

# Overview of current sanctions measures concerning Russian Federation

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*The information provided on the Interactive Sanctions Map and this document does not, and is not intended to, constitute legal advice; instead, all information, content, and materials available on this site are for general informational purposes only.*

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## 1. United Nations (UN) sanctions concerning Russian Federation

None

## 2. United States (US) sanctions concerning Russian Federation

### ARMS EMBARGO

Policy of denial for defense articles and defense services to

### ASSETS FREEZE

All property and interests in property that are in the United States, that hereafter come within the United States, or that are or hereafter come within the possession or control of any United States person of the listed persons are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt in.

### FINANCIAL RESTRICTIONS

- Ban on the exportation, reexportation, sale, or supply, directly or indirectly, from the United States, or by a United States person, wherever located, of U.S. dollar-denominated banknotes to the Government of the Russian Federation or any person located in the Russian Federation.
- Ban on new investment in the Russian Federation by a United States person, wherever located.

- Ban on any approval, financing, facilitation, or guarantee by a United States person, wherever located, of a transaction by a foreign person where the transaction by that foreign person would be prohibited if performed by a United States person or within the United States.
- Prohibition on the participation in the primary market for ruble or non-ruble denominated bonds issued after June 14, 2021 by the Central Bank of the Russian Federation, the National Wealth Fund of the Russian Federation, or the Ministry of Finance of the Russian Federation; and lending ruble or non-ruble denominated funds to the Central Bank of the Russian Federation, the National Wealth Fund of the Russian Federation, or the Ministry of Finance of the Russian Federation.
- Prohibition on the participation in the secondary market for ruble or non-ruble denominated bonds issued after March 1, 2022 by the Central Bank of the Russian Federation, the National Wealth Fund of the Russian Federation, or the Ministry of Finance of the Russian Federation.
- Prohibition on the opening or maintaining of a correspondent account or payable-through account for or on behalf of foreign financial institutions determined to be subject to the prohibitions of this Directive, or their property or interests in property; and the processing of a transaction involving foreign financial institutions determined to be subject to the prohibitions of this Directive, or their property or interests in property.
- Ban on the provision of financing for, and other dealings in new debt of longer than 14 days maturity or new equity to listed entities.
- Ban on any transaction involving the Central Bank of the Russian Federation, the National Wealth Fund of the Russian Federation, or the Ministry of Finance of the Russian Federation, including any transfer of assets to such entities or any foreign exchange transaction for or on behalf of such entities.
- Ban on new investment in the Crimea region of Ukraine by a United States person, wherever located.
- Ban on new investment in the so-called DNR or LNR regions of Ukraine.

**A U.S. financial institution shall not:**

- Open or maintain a correspondent account or a payable-through account in the United States for a foreign financial institution for which the opening or maintaining of such an account is prohibited pursuant to this section; or
- Maintain a correspondent account or a payable-through account in the United States for a foreign financial institution in a manner that is inconsistent with any strict condition imposed and in effect pursuant to this section.
- Restrictions on transactions with Russia's Central Bank, limiting its ability to draw on dollar-denominated foreign reserves, and transactions with Russia's Ministry of Finance and National Wealth Fund.
- Restrictions on secondary-market transactions by U.S. financial institutions in Russian sovereign debt (previous restrictions applied to primary-market transactions).

- Restrictions against new equity investment and financing for companies including:  
Gazprom, a state-owned energy company and Russia's largest firm;
- Sovcomflot, Russia's largest maritime and freight shipping firm; and
- Russian Railways.

Selected Russian banks removed from the SWIFT messaging system.

Sberbank and 25 foreign subsidiaries are subject to correspondent and payable-through account sanctions.

A ban on dealing in new debt of over 14 days maturity and new equity of strategic entities: Sberbank, AlfaBank, Credit Bank of Moscow, Gazprombank, Russian Agricultural Bank, Gazprom, Gazprom Neft, Transneft, Rostelecom, RusHydro, Alrosa, Sovcomflot, and Russian Railways.

The EU has introduced a new listing criterion, which will allow it to sanction persons who facilitate the circumvention of sanctions. This includes circumvention by EU citizens.

## **SECTORAL SANCTIONS**

- Sectoral sanctions apply to specific entities in Russia's financial, energy, and defense sectors. U.S. persons are restricted from engaging in specific transactions with these designated entities.
- Restrictions applied to new equity investment and financing for entities in Russia's financial sector;
- and new financing for identified entities in Russia's energy and defense sectors.
- Sectoral sanctions also prohibit U.S. trade related to the development of Russian deep-water, Arctic offshore, or shale projects that have the potential to produce oil and, as amended by CRIIEA, such projects worldwide in which those entities have an ownership interest of at least 33% or a majority of voting interests.
- The entities are listed under OFAC's Sectoral Sanctions Identifications List (SSI List).

## **TRANSPORT RESTRICTIONS**

- The unrestricted immigrant and nonimmigrant entry into the United States of designated noncitizens would be detrimental to the interests of the United States, and the entry of such persons into the United States, as immigrants or nonimmigrants, is hereby suspended.
- Ban on Russian aircraft entering and using U.S. airspace.
- Ban on Russian-affiliated vessels entering U.S. ports.

