

US, EU and UK Sanctions Against Russia and Belarus

Key Sanctioned Entities as of April 27, 2022[#]

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
ALFA BANK	<p>SDN subject to:</p> <ul style="list-style-type: none"> • <u>General License 8B</u> authorizes until June 24, 2022 all transactions “related to energy.” • <u>General License 9B</u> authorizes until June 30, 2022 all transactions ordinarily incident and necessary to dealings in pre-existing debt or equity. • <u>General License 10B</u> authorizes until June 30, 2022 all transactions related to the wind-down of pre-existing derivatives contracts. • <u>General License 23</u> authorizes until May 6, 2022 the wind-down of all other transactions. 	<p>Prohibition under <u>Decision 2022/327</u> / <u>Regulation 2022/328</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly dealing with transferable securities and money-market instruments issued by Alfa Bank after April 12, 2022, or any legal person, entity or body:</p> <ul style="list-style-type: none"> • Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above • Acting on behalf or at the direction of the above 	<p><u>Asset freeze</u>, subject to a <u>General License</u> permitting the wind-down of transactions with Alfa Bank and its Subsidiaries** until April 23, 2022*</p>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	New debt and equity restrictions through <u>Directive 3</u> under EO 14024		
ALMAZ-ANTEY	<u>SDN</u>	<p>Prohibition under <u>Decision 2022/430 / Regulation 2022/428</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly engaging in any transaction with Almaz-Antey, or any legal person, entity or body:</p> <ul style="list-style-type: none"> • Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above • Acting on behalf or at the direction of the above <p>Exception for certain fossil fuels and energy-related transactions</p> <p>Prohibition under <u>Decision 2022/327 / Regulation 2022/328</u> (amending <u>Regulation 833/2014</u>) on</p>	<u>Asset freeze [Pre-2022]</u>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p>directly or indirectly dealing with transferable securities and money-market instruments issued by Almaz-Antey after April 12, 2022, or any legal person, entity or body:</p> <ul style="list-style-type: none"> • Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above • Acting on behalf or at the direction of the above 	
ALROSA	<p><u>SDN</u> subject to:</p> <ul style="list-style-type: none"> • <u>General License 24</u> authorizes until May 7, 2022 the wind-down of transactions. • <u>General License 10C</u> authorizes until July 1, 2022 the wind-down of derivatives contracts involving Alrosa. • <u>General License 9C</u> authorizes until July 1, 	Not designated	<u>Asset freeze</u>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	<p>2022 all transactions ordinarily incident and necessary to dealings in pre-existing debt or equity.</p> <p>New debt and equity restrictions through <u>Directive 3</u> under EO 14024</p>		
BANK DABRABYT	<u>SDN</u>	<p>Prohibition under <u>Decision 2022/218 / Regulation 2022/212</u> (amending <u>Regulation 765/2006</u>) on directly or indirectly dealing with transferable securities and money-market instruments with a maturity exceeding 90 days issued by Bank Dabrabyt after June 29, 2021, or any legal person, entity or body:</p> <ul style="list-style-type: none"> Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above 	<p><u>Asset freeze</u>, subject to a <u>General License</u> permitting the wind-down of transactions with Bank Dabrabyt and its Subsidiaries** until April 23, 2022</p>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<ul style="list-style-type: none"> Acting on behalf or at the direction of the above <p>or making new loans or credit with a maturity exceeding 90 days after June 29, 2021 available to those persons</p>	
BANK OTKRITIE	<p><u>SDN</u> subject to:</p> <ul style="list-style-type: none"> <u>General License 9A</u> authorizes transactions incident to dealings in debt or equity issued prior to February 24, 2022 before May 25, 2022 <u>General License 10A</u> authorizes the wind down of derivative contracts entered into before February 24, 2022 before May 25, 2022 <p><u>General License No. 11</u> authorizes the wind down of all other transactions before March 26, 2022</p>	<p>SWIFT removal under <u>Decision 2022/346 / Regulation 2022/345</u> (amending <u>Regulation 833/2014</u>)</p> <p>Prohibition under <u>Decision 2022/327 / Regulation 2022/328</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly dealing with transferable securities and money-market instruments issued by Bank Otkritie after April 12, 2022, or any legal person, entity or body:</p> <ul style="list-style-type: none"> Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above 	<p><u>Asset freeze</u>, subject to a <u>General License</u> permitting the wind-down of transactions with Otkritie and its Subsidiaries** until April 3, 2022</p>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<ul style="list-style-type: none"> Acting on behalf or at the direction of the above Asset freeze under <u>Decision 2022/582 / Implementing Regulation 2022/581</u> (implementing <u>Regulation 269/2014</u>)	
BANK ROSSIYA	<u>SDN</u>	SWIFT removal under <u>Decision 2022/346 / Regulation 2022/345</u> (amending <u>Regulation 833/2014</u>) Prohibition under <u>Decision 2022/327 / Regulation 2022/328</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly dealing with transferable securities and money-market instruments issued by Bank Rossiya after April 12, 2022, or any legal person, entity or body: <ul style="list-style-type: none"> Established outside the EU whose proprietary rights are directly or 	Asset freeze, subject to a <u>General License</u> permitting the wind-down of transactions with Bank Rossiya and its Subsidiaries** until April 3, 2022

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p>indirectly owned more than 50% by the above</p> <ul style="list-style-type: none"> Acting on behalf or at the direction of the above <p>Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing <u>Regulation 269/2014</u>)</p>	
BELARUSBANK	Not designated	<p>Prohibition under <u>Decision 2022/218 / Regulation 2022/212</u> (amending <u>Regulation 765/2006</u>) on directly or indirectly dealing with transferable securities and money-market instruments with a maturity exceeding 90 days issued by Belarusbank after June 29, 2021, or any legal person, entity or body:</p> <ul style="list-style-type: none"> Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above 	Not designated

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<ul style="list-style-type: none"> Acting on behalf or at the direction of the above <p>or making new loans or credit with a maturity exceeding 90 days after June 29, 2021 available to those persons</p>	
BELINVESTBANK	<u>SDN</u>	<p>Prohibition under <u>Decision 2022/218 / Regulation 2022/212</u> (amending <u>Regulation 765/2006</u>) on directly or indirectly dealing with transferable securities and money-market instruments with a maturity exceeding 90 days issued by Belinvestbank after June 29, 2021, or any legal person, entity or body:</p> <ul style="list-style-type: none"> Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above Acting on behalf or at the direction of the above 	Not designated

