction of the above	
		Exceptions including for certain fossil fuels and energy-related transactions	
		Prohibition under <u>Decision 2022/327</u> / <u>Regulation 2022/328</u> (amending <u>Regulation</u> <u>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:	

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
		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	Asset freeze  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
			connection with such services, until the expiry of the license 90 days from the date of designation
KRONSHTADT	SDN	Asset freeze under Decision 2022/883 / Implementing Regulation 2022/878 (implementing Regulation 269/2014)	Asset freeze  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
			90 days from the date of designation
LAKHTA PARK / LAKHTA PARK PREMIUM / LAKHTA PLAZA	SDN / SDN / SDN	Not designated (in the sense of this company being itself sanctioned as a designated person), although owner Pavel Evgenevich Prigozhin is subject to EU sanctions (see table of individuals below)	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)	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 U.K. sanctions (see table of sanctioned individuals, below)

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
		LetterOne has denied that it is subject EU sanctions – see LetterOne <u>statement</u>	
LLC COMMERCIAL BANK – INTERNATIONAL SETTLEMENTS BANK	Not designated	Not designated	Asset freeze Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
LOCKO BANK	<ul> <li>SDN subject to:</li> <li>General License 71         authorizing the wind         down of transactions         involving certain         entities until         October 18, 2023</li> </ul>	Not designated	Not designated
LUKOIL	Previously imposed restrictions on export of U.S. goods, services, or technology for oil projects through Directive 4 under EO 13662	Not designated	Not designated
MAGNITOGORSK IRON & STEEL WORKS (MMK)	SDN	Not designated (in the sense of this company being itself sanctioned as a designated person), although owner Viktor Filippovich Rashnikov is subject to EU sanctions (see table of individuals below)	Not designated (in the sense of this company being itself sanctioned as a designated person), although owner Viktor Filippovich Rashnikov is subject to U.K. sanctions (see table of individuals below)

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
MANAGEMENT COMPANY OF THE RUSSIAN DIRECT INVESTMENT FUND (MC RDIF)	SDN	Not designated	Not designated
MARSHAL. GLOBAL	SDN	Not designated	Asset freeze  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
PJSC SCB METALLINVESTBANK	SDN	Not designated	Asset freeze subject to:

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
			General License     allowing funds     controlled by PJSC     SCB     Metallinvestbank to     be used to support     the delivery of     humanitarian     assistance in relation     to the conflict in     Ukraine and non-     government     controlled Ukrainian     territory
			Trust Services Sanctions, subject to:
			General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
			designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
MORINFORMSYSTEM AGAT JSC	SDN	Asset freeze under  Decision 2023/432 /  Implementing  Regulation 2023/429  (implementing  Regulation 269/2014)	Not designated
MOSCOW INDUSTRIAL BANK	SDN	Not designated	Asset freeze Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust

ENTITY	U.S. <sup>[1]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
			services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation.
MTS BANK PJSC	SDN	Not designated	Asset freeze subject to:  • General License permitting, until November 21, 2023, payment to U.K. persons by designated persons in satisfaction of contractual obligations which arose prior to designation, where payment is for benefit of U.K. person and total value of payment

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
			does not exceed £200,000 (inc. VAT). Certain contracts are excluded from General License e.g., bonds, derivatives, credit default swaps, professional legal fees
			General License allowing funds controlled by MTS Bank PJSC to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and nongovernment controlled Ukrainian territory
			Trust Services Sanctions, subject to:

ENTITY	U.S. <sup>[ī]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
			General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of     designated persons,     and the processing     of payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
NATIONAL MEDIA GROUP	Not designated	Asset freeze under  Decision 2022/2477 /  Implementing Regulation 2022/2476 (implementing Regulation 269/2014)	Not designated

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
NEMCHINOVO INVESTMENTS	SDN	Not designated	Not designated
NORD STREAM 2 AG	SDN	Not designated	Not designated
NOVIKOMBANK	SDN Previously imposed restrictions on dealings in new debt and equity through Directive 3 under EO 13662	SWIFT removal under Decision 2022/346 / Regulation 2022/345 (amending Regulation 833/2014)  Asset freeze under Decision 2022/582 / Implementing Regulation 2022/581 (implementing Regulation 269/2014)	Not designated, but likely to be indirectly sanctioned by virtue of Rostec ownership  • General License allowing funds controlled by Novikombank to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and nongovernment controlled Ukrainian territory
OBORONPROM	Previously imposed restrictions on dealings in new debt and equity	Prohibition under <u>Decision 2022/430</u> / <u>Regulation 2022/428</u> (amending <u>Regulation</u> <u>833/2014</u> ) on directly or	Investment ban [Pre-2022]

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
	through <u>Directive 3</u> under EO 13662	indirectly engaging in any transaction with Oboronprom, or any legal person, entity or body:	
		Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above	
		<ul> <li>Acting on behalf or at the direction of the above</li> </ul>	
		Prohibition does not apply to receipt of payments for contracts performed prior to May 15, 2022	
		Exceptions including for certain fossil fuels and energy-related transactions	

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
OPEN JOINT STOCK COMPANY BELAVIA BELARUSIAN AIRLINES	SDN subject to:  • General License 9 authorizing transactions related to civil aviation safety or the wind down of transactions involving Open Joint Stock Company Belavia Belarusian Airlines until September 8, 2023	Asset freeze under  Decision 2021/2125 / Implementing Regulation 2021/2124 (implementing Regulation 765/2006)  Prohibition on Belarusian air carriers landing in, taking off from or overflying EU territory under Decision 2021/908 / Regulation 2021/907 (amending Regulation 765/2006)	Not designated
OPEN JOINT STOCK COMPANY BYELORUSSIAN STEEL WORKS MANAGEMENT COMPANY OF HOLDING BYELORUSSIAN METALLURGICAL COMPANY	SDN subject to:  • General License 8 authorizing the wind down of transactions involving Joint Stock Company Byelorussian Steel Works Management Company of Holding Byelorussian Metallurgical	Asset freeze under Decision 2023/1592 / Implementing Regulation 2023/1591 (implementing Regulation 765/2006)	Not designated

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
	Company until October 9, 2023		
OPEN JOINT STOCK COMPANY MINSK CIVIL AVIATION PLANT 407	SDN	Not designated	Not designated
PATRIOT MEDIA GROUP	Not designated	Asset freeze under  Decision 2023/432 /  Implementing  Regulation 2023/429  (implementing  Regulation 269/2014)	Not designated
PETERSBURG SOCIAL COMMERCIAL BANK	<ul> <li>SDN subject to:</li> <li>General License 71         authorizing the wind         down of transactions         involving certain         entities until         October 18, 2023</li> </ul>	Not designated	Not designated
PROMSVYAZBANK	SDN	SWIFT removal under Decision 2022/346 / Regulation 2022/345 (amending Regulation 833/2014)	Asset freeze subject to:  • General License allowing funds controlled by Promsvyazbank to

ENTITY	U.S. <sup>[1]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
		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 Promsvyazbank after April 12, 2022, or any legal person, entity or body:  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  Asset freeze under Decision 2022/265 / Implementing Regulation 2022/260	be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and non- government controlled Ukrainian territory  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
		(implementing Regulation 269/2014)	expiry of the license 90 days from the date of designation
RN KAT	SDN	Not designated	Not designated
PJSC ROSBANK	SDN	Asset freeze under Decision 2023/432 / Implementing Regulation 2023/429 (implementing Regulation 269/2014)	Asset freeze subject to:  • General License allowing funds controlled by PJSC Rosbank to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and nongovernment controlled Ukrainian territory  • General License permitting, until August 14, 2025, payments to the bank and its subsidiaries for the purpose of making

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
			energy available in Mongolia and any activities reasonably necessary to effect this
			<u>Trust Services</u> <u>Sanctions</u> , subject to:
			General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of     designated persons,     and the processing     of payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
ROSNEFT	Previously imposed restrictions on dealings in new debt through Directive 2 under EO 13662  Previously imposed restrictions on export of U.S. goods, services, or technology for oil projects through Directive 4 under EO 13662	Prohibition under  Decision 2022/430 / Regulation 2022/428 (amending Regulation 833/2014) on directly or indirectly engaging in any transaction with Rosneft, or any legal person, entity or body:  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  Exceptions including for certain fossil fuels and energy-related transactions	Investment ban [Pre-2022]
ROSNEFT AERO	Not designated	Asset freeze under <u>Decision 2022/429</u> / <u>Implementing</u>	Asset freeze