## **IMPORT RESTRICTIONS**

Ban on the importation into the United States of the following products of Russian Federation origin:

- crude oil;
- petroleum;

- petroleum fuels, oils, and products of their distillation;
- liquefied natural gas;
- coal;
- and coal products;
- fish, seafood, and preparations thereof;
- alcoholic beverages;
- non-industrial diamonds;
- diamonds
- gold

and any other products of Russian Federation origin as may be determined by the Secretary of the Treasury, in consultation with the Secretary of State and the Secretary of Commerce. Ban on the importation into the United States, directly or indirectly, of any goods, services, or technology from the Crimea region of Ukraine;

Ban on the importation into the United States, directly or indirectly, of any goods, services, or technology from the the so-called DNR or LNR regions of Ukraine. Ban on the importation into the United States of aluminum, copper, and nickel of Russian Federation origin produced on or after April 13, 2024 (the “metals”). Ban on the exportation, reexportation, sale, or supply to any person located in the Russian Federation of warranting services for the metals produced on or after April 13, 2024 on a global metal exchange and services to acquire the metals produced on or after April 13, 2024 as part of the physical settlement of a derivative contract.

## EXPORT RESTRICTIONS

- Ban on the exportation, reexportation, sale, or supply, directly or indirectly, from the United States, or by a United States person, wherever located, of luxury goods and dollar-denominated banknotes to any person located in the Russian Federation.
- Ban on the exportation, reexportation, sale, or supply, directly or indirectly, from the United States, or by a United States person, wherever located, of any category of services.
- Ban on the exportation, reexportation, sale, or supply, directly or indirectly, from the United States, or by a United States person, wherever located, of any goods, services, or technology to the Crimea region of Ukraine.
- Ban on the exportation, reexportation, sale, or supply, directly or indirectly, from the United States, or by a United States person, wherever located, of any goods, services, or technology to the so-called DNR or LNR regions of Ukraine.
- Prohibition on accounting, trust and corporate formation and management consulting services

## EXPORT CONTROLS

- Export controls on trade with Russia and Belarus, including restrictions on “sensitive U.S. technologies produced in foreign countries using U.S.-origin software, technology, or equipment” and oil and gas extraction equipment.

- New export licensing requirements for items not previously controlled for Russia (listed in Categories 3-9 of the Commerce Control List; expanding US scrutiny of transactions to almost any sensitive dual-use technology, software, or commodities that could be used to support Russia's war effort, and a policy of denial of all export licences to Russia, with some exceptions (e.g. humanitarian).
- Expansion of controls on foreign-made (non-US) direct products of US technology for military end-use and users in Russia.
- A ban on all supply of ECCN 5A002 or 5D002 encryption products and software to Russia and Belarus. License exception ENC is no longer available for those items except for exports to US or close-ally-country companies' operations. This ban includes software updates, upgrades, patches, and other technical support relating to that software. A Consumer Communications Devices (CCD) license exception applies to mass market products under ECCN 5A992 or 5D992.
- Russian military end users in the technology, research, defense, marine and aerospace industries, have been added to the Entity List are subject to a comprehensive export ban.

Source:

<https://ofac.treasury.gov/sanctions-programs-and-country-information/russian-harmful-foreign-activities-sanctions> &  
<https://ofac.treasury.gov/sanctions-programs-and-country-information/ukraine-russia-related-sanctions>

### 3. European Union (EU) sanctions concerning Russian Federation

#### EXPORT RESTRICTIONS

- Prohibition to sell, supply, transfer or export, dual-use goods and technology, including technical assistance, brokering services, financing or financial assistance or other related services, as well as sell, license or transfer in any other way intellectual property rights or trade secrets as well as grant rights to access or re-use any material or information protected by means of intellectual property rights or constituting trade secrets and to the provision, manufacture, maintenance and use [“, including Related Services, Licenses, Intellectual Property Rights, etc.”].
- Prohibition to sell, supply, transfer or export, goods and technology which might contribute to Russia's military and technological enhancement, or the development of the defence and security sector, including Related Services, Licenses, Intellectual Property Rights, etc.
- Prohibition to sell, supply, transfer or export, firearms, their parts and essential components and ammunition and firearms and other arms, including Related Services, Licenses, Intellectual Property Rights, etc.

- Prohibition to sell, supply, transfer or export, specific goods or technology, including Related Services, Licenses, Intellectual Property Rights, etc.
- Prohibition to sell, supply, transfer, or export, goods and technology suited for use in oil refining and liquefaction of natural gas, including Related Services, Licenses, Intellectual Property Rights, etc.
- Prohibition to sell, supply, transfer or export, goods and technology suited for use in aviation or the space industry, and jet fuel and fuel additives, including Related Services, Licenses, Intellectual Property Rights, etc.
- Prohibition to sell, supply, transfer or export, maritime navigation goods and technology, including Related Services, Licenses, Intellectual Property Rights, etc.
- Prohibition to sell, supply, transfer or export, luxury goods, including Related Services, Licenses, Intellectual Property Rights, etc.
- Prohibition to sell, supply, transfer or export, goods which could contribute in particular to the enhancement of Russian industrial capacities, including Related Services, Licenses, Intellectual Property Rights, etc.
- Prohibition on the transit via the territory of Russia of the goods and technology which could contribute in particular to the enhancement of Russian industrial capacities, exported from the Union, including Related Services, Licenses, Intellectual Property Rights, etc.
- Prohibition to sell, supply, transfer or export banknotes denominated in any official currency of a Member State.
- Prohibition to sell, supply, transfer or export, specified [sensitive dual-use goods and technology, or goods and technology that might contribute to the enhancement of Russia's military, technological or industrial capacities or to the development of Russia's defence and security sector, in a way that strengthens its ability to wage war, and whose export to Russia is prohibited and that present a high and continuous risk of being sold, supplied, transferred or exported from third countries to Russia after being sold, supplied, transferred or exported from the Union. It will be specified, for each item of listed goods or technology, the third countries to which the sale, supply, transfer or export is prohibited. Only third countries will be included that have been identified by the Council as having systematically and persistently failed to prevent the sale, supply, transfer or export to Russia of goods and technology exported from the Union, despite the Union's prior outreach and assistance to the country in question.] goods and technology to any natural or legal person, entity or body in the third country specified, including technical assistance, brokering services, financing or financial assistance and other related services, as well as sell, license or transfer in any other way intellectual property rights or trade secrets as well as grant rights to access or re-use any material or information protected by means of intellectual property rights or constituting trade secrets related to the goods and technology and to the provision, manufacture, maintenance and use to any natural or legal person, entity or body in the third country specified.