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
BELAGROPROMBANK	Not designated	<p>Prohibition under <u>Decision 2022/218 / Regulation 2022/212</u> (amending <u>Regulation 765/2006</u>) on directly or indirectly dealing with transferable securities and money-market instruments with a maturity exceeding 90 days issued by Belagroprombank after June 29, 2021, or any legal person, entity or body:</p> <ul style="list-style-type: none"> • Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above • Acting on behalf or at the direction of the above <p>or making new loans or credit with a maturity exceeding 90 days after June 29, 2021 available to those persons</p>	Not designated
BITRIVER AG	<u>SDN</u>	Not designated	Not designated

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
BLACK SEA BANK FOR DEVELOPMENT AND RECONSTRUCTION	<u>SDN</u>	Not designated	<u>Asset freeze</u>
CENTRAL BANK OF RUSSIA	<p>Russian sovereign debt restrictions through <u>Directive 1A</u> under EO 14024</p> <p>Restrictions on transactions through <u>Directive 4</u> under EO 14024, subject to:</p> <ul style="list-style-type: none"> • <u>General License 8A</u> allowing certain energy-related transactions until June 24, 2022, though not transactions otherwise prohibited by EO 14066 • <u>General License 9A</u> allowing before May 25, 2022, transactions ordinarily incident and necessary to the receipt of interest, dividend, or maturity payments in connection with debt or equity of Directive 4 entities issued before March 1, 2022, provided 	<p>Prohibition under <u>Decision 2022/335</u> / <u>Regulation 2022/334</u> (amending <u>Regulation 833/2014</u>) on transactions related to the management of reserves as well as of assets of the Central Bank of Russia, including transactions with any legal person, entity or body acting on behalf of, or at the direction of, the Central Bank of Russia</p> <p>By way of derogation from the above, a transaction may be authorized provided that it is strictly necessary to ensure the financial stability of the Union as a whole or of a Member State</p> <p>Amended by <u>Decision 2022/395</u> / <u>Regulation 2022/394</u> to clarify that the prohibition extends to the Russian National Wealth Fund</p>	<p><u>Financial services restriction (foreign exchange reserves and asset management), subject to:</u></p> <ul style="list-style-type: none"> • a <u>General License</u> permitting the wind-down of derivatives, repurchase and reverse repurchase transactions entered into prior to March 1, 2022 with the Central Bank of Russia (or entities owned or controlled by it directly or indirectly, or a person acting on its behalf or at its direction) until May 2, 2022; and • a <u>General License</u> permitting financial services for the purposes of receipt and onward transfer of non-rouble denominated interest/coupon or

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	<p>that any divestment or transfer of covered debt or equity be to a non-US person</p> <ul style="list-style-type: none"> • <u>General License 10A</u> allowing before May 25, 2022, transactions ordinarily incident and necessary to the wind down of derivative contracts, repurchase agreements, or reverse repurchase agreements entered into prior to March 1, 2022 with Directive 4 entities, provided that any payments to a blocked person are made to a blocked account • <u>General License 13</u> allowing payment of taxes, fees, and import duties or receipt of permits, licenses, registrations, or certifications by U.S. persons, provided that 		<p>maturity/principal payments from the Central Bank of Russia (or entities owned or controlled by it directly or indirectly, or a person acting on its behalf or at its direction) in connection with debt issued before March 1, 2022 until June 30, 2022</p> <p>Exemptions for humanitarian assistance activity, activities conducted by or on behalf of financial regulators for the purposes of their regulatory functions, actions taken in consultation with the Bank of England to protect the U.K.’s financial stability, promoting the safety and soundness of a U.K.-regulated firm and anything done to deal with an “extraordinary situation”</p>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	<p>such transactions are ordinarily incident and necessary to U.S. persons' day-to-day operations in Russia (effective before June 24, 2022)</p> <ul style="list-style-type: none"> • <u>General License 14</u> allowing certain clearing and settlement transactions 		
CREDIT BANK OF MOSCOW	New debt and equity restrictions through <u>Directive 3</u> under EO 14024	Not designated	<u>Asset freeze</u> , subject to a <u>General License</u> permitting the wind-down of transactions with Credit Bank of Moscow and its Subsidiaries** until May 6, 2022
CHELSEA FOOTBALL CLUB[#]	Not designated	Asset freeze (by virtue of being owned by Roman Abramovich who is subject to an asset freeze under <u>Decision 2022/429 / Implementing Regulation 2022/427</u> (implementing <u>Regulation 269/2014</u>))	<u>Asset freeze</u> (by virtue of being owned by Roman Abramovich), subject to a <u>General License</u> permitting certain activities to be conducted with respect to Chelsea Football Club, Chelsea FC Plc and its subsidiaries (the "Club"), as well as its parent company,

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
			<p>Fordstam Ltd, until May 31, 2022.</p> <p>This includes permission for the Club to conduct various activities including (but not limited to): (i) remuneration of employees, including players; (ii) payment of fees, dividends and other allowances to directors of the Club under obligations pre-dating the General License and payable during the period of the General License, other than to Roman Abramovich (and Eugene Tenenbaum); (iii) sale of tickets to fixtures held at a ground other than the Club's home grounds, or for certain specified fixtures (namely, UEFA Champions League, FA Cup or Women's Super League) at the Club's home ground. The License also permits ticketholders who purchased tickets (including season tickets) prior to March 10, 2022 to attend those</p>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
			<p>fixtures and pay for season tickets. Fordstam Ltd is also permitted to conduct certain activities, such as paying its employees and the employees of its U.K. subsidiaries. Broadcasters are permitted to broadcast fixtures involving the Club.</p> <p>The General License should be consulted for a full list of permitted activities.</p>
DEVELOPMENT BANK OF THE REPUBLIC OF BELARUS	<u>SDN</u>	Prohibition under <u>Decision 2022/218 / Regulation 2022/212</u> (amending <u>Regulation 765/2006</u>) on directly or indirectly dealing with transferable securities and money-market instruments with a maturity exceeding 90 days issued by Development Bank of the Republic of Belarus after June 29, 2021, or any legal person, entity or body:	Not designated