ENTITY	U.S. <sup>[1]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
		Regulation 2022/427 (implementing Regulation 269/2014)	Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
ROSSELKHOZBANK (RUSSIAN AGRICULTURAL BANK)	New debt and equity restrictions through Directive 3 under EO 14024	SWIFT removal under Decision 2022/884 / Council Regulation 2022/879 (amending Regulation 833/2014)	Investment Ban (pre-2022)  Asset freeze subject to:  General License allowing funds

ENTITY	U.S. <sup>[1]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
	Previously imposed restrictions on dealings in new debt and equity through Directive 1A under EO 13662	Existing restrictions on dealings in transferable securities and moneymarket instruments under Regulation (EU) 833/2014 [Pre-2022]	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  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
			connection with such services, until the expiry of the license 90 days from the date of designation
ROSSIYA AIRLINES	Not designated, but note <u>U.S. airspace</u> restrictions on Russian aircraft	Not <b>designated</b> , but airline added to EU Air Safety List.	Asset freeze subject to:  • General License permitting U.K. nationals to purchase tickets from Rossiya Airlines or its Subsidiaries for flights originating in or within Russia until May 23, 2024  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
			services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
ROSSIYA SEGODNYA	Not designated	Asset freeze under Decision 2023/432 / Implementing Regulation 2023/429 (implementing Regulation 269/2014)	Asset freeze  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
			of payments in connection with such services, until the expiry of the license 90 days from the date of designation  Internet Services Sanctions
ROSTEC (RUSSIAN TECHNOLOGIES STATE CORPORATION)	SDN Previously imposed restrictions on dealings in new debt and equity through Directive 3 under EO 13662	Prohibition under  Decision 2022/430 / Regulation 2022/428 (amending Regulation 833/2014) on directly or indirectly engaging in any transaction with Rostec, or any legal person, entity or body:  Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above	Asset freeze  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
		<ul> <li>Acting on behalf or at the direction of the above</li> <li>Exceptions including for certain fossil fuels and energy-related transactions</li> </ul>	services, until the expiry of the license 90 days from the date of designation
		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 Rostec after April 12, 2022, or any legal person, entity or body:	
		<ul> <li>Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above</li> </ul>	

ENTITY	U.S. <sup>[1]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
		<ul> <li>Acting on behalf or at the direction of the above</li> </ul>	
ROSTELECOM	New debt and equity restrictions through Directive 3 under EO 14024	Not designated	Not designated
R-STYLE SOFTLAB	Not designated	Not designated	Asset freeze  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
			expiry of the license 90 days from the date of designation
RUSHYDRO	New debt and equity restrictions through Directive 3 under EO 14024	Not designated	Asset freeze Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
RUSSIAN DIRECT INVESTMENT FUND	SDN	Investment ban under Decision 2022/346 / Regulation 2022/345 (amending Regulation 833/2014)  Exception for investment participation or contributions due under contracts concluded before March 2, 2022, or ancillary contracts	Asset freeze Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
RUSSIAN MINISTRY OF FINANCE	Russian sovereign debt restrictions through <u>Directive 1A</u> under EO 14024	Not designated	Financial services restriction (foreign exchange reserves and asset management)

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
	Restrictions on transactions through Directive 4 under EO 14024, subject to:  • General License 13F allowing certain administrative transactions until November 8, 2023  • General License 14 allowing certain clearing and settlement transactions		
RUSSIAN NATIONAL COMMERCIAL BANK	SDN	Asset freeze under Council Decision 2021/448 / Implementing Regulation 2021/446 (amending Regulation 269/2014) [Pre-2022]	Asset freeze [pre-2022] Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
			services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
RUSSIAN NATIONAL REINSURANCE	Not designated	Asset freeze under  Decision 2023/432 /  Implementing  Regulation 2023/429  (implementing  Regulation 269/2014)	Not designated
RUSSIAN NATIONAL WEALTH FUND	Russian sovereign debt restrictions through Directive 1A under EO 14024 Restrictions on transactions through Directive 4 under EO 14024, subject to:	See Central Bank of Russia Asset freeze under Decision 2023/432 / Implementing Regulation 2023/429 (implementing Regulation 269/2014)	Financial services restriction (foreign exchange reserves and asset management)

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
	<ul> <li>General License 8G allowing certain energy-related transactions involving certain Russian banks until November 1, 2023</li> <li>General License 13F allowing certain administrative transactions until November 8, 2023</li> <li>General License 14 allowing certain clearing and settlement transactions</li> </ul>		
RUSSIAN RAILWAYS	New debt and equity restrictions through Directive 3 under EO 14024	Prohibition under <u>Decision 2022/327</u> / <u>Regulation 2022/328</u> (amending <u>Regulation</u> <u>833/2014</u> ) on directly or indirectly dealing with transferable securities and money-market	Asset freeze subject to:  • General License permitting U.K. nationals or companies to purchase tickets from Russian Railways or its

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
		<ul> <li>instruments issued by Russian Railways after April 12, 2022, or any legal person, entity or body:</li> <li>Established outside the EU whose proprietary rights are</li> </ul>	Subsidiaries for flights or rail journeys originating in or within Russia until May 23, 2024  • General License permitting, until April 13, 2025,
		directly or indirectly owned more than 50% by the above  • Acting on behalf or at the direction of the above	Russian Railways to pay Lithuanian Railways (LTG) for the transit of nondesignated persons (but not goods) between the Kaliningrad Region and other parts of Russia via LTG passenger rail services, and permitting those payments to be effected by other persons (Note the sale of
			GEFCO, formerly owned

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
			by Russian Railways, means it is no longer subject to U.K. sanctions)
			<u>Trust Services</u> <u>Sanctions</u> , subject to:
			General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of     designated persons,     and the processing     of payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
RUSSIAN REGIONAL DEVELOPMENT BANK	Previously imposed restrictions on dealings in new debt through Directive 2 under EO 13662  Previously imposed restrictions on export of U.S. goods, services, or technology for oil projects through Directive 4 under EO 13662	Prohibition under  Decision 2022/430 / Regulation 2022/428 (amending Regulation 833/2014) on directly or indirectly engaging in any transaction with Russian Regional Development Bank, or any legal person, entity or body:  • 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  Exceptions including for certain fossil fuels and energy-related transactions	Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

ENTITY	U.S. <sup>[ī]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
SBERBANK	SDN subject to:  General License 8G allowing certain energy-related transactions involving certain Russian banks until November 1, 2023  Correspondent and payable-through account (CAPTA) restrictions through Directive 2 under EO 14024  New debt and equity restrictions through Directive 3 under EO 14024  Previously imposed restrictions on dealings in new debt and equity through Directive 1 under EO 13662	Asset freeze under Council Decision 2022/1272 / Implementing Regulation 2022/1270 (amending Regulation 269/2014)  Existing restrictions on dealings in transferable securities and money- market instruments under Regulation (EU) 833/2014 [Pre-2022]	Asset freeze, subject to:  General License allowing funds controlled by Sberbank to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and nongovernment controlled Ukrainian territory  General License applicable to Sberbank CIB (U.K.) Ltd and U.K. entities owned or controlled by Sberbank CIB (U.K.) Ltd incorporated in the U.K. permitting them to pay for basic needs e.g., insurance premiums,

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
			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, 2025
			• General License permitting, until August 14, 2025, payments to the bank and its subsidiaries for the purpose of making energy available in Mongolia and any activities reasonably

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
			necessary to effect
			this
			Financial services
			restriction
			(correspondent banking
			relationships) subject to
			General License
			applicable to Sberbank
			CIB (U.K.) Ltd and U.K.
			entities owned or
			controlled by Sberbank
			CIB (U.K.) 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 frozen
			funds and reasonable
			professional fees for
			legal services, as well
			as payments related to

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
			insolvency proceedings, until April 3, 2025
			In addition, U.K regulated firms may process GBP payments made in accordance with activities conducted under each of these General Licenses
			Financial services restriction (foreign exchange reserves and asset management activities) by virtue of Sberbank being owned or controlled directly or indirectly by the Central Bank, the National Wealth Fund or the Ministry of Finance
			Investment ban [Pre-2022]
			<u>Trust Services</u> <u>Sanctions</u> , subject to:

ENTITY	U.S. <sup>[1]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
			• applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
SEVMASH	SDN	Prohibition under  Decision 2022/430 / Regulation 2022/428 (amending Regulation 833/2014) on directly or indirectly engaging in any transaction with Sevmash, or any legal person, entity or body:	Not designated