## IMPORT RESTRICTIONS

- Prohibition to import, iron and steel products into the, including technical assistance, brokering services, financing or financial assistance, including financial derivatives, as well as insurance and related re-insurance [“, including Related Services.”].
- Prohibition to purchase, iron and steel products which are located or which originated in Russia, including Related Services.
- Prohibition to transport iron and steel products from Russia to any other country, including Related Services.
- Prohibition to import or purchase iron and steel products when processed in a third country incorporating iron and steel products originating in Russia. For the purpose of the application of this point, at the moment of importation, importers shall provide evidence of the country of origin of the iron and steel inputs used for the processing of the product in a third country unless the product is imported from a partner country for importation of iron and steel, including Related Services.
- Prohibition to purchase, import, or transfer, goods which generate significant revenues for Russia thereby enabling its actions destabilising the situation in Ukraine into the Union, including, including Related Services.
- Prohibition to purchase, import or transfer, crude oil or petroleum products, including Related Services.
- Prohibition to purchase, import, or transfer, gold into the Union or to any third country after 22 July 2022, including Related Services.
- Prohibition to purchase, import, or transfer specific products when processed in a third country incorporating the gold originating or exported from Russia, including Related Services.
- Prohibition to purchase, import, or transfer, specific gold [Articles of jewelry/goldsmiths’ wares/silversmiths’ wares and parts thereof] into the Union after 22 July 2022, including Related Services.
- Prohibition to purchase, import, or transfer, diamonds and products incorporating diamonds into the Union or to any third country, including Related Services.
- Prohibition to purchase, import, or transfer, diamonds and products incorporating diamonds of any origin, if they transited via the territory of Russia, including Related Services.
- Prohibition to purchase, import, or transfer, specific products [unsorted diamonds/non-industrial diamonds] when processed in a third country, consisting of diamonds originating in Russia or exported from Russia with a weight equal to or above 1.0 carats per diamond, including Related Services.
- Prohibition, as of 1 September 2024, to purchase, import, or transfer, specific products [unsorted diamonds/non-industrial diamonds/synthetic diamonds/articles or jewellery/goldsmiths’ wares/silversmith’s wares/other articles of precious metal/articles of natural or cultural pearls/wristwatches/pocketwatches/other watches] when processed in a third country, consisting of or incorporating diamonds originating in Russia or exported from Russia with a weight equal to or above 0.5 carats or 0.1 grams per diamond, including Related Services.



## TRANSPORT RESTRICTIONS

- Prohibition on the transit via the territory of Russia of the dual-use goods and technology, including Related Services.
- Prohibition on the transit via the territory of Russia of goods and technology which might contribute to Russia's military and technological enhancement or to the development of its defence and security sector, exported from the Union, including Related Services.
- Prohibition on the transit via the territory of Russia of firearms, their parts and essential components and ammunition exported from the Union, including Related Services.
- Prohibition on the transit via the territory of Russia of goods and technology suited for use in aviation or the space industry, and of jet fuel and fuel additives, exported from the Union, including Related Services.
- Prohibition for any road transport undertaking established in Russia to transport goods by road within the territory of the Union, including in transit. This shall apply to the transport of goods within the territory of the Union by road transport undertakings, carried out by means of trailers or semi-trailers registered in Russia, including if those trailers or semi-trailers are hauled by trucks registered in other countries.

## FINANCIAL RESTRICTIONS

- Prohibition to provide public financing or financial assistance for trade with, or investment in, Russia.
- Prohibition to invest, participate or otherwise contribute to projects co-financed by the Russian Direct Investment Fund.
- Prohibition to acquire any new or extend any existing participation in any legal person, entity or body incorporated or constituted under the law of Russia or any other third country and operating in the energy or the mining and quarrying sector in Russia, including investment services.
- Prohibition to grant or be part of any arrangement to grant any new loan or credit or otherwise provide financing, including equity capital, to any legal person, entity or body incorporated or constituted under the law of Russia or any other third country and operating in the energy or the mining and quarrying sector in Russia, or for the documented purpose of financing such a legal person, entity or body, including investment services.
- Prohibition to create any new joint venture with any legal person, entity or body incorporated or constituted under the law of Russia or any other third country and operating in the energy or the mining and quarrying sector in Russia, including investment services.
- Prohibition to purchase, sell, provide investment services for or assistance in the issuance of, or otherwise deal with transferable securities and money-market instruments with a maturity exceeding 90 days, issued after 1 August 2014 to 12 September 2014, or with a maturity exceeding 30 days, issued after 12 September 2014 to 12 April 2022 or any transferable securities and money market instruments issued after 12 April 2022 by: (a) a major credit institution, or other major institution having an explicit mandate to promote competitiveness of



the Russian economy, its diversification and encouragement of investment, established in Russia with over 50 % public ownership or control as of 1 August 2014, as listed; or (b) a legal person, entity or body established outside the Union whose proprietary rights are owned for more than 50 % by a listed entity; or (c) a legal person, entity or body acting on behalf or at the direction of an entity referred to in point (b) or listed entity.