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<ul style="list-style-type: none"> • Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above • Acting on behalf or at the direction of the above <p>or making new loans or credit with a maturity exceeding 90 days after June 29, 2021 available to those persons</p>	
EVRAZ PLC[#]	Not designated	<p>Evraz PLC is mentioned in the asset freeze designation of Roman Abramovich (under <u>Decision 2022/429 / Implementing Regulation 2022/427 (implementing Regulation 269/2014)</u>).</p> <p><u>EU FAQs on assets freezes following sanctions adopted in view of Russia’s military aggression against Ukraine and Belarus’ involvement in it state that where entities</u></p>	<p><u>Asset freeze (by virtue of Roman Abramovich being a controlling stakeholder as specified under the U.K. designation instrument)</u></p>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p>associated with designated individuals or entities are mentioned in the identifying information and/or reasons column of the relevant Regulation, operators should exercise the highest caution when dealing with these associated entities as they may be deemed to be owned or controlled by listed persons or entities, and their assets must be frozen as well.</p>	
GAZPROM NEFT	<p>New debt and equity restrictions through <u>Directive 3</u> under EO 14024</p>	<p>Prohibition under <u>Decision 2022/430</u> / <u>Regulation 2022/428</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly engaging in any transaction with Gazprom Neft, or any legal person, entity or body:</p> <ul style="list-style-type: none"> Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above 	<p><u>Investment ban</u> [Pre-2022]</p>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<ul style="list-style-type: none"> Acting on behalf or at the direction of the above <p>Exception for certain fossil fuels and energy-related transactions</p>	
GAZPROMBANK	New debt and equity restrictions through <u>Directive 3</u> under EO 14024	Existing restrictions on dealings in transferable securities and money-market instruments under <u>Regulation (EU) 833/2014</u>	<u>Investment ban</u> [Pre-2022] <u>Asset freeze</u> , subject to: <ul style="list-style-type: none"> a <u>General License</u> permitting the wind-down of transactions with Gazprombank and its Subsidiaries** until April 23, 2022; and a <u>General License</u> permitting, until May 31, 2022, payments to Gazprombank and its Subsidiaries** under contracts for gas available for use in the EU entered into prior to April 21, 2022
GENBANK	<u>SDN</u>	Not designated	<u>Asset freeze</u>
GEOPOLITICA	<u>SDN</u>	Not designated	<u>Asset freeze</u>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
INTEGRAL	<u>SDN</u>	Not designated	<u>Asset freeze</u>
INTERNET RESEARCH AGENCY	<u>SDN</u>	Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze</u>
INVESTTRADEBANK JSC	<u>SDN</u> subject to: <u>General License 29</u> authorizes until May 20, 2022 all transactions “ordinarily incident and necessary to the wind down” of transactions.	Not designated	Not designated
IS BANK	<u>SDN</u>	Not designated	<u>Asset freeze</u>
KAMAZ	Not designated	Prohibition under <u>Decision 2022/430 / Regulation 2022/428</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly engaging in any transaction with Kamaz, or any legal person, entity or body: <ul style="list-style-type: none"> Established outside the EU whose proprietary rights are directly or 	Not designated

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p>indirectly owned more than 50% by the above</p> <ul style="list-style-type: none"> • Acting on behalf or at the direction of the above <p>Exception for certain fossil fuels and energy-related transactions</p> <p>Prohibition under <u>Decision 2022/327 / Regulation 2022/328</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly dealing with transferable securities and money-market instruments issued by Kamaz after April 12, 2022, or any legal person, entity or body:</p> <ul style="list-style-type: none"> • Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above • Acting on behalf or at the direction of the above 	

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
KRONSTADT	<u>SDN</u>	Not designated	<u>Asset freeze</u>
LAKHTA PARK / LAKHTA PARK PREMIUM / LAKHTA PLAZA	<u>SDN</u> / <u>SDN</u> / <u>SDN</u>	Not designated	Not designated
LUKOIL	Previously imposed restrictions on export of U.S. goods, services, or technology for oil projects through <u>Directive 4</u> under EO 13662	Not designated	Not designated
MANAGEMENT COMPANY OF THE RUSSIAN DIRECT INVESTMENT FUND (MC RDIF)	<u>SDN</u>	Not designated	Not designated
NEMCHINOVO INVESTMENTS	<u>SDN</u>	Not designated	Not designated
NORD STREAM 2 AG	<u>SDN</u> , subject to <u>General License 4</u> permitting the winding down of transactions before March 2, 2022	Not designated	Not designated
NOVIKOMBANK	<u>SDN</u> Previously imposed restrictions on dealings in new debt and equity through <u>Directive 3</u> under EO 13662	SWIFT removal under <u>Decision 2022/346</u> / <u>Regulation 2022/345</u> (amending <u>Regulation 833/2014</u>) Asset freeze under <u>Decision 2022/582</u> / <u>Implementing Regulation 2022/581</u>	Not designated

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		(implementing <u>Regulation 269/2014</u>)	
OBORONPROM	Previously imposed restrictions on dealings in new debt and equity through <u>Directive 3</u> under EO 13662	Prohibition under <u>Decision 2022/430</u> / <u>Regulation 2022/428</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly engaging in any transaction with Gazprom Neft, or any legal person, entity or body: <ul style="list-style-type: none"> • Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above • Acting on behalf or at the direction of the above Exception for certain fossil fuels and energy-related transactions	<u>Investment ban</u> [Pre-2022]
PROMSVYAZBANK	<u>SDN</u>	SWIFT removal under <u>Decision 2022/346</u> / <u>Regulation 2022/345</u> (amending <u>Regulation 833/2014</u>)	<u>Asset freeze</u> , subject to a <u>General License</u> permitting the wind-down of transactions with Promsvyazbank and its

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p>Prohibition under <u>Decision 2022/327 / Regulation 2022/328</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly dealing with transferable securities and money-market instruments issued by Promsvyazbank after April 12, 2022, or any legal person, entity or body:</p> <ul style="list-style-type: none"> • Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above • Acting on behalf or at the direction of the above <p>Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing <u>Regulation 269/2014</u>)</p>	*Subsidiaries until April 3, 2022
ROSNEFT	Previously imposed restrictions on dealings in new debt	Prohibition under <u>Decision 2022/430 / Regulation 2022/428</u> (amending <u>Regulation 833/2014</u>) on	<u>Investment ban</u> [Pre-2022]