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
		Established outside     the EU whose     proprietary rights are     directly or indirectly     owned more than     50% by the above	
		<ul> <li>Acting on behalf or at the direction of the above</li> </ul>	
		Exceptions including for certain fossil fuels and energy-related transactions	
		Prohibition under <u>Decision 2022/327</u> / <u>Regulation 2022/328</u> (amending <u>Regulation</u> <u>833/2014</u> ) on directly or indirectly dealing with	
		transferable securities and money-market instruments issued by Sevmash after April 12, 2022, or any legal person, entity or body:	

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
		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	SDN	Not designated	Asset freeze subject to:  • General License allowing funds controlled by SMP Bank to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and nongovernment controlled Ukrainian territory
			<u>Trust Services</u> <u>Sanctions</u> , subject to:

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
			General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of     designated persons,     and the processing     of payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
SOGAZ	Not designated	Asset freeze under  Decision 2022/337 /  Implementing  Regulation 2022/336  (implementing  Regulation 269/2014)	Asset freeze subject to:  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
			wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
SOVCOMBANK	<ul> <li>SDN, subject to:</li> <li>General License 8G allowing certain energy-related transactions involving certain Russian banks until November 1, 2023</li> </ul>	SWIFT removal under  Decision 2022/346 /  Regulation 2022/345, amending Regulation 833/2014  Asset freeze under Decision 2022/582 / Implementing Regulation 2022/581 (implementing Regulation 269/2014)	Asset freeze subject to:  • General License allowing funds controlled by Sovcombank to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and nongovernment

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
			controlled Ukrainian territory  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
SOVCOMFLOT	New debt and equity restrictions through	Prohibition under <u>Decision 2022/430</u> / <u>Regulation 2022/428</u>	Asset freeze Trust Services Sanctions, subject to:

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
	Directive 3 under EO 14024	<ul> <li>(amending Regulation 833/2014) on directly or indirectly engaging in any transaction with Sovcomflot, or any legal person, entity or body:         <ul> <li>Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above</li> <li>Acting on behalf or at the direction of the above</li> </ul> </li> </ul>	General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
		Exceptions including for certain fossil fuels and energy-related transactions  Prohibition under  Decision 2022/327 / Regulation 2022/328	
		(amending <u>Regulation</u> 833/2014) on directly or indirectly dealing with	

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
		transferable securities and money-market instruments issued by Sovcomflot after April 12, 2022, or any legal person, entity or body:  • 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	
THE WAGNER GROUP	SDN	Asset freeze under  Decision 2021/2197 /  Implementing  Regulation 2021/2195  (implementing  Regulation 2020/1998)  [Pre-2022]	Asset freeze  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
			for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
TINKOFF BANK JSC	<ul> <li>SDN subject to:</li> <li>General License 71         authorizing the wind         down of transactions         involving certain         entities until         October 18, 2023</li> </ul>	Asset freeze under <u>Decision 2023/432</u> / <u>Implementing</u> <u>Regulation 2023/429</u> (implementing <u>Regulation 269/2014</u> )	Asset freeze subject to:  • General License allowing funds controlled by Tinkoff Bank JSC to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and nongovernment

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
			controlled Ukrainian territory
			<u>Trust Services</u> <u>Sanctions</u> , subject to:
			General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of     designated persons,     and the processing     of payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
TRANSKAPITALBANK PJSC	SDN	Not designated	Not designated

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
TRANSNEFT	New debt and equity restrictions through Directive 3 under EO 14024	Prohibition under  Decision 2022/430 /  Regulation 2022/428 (amending Regulation 833/2014) on directly or indirectly engaging in any transaction with Transneft, or any legal person, entity or body:  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	Investment ban [Pre-2022]
		the above  Exceptions including for	
		certain fossil fuels and energy-related transactions	
TYUMEN PETROLEUM RESEARCH CENTER (TPRC)	SDN	Not designated	Not designated

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
UNISTREAM COMMERCIAL BANK	<ul> <li>SDN subject to:</li> <li>General License 71         authorizing the wind         down of transactions         involving certain         entities until         October 18, 2023</li> </ul>	Not designated	Not designated
UNITED AIRCRAFT CORPORATION	SDN	Asset freeze under  Decision 2022/429 /  Implementing Regulation 2022/427 (implementing Regulation 269/2014)  Prohibition under Decision 2022/430 / Regulation 2022/428 (amending Regulation 833/2014) on directly or indirectly engaging in any transaction with United Aircraft Corporation, or any legal person, entity or body:	Asset freeze  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
		<ul> <li>Established outside         the EU whose         proprietary rights are         directly or indirectly         owned more than         50% by the above</li> <li>Acting on behalf or         at the direction of         the above</li> </ul>	expiry of the license 90 days from the date of designation Investment ban [Pre- 2022]
		Exceptions including for certain fossil fuels and energy-related transactions	
UNITED SHIPBUILDING CORPORATION	SDN	Asset freeze under Decision 2022/429 / Implementing Regulation 2022/427 (implementing Regulation 269/2014)  Prohibition under Decision 2022/430 / Regulation 2022/428 (amending Regulation 833/2014) on directly or indirectly engaging in	Asset freeze  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the

ENTITY	U.S. <sup>[1]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
		<ul> <li>any transaction with</li> <li>United Shipbuilding</li> <li>Corporation, or any</li> <li>legal person, entity or</li> <li>body:</li> <li>Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above</li> </ul>	benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
		<ul> <li>Acting on behalf or at the direction of the above</li> </ul>	
		Exceptions including for certain fossil fuels and energy-related transactions	
		Prohibition under  Decision 2022/327 /  Regulation 2022/328 (amending Regulation 833/2014) on directly or indirectly dealing with	
		transferable securities	

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
		and money-market instruments issued by Rostec after April 12, 2022, or any legal person, entity or body:	
		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	
URAL AIRLINES	Not designated, but note <u>U.S. airspace</u> restrictions on Russian aircraft	Not designated, but airline added to <u>EU Air</u> <u>Safety List</u>	Asset freeze subject to:  • General License permitting U.K. nationals or companies to purchase tickets from Ural Airlines or its Subsidiaries for flights originating in or within Russian until May 23, 2024

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
			Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
URAL BANK FOR RECONSTRUCTION AND DEVELOPMENT	SDN	Not designated	Asset freeze, subject to:  • General License allowing funds controlled by Ural Bank for

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
			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
			<u>Trust Services</u> <u>Sanctions</u> , subject to:
			General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing
			for the continued provision of trust services to or for the benefit of
			designated persons, and the processing of payments in

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
			connection with such services, until the expiry of the license 90 days from the date of designation
URAL CIVIL AVIATION FACTORY	SDN	Asset freeze under  Decision 2023/432 /  Implementing  Regulation 2023/429  (implementing  Regulation 269/2014)	Not designated
URAL MINING AND METALLURGICAL COMPANY (UMMC)	<ul> <li>SDN</li> <li>General License 70         <ul> <li>authorizing wind</li> <li>down of transactions</li> <li>involving Ural Mining</li> <li>and Metallurgical</li> <li>Company until</li> <li>October 18, 2023</li> </ul> </li> </ul>	Not designated	Not designated but likely to be indirectly sanctioned by virtue of ownership by Iskander Kakhramonovich Makhmudov
URALVAGONZAVOD	SDN	Prohibition under  Decision 2022/430 /  Regulation 2022/428 (amending Regulation 833/2014) on directly or	Asset freeze Trust Services Sanctions, subject to:

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
		<ul> <li>indirectly engaging in any transaction with UralVagonZavod, or any legal person, entity or body:         <ul> <li>Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above</li> <li>Acting on behalf or at the direction of the above</li> </ul> </li> <li>Exceptions including for certain fossil fuels and energy-related transactions         <ul> <li>Asset freeze under Decision 2022/429 / Implementing Regulation 2022/427 (implementing Regulation 269/2014)</li> </ul> </li> </ul>	General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of     designated persons,     and the processing     of payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation  Investment ban [Pre- 2022]