- Prohibition to purchase, sell, provide investment services for or assistance in the issuance of, or otherwise deal with transferable securities and money-market instruments issued after 12 April 2022 by: (a) any major credit institution, or other institution with over 50 % public ownership or control as of 26 February 2022 or any other credit institution having a significant role in supporting the activities of Russia, its government or the Central Bank and established in Russia; or (b) a legal person, entity or body established outside the Union whose proprietary rights are owned for more than 50 % by a listed entity; or (c) a legal person, entity or body acting on behalf or at the direction of an entity referred to in point (a) or (b).
- Prohibition to purchase, sell, provide investment services for or assistance in the issuance of, or otherwise deal with transferable securities and money-market instruments with a maturity exceeding 30 days, issued after 12 September 2014 to 12 April 2022 or any transferable securities and money market instruments issued after 12 April 2022 by: (a) a legal person, entity or body established in Russia predominantly engaged, and with major activities, in the conception, production, sales or export of military equipment or services except legal persons, entities or bodies active in the space or the nuclear energy sectors; (b) a legal person, entity or body established in Russia, which is publicly controlled or with over 50 % public ownership and having estimated total assets of over RUB 1 trillion and whose estimated revenues originate for at least 50 % from the sale or transportation of crude oil or petroleum products; (c) a legal person, entity or body established outside the Union whose proprietary rights are owned for more than 50 % by an entity listed in point (a) or (b); or (d) a legal person, entity or body acting on behalf or at the direction of an entity referred to in point (a), (b) or (c).
- Prohibition to purchase, sell, provide investment services for or assistance in the issuance of, or otherwise deal with transferable securities and money-market instruments, issued after 12 April 2022 by: (a) a legal person, entity or body established in Russia, which is publicly controlled or with over 50 % public ownership and in which Russia, its Government or Central Bank has the right to participate in profits or with which Russia, its Government or Central Bank has other substantial economic relationships; or (b) a legal person, entity or body established outside the Union whose proprietary rights are owned for more than 50 % by a listed entity; or (c) a legal person, entity or body acting on behalf or at the direction of an entity referred to in point (a) or (b).
- Prohibition to list and provide services for and to admit to trading on trading venues registered or recognised in the Union, the transferable securities of any legal person, entity or body established in Russia and with over 50 % public ownership.
- Prohibition to make or be part of any arrangement to make: (i) new loans or credit with a maturity exceeding 30 days to specific legal persons, entities or, after 12 September 2014 to 26

February 2022; or (ii) any new loans or credit to specific legal persons, entities or bodies after 26 February 2022.

- Prohibition to purchase, sell, provide investment services for or assistance in the issuance of, or otherwise deal with transferable securities and money-market instruments issued after 9 March 2022 by: (a) Russia and its government; or (b) the Central Bank of Russia; or (c) a legal person, entity or body acting on behalf or at the direction of the entity referred to in point (b).
- Prohibition to make or be part of any arrangement to make any new loans or credit to: (a) Russia and its government; or (b) the Central Bank of Russia; or (c) a legal person, entity or body acting on behalf or at the direction of the entity referred to in point (b), after 23 February 2022.
- Prohibition to accept any deposits from Russian nationals or natural persons residing in Russia, legal persons, entities or bodies established in Russia or a legal person, entity or body established outside the Union and whose proprietary rights are owned for more than 50 % by Russian nationals or natural persons residing in Russia, if the total value of deposits of that natural or legal person, entity or body per credit institution exceeds EUR 100 000.
- Prohibition to provide crypto-asset wallet, account or custody services to Russian nationals or natural persons residing in Russia, or legal persons, entities or bodies established in Russia.
- Prohibition to allow Russian nationals or natural persons residing in Russia to own or control, or to hold any posts in the governing bodies of, a legal person, entity or body which is incorporated or constituted under the law of a Member State and is providing crypto-asset wallet, account or custody services.
- Prohibition for Union central securities depositories to provide any services as defined in the Annex of Regulation (EU) No 909/2014 for transferable securities issued after 12 April 2022 to any Russian national or natural person residing in Russia or any legal person, entity or body established in Russia.
- Prohibition to sell transferable securities denominated in any official currency of a Member State issued after 12 April 2022, or denominated in any other currency issued after 6 August 2023, or units in collective investment undertakings providing exposure to such securities, to any Russian national or natural person residing in Russia or any legal person, entity or body established in Russia.

## COMMUNICATION RESTRICTIONS

- Prohibition for operators to broadcast or to enable, facilitate or otherwise contribute to broadcast, any content by specific legal persons, entities or bodies, including through transmission or distribution by any means such as cable, satellite, IP-TV, internet service providers, internet video-sharing platforms or applications, whether new or pre-installed.
- Any broadcasting licence or authorisation, transmission and distribution arrangement with specific legal persons, entities or bodies shall be suspended.
- Prohibition to advertise products or services in any content produced or broadcast by specific legal persons, entities or bodies, including through transmission or distribution by any of the means as mentioned above.