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	<p>through <u>Directive 2</u> under EO 13662</p> <p>Previously imposed restrictions on export of U.S. goods, services, or technology for oil projects through <u>Directive 4</u> under EO 13662</p>	<p>directly or indirectly engaging in any transaction with Rosneft, or any legal person, entity or body:</p> <ul style="list-style-type: none"> • Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above • Acting on behalf or at the direction of the above <p>Exception for certain fossil fuels and energy-related transactions</p>	
ROSNEFT AERO	Not designated	Asset freeze under <u>Decision 2022/429 / Implementing Regulation 2022/427</u> (implementing Regulation 269/2014)	<u>Asset freeze</u>
ROSSELKHOZBANK (RUSSIAN AGRICULTURAL BANK)	<p>New debt and equity restrictions through <u>Directive 3</u> under EO 14024</p> <p>Previously imposed restrictions on dealings in new debt and</p>	Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing <u>Regulation 269/2014</u>)	<p><u>Investment ban</u> [Pre-2022]</p> <p><u>Asset freeze</u>, subject to a <u>General License</u> permitting the wind-down of transactions with Rosselkohzbank and its</p>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	equity through <u>Directive 1A</u> under EO 13662	Existing restrictions on dealings in transferable securities and money-market instruments under <u>Regulation (EU) 833/2014</u> [Pre-2022]	Subsidiaries** until April 23, 2022
ROSTEC (RUSSIAN TECHNOLOGIES STATE CORPORATION)	Previously imposed restrictions on dealings in new debt and equity through <u>Directive 3</u> under EO 13662	<p>Prohibition under <u>Decision 2022/430</u> / <u>Regulation 2022/428</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly engaging in any transaction with Rostec, or any legal person, entity or body:</p> <ul style="list-style-type: none"> • Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above • Acting on behalf or at the direction of the above <p>Exception for certain fossil fuels and energy-related transactions</p> <p>Prohibition under <u>Decision 2022/327</u> / <u>Regulation</u></p>	<u>Asset freeze</u> , subject to a <u>General License</u> applicable to Novikombank (a subsidiary of Rostec) permitting the wind-down of transactions with Novikombank until April 3, 2022

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p><u>2022/328</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly dealing with transferable securities and money-market instruments issued by Rostec after April 12, 2022, or any legal person, entity or body:</p> <ul style="list-style-type: none"> Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above Acting on behalf or at the direction of the above 	
ROSTELECOM	New debt and equity restrictions through <u>Directive 3</u> under EO 14024	Not designated	Not designated
RUSHYDRO	New debt and equity restrictions through <u>Directive 3</u> under EO 14024	Not designated	<u>Asset freeze</u>
RUSSIAN DIRECT INVESTMENT FUND	<u>SDN</u>	Investment ban under <u>Decision 2022/346</u> / <u>Regulation</u>	<u>Asset freeze</u>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p><u>2022/345</u> (amending Regulation 833/2014)</p> <p>Exception for investment participation or contributions due under contracts concluded before March 2, 2022 or ancillary contracts</p>	
<p>RUSSIAN MINISTRY OF FINANCE</p>	<p>Russian sovereign debt restrictions through <u>Directive 1A</u> under EO 14024</p> <ul style="list-style-type: none"> • <u>General License 8A</u> allowing certain energy-related transactions with the Central Bank until June 24, 2022, though not transactions otherwise prohibited by EO 14066 • <u>General License 9A</u> allowing before May 25, 2022, transactions ordinarily incident and necessary to the receipt of interest, dividend, or maturity payments in connection with debt or equity of Directive 4 	<p>Not designated</p>	<p><u>Financial services restriction (foreign exchange reserves and asset management)</u>, subject to:</p> <ul style="list-style-type: none"> • a <u>General License</u> permitting the wind-down of derivatives, repurchase and reverse repurchase transactions entered into prior to March 1, 2022 with the Russian Ministry of Finance (or entities owned or controlled by it directly or indirectly, or a person acting on its behalf or at its direction) until May 2, 2022; and • a <u>General License</u> permitting financial services for the

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	<p>entities issued before March 1, 2022, provided that any divestment or transfer of covered debt or equity be to a non-US person</p> <ul style="list-style-type: none"> • <u>General License 10A</u> allowing before May 25, 2022, transactions ordinarily incident and necessary to the wind down of derivative contracts, repurchase agreements, or reverse repurchase agreements entered into prior to March 1, 2022 with Directive 4 entities, provided that any payments to a blocked person are made to a blocked account • <u>General License 13</u> allowing payment of taxes, fees, and import duties or receipt of permits, licenses, registrations, or 		<p>purposes of receipt and onward transfer of non-ruble denominated interest/coupon or maturity/principal payments from the Russian Ministry of Finance (or entities owned or controlled by it directly or indirectly, or a person acting on its behalf or at its direction) in connection with debt issued before March 1, 2022 until June 30, 2022</p>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	<p>certifications by U.S. persons, provided that such transactions are ordinarily incident and necessary to U.S. persons' day-to-day operations in Russia (effective before June 24, 2022)</p> <ul style="list-style-type: none"> • <u>General License 14</u> allowing certain clearing and settlement transactions 		
RUSSIAN NATIONAL COMMERCIAL BANK	<u>SDN</u>	Asset freeze under <u>Council Decision 2021/448 / Implementing Regulation 2021/446</u> (amending Regulation <u>269/2014</u>)	<u>Asset freeze [pre-2022]</u>
RUSSIAN NATIONAL WEALTH FUND	<p>Russian sovereign debt restrictions through <u>Directive 1A</u> under EO 14024</p> <ul style="list-style-type: none"> • <u>General License 8A</u> allowing certain energy-related transactions with the Central Bank until June 24, 2022, though 	See Central Bank of Russia	<p><u>Financial services restriction (foreign exchange reserves and asset management)</u>, subject to:</p> <ul style="list-style-type: none"> • <u>General License</u> permitting the wind-down of derivatives, repurchase and reverse repurchase transactions

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	<p>not transactions otherwise prohibited by EO 14066</p> <ul style="list-style-type: none"> • <u>General License 9A</u> allowing before May 25, 2022, transactions ordinarily incident and necessary to the receipt of interest, dividend, or maturity payments in connection with debt or equity of Directive 4 entities issued before March 1, 2022, provided that any divestment or transfer of covered debt or equity be to a non-US person • <u>General License 10A</u> allowing before May 25, 2022, transactions ordinarily incident and necessary to the wind down of derivative contracts, repurchase agreements, or reverse repurchase agreements entered into prior to 		<p>entered into prior to March 1, 2022 with the Russian National Wealth Fund (or entities owned or controlled by it directly or indirectly, or a person acting on its behalf or at its direction) until May 2, 2022; and</p> <ul style="list-style-type: none"> • a <u>General License</u> permitting financial services for the purposes of receipt and onward transfer of non-rouble denominated interest/coupon or maturity/principal payments from the Russian National Wealth Fund (or entities owned or controlled by it directly or indirectly, or a person acting on its behalf or at its direction) in connection with debt issued before March 1, 2022 until June 30, 2022

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	<p>March 1, 2022 with Directive 4 entities, provided that any payments to a blocked person are made to a blocked account</p> <ul style="list-style-type: none"> • <u>General License 13</u> allowing payment of taxes, fees, and import duties or receipt of permits, licenses, registrations, or certifications by U.S. persons, provided that such transactions are ordinarily incident and necessary to U.S. persons' day-to-day operations in Russia (effective before June 24, 2022) • <u>General License 14</u> allowing certain clearing and settlement transactions 		