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
VEB (VNESHEKONOMBANK)	SDN, subject to:  • General License 8G allowing certain energy-related transactions involving certain Russian banks until November 1, 2023  Previously imposed restrictions on dealings in new debt and equity through Directive 1A under EO 13662	SWIFT removal under Decision 2022/346 / Regulation 2022/345 (amending Regulation 833/2014)  Asset freeze under Decision 2022/265 / Implementing Regulation 2022/260 (implementing Regulation 269/2014)  Existing restrictions on dealings in transferable securities and moneymarket instruments under Regulation (EU) 833/2014 [Pre-2022]	Asset freeze subject to:  General License allowing funds controlled by VEB to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and nongovernment controlled Ukrainian territory  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
			designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
VTB BANK	SDN, subject to:  • General License 8G allowing certain energy-related transactions involving certain Russian banks until November 1, 2023  Previously imposed restrictions on dealings in new debt and equity through Directive 1 under EO 13662	SWIFT removal under Decision 2022/346 / Regulation 2022/345, amending Regulation 833/2014  Existing restrictions on dealings in transferable securities and moneymarket instruments under Regulation (EU) 833/2014 [Pre-2022]  Asset freeze under Decision 2022/582 / Implementing Regulation 2022/581 (implementing Regulation 269/2014)	Asset freeze, subject to:      General License allowing funds controlled by VTB Bank to be used to support the delivery of humanitarian assistance in relation to the conflict in Ukraine and nongovernment controlled Ukrainian territory      General License applicable to VTB Capital and U.K. entities owned or

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
			controlled by VTB Capital incorporated in the U.K and VTBC Asset Management International Limited (Guernsey subsidiary), VTB Bank (Europe) SE ("VTBE") (EU subsidiary) and any entity owned or controlled by VTBE incorporated in Gerpetersmany. 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

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
			reasonable professional fees for legal services, as well as payments related to insolvency proceedings, until April 3, 2025
			• General License 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
			enhancing the financial stability of the U.K. and/or protecting consumers and

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K.[iii]
			enhancing the integrity of the U.K. financial system until April 3, 2025
			<u>Trust Services</u> <u>Sanctions</u> , subject to:
			• General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

ENTITY	U.S. <sup>[i]</sup>	EU <sup>[ii]</sup>	U.K. <sup>[iii]</sup>
			Investment ban [Pre- 2022]

# Key Sanctioned Individuals as of September 5, 2023 $^{\mbox{\tiny [\#]}}$

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
ABRAMOV, ALEXANDER GRIGORYEVICH	Evraz PLC	Not designated	Not designated	Asset freeze; travel ban; transport sanctions  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
ABRAMOVICH, ROMAN	Owner of Chelsea FC; shareholder of steel group Evraz	Not designated	Asset freeze under Decision 2022/429 / Implementing Regulation 2022/427 (implementing Regulation 269/2014)	Asset freeze; travel ban; transport sanctions  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
AKIMOV, ANDREY IGOREVICH	CEO of Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
ALEKPEROV, VAGIT	President of PJSC Lukoil	Not designated	Not designated	Asset freeze; travel ban; transport sanctions

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				Trust Services Sanctions, subject to: General License
				applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
ALEKSANDROVSKY, SERGEY VLADIMIROVICH	Aeroflot	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
ALISOV, VLADIMIR IVANOVICH	Gazprom	Not designated	Not designated	Asset freeze; travel ban; transport sanctions  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
ALTUSHKIN, IGOR ALEKSEEVICH	Russian Copper Company (RMK or RCC)	Not designated	Not designated	Asset freeze; travel ban; transport sanctions  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
ANDRIANOV, NIKOLAY VALENTINOVICH	Rostec	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				payments in connection with such services, until the expiry of the license 90 days from the date of designation
ANTONOV, IGOR KONSTANTINOVICH	Gazprom	Not designated	Not designated	Asset freeze; travel ban; transport sanctions  Trust Services Sanctions, subject to:
				General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				expiry of the license 90 days from the date of designation
ARTYAKOV, VLADIMIR VLADIMIROVICH	Rostec	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
AVEN, PETR OLEGOVICH	President of Alfa Bank and founder of LetterOne	SDN	Asset freeze under Decision 2022/337 / Implementing Regulation 2022/336 (implementing Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
AVTUKHOV, MIKHAIL OLEGOVICH	Sovcombank	SDN	Not designated	Asset freeze; travel ban Trust Services Sanctions, subject to:

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of designated     persons, and the     processing of     payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
BARCHUGOV, PAVEL	Sberbank	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
BELOUS, ALEKSEI PETROVICH	Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
BELOZYOROV, OLEG VALENTINOVICH	CEO of Russian Railways	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				payments in connection with such services, until the expiry of the license 90 days from the date of designation
BELYANINA, ANASTASIA EDUARDOVNA	Sberbank	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				90 days from the date of designation
BONDAROVICH, SERGEY NIKOLAEVICH	Sovcombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
BORIS, ALBERT ALEXANDROVICH	Sovcombank	SDN	Not designated	Asset freeze; travel ban

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
INDIVIDUAL	RELATED ENTITY	U.S.	EU	Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust
				services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
BORISENKO, ELENA ADOLFOVNA	Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
BORISOVA, NATALYA VLADIMIROVNA	Rostec	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
BORTNIKOV, DENIS ALEKSANDROVICH	Deputy president and chair of the management board of VTB Bank	SDN	Asset freeze under  Decision 2022/265 /  Implementing  Regulation 2022/260 (implementing  Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
BRAVERMAN, ANATOLY ALEXANDROVICH	Socvombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services, until the expiry of the license 90 days from the date of designation
BRODSKIY, ILYA BORISOVICH	Sovcombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
BROVKO, VASILY YURYEVICH	Rostec	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
BRYCHYOVA, LARISSA IGOREVNA	Rosatom	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of designated     persons, and the     processing of     payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
BURMISTROVA, ELENA VIKTOROVNA	Gazprom	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
CAMARA, SADIO	Minister of Defense of Mali; Linked to Private Military Company 'Wagner'	SDN	Not designated	Not designated
CASIMIRO, DIDIER	First Vice President of Rosneft	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
CHEMEZOV, SERGEI	CEO of Rostec	SDN	Existing asset freeze under Implementing Regulation 2020/398 (implementing Regulation 269/2014) [Pre-2022]	Asset freeze; travel ban [Pre-2022]  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
CHERKASOVA, NADIA NARIMANOVNA	Bank Otkritie	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
CHERNER, ANTALOIY MOISEEVICH	Gazprom	Not designated	Not designated	Asset freeze; travel ban; transport sanctions  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services, until the expiry of the license 90 days from the date of designation
CHERSTVOVA, ELENA ALEXANDROVNA	Sovcombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
CHIKHANCHIN, ANDREY YUREVICH	Aeroflot	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
CHISTYAKOV, OLEG	Sberbank	Not designated	Not designated	Asset freeze; travel ban  Trust Services  Sanctions, subject to:

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of designated     persons, and the     processing of     payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
CHUBAROVA, IRINA VLADIMIROVNA	Gazprom	Not designated	Not designated	Asset freeze; travel ban; transport sanctions  Trust Services Sanctions, subject to:  General License applicable to trust services providers

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
DAVIDOVICH, DAVID	Chairman of Prodo Group	Not designated	Not designated	Asset freeze; travel ban; transport sanctions  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
DELVIG, GALINA YURJEVNA	Gazprom	Not designated	Not designated	Asset freeze; travel ban; transport sanctions  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
DENISOV, KONSTANTIN	Rosatom	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				connection with such services, until the expiry of the license 90 days from the date of designation
DERIPASKA, OLEG VLADIMIROVICH	Founder of Basic Element and Volnoe Delo	SDN	Not designated	Asset freeze; travel ban; transport sanctions  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				90 days from the date of designation
DMITRIEV, KIRILL ALEKSANDROVICH	CEO of Russian Direct Investment Fund and Management Company of the Russian Direct Investment Fund	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation.