## SERVICES RESTRICTIONS

- Prohibition to provide insurance and reinsurance, in relation to goods and technology suited for use in aviation or the space industry to any person, entity or body in Russia or for use in Russia.
- Prohibition to provide any one or any combination of the following activities: overhaul, repair, inspection, replacement, modification or defect rectification of an aircraft or component, with the exception of pre-flight inspection, in relation to the goods and technology suited for use in aviation or the space industry,.
- Prohibition to provide, technical assistance, brokering services or financing or financial assistance, related to the trading, brokering or transport, including through ship-to-ship transfers, to third countries of crude oil or petroleum products which originate in Russia or which have been exported from Russia.
- Prohibition to trade, broker or transport, including through ship-to-ship transfers, to third countries, crude oil falling under CN code 2709 00 or petroleum products falling under CN code 2710 which originate in Russia or which have been exported from Russia.
- Prohibition to provide, technical assistance and brokering services related to the goods and technology listed in the Common Military List, or related to the provision, manufacture, maintenance and use of goods included in that list,.
- Prohibition to provide, financing or financial assistance related to the goods and technology listed in the Common Military List, including in particular grants, loans and export credit insurance or guarantee, as well as insurance and reinsurance for any sale, supply, transfer or export of such items, or for any provision of related technical assistance,.
- Prohibition to provide specialised financial messaging services, which are used to exchange financial data, to listed legal persons, entities or bodies or to any legal person, entity or body established in Russia whose proprietary rights are owned for more than 50 % by a listed entity.
- Prohibition to provide credit rating services to or on any Russian national or natural person residing in Russia or any legal person, entity or body established in Russia.
- Prohibition to provide access to any subscription services in relation to credit rating activities to any Russian national or natural person residing in Russia or any legal person, entity or body established in Russia.
- Prohibition to provide direct or indirect support, including financing and financial assistance or any other benefit under a Union, Euratom or Member State national programme and contracts within the meaning of Regulation (EU, Euratom) 2018/1046, to any legal person, entity or body established in Russia with over 50 % public ownership or public control.
- Prohibition to register, provide a registered office, business or administrative address as well as management services to, a trust or any similar legal arrangement having as a trustor or a beneficiary: (a) Russian nationals or natural persons residing in Russia; (b) legal persons, entities or bodies established in Russia; (c) legal persons, entities or bodies whose proprietary rights are owned for more than 50 % by a natural or legal person, entity or body referred to in points (a) or (b); (d) legal persons, entities or bodies controlled by a natural or legal person, entity or body referred to in points (a), (b) or (c); (e) a natural or legal person, entity or body acting on behalf

or at the direction of a natural or legal person, entity or body referred to in points (a), (b), (c) or (d).

- Prohibition to act as, or arrange for another person to act as, a trustee, nominee shareholder, director, secretary or a similar position, for a trust or similar legal arrangement having as a trustor or a beneficiary: (a) Russian nationals or natural persons residing in Russia; (b) legal persons, entities or bodies established in Russia; (c) legal persons, entities or bodies whose proprietary rights are owned for more than 50 % by a natural or legal person, entity or body referred to in points (a) or (b); (d) legal persons, entities or bodies controlled by a natural or legal person, entity or body referred to in points (a), (b) or (c); (e) a natural or legal person, entity or body acting on behalf or at the direction of a natural or legal person, entity or body referred to in points (a), (b), (c) or (d).
- Prohibition to provide, accounting, auditing, including statutory audit, bookkeeping or tax consulting services, or business and management consulting or public relations services, architectural and engineering services, legal advisory services and IT consultancy services, market research and public opinion polling services, technical testing and analysis services and advertising services to: (a) the Government of Russia; or (b) legal persons, entities or bodies established in Russia, including technical assistance, brokering services, provide financing or financial assistance and other related services.
- Prohibition to sell, supply, transfer, export, or provide, software for the management of enterprises and software for industrial design and manufacture to: (a) the Government of Russia; or (b) legal persons, entities or bodies established in Russia, including technical assistance, brokering services, provide financing or financial assistance and other related services.

## AVIATION RESTRICTIONS

- Prohibition for any aircraft operated by Russian air carriers, including as a marketing carrier in code-sharing or blocked-space arrangements, or for any Russian registered aircraft, or for any non-Russian-registered aircraft which is owned or chartered, or otherwise controlled by any Russian natural or legal person, entity or body, to land in, take off from or overfly the territory of the Union.
- The Network Manager for air traffic management network functions of the single European sky shall support the Commission and the Member States in ensuring the implementation of, and compliance with, Article 3d. The Network Manager shall, in particular, reject all flight plans filed by aircraft operators indicating an intent to carry out activities over the territory of the Union that constitute a violation of this Regulation, such that the pilot is not permitted to fly.

## SHIPPING RESTRICTIONS

- Prohibition to provide access to ports and to locks in the territory of the Union, to any vessel registered under the flag of Russia, with the exception of access to locks for the purpose of leaving the territory of the Union. This also applies to any vessel certified by the Russian

Maritime Register of Shipping and to vessels that have changed their Russian flag or their registration, to the flag or register of any other State after 24 February 2022.

- Prohibition to provide access to ports and locks in the territory of the Union, by any vessel performing ship-to-ship transfers, at any point of the voyage to a Member State's ports or locks, if the competent authority has reasonable cause to suspect that the vessel is in breach of the prohibitions
- Prohibition to provide access to ports and locks in the territory of the Union by any vessel which the competent authority has reasonable cause to suspect of illegally interfering with, switching off or otherwise disabling its shipborne automatic identification system at any point of the voyage to a Member State's ports or locks, in breach of SOLAS Regulation V/19, point 2.4, when transporting crude oil or petroleum products subject to the prohibitions
- Prohibition for any national of a Member State, natural person residing in a Member State, and legal person, entity or body which is established in the Union to sell, or otherwise transfer ownership, of tankers for the transport of crude oil or petroleum products, falling under HS code ex 8901 20 .
- Any sale or other arrangement entailing a transfer of ownership by a national of a Member State, a natural person residing in a Member State, and a legal person, entity or body which is established in the Union to any third country of tankers for the transport of crude oil or petroleum products, falling under HS code ex 8901 20 , with the exception of a prohibited sale or other prohibited transfer of ownership, shall be notified immediately to the competent authorities of the Member State where the owner of the tanker is a citizen, a resident or is established