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
RUSSIAN RAILWAYS	New debt and equity restrictions through <u>Directive 3</u> under EO 14024	Prohibition under <u>Decision 2022/327</u> / <u>Regulation 2022/328</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly dealing with transferable securities and money-market instruments issued by Russian Railways after April 12, 2022, or any legal person, entity or body: <ul style="list-style-type: none"> • Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above • Acting on behalf or at the direction of the above 	<u>Asset freeze</u> (Note the revocation of a <u>General License</u> that had been granted permitting the continuation of business operations involving GEFCO (a Joint Venture co-owned by Russian Railways) and its Subsidiaries** until May 23, 2022. The sale of GEFCO means it is no longer subject to U.K. sanctions)
SBERBANK	<u>SDN</u> subject to: <ul style="list-style-type: none"> • <u>General License 21</u> authorizes until June 7, 2022 all transactions “ordinarily incident and necessary to the wind down of Sberbank CIB USA, Inc.” 	Existing restrictions on dealings in transferable securities and money-market instruments under <u>Regulation (EU) 833/2014</u> [Pre-2022]	<u>Asset freeze</u> subject to: <ul style="list-style-type: none"> • <u>General License</u> allowing U.K. credit or financial institutions to process sterling payments to, from or via Sberbank or U.K. or non-U.K. credit or financial institutions owned or

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	<ul style="list-style-type: none"> • <u>General License 26</u> authorizes until July 12, 2022 all transactions “ordinarily incident and necessary to the wind down of transactions involving Joint Stock Company SB Sberbank Kazakhstan or Sberbank Europe AG,” or their subsidiaries. • <u>General License 22</u> authorizes until April 13, 2022 the wind down of all other transactions involving Sberbank. <p>Correspondent and payable-through account (CAPTA) restrictions through <u>Directive 2</u> under EO 14024</p> <p>New debt and equity restrictions through <u>Directive 3</u> under EO 14024, subject to:</p> <ul style="list-style-type: none"> • <u>General License 9A</u> authorizes transactions incident to dealings in debt or equity issued prior to February 24, 		<p>controlled by Sberbank in order to make crude oil, petroleum products or gas available for use in the U.K. until June 24, 2022;</p> <ul style="list-style-type: none"> • <u>General License</u> applicable to Sberbank CIB (UK) Ltd and U.K. entities owned or controlled by Sberbank CIB (UK) Ltd incorporated in the U.K. permitting them to pay for basic needs e.g., insurance premiums, remuneration or pensions of employees and rent and utility payments, as well as reasonable fees for holding and maintenance of frozen funds and reasonable professional fees for legal services, as well as payments related to

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	<p>2022 before May 25, 2022</p> <ul style="list-style-type: none"> • <u>General License 10A</u> authorizes the wind down of derivative contracts entered into before February 24, 2022 before May 25, 2022 		<p>insolvency proceedings, until April 3, 2023;</p> <p><u>Financial services restriction (correspondent banking relationships) subject to:</u></p> <ul style="list-style-type: none"> • <u>General License</u> allowing U.K. credit or financial institutions to process sterling payments to, from or via Sberbank or U.K. or non-U.K. credit or financial institutions owned or controlled by Sberbank in order to make crude oil, petroleum products or gas available for use in the U.K. until June 24, 2022 • <u>General License</u> allowing U.K. credit or financial institutions to: (1) continue banking relationships with Sberbank; and (2) process sterling payments to, from or via Sberbank or U.K. or non-U.K. credit or financial

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
			<p>institutions owned or controlled by Sberbank until March 31, 2022</p> <ul style="list-style-type: none"> <p><u>General License</u> applicable to Sberbank CIB (UK) Ltd and U.K. entities owned or controlled by Sberbank CIB (UK) Ltd incorporated in the U.K. permitting them to pay for basic needs e.g., insurance premiums, remuneration or pensions of employees and rent and utility payments, as well as reasonable fees for holding and maintenance of frozen funds and reasonable professional fees for legal services, as well as payments related to insolvency proceedings, until April 3, 2023;</p>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
			<p>In addition, U.K.-regulated firms may process GBP payments made in accordance with activities conducted under each of these General Licenses</p> <p><u>Financial services restriction (foreign exchange reserves and asset management activities)</u> by virtue of Sberbank being owned or controlled directly or indirectly by the Central Bank, the National Wealth Fund or the Ministry of Finance, subject to <u>General License</u> applicable to PJSC Sberbank and *Subsidiaries of PJSC Sberbank permitting wind-down of transactions with the named Sberbank entities until April 3, 2022</p> <p><u>Investment ban</u> [Pre-2022]</p>

<p>SEVMASH</p>	<p>Not designated</p>	<p>Prohibition under <u>Decision 2022/430 / Regulation 2022/428</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly engaging in any transaction with Sevmash, or any legal person, entity or body:</p> <ul style="list-style-type: none"> • Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above • Acting on behalf or at the direction of the above <p>Exception for certain fossil fuels and energy-related transactions</p> <p>Prohibition under <u>Decision 2022/327 / Regulation 2022/328</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly dealing with transferable securities and money-market instruments issued by Sevmash after</p>	<p>Not designated</p>
-----------------------	-----------------------	---	-----------------------

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p>April 12, 2022, or any legal person, entity or body:</p> <ul style="list-style-type: none"> Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above Acting on behalf or at the direction of the above 	
SMP BANK	<u>SDN</u>	Not designated	<u>Asset freeze</u> , subject to a <u>General License</u> permitting the wind-down of transactions with SMP Bank and its Subsidiaries** until April 23, 2022
SOGAZ	Not designated	Asset freeze under <u>Decision 2022/337 / Implementing Regulation 2022/336</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze</u>
SOVCOMBANK	<u>SDN</u> , subject to: <ul style="list-style-type: none"> <u>General License 9A</u> authorizes transactions incident to dealings in 	SWIFT removal under <u>Decision 2022/346 / Regulation 2022/345</u> , amending <u>Regulation 833/2014</u>	<u>Asset freeze</u> , subject to a <u>General License</u> permitting the wind-down of transactions with Sovcombank and its