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
DMITRIEV, VLADIMIR ALEKSANDROVICH	Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
DYUKOV, ALEKSANDER	CEO of Gazprom Neft	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of designated     persons, and the     processing of     payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
YELISEYEV, ILYA VLADIMIROVICH	Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
EVTUSHENKO, OLEG NIKOLAEVICH	Rostec	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
EVTUSHENKOV, FELIX VLADIMIROVICH	Prominent businessman. Owner of Sistema JSFC, a conglomerate which has business interests in the Russian energy and information, communications and digital technologies sectors	Not designated	Not designated	Asset freeze; travel ban; technical assistance related to aircraft; transport sanctions  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
EVTUSHENKOVA, NATALIA NIKOLAYEVNA	Associated with Felix Evtushenkov	Not designated	Not designated	Asset freeze; travel ban; technical assistance related to aircraft; transport sanctions  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
EVTUSHENKOVA, TATIANA VLADIMIROVNA	Associated with Felix Evtushenkov	Not designated	Not designated	Asset freeze; travel ban; technical assistance related to aircraft; transport sanctions  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
FISUN, ALEKSEY LEONIDOVICH	Sovcombank	SDN	Not designated	Asset freeze; travel ban
				Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				expiry of the license 90 days from the date of designation
FRADKOV, PETR MIKHAILOVICH	CEO of Promsvyazbank	SDN	Asset freeze under Decision 2022/337 / Implementing Regulation 2022/336 (implementing Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
FRIDMAN, MIKHAIL MARATOVICH	Founder of Alfa Bank, LetterOne	SDN	Asset freeze under Decision 2022/337 / Implementing Regulation 2022/336 (implementing Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation.
FROLOV, ALEXANDER VLADIMIROVICH	Evraz PLC	Not designated	Not designated	Asset freeze; travel ban; transport sanctions

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				<u>Trust Services</u> <u>Sanctions</u> , subject to:  • General License
				applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
GADZHIEV, NARIMAN GADZHIEVICH	Associated with Suleyman Kerimov	SDN	Not designated	Asset freeze; travel ban; technical assistance related to aircraft; transport sanctions

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
GANEEV, OLEG VLADIMIROVICH	Sberbank	Not designated	Not designated	Asset freeze; travel ban
CARLLY, OLLO YLADIMIROVICII	Sperbulk	Trot designated	Trot designated	Trust Services Sanctions, subject to:  General License applicable to trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
GAVRILENKO, ANATOLII ANATOLYEVICH	Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
GAZARYAN, YURIY GARUNOVICH	Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services
				Sanctions, subject to:
				General License
				applicable to trust services providers
				enabling them to
				wind down such
				services by allowing for the continued
				provision of trust
				services to or for the
				benefit of designated

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
GEORGIEVA, ELENA ALEKSANDROVNA	Chair of the board of directors of Novikombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services, until the expiry of the license 90 days from the date of designation
GOLODETS, OLGA YURYEVNA	Sberbank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
GREF, HERMAN OSKAROVICH	Chief Executive Officer of Sberbank	SDN	Asset freeze under Decision 2022/582 / Implementing Regulation 2022/581 (implementing Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
GRIGORENKO, DMITRIY YURYEVICH	Deputy prime minister and chief of the government staff and	SDN	Asset freeze under <u>Decision 2022/265</u> / <u>Implementing</u> <u>Regulation 2022/260</u>	Asset freeze; travel ban  Trust Services Sanctions, subject to:

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
	chair of the supervisory council of VTB bank		(implementing Regulation 269/2014)	General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of designated     persons, and the     processing of     payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
GUNDYAYEV, VLADIMIR (PATRIARCH KIRILL)	Primate of the Russian Orthodox Church	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
ILYUKHINA, ELENA ANATOLEVNA	Gazprom	Not designated	Not designated	Asset freeze; travel ban; transport sanctions  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
ISMAILOV, SANJAR ZUNNUROVICH	Nephew of Alisher Usmanov, Businessman and pro-Kremlin oligarch	Not designated	Not designated	Asset freeze  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
ISMAILOV, SARVAR	Nephew of Alisher Usmanov, Businessman and pro-Kremlin oligarch	Not designated	Not designated	Asset freeze  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				expiry of the license 90 days from the date of designation
IVANOV, SERGEI SERGEEVICH	CEO of Alrosa, board member of Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
KADYROV, RAMZAN AKHMATOVICH	Head of the Republic of Chechnya	SDN	Asset freeze under Implementing Regulation (EU) 2023/571 (implementing Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
KAMENSKOY, IGOR	Aeroflot	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of designated     persons, and the     processing of     payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
KAPLUNNIK, IRINA ALEKSANDROVNA	Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
KERIMOV, SULEYMAN ABUSAIDOVICH	Owner of financial and industrial group Nafta Moscow	SDN	Asset freeze under Decision 2022/429 / Implementing Regulation 2022/427 (implementing Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
KERIMOVA, GULNARA SULEYMANOVNA	Associated with Suleyman Kerimov	SDN	Not designated	Asset freeze; travel ban; technical assistance related to aircraft; transport sanctions  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
KHACHATUROV, TIGRAN GARIKOVICH	Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				connection with such services, until the expiry of the license 90 days from the date of designation
KHAN, ANZHELIKA	Wife of German Khan	Not designated	Not designated	Asset freeze; transport sanctions  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				90 days from the date of designation
KHAN, GERMAN BORISOVICH	Business partner of Aven and Fridman in Alfa Bank and LetterOne	SDN	Asset freeze under Decision 2022/429 / Implementing Regulation 2022/427 (implementing Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
KHARICHEV, ALEKSANDR DMITRIEVICH	Chief of the Presidential Directorate for Supporting Activities of the State Council of the Russian Federation (for ensuring the activities of the State Council of the Russian Federation)	SDN	Asset freeze under Decision 2022/582 / Implementing Regulation 2022/581 (amending Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
KHOMYAKOV, SERGEY FEDOROVICH	Gazprom	Not designated	Not designated	Asset freeze; travel ban Trust Services Sanctions, subject to:

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of designated     persons, and the     processing of     payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
KHOTIMSKIY, DMITRY VLADIMIROVICH	Sovcombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
KHOTSENKO, VITALIY PAVLOVICH	Prime Minister of the so- called Donetsk People's Republic	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
KHUCHIEV, MUSLIM MAGOMEDOVICH	Chairman of the Chechen Republic	SDN	Asset freeze under  Decision 2023/1218 /  Implementing  Regulation 2023/1216  (implementing  Regulation 269/2014)	Not designated
KIRIYENKO, VLADIMIR SERGEEVICH	CEO of VK Group	SDN	Asset freeze under Decision 2022/397 / Implementing Regulation 2022/396 (implementing Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
KIRYANOV, VICTOR NIKOLAYEVICH	Rostec	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
KLISHIN, MIKHAIL ALEKSEEVICH	Director of SOGAZ	SDN	Not designated	Asset freeze; travel ban  Trust Services
				Sanctions, subject to:
				General License
				applicable to trust services providers
				enabling them to
				wind down such
				services by allowing for the continued
				provision of trust
				services to or for the
				benefit of designated
				persons, and the
				processing of payments in
				connection with such

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services, until the expiry of the license 90 days from the date of designation
KLYUKIN, MIKHAIL VASILYEVICH	Sovcombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
KOGOGIN, SERGEI ANATOLYEVICH	Director of Kamaz	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
KOMANOV, VIKTOR ALEKSEEVICH	Gazprombank	<u>SDN</u>	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of designated     persons, and the     processing of     payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
KOMAROV, KIRILL BORISOVICH	Rosatom	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
KONDRASHOV, IGOR	Sberbank	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
KOPTEV, YURY NIKOLAYEVICH	Rostec	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				payments in connection with such services, until the expiry of the license 90 days from the date of designation
KORCHIK, DMITRY ALEKSANDROVICH	General Director of Open Joint Stock Company Byelorussian Steel Works Management Company of Holding Byelorussian Metallurgical Company	SDN	Not designated	Not designated
KOROLEV, SERGEY BORISOVICH	Rosatom	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
KOSTIN, ANDREY LEONIDOVICH	Chair of the board of directors of VTB Bank	SDN	Asset freeze under Decision 2022/265 / Implementing Regulation 2022/260 (implementing Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				connection with such services, until the expiry of the license 90 days from the date of designation
KOVALCHUK, BORIS YURIEVICH	Leading businessperson associated with PSJC Inter RAO and Rozneftegaz	SDN	Asset freeze under Decision 2022/337 / Implementing Regulation 2022/336 (implementing Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				90 days from the date of designation
KOVALCHUK, MIKHAIL VALENTIVOVICH	Sberbank	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
KOVALCHUK, TATYANA ALEKSANDROVNA	Wife of Yuriy Kovalchuck; Sogaz and Aquila Capital Group.	SDN	Asset freeze under Decision 2022/337 / Implementing Regulation 2022/336 (implementing Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
KOVALEVA, POLINA	Stepdaughter of Foreign Minister Sergei Lavrov	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of designated     persons, and the     processing of     payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
KRAVCHENKO, KIRILL ALBERTOVICH	Gazprom	Not designated	Not designated	Asset freeze; travel ban; transport sanctions  Trust Services Sanctions, subject to:  General License applicable to trust services providers