## OTHER RESTRICTIONS

- Prohibition to engage in any transaction with: (a) a legal person, entity or body established in Russia, which is publically controlled or with over 50 % public ownership or in which Russia, its Government or Central Bank has the right to participate in profits or with which Russia, its Government or Central Bank has other substantial economic relationship; (b) a legal person, entity or body established outside the Union whose proprietary rights are owned for more than 50 % by a listed entity; or (c) a legal person, entity or body acting on behalf or at the direction of an entity referred to in point (a) or (b).
- Prohibition to hold any posts in the governing bodies of: : (a) a legal person, entity or body established in Russia, which is publically controlled or with over 50 % public ownership or in which Russia, its Government or Central Bank has the right to participate in profits or with which Russia, its Government or Central Bank has other substantial economic relationship; (b) a legal person, entity or body established outside the Union whose proprietary rights are owned for more than 50 % by a listed entity; or (c) a legal person, entity or body acting on behalf or at the direction of an entity referred to in point (a) or (b).
- Prohibition to hold any posts in the governing bodies of: (a) a legal person, entity or body established in Russia, which is publicly controlled or with over 50 % public ownership, or in

which Russia, its Government or Central Bank has the right to participate in profits or with which Russia, its Government or Central Bank has other substantial economic relationship; (b) a legal person, entity or body

established in Russia whose proprietary rights are owned for more than 50 % by an entity referred to in point (a) of this paragraph; or (c) a legal person, entity or body established in Russia and acting on behalf or at the direction of an entity referred to in point (a) or (b).

- Prohibition to award or continue the execution of any public or concession contract.
- Prohibition to allow Russian nationals or natural persons residing in Russia to hold any posts in the governing bodies of the owners or operators of critical infrastructures, European critical infrastructures and critical entities.
- Prohibition to provide storage capacity as defined in Article 2(1), point 28 of Regulation (EC) No 715/2009 of the European Parliament and of the Council in a storage facility as defined in Article 2, point 9 of Directive 2009/73/EC of the European Parliament and of the Council, except for the part of liquefied natural gas facilities used for storage, to: (a) a Russian national, a natural person residing in Russia, or a legal person, entity or body established in Russia; (b) a legal person, entity or body whose proprietary rights are owned for more than 50 % by a legal person, entity or body referred to in point (a) of this paragraph; or (c) a natural or legal person, entity or body acting on behalf or at the direction of a legal person, entity or body referred to in point (a) or (b).

## MISCELLANEOUS

- Credit institutions shall: (a) supply to the national competent authority of the Member State where they are located or to the Commission by no later than 27 May 2022, a list of deposits exceeding 100 000 EUR held by Russian nationals or natural persons residing in Russia, or by legal persons, entities or bodies established in Russia. They shall provide updates regarding the amounts of such deposits every 12 months; (aa) supply to the national competent authority of the Member State where they are located or to the Commission by no later than 27 May 2023 a list of deposits exceeding 100 000 EUR held by a legal person, entity or body established outside the Union and whose proprietary rights are owned for more than 50 % by Russian nationals or natural persons residing in Russia. They shall provide updates regarding the amounts of such deposits every 12 months; (b) supply to the national competent authority of the Member State where they are located information on deposits exceeding EUR 100 000 held by Russian nationals or natural persons residing in Russia who have acquired the citizenship of a Member State or residence rights in a Member State through an investor citizenship scheme or an investor residence scheme.
- Legal persons, entities and bodies established in the Union whose proprietary rights are owned for more than 40 % by: (a) a legal person, entity or body established in Russia; (b) a Russian national; or (c) a natural person residing in Russia, shall, as of 1 May 2024, report to the competent authority of the Member State where they are established, within two weeks of the end of each quarter, any transfer of funds exceeding 100 000 EUR out of the Union that they made during that quarter, in one or several operations.



- When selling, supplying, transferring or exporting to a third country, with the exception of listed partner countries, specific goods or technology, common high priority items, or firearms and ammunition as listed in Annex I to Regulation (EU) No 258/2012, exporters shall contractually prohibit re-exportation to Russia and re-exportation for use in Russia.

### **CIRCUMVENTION & FACILITATION**

Prohibition to participate, knowingly or intentionally, in activities the object or effect of which is to circumvent the prohibitions.

### **CLAIMS**

No claims in connection with any contract or transaction the performance of which has been affected, in whole or in part, by the measures imposed, including claims for indemnity or any other claim of this type, such as a claim for compensation or a claim under a guarantee, notably a claim for extension or payment of a bond, guarantee or indemnity, particularly a financial guarantee or financial indemnity, of whatever form, shall be satisfied, if they are made by: (a) legal persons, entities or bodies listed in the Annexes to this Regulation or legal persons, entities or bodies established outside the Union whose proprietary rights are owned for more than 50 % by them; (b) any other Russian person, entity or body; (c) any person, entity or body acting through or on behalf of one of the persons, entities or bodies referred to in points (a) or (b).

SOURCE:

<https://www.sanctionsmap.eu/#/main/details/26/?search=%7B%22value%22:%22%22,%22searchType%22:%7B%7D%7D>

## **4. United Kingdom (UK) sanctions concerning Russian Federation**

The Russia (Sanctions) (EU Exit) Regulations 2019 are intended to ensure that certain sanctions relating to Russia continue to operate effectively.