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	<p>debt or equity issued prior to February 24, 2022 before May 25, 2022</p> <ul style="list-style-type: none"> • <u>General License 10A</u> authorizes the wind down of derivative contracts entered into before February 24, 2022 before May 25, 2022 • <u>General License No. 11</u> authorizes the wind down of all other transactions before March 26, 2022 	<p>Asset freeze under <u>Decision 2022/582 / Implementing Regulation 2022/581</u> (implementing <u>Regulation 269/2014</u>)</p>	<p>Subsidiaries** until April 3, 2022</p>
SOVCOMFLOT	<p>New debt and equity restrictions through <u>Directive 3</u> under EO 14024</p>	<p>Prohibition under <u>Decision 2022/430 / Regulation 2022/428</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly engaging in any transaction with Sovcomflot, or any legal person, entity or body:</p> <ul style="list-style-type: none"> • Established outside the EU whose proprietary rights are directly or 	<p><u>Asset freeze</u>, subject to a <u>General License</u> permitting wind-down of transactions with Sovcomflot and its Subsidiaries** until May 15, 2022</p>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p>indirectly owned more than 50% by the above</p> <ul style="list-style-type: none"> • Acting on behalf or at the direction of the above <p>Exception for certain fossil fuels and energy-related transactions</p> <p>Prohibition under <u>Decision 2022/327</u> / <u>Regulation 2022/328</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly dealing with transferable securities and money-market instruments issued by Sovcomflot after April 12, 2022, or any legal person, entity or body:</p> <ul style="list-style-type: none"> • Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above • Acting on behalf or at the direction of the above 	

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
THE WAGNER GROUP	<u>SDN</u>	Asset freeze under <u>Decision 2021/2197 / Implementing Regulation 2021/2195</u> (implementing <u>Regulation 2020/1998</u>) [Pre-2022]	<u>Asset freeze</u>
TRANSKAPITALBANK PJSC	<u>SDN</u> subject to: <u>General License 29</u> authorizes until May 20, 2022 all transactions “ordinarily incident and necessary to the wind down” of transactions involving TKB or its subsidiaries.	Not designated	Not designated
TRANSNEFT	New debt and equity restrictions through <u>Directive 3</u> under EO 14024	Prohibition under <u>Decision 2022/430 / Regulation 2022/428</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly engaging in any transaction with Transneft, or any legal person, entity or body: <ul style="list-style-type: none"> Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above 	<u>Investment ban</u> [Pre-2022]

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

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

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<p>Asset freeze under <u>Decision 2022/429 / Implementing Regulation 2022/427</u> (implementing Regulation 269/2014)</p> <p>Prohibition under <u>Decision 2022/327 / Regulation 2022/328</u> (amending Regulation 833/2014) on directly or indirectly dealing with transferable securities and money-market instruments issued by Rostec after April 12, 2022, or any legal person, entity or body:</p> <ul style="list-style-type: none"> • Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above • Acting on behalf or at the direction of the above 	
URAL BANK FOR RECONSTRUCTION AND DEVELOPMENT	Not designated	Not designated	<u>Asset freeze</u> , subject to a <u>General License</u> permitting the wind-down of transactions with Ural Bank for Reconstruction

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
			and Development and its Subsidiaries** until April 23, 2022
URALVAGONZAVOD	<u>SDN</u>	<p>Prohibition under <u>Decision 2022/430 / Regulation 2022/428</u> (amending <u>Regulation 833/2014</u>) on directly or indirectly engaging in any transaction with UralVagonZavod, or any legal person, entity or body:</p> <ul style="list-style-type: none"> • Established outside the EU whose proprietary rights are directly or indirectly owned more than 50% by the above • Acting on behalf or at the direction of the above <p>Exception for certain fossil fuels and energy-related transactions</p> <p>Asset freeze under <u>Decision 2022/429 / Implementing Regulation</u></p>	<p><u>Asset freeze</u></p> <p><u>Investment ban</u> [Pre-2022]</p>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
		<u>2022/427</u> (implementing Regulation 269/2014)	
VEB (VNESHEKONOMBANK)	<p><u>SDN</u>, subject to:</p> <ul style="list-style-type: none"> • <u>General License 2</u> authorizes transactions incident to the servicing of bonds issued before March 1, 2022 • <u>General License 3</u> authorizes the wind down of transactions through March 24, 2022 • <u>General License 9A</u> authorizes transactions incident to dealings in debt or equity issued prior to February 24, 2022 before May 25, 2022 • <u>General License 10A</u> authorizes the wind down of derivative contracts entered into before February 24, 2022 before May 25, 2022 	<p>SWIFT removal under <u>Decision 2022/346 / Regulation 2022/345</u> (amending <u>Regulation 833/2014</u>)</p> <p>Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing <u>Regulation 269/2014</u>)</p> <p>Existing restrictions on dealings in transferable securities and money-market instruments under <u>Regulation (EU) 833/2014</u> [Pre-2022]</p>	<p>Asset freeze, subject to a <u>General License</u> permitting the wind-down of transactions with VEB and its Subsidiaries** until April 3, 2022</p> <p><u>Investment ban</u> [Pre-2022]</p>

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	Previously imposed restrictions on dealings in new debt and equity through <u>Directive 1A</u> under EO 13662		
VTB BANK	<p><u>SDN</u>, subject to:</p> <ul style="list-style-type: none"> • <u>General License 9A</u> authorizes transactions incident to dealings in debt or equity issued prior to February 24, 2022 before May 25, 2022 • <u>General License 10A</u> authorizes the wind down of derivative contracts entered into before February 24, 2022 before May 25, 2022 • <u>General License 11</u> authorizes the wind down of all other transactions before March 26, 2022 <p>Previously imposed restrictions on dealings in new debt and</p>	<p>SWIFT removal under <u>Decision 2022/346 / Regulation 2022/345</u>, amending <u>Regulation 833/2014</u></p> <p>Existing restrictions on dealings in transferable securities and money-market instruments under <u>Regulation (EU) 833/2014 [Pre-2022]</u></p> <p>Asset freeze under <u>Decision 2022/582 / Implementing Regulation 2022/581</u> (implementing <u>Regulation 269/2014</u>)</p>	<p><u>Asset freeze</u>, subject to:</p> <ul style="list-style-type: none"> • <u>General License</u> applicable to VTB Capital and U.K. entities owned or controlled by VTB Capital incorporated in the U.K. permitting them to pay for basic needs e.g., insurance premiums, remuneration or pensions of employees and rent and utility payments, as well as reasonable fees for holding and maintenance of frozen funds and reasonable professional fees for legal services, as well as payments related to insolvency proceedings, until April 3, 2023;

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
	equity through <u>Directive 1A</u> under EO 13662		<ul style="list-style-type: none"> <li data-bbox="1693 185 2119 863">• <u>General License</u> applicable to U.K. financial regulators (including the FCA, FSCS, PRA and Bank of England) to do anything with regard to VTB Capital and U.K. entities owned or controlled by VTB Capital related to prudential regulation, or protecting, maintaining or enhancing the financial stability of the U.K. until March 1, 2023; and <li data-bbox="1693 895 2119 1401">• <u>General License</u> permitting the wind-down of transactions with VTB Bank and *Subsidiaries of VTB Bank, including by closing out any positions until March 27, 2022 (amended on <u>March 7, 2022</u> to expand the definition of “subsidiary of VTB Bank” from VTB