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
KREMLEVA, IRINA VLADIMIROVNA	Bank Otkritie	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
KRIVONOGIKH, SVETLANA ALEXANDROVNA	Bank Rossiya	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
KRYUKOV, OLEG VASILYEVICH	Rosatom	Not designated	Not designated	Asset freeze; travel ban  Trust Services  Sanctions, subject to:
				• General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				expiry of the license 90 days from the date of designation
KUDRYAVTSEV, NIKOLAY	Sberbank	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
KULESHOV, ALEKSANDER	Sberbank	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
KUZMICHEV, ALEXEY VIKTOROVICH	Shareholder of Alfa group of companies, including Alfa Bank	SDN	Asset freeze under  Decision 2022/429 /  Implementing  Regulation 2022/427	Asset freeze; travel ban  Trust Services Sanctions, subject to:

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
			(implementing Regulation 269/2014)	General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of designated     persons, and the     processing of     payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
KUZNETS, SERGEY IVANOVICH	Gazprom	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
KUZNETSOV, STANISLAV KONSTANTINOVICH	Sberbank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
LAVROV, SERGEI VIKTOROVICH	Russian Foreign Minister	SDN	Asset freeze under Decision 2022/331 / Regulation 2022/332 (amending Regulation 269/2014)	Asset freeze  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				payments in connection with such services, until the expiry of the license 90 days from the date of designation
LEBEDEV, DMITRI ALEKSEEVICH	Chair of the board of directors of Bank Rossiya	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				90 days from the date of designation
LELIKOV, DMITRY YURYEVICH	Rostec	SDN	Not designated	Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
LEVIN, DMITRIY OLEGOVICH	Linked to Bank Otkritie	SDN	Not designated	Asset freeze; travel ban

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
LIKHACHEV, ALEKSEY EVGENEVICH	Rosatom	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
LIKSUTOV, MAKSIM	Aeroflot	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
LITVIN, VLADIMIR ZALMANOVICH	Rostec	SDN	Not designated	Asset freeze; travel ban
				<u>Trust Services</u> <u>Sanctions</u> , subject to:
				General License     applicable to trust     services providers     enabling them to
				wind down such
				services by allowing for the continued
				provision of trust services to or for the
				benefit of designated

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
LOKSHIN, ALEXANDER MARKOVICH	Rosatom	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services, until the expiry of the license 90 days from the date of designation
LVOVA-BELOVA, MARIA ALEXEYEVNA	Presidential Commissioner for Children's Rights; GoR	SDN	Asset Freeze under Implementing Regulation (EU) 2023/571 (implementing Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
MAKAROV, IGOR	President and owner of ARETI International Group, a major investor in the oil and gas sector	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
MAKHMUDOV, ISKANDER KAKHRAMONOVICH	President of Ural Mining and Metallurgical Company (UMMC)	Not designated	Not designated	Asset freeze; travel ban; transport sanctions

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
INDIVIDUAL	RELATED ENTITY	U.S.	EU	Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated
				persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
MAKSIMOV, TIMUR	Aeroflot	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
MARKELOV, VITALIY ANATOLYEVICH	Gazprom	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
MARKOV, VLADIMIR KONSTANTINOVICH	Gazprom	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
MARTYNOV, VIKTOR GEORGIEVICH	Gazprom	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services, until the expiry of the license 90 days from the date of designation
MATVEEV, ALEKSEI ANATOLIEVICH	Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
MATVEEV, GEORGIY NIKOLAEVICH	Aeroflot	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
MELIKYAN, GENNADY GEORGIYEVICH	Sberbank	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of designated     persons, and the     processing of     payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
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 IGOREVICH	Founder of EuroChem Group	SDN	Asset freeze under Decision 2022/397 /	Asset freeze; travel ban

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
			Implementing Regulation 2022/396 (implementing Regulation 269/2014)	Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
MENSHIKOV, SERGEY NIKOLAEVICH	Gazprom	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
MIHALENKO, VYACHESLAV ALEXANDROVICH	Gazprom	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
MIHAYLOVA, ELENA VLADIMIROVNA	Gazprom	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
MIKHAILOVA, ELENA VLADIMIROVNA	Gazprom	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services, until the expiry of the license 90 days from the date of designation
MIKHEEV, ALEKSANDER ALEKSANDROVICH	CEO of Rosoboronexport	SDN	Asset freeze under Decision 2022/429 / Implementing Regulation 2022/427 (implementing Regulation 269/2014)	Asset freeze; travel ban; technical assistance related to aircraft; transport sanctions  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				expiry of the license 90 days from the date of designation
MILLER, ALEXEY BORISOVICH	Chair of the management committee and Deputy Chair of the board of directors of Gazprom	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
MISHUSTIN, MIKHAIL	Russian Prime Minister	SDN	Asset freeze under Decision 2022/331 / Regulation 2022/332 (amending Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
MORDASCHOV, ALEXEY ALEKSANDROVICH	Majority shareholder in steel company Severstal	SDN	Asset freeze under  Decision 2022/337 /  Implementing  Regulation 2022/336	Asset freeze; travel ban  Trust Services Sanctions, subject to:

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
			(implementing Regulation 269/2014)	General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of designated     persons, and the     processing of     payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
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)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
MURANOV, ALEKSANDER YURIEVICH	Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
NABIULLINA, ELVIRA SAKHIPZADOVNA	Governor, Central Bank of the Russian federation	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				payments in connection with such services, until the expiry of the license 90 days from the date of designation
NAZAROV, ALEKSANDR YURYEVICH	Rostec	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				90 days from the date of designation
NESTERENKO, TATYANA GENNADEVNA	Linked to Bank Otkritie	SDN	Not designated	Asset freeze; travel ban Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
NIKIPELOV, ANDREY VLADIMIROVICH	Rosatom	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
NOVAK, ALEKSANDR VALENTINOVICH	Rosatom	SDN	Not designated	Asset freeze; travel ban  Trust Services  Sanctions, subject to:

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of designated     persons, and the     processing of     payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
NOVIKOV, SERGEY	Rosatom	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
OBOZOV, SERGEY ALEXANDROVICH	Rosatom	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
ODEROV, PAVEL VALERIEVICH	Gazprom	Not designated	Not designated	Asset freeze; travel ban; transport sanctions
				Trust Services
				<u>Sanctions</u> , subject to:
				General License
				applicable to trust services providers
				enabling them to
				wind down such
				services by allowing for the continued
				provision of trust
				services to or for the
				benefit of designated
				persons, and the

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
OLENIN, YURI ALEXANDROVICH	Rosatom	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				expiry of the license 90 days from the date of designation
OSEEVSKY, MIKHAIL	President of Rostelecom	Not designated	Asset freeze under Decision 2022/397 / Implementing Regulation 2022/396 (implementing Regulation 269/2014)	Asset freeze; travel ban Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation.

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
OSIN, PAVEL MIKHAYLOVICH	Rostec	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
PAKHOMOV, ROMAN	Aeroflot	Not designated	Not designated	Asset freeze; travel ban  Trust Services  Sanctions, subject to:

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of designated     persons, and the     processing of     payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
PATRUSHEV, ANDREY	Former CEO of Gazprom Neft	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
PESKOV, DMITRIY SERGEEVICH	Kremlin Press Secretary	SDN	Asset freeze under  Decision 2022/337 /  Implementing  Regulation 2022/336  (implementing  Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
PESKOV, DMITRY NIKOLAEVICH	Aeroflot	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				payments in connection with such services, until the expiry of the license 90 days from the date of designation
PETROV, ANDREI YUVENALYEVICH	Rosatom	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				90 days from the date of designation
POLUBOYARINOV, MIKHAIL	CEO of Aeroflot	Not designated	Asset freeze under Decision 2022/397 / Implementing Regulation 2022/396 (implementing Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
POPOV, ALEKSANDR NIKOLAEVICH	Rostec / Rosatom	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
POPOV, ANATOLIY LEONIDOVICH	Sberbank	<u>SDN</u>	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of designated     persons, and the     processing of     payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
POPOVICH, ALEKSEI VALERIEVICH	Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
POTANIN, VLADIMIR OLEGOVICH	Shareholder of Norilsk Nickel and controller of Rosbank	SDN	Not designated	Asset freeze; travel ban; technical assistance related to aircraft; transport sanctions  Following Potanin's designation, General License permits the wind down of positions involving Rosbank PJSC until September 30, 2022

