{{date}}

**BY INTERNATIONAL COURIER**

H.E. Dimitry A. Medvedev

Prime Minister of the Russian Federation

Government of the Russian Federation Building

2 Krasnopresnenskaya Naberezhnaya

Moscow 103274

The Russian Federation

***{{investor}} (Investor)***

**v.**

***The Russian Federation (Disputing Party)***

Notice of Intent to Submit a Claim to Arbitration Under the Agreement between the Government of the Russian Federation and the Cabinet of Ministers of the Ukraine on the Encouragement and Mutual Protection of Investments of November 27, 1998

Prime Minister:

In accordance with Article 9(1) of the Agreement between the Government of the Russian Federation and the Cabinet of Ministers of the Ukraine on the Encouragement and Mutual Protection of Investments of November 27, 1998 (the “Treaty”), disputing investor, {{investor}}, hereby provides the Russian Federation with this written notice of intention to submit a claim to arbitration under Article 9(2) of the Treaty. This letter is being sent with copy to the President of the Russian Federation, the Minister of Justice of the Russian Federation, the Minister of Foreign Affairs of the Russian Federation, and Minister of Finance of the Russian Federation.

Investor had a substantial investment in the province of {{asset.address.province}}. On {{asset.date}}, Investor {{asset.ownership}} property in {{ asset.address }}, and total of {{ currency(asset.total\_investment, decimals=False, symbol='$')}} was invested in the property. The Russian Federation failed to protect the property while it was under its control, and a series of actions carried by the Russian Federation diminished the value of the property. {{ letter\_2}}

{{ use\_description }}

On February 24, 2022, the Russian Federation launched a major escalation of the ongoing Russo-Ukrainian War, which began in 2014, through an invasion of Ukraine. This action has resulted in tens of thousands of fatalities on both sides and caused the displacement of approximately 8 million Ukrainians within the country by May 2022 and the departure of approximately 7.8 million from the country by November 8, 2022. Prior to the invasion, in 2014, the Russian Federation announced the purported annexed Crimea and supported the seizure of part of the Donbas region of southeastern Ukraine, consisting of Luhansk and Donetsk oblasts, by Russian-backed paramilitaries, leading to a regional conflict (the “Purported Crimea Annexation”). In March 2021, the Russian Federation began a large military build-up along its border with Ukraine, eventually deploying up to 190,000 troops and their associated equipment. Despite these preparations, Russian officials denied any plans to invade or attack Ukraine until the day before the invasion took place. On February 21, 2022, the Russian Federation recognized the Donetsk People's Republic and the Luhansk People's Republic, two self-proclaimed, breakaway entities in the Donbas region. The following day, the Russian Federation Council authorized the use of military force, and Russian troops entered both territories.

On the morning of February 24, 2022, Russian President Vladimir Putin announced a “special military operation,” and Russian forces launched strikes and a large-scale ground invasion along multiple fronts, including a northern front from Belarus towards Kyiv, a northeastern front towards Kharkiv, a southern front from Crimea, and a southeastern front from Luhansk and Donetsk. Russian troops withdrew from the northern front by April. On the southern and southeastern fronts, the Russian Federation captured Kherson in March and Mariupol in May after a siege. In April, the Russian Federation launched a renewed attack on the Donbas region, and Russian forces continued to bomb both military and civilian targets, including infrastructure such as electrical and water systems, far from the front lines. In September 2022, the Russian Federation announced the purported annexation of four partially occupied oblasts: Luhansk, Donetsk, Kherson, and Zaporizhzhia.

{{events\_description}}

{{damages\_description}}

The Russian Federation’s failure to protect the property after gaining effective control over {{asset.address.province}}, and its actions thereafter that continuously interfere with Investor’s enjoyment of the property and diminished its value, constitute ongoing breaches of the Treaty, which include the following:

1. Effective expropriation of Investor’s property indirectly through measures tantamount to expropriation or nationalization without payment of “prompt, adequate and effective compensation,” as required by Article 5(1) of the Treaty;
2. Failure to afford Investor “complete and unconditional” protection of the property, as required by Article 2(2) of the Treaty;
3. Discrimination against Investor in favor of investors of the Russian Federation and third countries, in violation of Article 3(1) of the Treaty;
4. Failure to provide Investor and its investment with fair and equitable treatment, as required by Article 3(3) of the Agreement between the Government of Canada and the Government of the Union of Soviet Socialist Republics for the Promotion and Reciprocal Protections of Investments (20 November 1989) (the “Canada-USSR BIT”), a protection applicable to Investor by operation of Article 3(1) of the Treaty;
5. Failure to provide Investor with full protection and security” within the territory of the Russian Federation, as required by Article 3(1) of the Canada-USSR BIT, an obligation applicable to Investor pursuant to Article 3(1) of the Treaty;
6. Discrimination against Investor in favor of investors of the Russian Federation and third countries, in violation of Article 3(1) of the Treaty;
7. Impediment of the transfer of investment related funds to and from mainland Ukraine, in violation of Article 7 of the Treaty.

Investor hereby provides this formal written notice as required by Article 9(2) of the Ukraine-Russian Federation BIT. Investor is available to engage in negotiations with designated representatives of the Russian Federation to reach an amicable resolution of the disputes arising from these measures. If a settlement cannot be reached, Investor will be compelled to initiate arbitration against the Russian Federation in accordance with Article 9 of the Ukraine-Russian Federation BIT, and to seek compensation for the fair value of any businesses, assets, and operations that have been seized or had their value impaired.

Names and Addresses of Disputing Investor and Its Enterprises

The name and address of the disputing investor is:

{{investor}}

{{ client.address.block(international=True) }}

Relief Sought

The Investor is s hopeful that an amicable settlement to this dispute can be reached. If such a resolution is not forthcoming, it seeks damages for {{ total\_damages }}

Sincerely,

{{investor}}

Copy to: H.E. Vladimir V. Putin President of the Russian Federation

23 Ilyinka Ulitsa

Moscow 103132

The Russian Federation

H.E. Alexander V. Konovalov Minister of Justice of the Russian Federation

Ministry of Justice

Ulitsa Zhitnaya, Dom 14

GSP-1

Moscow 119049

The Russian Federation

H.E. Sergei V. Lavrov Minister of Foreign Affairs of the Russian Federation

Ministry of Foreign Affairs

Smolenskaya-Sennaya Pl., 32/34

Moscow 119200

The Russian Federation

H.E. Anton G. Siluanov Minister of Finance of the Russian Federation

Ministry of Finance

9 Ilyinka Ulitsa

Moscow 109097

The Russian Federation