ENTITY	US ⁱ	EU ⁱⁱ	UK ⁱⁱⁱ
			<p>Capital plc (and any entity owned or controlled by VTB Capital plc incorporated in the U.K.) to “an entity owned or controlled by VTB Bank” and amended on <u>March 9, 2022</u> with amendments to the publication notice)</p> <p>Investment ban [Pre-2022]</p>

Key Sanctioned Individuals as of April 27, 2022#

INDIVIDUAL	RELATED ENTITY	US	EU	UK
ABRAMOVICH, ROMAN	Owner of Chelsea FC; shareholder of steel group Evraz	Not designated	Asset freeze under <u>Decision 2022/429 / Implementing Regulation 2022/427</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u> subject to a <u>General Licence</u> permitting certain activities to be conducted with respect to Chelsea Football Club, Chelsea FC Plc and its subsidiaries (the “Club”), as well as its parent company, Fordstam Ltd, until May 31, 2022. See “Chelsea Football Club”, above, for further details.
ALEKPEROV, VAGIT	President of PJSC Lukoil	Not designated	Not designated	<u>Asset freeze; travel ban</u>
AKIMOV, ANDREY	CEO of Gazprombank	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
AVEN, PETR	President of Alfa Bank and founder of LetterOne	Not designated	Asset freeze under <u>Decision 2022/337 / Implementing</u>	<u>Asset freeze; travel ban</u>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
			<u>Regulation 2022/336</u> (implementing <u>Regulation 269/2014</u>)	
BELOZYOROV, OLEG	CEO of Russian Railways	Not designated	Not designated	<u>Asset freeze; travel ban</u>
BORTNIKOV, DENIS	Deputy president and chair of the management board of VTB Bank	<u>SDN</u>	Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
CASIMIRO, DIDIER	First Vice President of Rosneft	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
CHEMEZOV, SERGEI	CEO of Rostec	<u>SDN</u>	Existing asset freeze under <u>Implementing Regulation 2020/398</u> (implementing <u>Regulation 269/2014</u>) [Pre-2022]	<u>Asset freeze; travel ban</u> [Pre-2022]