### **PROHIBITIONS ON FINANCE**

Asset freeze in relation to designated persons

- Prohibition to make funds available to, or for the benefit of, designated persons
- Prohibition to make economic resources available to, or for the benefit of, designated persons
- Prohibition on dealing with transferable securities or money-market instruments
- Prohibition on loans and credit arrangements
- Prohibition on correspondent banking relationships and processing payments
- Prohibition on investments in relation to non-government controlled Ukrainian territory



- Prohibition on provision of financial services relating to foreign exchange reserve and asset management
- Prohibition on the provision of financial services relating to foreign exchange reserve and asset management
- Prohibition on investments in relation to Russia
- Prohibition on Trust services
- Prohibition on circumventing

## **DIRECTOR DISQUALIFICATION SANCTIONS**

### **PROHIBITIONS ON IMMIGRATION**

- Refusal of leave to enter and/or remain in the United Kingdom
- Cancelling a persons leave to enter or remain in the United Kingdom

### **PROHIBITIONS ON TRADE**

#### Definitions

- Restricted goods and technology - critical-industry goods, dual-use goods, military goods, aviation and space goods, oil refining goods, quantum computing and advanced materials goods, defence and security goods, maritima goods
- Professional and business services - accounting services, advertising services, architectural services, auditing services, business and management consulting services, engineering services, IT consultancy services and design, public relations services
- Prohibition on the export (or for use in), supply, delivery, making available, acquiring, transfer, technical assistance, financial services and funds, brokering services of restricted goods, restricted technology and related activities
- Prohibition on the import of arms and related materiel which are consigned from Russia
- Prohibition on insurance and reinsurance services relating to aviation and space goods and aviation and space technology
- Prohibition on enabling or facilitating military activities
- Prohibition on the export, supply, delivery, making available, transfer, technical assistance, financial services, brokering services of relevant restricted goods and relevant restricted technology relating to non-government controlled Ukrainian territory
- Prohibition on the export, supply, delivery, making available, transfer, technical assistance, financial services, brokering services of energy-related goods and energy-related activities
- Prohibition on technical assistance relating to aircraft and ships
- Prohibition on the export (or for use in), supply, delivery, making available, technical assistance, financial services and funds, brokering services of luxury goods
- Prohibition on the import, acquisition, supply and delivery, technical assistance, financial services, and funds brokering services of Iron or steel products

- Prohibition on the import, acquisition, supply and delivery, technical assistance, financial services, and funds brokering services of relevant processed Iron or steel products
- Prohibition on the import, acquisition, supply and delivery, technical assistance, financial services, and funds brokering services of metals
- Prohibition on the provision of interception and monitoring services to, or for the benefit of, the Government of Russia
- Prohibition on the export, supply, delivery, making available of Banknotes
- Prohibition on the export, supply, delivery, making available, technical assistance, financial services and funds, brokering of jet fuel and fuel additives
- Prohibition on the import, acquisition, supply and delivery, technical assistance, financial services and funds, brokering services of revenue generating goods
- Prohibition on the export, supply, delivery, making available, technical assistance, financial services and funds, brokering services of G7 dependency and further goods list goods
- Prohibition on the import, acquisition, supply and delivery, technical assistance, financial services and funds, brokering services of oil and oil products
- Prohibition on the maritime transportation, financial services and funds, brokering services related to maritime transportation of certain oil and oil products
- Prohibition on the import, acquisition, supply and delivery, technical assistance, financial services and funds, brokering services of gold
- Prohibition on the import, acquisition, supply, delivery, technical assistance, financial services and funds, brokering services of gold jewellery and relevant processed gold
- Prohibition on the import, acquisition, supply, delivery, technical assistance, financial services and funds, brokering services of diamonds and diamond jewellery
- Prohibition on the import, technical assistance, financial services and funds, brokering services of relevant processed diamonds
- Prohibition on the import, acquisition, supply and delivery, technical assistance, financial services and funds, brokering services of coal and coal products
- Prohibition on the import, acquisition, technical assistance, financial services and funds, brokering services of liquefied natural gas
- Prohibition on the export, supply, delivery, making available, technical assistance, financial services and funds, brokering services of Russia's vulnerable goods
- Prohibition on imports and exports, supply, delivery, making available, technical assistance, financial services and funds, brokering services, and related activities, in relation to non-government controlled Ukrainian territory
- Prohibition on providing certain services relating to non-government controlled Ukrainian territory
- Preventing provision of internet services to or for the benefit of designated persons
- Prohibition on providing professional and business services
- Prohibition on providing legal advisory services
- Prohibition on circumventing

## PROHIBITIONS IN TELATION TO SHIPS

- Prohibition on port entry
- Prohibition on registration in the United Kingdom

## PROHIBITIONS IN TELATION TO AIRCRAFT

- Prohibition on overflying or landing in the United Kingdom
- Prohibition on registration in the United Kingdom

Source: <https://www.gov.uk/government/collections/uk-sanctions-on-russia>

## 5. Canada (CA) sanctions concerning Russian Federation

Sanctions related to Russia were imposed under the Special Economic Measures Act in order to respond to the gravity of Russia's violation of the sovereignty and territorial integrity of Ukraine, and grave human rights violations that have been committed in Russia. Subject to certain exceptions, the measures imposed against Russia include:

### FINANCIAL RESTRICTIONS

- Prohibition on dealing in property, wherever situated, that is owned, held or controlled by a listed person or a person acting on behalf of a listed person;
- Prohibition on entering into or facilitating any transaction related to a dealing prohibited by these Regulations;
- Prohibition on providing any financial or related services in respect of a dealing prohibited by these Regulations;
- Prohibition on making available any goods, wherever situated, to a listed person or a person acting on behalf of a listed person;
- Prohibition on providing any financial or other related services to or for the benefit of a listed person.

### SECTORAL SANCTIONS

- Prohibition to transact in, provide financing for or otherwise deal in new debt of longer than 30 days' maturity, including bonds, loans, debentures, extensions of credit, loan guarantees, letters of credit, bank drafts, bankers' acceptances, discount notes, treasury bills, commercial paper and other similar instruments, in relation to (a) a person listed in Schedule 2; (b) the property of a person listed in Schedule 2; or (c) the interests or rights in property of a person listed in Schedule 2.