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
PRIGOZHIN, PAVEL EVGENYEVICH	Russian businessman, associated with Lakhta companies	SDN	Asset freeze under  Decision 2022/883 /  Implementing  Regulation 2022/878	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
			(implementing Regulation 269/2014	services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
PRIGOZHIN, YEVGENIY VIKTOROVICH <sup>†</sup>	Russian businessman, associated with following entities:  Internet Research Agency  Wagner Group  Concord Company Group	SDN	Asset freeze under  Decision 2020/1483 /  Implementing  Regulation 2020/1481  [Pre-2022, re. Libya]	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
	<ul> <li>Concord         Management and         Consulting LLC</li> <li>Megaline LLC</li> </ul>			for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
PRIGOZHINA, LYUBOV VALENTINOVNA	Wife of Yevgeniy Prigozhin; owner of Agat LLC (subsidiary of Concord Management & Consulting LLC)	SDN	Asset freeze under  Decision 2022/265 / Implementing Regulation 2022/260 (implementing Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
PRIGOZHINA, POLINA EVGENYEVNA	Daughter of Yevgeniy Prigozhin	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services, until the expiry of the license 90 days from the date of designation
PRIGOZHINA, VIOLETTA	Mother of Yevgeniy Prigozhin; owner of Concord Management & Consulting LLC	Not designated	Asset freeze under Decision 2022/265 / Implementing Regulation 2022/260 (implementing Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
PUCHKOV, ANDREY SERGEYEVICH	Executive of VTB Bank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
PUMPYANSKAYA, GALINA	Wife of Dmitry Pumpyansky	Not designated	Asset freeze under  Decision 2022/397 /  Implementing  Regulation 2022/396	Asset freeze; travel ban; transport sanctions

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
			(implementing Regulation 269/2014)	Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
PUMPYANSKY, ALEXANDER	Son of Dmitry Pumpyansky	Not designated	Asset freeze under <u>Decision 2022/397</u> / <u>Implementing</u> <u>Regulation 2022/396</u>	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
			(implementing Regulation 269/2014)	services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
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)	Asset freeze; travel ban; transport sanctions  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
PUTIN, MIKHAIL EVGENIEVICH	Deputy Chairman of SOGAZ Insurance and Gazprom; cousin of Vladimir Putin	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
PUTIN, VLADIMIR VLADIMIROVICH	President of the Russian Federation	SDN	Asset freeze under <u>Decision 2022/331</u> / <u>Regulation 2022/332</u> (amending <u>Regulation</u> <u>269/2014</u> )	Asset freeze [Note that Vladimir Putin's daughters, Katerina Tikhonova and Maria Vorontsova (below) are subject to asset freezes and travel bans]
				<u>Trust Services</u> <u>Sanctions</u> , subject to:
				General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
PUZYRNIKOVA, NATALYA VLADISLAVOVNA	Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
RAPOPORT, BORIS YAKOVLEVICH	Deputy Head of the Presidential Directorate for Supporting Activities of the State Council of the Russian Federation	SDN	Asset freeze under  Decision 2022/582 /  Implementing  Regulation 2022/581 (amending Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services, until the expiry of the license 90 days from the date of designation
RASHNIKOV, VIKTOR FILIPPOVICH	Owner and chair of the board of directors of Magnitogorsk Iron & Steel Works	SDN	Asset freeze under Decision 2022/429 / Implementing Regulation 2022/427 (implementing Regulation 269/2014)	Asset freeze; travel ban; technical assistance related to aircraft; transport sanctions  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				expiry of the license 90 days from the date of designation
REPIK, ALEXANDER EVGENYEVICH	Chairman of the Board of R-Pharm, one of Russia's largest pharmaceutical companies	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
RESHETNIKOV, MAXIM GENNADYEVICH	Minister of Economic Development and member of the supervisory council of VTB Bank	SDN	Asset freeze under Decision 2022/265 / Implementing Regulation 2022/260 (implementing Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
ROSSEEV, MIKHAIL NIKOLAEVICH	Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of designated     persons, and the     processing of     payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
ROTENBERG, ARKADY ROMANOVICH	Businessperson	SDN	Existing asset freeze under Regulation 2020/1267 (implementing Regulation 269/2014) [Pre-2022]	Asset freeze; travel ban; technical assistance related to aircraft; transport sanctions [Pre- 2022] Trust Services Sanctions, subject to:

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of designated     persons, and the     processing of     payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
ROTENBERG, BORIS ROMANOVICH	Board member and shareholder of SMP Bank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
ROTENBERG, IGOR ARKADYEVICH	Chair of the board of directors of National Telematic Systems	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
RUKSHA, VYASCHESLAV VLADIMIROVICH	Rosatom	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				payments in connection with such services, until the expiry of the license 90 days from the date of designation
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	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				90 days from the date of designation
RUSANOV, IGOR VALERIEVICH	Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
RUSANOV, SERGEY GEORGIEVICH	Bank Otkrite	SDN	Not designated	Asset freeze; travel ban

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
INDIVIDUAL	RELATED ENTITY	U.S.	EU	Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the
				benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
RYSKIN, VLADIMIR MARKOVICH	Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
SADYGOV, FAMIL KAMIL OGLY	Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
SECHIN, IGOR IVANOVICH	CEO of Rosneft	SDN	Asset freeze under Decision 2022/337 / Implementing Regulation 2022/336 (implementing Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
SECHINA, MARINA	Wife of Igor Sechin	Not designated	Asset freeze under Decision 2022/429 / Implementing Regulation 2022/427 (implementing Regulation 269/2014)	Asset freeze; travel ban; technical assistance related to aircraft; transport sanctions  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
SERDYUKOV, ANATOLY EDUARDOVICH	Rostec	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				expiry of the license 90 days from the date of designation
SERDYUKOV, VALERY PAVLOVICH	Gazprom	Not designated	Not designated	Asset freeze; travel ban; transport sanctions  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
SEREDA, MIKHAIL LEONIDOVICH	Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
SHADAYEV, MAKSUT IGOREVICH	Aeroflot	<u>SDN</u>	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of designated     persons, and the     processing of     payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
SHAMALOV, KIRILL NIKOLAEVICH	Deputy chair on the management board of PAO SIBUR Holding	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
SHAMALOV, YURII NIKOLAEVICH	Director of Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
SHARONOV, ANDREY VLADIMIROVICH	Sberbank	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				payments in connection with such services, until the expiry of the license 90 days from the date of designation
SHEVCHUK, STANISLAV	Russian Imperial Movement Leader	<u>SDN</u>	Not designated	Not designated
SHOIGU, SERGEI KUZHUGETOVICH	Russian Defense Minister	SDN	Asset freeze under  Decision 2022/265 /  Implementing  Regulation 2022/260 (implementing  Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services, until the expiry of the license 90 days from the date of designation
SHUVALOV, IGOR IVANOVICH	Chair of the management board of VEB	SDN	Asset freeze under Decision 2022/265 / Implementing Regulation 2022/260 (implementing Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
SIDORENKO, VALERIY VALERYEVICH	VTB Bank	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
SILUANOV, ANTON GERMANOVICH	Russian Finance Minister	SDN	Not designated	Not designated

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
SINELIN, MIKHAIL ANATOLYEVICH	Deputy chairman of the Bank for Development and Foreign Economic Activity	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
SKOCH, ANDREI VLADIMIROVICH	Member of the State Duma, USM Holdings	SDN	Asset freeze under Implementing Regulation (EU) 2022/1529	Asset freeze; travel ban  Trust Services Sanctions, subject to:

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
			(implementing Regulation (EU) 269/2014)	General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of designated     persons, and the     processing of     payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
SKOCH, VLADIMIR NIKITOVICH	Shareholder in USM Holdings	SDN	Not designated	Asset freeze; travel ban; transport sanctions; technical assistance related to aircraft  Trust Services Sanctions, subject to:

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of designated     persons, and the     processing of     payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
SLYUSAR, YURY BORISOVICH	Director general of United Aircraft Corporation	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
SMIRNOVA, NATALYA IVANOVA	Rostec	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
SOBOL, ALEXANDER IVANOVICH	Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				payments in connection with such services, until the expiry of the license 90 days from the date of designation
SOLOVIEV, YURIY ALEKSEYEVICH	First deputy president and chair of the management board of VTB Bank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				90 days from the date of designation
SOLTAEV, MANSUR MUSSAEVICH	Commissioner of Human Rights of the Chechen Republic	SDN	Asset freeze under Decision 2023/1218 / Implementing Regulation 2023/1216 (implementing Regulation 269/2014)	Not designated
SPASSKIY, NIKOLAI	Rosatom	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services, until the expiry of the license 90 days from the date of designation
STEPANOV, ALEKSANDR MIKHAILOVICH	Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
STOGNIENKO, SERGEY	Bank Otkritie	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
SUKHOV, GENNADY NIKOLAEVICH	Gazprom	Not designated	Not designated	Asset freeze; travel ban  Trust Services  Sanctions, subject to:

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of designated     persons, and the     processing of     payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
TENENBAUM, EUGENE	Controller of Ervington Investments Ltd	Not designated	Not designated	Asset freeze; transport sanctions;  Trust Services Sanctions, subject to:  General License applicable to trust services providers

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
TIKHONOVA, KATERINA VLADIMIROVNA	Daughter of President Vladimir Putin	SDN	Asset freeze under Decision 2022/582 / Implementing Regulation 2022/581 (amending Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
TIMCHENKO, GENNADY NIKOLAYEVICH	Major shareholder in Bank Rossiya	SDN	Asset freeze under Decision 2022/337 / Implementing Regulation 2022/336 (implementing Regulation 269/2014)	Asset freeze; travel ban; technical assistance related aircraft; transport sanctions  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
TITOV, BORIS YURYEVICH	Russia's Presidential Commissioner for Entrepreneurs' Rights and a prominent businessperson	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				payments in connection with such services, until the expiry of the license 90 days from the date of designation
TITOV, PAVEL BORISOVICH	Son of Boris Titov	Not designated	Not designated	Asset freeze
				Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				90 days from the date of designation
TOKAREV, NIKOLAY PETROVICH	CEO of Transneft	SDN	Asset freeze under Decision 2022/337 / Implementing Regulation 2022/336 (implementing Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
TOKAREVA, GALINA ALEKSEYEVNA	Wife and daughter of Nikolai Tokarev	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
TOKAREVA, MAIYA NIKOLAEVNA	Daughter of Nikolai Tokarev	SDN	Asset freeze under Implementing Regulation (EU)	Asset freeze; travel ban  Trust Services Sanctions, subject to:

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
			2023/571 (implementing Regulation 269/2014)	General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of designated     persons, and the     processing of     payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
TSAREV, KIRILL ALEKSANDROVICH	Sberbank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
TSIVELEVA, ANNA	Chair of Board of Directors of Kolmar Group	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
TSYB, SERGEY ANATOLYEVICH	Rostec	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated
				persons, and the processing of

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				payments in connection with such services, until the expiry of the license 90 days from the date of designation
TYURIN, VYACHESLAV ALEKSANDROVICH	Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				90 days from the date of designation
ULYUTINA, GALINA OLEGOVNA	Wife of Yuriy Soloviev	SDN	Not designated	Not designated
USMANOV, ALISHER BURHANOVICH	Businessperson and pro-Kremlin oligarch	SDN Private aircraft and superyacht designated as blocked property	Asset freeze under Decision 2022/337 / Implementing Regulation 2022/336 (implementing Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
VEDYAKHIN, ALEXANDER ALEKSANDROVICH	First deputy chair of the executive board of Sberbank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
VEKSELBERG, VIKTOR FELIKSOVICH	Owner of the Renova Group	SDN	Not designated	Asset freeze; travel ban; technical assistance related to aircraft; transport sanctions

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				<u>Trust Services</u> <u>Sanctions</u> , subject to:
				• General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
				Viktor Vekselberg's controlled companies,
				Renova Group, Liwet Holding AG and Tiwel
				Holding AG, are generally considered

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				sanctioned as a result of his control. However, there is no official statement that this would be the case for Sulzer AG, in which Viktor Vekselberg holds a large indirect minority stake
VINOKUROV, VLADIMIR NIKOLAEVICH	Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				connection with such services, until the expiry of the license 90 days from the date of designation
VINOKUROVA, YEKATERINA SERGEYEVNA	Daughter of Foreign Minister Sergei Lavrov	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				90 days from the date of designation
VOLOBUEV, NIKOLAI ANATOLEVICH	Rostec	SDN	Not designated	Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
VORONTSOVA, MARIA VLADIMIROVNA	Daughter of President Vladimir Putin	<u>SDN</u>	Asset freeze under  Decision 2022/582 /  Implementing	Asset freeze; travel ban

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
			Regulation 2022/581 (amending Regulation 269/2014)	Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
VYBORNYKH, MAKSIM VLADIMIROVICH	Rostec	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
WARNIG, MATTHIAS ARTUR	Rosneft; Transneft; Nord Stream 2 AG	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
YAKOVLEV, VADIM VLADISLAVOVICH	Gazprom	Not designated	Not designated	Asset freeze; travel ban; transport sanctions  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
YAKOVLEV, YURI VLADIMIROVICH	Rosatom	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				connection with such services, until the expiry of the license 90 days from the date of designation
YANKEVICH, ALEXEY VIKTOROVICH	Gazprom	Not designated	Not designated	Asset freeze; travel ban; transport sanctions  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				90 days from the date of designation
YANUKOVYCH, VIKTOR FEDOROVYCH	Oligarch and former president of Ukraine	SDN	Asset freeze under Decision 2022/337 / Implementing Regulation 2022/1354 (implementing Regulation 269/2014)	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
YARIN, ANDREI VENIAMINOVICH	Head of the Office of the President of Russia for Domestic Policy	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
YEMELYANOVA, SVETLANA PETROVNA	Bank Otkritie	Not designated	Not designated	Asset freeze; travel ban  Trust Services  Sanctions, subject to:

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				General License     applicable to trust     services providers     enabling them to     wind down such     services by allowing     for the continued     provision of trust     services to or for the     benefit of designated     persons, and the     processing of     payments in     connection with such     services, until the     expiry of the license     90 days from the     date of designation
ZADORNOV, MIKHAIL MIKHAYLOVICH	Linked to Bank Otkritie	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
ZALOMIKHINA, LARISA	Sberbank	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation
ZAUERS, DMITRII VLADIMIROVICH	Gazprombank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				payments in connection with such services, until the expiry of the license 90 days from the date of designation
ZAVIYALOV, IGOR NIKOLAEVICH	Rostec	SDN	Not designated	Asset freeze; travel ban
				Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license

RELATED ENTITY	U.S.	EU	U.K.
			90 days from the date of designation
Russian Imperial Movement Leader	SDN	Not designated	Not designated
Sberbank	SDN	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such
	Russian Imperial Movement Leader	Russian Imperial SDN Movement Leader	Russian Imperial SDN Not designated Movement Leader

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
				90 days from the date of designation
ZUBKOV, VIKTOR ALEXEEVICH	Gazprom	Not designated	Not designated	Asset freeze; travel ban  Trust Services Sanctions, subject to:  • General License applicable to trust services providers enabling them to wind down such services by allowing for the continued provision of trust services to or for the benefit of designated persons, and the processing of payments in connection with such services, until the expiry of the license 90 days from the date of designation

INDIVIDUAL	RELATED ENTITY	U.S.	EU	U.K.
VARIOUS	Members of Russian State Duma and Armed Forces	Various individuals, see OFAC press release for further details	Various individuals, asset freeze under Decision 2022/331 / Regulation 2022/332 and Decision 2022/267 / Regulation 2022/261 (amending Regulation 269/2014)	Various individuals, see U.K. consolidated financial sanctions targets 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 tables focus 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 the table of entities to provide broader information. However, the information in these tables 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 these tables 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 18 September 2023 client note "US, EU and UK Maintain Pressure Through Russia Sanctions".

[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 <u>Consolidated List</u>. 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 <u>European Commission FAQs</u> 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.

restrictions will apply to entities (meaning a body of persons corporate or unincorporated, or any organization 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. OFSI's Monetary Penalty and Enforcement Guidance confirms (amongst other things) that where a sanctions breach occurs based on an incorrect assessment of ownership and control, the conduct of appropriate prior due diligence may be a mitigating factor, where a reasonable conclusion on ownership and control was drawn in good faith. OFSI lists examples of due diligence which may qualify as potentially mitigating. Failure to conduct appropriate due diligence, or acting in bad faith, may be an aggravating factor in OFSI's determination of enforcement action. A composite list of OFSI general licenses that are currently in force can be found in the OFSI General Licenses Collection and expired general licenses 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 licenses in the table, but have discussed them in our 18 September 2023 client note, "US, EU and UK Maintain Pressure Through Russia Sanctions".

<sup>†</sup> Individual is now deceased. The applicability of sanctions to the estate of a deceased designated person would need to consider the effect of probate or intestacy rules in the relevant country.