- Prohibition to transact in, provide financing for or otherwise deal in new debt of longer than 90 days' maturity, including bonds, loans, debentures, extensions of credit, loan guarantees, letters of credit, bank drafts, bankers' acceptances, discount notes, treasury bills, commercial paper and other similar instruments, in relation to (a) a person listed in Schedule 3; (b) the property of a person listed in Schedule 3; or (c) the interests or rights in property of a person listed in Schedule 3.

## **INVESTMENTS SANCTIONS**

Prohibition to transact in, provide financing for or otherwise deal in new securities, including shares or any other ownership interest, in relation to (a) a person listed in Schedule 2; (b) the property of a person listed in Schedule 2; or (c) the interests or rights in property of a person listed in Schedule 2.

## **OIL EXPLORATION OR PRODUCTION**

Prohibition to export, sell, supply or ship any good referred to in column 1 of Schedule 4, wherever situated, to Russia or to any person in Russia for use in (a) offshore oil exploration or production at a depth greater than 500 m; (b) oil exploration or production in the Arctic; or (c) shale oil exploration or production.

## **SERVICES**

Prohibition to provide to Russia or to any person in Russia any financial, technical or other services related to any good whose export, sale, supply or shipment is prohibited by subsection (1).

## **SHIPS**

Prohibition to dock in Canada or pass through Canada any ship that is registered in Russia or used, leased or chartered, in whole or in part, by or on behalf of or for the benefit of Russia, a person in Russia or a person listed in Schedule 1, 2 or 3, unless such docking or passage is necessary to safeguard human life or to ensure navigational safety.

## **PETROLEUM**

Prohibition to import, purchase or acquire any good referred to in column 1 of Schedule 5, wherever situated, from Russia or from any person in Russia.

## **RESTRICTED GOODS**

Prohibition to export, sell, supply or ship any good, wherever situated, to Russia or to any person in Russia if the good is referred to in the Restricted Goods and Technologies List or in Schedule 5.1.

## **RESTRICTED TECHNOLOGIES**

Prohibition to provide to Russia or to any person in Russia any technology that is referred to in the Restricted Goods and Technologies List or in Schedule 5.1.

#### **INSURANCE — AVIATION AND AEROSPACE**

Prohibition to provide insurance or reinsurance to or for the benefit of Russia or any person in Russia in relation to any good described in Chapter 88 of the Harmonized Commodity Description and Coding System, published by the World Customs Organization, or in relation to technology for a good described in that chapter.

#### **LUXURY GOODS — EXPORT**

Prohibition to export, sell, supply or ship any good referred to in column 1 of Part 1 to Schedule 6, wherever situated, to Russia or to any person in Russia.

#### **LUXURY GOODS — IMPORT**

Prohibition to import, purchase or acquire any good referred to in column 1 of Part 2 of Schedule 6, wherever situated, from Russia or from any person in Russia.

#### **GOODS — MANUFACTURE OF WEAPONS**

Prohibition to export, sell, supply or ship any good referred to in column 1 of Schedule 7, wherever situated, to Russia or to any person in Russia.

#### **SERVICES**

Prohibition to provide to Russia or to any person in Russia a service referred to in Part 1 of Schedule 8 in relation to an industry referred to in Part 2 of that Schedule.

#### **GOLD — IMPORT**

Prohibition to import, purchase or acquire any good referred to in column 1 of Schedule 9, from Russia or from any person in Russia.

#### **SERVICES — MARINE TRANSPORTATION OF CRUDE OIL AND PETROLEUM PRODUCTS**

Prohibition to provide to or for the benefit of Russia or any person in Russia a service referred to in Schedule 10 in relation to marine transportation, including ship-to-ship transfers, of goods referred to in item 1 or 2 of Schedule 5 if (a) the service is provided in relation to an industry referred to in Division 50 of the International Standard Industrial Classification of All Economic Activities, Revision 4, published by the United Nations in 2008; (b) the goods are exported from Russia or originate from Russia; and (c) the goods are purchased above the price set out for those goods in the G7+ Coalition Oil

Price Cap List, prepared by the Department of Foreign Affairs, Trade and Development and published on the Department's website.

#### **ARMS AND RELATED MATERIAL — IMPORT**

Prohibition to import, purchase or acquire arms and related material from Russia or from any person in Russia.

#### **ARMS AND RELATED MATERIEL — EXPORT**

Prohibition to export, sell, supply or ship arms and related material, wherever situated, to Russia or to any person in Russia.

#### **ARMS AND RELATED MATERIEL — SERVICES**

Prohibition to provide any financial, technical or other services related to the sale, supply, transfer, manufacture, maintenance or use of arms and related material to Russia or to any person in Russia.

#### **STEEL AND ALUMINUM — IMPORT**

Prohibition to import, purchase or acquire any good referred to in column 1 of Schedule 11 from Russia or from any person in Russia.

#### **DIAMONDS — IMPORT FROM ANY COUNTRY**

Prohibition to import, purchase or acquire any good referred to in column 1 of Part 1 of Schedule 12, wherever situated, from Russia or from any person in Russia.

#### **DIAMONDS — IMPORT FROM RUSSIA**

Prohibition to import, purchase or acquire any good referred to in column 1 of Part 2 of Schedule 12 from Russia or from any person in Russia.

#### **CIRCUMVENTION & FACILITATING**

PROHIBITION to knowingly do anything that causes, facilitates or assists in, or is intended to cause, facilitate or assist in, any activity prohibited by sections 3 to 3.15.

#### **TRAVEL BAN**

Listed individuals are inadmissible to Canada.

SOURCE:

[https://www.international.gc.ca/world-monde/international\\_relations-relations\\_internationales/sancti](https://www.international.gc.ca/world-monde/international_relations-relations_internationales/sancti)

[ons/russia-russie.aspx?lang=eng](#)

SOURCE: <https://laws.justice.gc.ca/eng/regulations/SOR-2014-58/FullText.html>