INDIVIDUAL	RELATED ENTITY	US	EU	UK
DERIPASKA, OLEG	Founder of Basic Element and Volnoe Delo	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
DMITRIEV, KIRILL	CEO of Russian Direct Investment Fund and Management Company of the Russian Direct Investment Fund	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
DYUKOV, ALEKSANDER	CEO of Gazprom Neft	Not designated	Not designated	<u>Asset freeze; travel ban</u>
FRADKOV, PETR	CEO of Promsvyazbank	<u>SDN</u>	Asset freeze under <u>Decision 2022/337 / Implementing Regulation 2022/336</u> (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>
FRIDMAN, MIKHAIL	Founder of Alfa Bank, LetterOne	Not designated	Asset freeze under <u>Decision 2022/337 / Implementing Regulation 2022/336</u> (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>
GEORGIEVA, ELENA	Chair of the board of directors of Novikombank	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
GRIF, HERMAN	Chief Executive Officer of Sberbank	<u>SDN</u>	Asset freeze under <u>Decision 2022/582 / Implementing Regulation 2002/581</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
GRIGORENKO, DMITRY	Deputy prime minister and chief of the government staff and chair of the supervisory council of VTB bank	Not designated	Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
IVANOV, SERGEI	CEO of Alrosa, board member of Gazprombank	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
KERIMOV, SULEYMAN	Owner of financial and industrial group Nafta Moscow	<u>SDN</u>	Asset freeze under <u>Decision 2022/429 / Implementing Regulation 2022/427</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
KHAN, ANZHELIKA	Wife of German Khan	Not designated	Not designated	<u>Asset freeze; transport sanctions</u>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
KHAN, GERMAN	Business partner of Aven and Fridman in Alfa Bank and LetterOne	Not designated	Asset freeze under <u>Decision 2022/429 / Implementing Regulation 2022/427</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
KIRIYENKO, VLADIMIR	CEO of VK Group	<u>SDN</u>	Asset freeze under <u>Decision 2022/397 / Implementing Regulation 2022/396</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
KOGOGIN, SERGEY	Director of Kamaz	Not designated	Not designated	<u>Asset freeze; travel ban</u>
KOSTIN, ANDREI	Chair of the board of directors of VTB Bank	<u>SDN</u>	Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
KOVALEVA, POLINA	Stepdaughter of Foreign Minister Sergei Lavrov	Not designated	Not designated	<u>Asset freeze; travel ban</u>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
KUZMICHEV, ALEXEY	Shareholder of Alfa group of companies, including Alfa Bank	Not designated	Asset freeze under <u>Decision 2022/429 / Implementing Regulation 2022/427</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
LAVROV, SERGEI	Russian Foreign Minister	<u>SDN</u>	Asset freeze under <u>Decision 2022/331 / Regulation 2022/332</u> (amending <u>Regulation 269/2014</u>)	<u>Asset freeze</u>
LEBEDEV, DMITRI	Chair of the board of directors of Bank Rossiya	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
MELNICHENKO, ANDREY	Founder of EuroChem Group	Not designated	Asset freeze under <u>Decision 2022/397 / Implementing Regulation 2022/396</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
MIKHEEV, ALEXANDER	CEO of Rosoboronexport	<u>SDN</u>	Asset freeze under <u>Decision 2022/429 / Implementing Regulation 2022/427</u>	<u>Asset freeze; travel ban</u>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
			(implementing Regulation 269/2014)	
MILLER, ALEXEI	Chair of the management committee and Deputy Chair of the board of directors of Gazprom	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
MISHUSTIN, MIKHAIL	Russian Prime Minister	Not designated	Asset freeze under Decision 2022/331 / Regulation 2022/332 (amending Regulation 269/2014)	<u>Asset freeze; travel ban</u>
MORDASCHOV, ALEXEY	Majority shareholder in steel company Severstal	Not designated	Asset freeze under Decision 2022/337 / Implementing Regulation 2022/336 (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>
MOSHKOVICH, VADIM	Chair of the board of directors of Rusagro Group	Not designated	Asset freeze under Decision 2022/397 / Implementing Regulation 2022/396 (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
OSEEVSKY, MIKHAIL	President of Rostelecom	Not designated	Asset freeze under <u>Decision 2022/397 / Implementing Regulation 2022/396</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
PATRUSHEV, ANDREY	Former CEO of Gazprom Neft	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
PESKOV, DMITRY	Kremlin Press Secretary	<u>SDN</u>	Asset freeze under <u>Decision 2022/337 / Implementing Regulation 2022/336</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
POLUBOYARINOV, MIKHAIL	CEO of Aeroflot	Not designated	Asset freeze under <u>Decision 2022/397 / Implementing Regulation 2022/396</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
PRIGOZHIN, YEVGENIY	Russian businessman, associated with following entities:	<u>SDN</u>	Asset freeze under <u>Decision 2020/1483 / Implementing Regulation 2020/1481</u> [Pre-2022, re. Libya]	<u>Asset freeze; travel ban</u>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
	<ul style="list-style-type: none"> • Internet Research Agency • Lakhta companies • Wagner Group 			
PRIGOZHINA, LYUBOV	Wife of Yevgeniy Prigozhin; owner of Agat LLC (subsidiary of Concord Management & Consulting LLC)	<u>SDN</u>	Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
PRIGOZHINA, POLINA	Daughter of Yevgeniy Prigozhin	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
PRIGOZHINA, VIOLETTA	Mother of Yevgeniy Prigozhin; owner of Concord Management & Consulting LLC	Not designated	Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
PUCHKOV, ANDREY	Executive of VTB Bank	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
PUMPYANSKY, ALEXANDER	Son of Dmitry Pumpyansky	Not designated	Asset freeze under <u>Decision 2022/397 / Implementing Regulation 2022/396</u>	<u>Asset freeze; travel ban</u>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
			(implementing Regulation 269/2014)	
PUMPYANSKY, DMITRY	Owner and chair of the board of directors of Pipe Metallurgical Company (TMK)	Not designated	Asset freeze under Decision 2022/397 / Implementing Regulation 2022/396 (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>
PUMPYANSKAYA, GALINA	Wife of Dmitry Pumpyansky	Not designated	Asset freeze under Decision 2022/397 / Implementing Regulation 2022/396 (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>
PUTIN, VLADIMIR	President of the Russian Federation	<u>SDN</u>	Asset freeze under Decision 2022/331 / Regulation 2022/332 (amending Regulation 269/2014)	<u>Asset freeze</u> [Note that Vladimir Putin's daughters, Katerina Tikhonovna and Maria Vorontsova (below) are subject to asset freezes and travel bans]
RASHNIKOV, VIKTOR	Owner and chair of the board of directors of	Not designated	Asset freeze under Decision 2022/429 / Implementing	<u>Asset freeze; travel ban</u>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
	Magnitogorsk Iron & Steel Works		<u>Regulation 2022/427</u> (implementing <u>Regulation 269/2014</u>)	
RESHETNIKOV, MAXIM	Minister of Economic Development and member of the supervisory council of VTB Bank	Not designated	Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
ROTENBERG, ARKADY	Businessperson	<u>SDN</u>	Existing asset freeze under <u>Regulation 2020/1267</u> (implementing <u>Regulation 269/2014</u>) [Pre-2022]	<u>Asset freeze; travel ban</u> [Pre-2022]
ROTENBERG, BORIS	Board member and shareholder of SMP Bank	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
ROTENBERG, IGOR	Chair of the board of directors of National Telematic Systems	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
RUNJE, ZELJKO	Deputy Chairman of the Management Board and First Vice President for Oil, Gas and Offshore	Not designated	Not designated	<u>Asset freeze; travel ban</u>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
	Business Development of Rosneft			
SECHIN, IGOR	CEO of Rosneft	<u>SDN</u>	Asset freeze under <u>Decision 2022/337 / Implementing Regulation 2022/336</u> (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>
SECHINA, MARINA	Wife of Igor Sechin	Not designated	Asset freeze under <u>Decision 2022/429 / Implementing Regulation 2022/427</u> (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>
SHAMALOV, KIRILL	Deputy chair on the management board of PAO SIBUR Holding	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
SHOIGU, SERGEI	Russian Defense Minister	<u>SDN</u>	Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing Regulation 269/2014)	<u>Asset freeze; travel ban</u>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
SHUVALOV, IGOR	Chair of the management board of VEB	<u>SDN</u>	Asset freeze under <u>Decision 2022/265 / Implementing Regulation 2022/260</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
SILUANOV, ANTON	Russian Finance Minister	<u>SDN</u>	Not designated	Not designated
SLYUSAR, YURY	Director general of United Aircraft Corporation	Not designated	Not designated	<u>Asset freeze; travel ban</u>
SOLOVIEV, YURIY	First deputy president and chair of the management board of VTB Bank	<u>SDN</u>	Not designated	Not designated
TIKHONOVA, KATERINA	Daughter of President Vladimir Putin	<u>SDN</u>	Asset freeze under <u>Decision 2022/582 / Implementing Regulation 2022/581</u> (amending <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
TIMCHENKO, GENNADIY	Major shareholder in Bank Rossiya	<u>SDN</u>	Asset freeze under <u>Decision 2022/337 / Implementing</u>	<u>Asset freeze; travel ban</u>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
			<u>Regulation 2022/336</u> (implementing <u>Regulation 269/2014</u>)	
TOKAREV, NIKOLAI	CEO of Transneft	<u>SDN</u>	Asset freeze under <u>Decision 2022/337 /</u> <u>Implementing</u> <u>Regulation 2022/336</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
TOKAREVA, GALINA	Wife and daughter of Nikolai Tokarev	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
TOKAREVA, MAIYA	Daughter of Nikolai Tokarev	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
ULYUTINA, GALINA	Wife of Yuriy Soloviev	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
USMANOV, ALISHER	Businessperson and pro-Kremlin oligarch	<u>SDN</u> , subject to <u>General</u> <u>License 15</u> allowing all transactions and unblocking all property of any entity owned 50% or more, directly or indirectly, by Usmanov, that does not specifically appear on OFAC's SDN List	Asset freeze under <u>Decision 2022/337 /</u> <u>Implementing</u> <u>Regulation 2022/336</u> (implementing <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>

INDIVIDUAL	RELATED ENTITY	US	EU	UK
		Private aircraft and superyacht designated as blocked property		
VEDYAKHIN, ALEXANDER	First deputy chair of the executive board of Sberbank	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
VEKSELBERG, VIKTOR	Owner of the Renova Group	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
VINOKUROVA, YEKATERINA	Daughter of Foreign Minister Sergei Lavrov	<u>SDN</u>	Not designated	<u>Asset freeze; travel ban</u>
VORONTSOVA, MARIA	Daughter of President Vladimir Putin	<u>SDN</u>	Asset freeze under <u>Decision 2022/582 / Implementing Regulation 2022/581</u> (amending <u>Regulation 269/2014</u>)	<u>Asset freeze; travel ban</u>
WARNIG, MATTHIAS	CEO of Nord Stream 2 AG	<u>SDN</u>	Not designated	Not designated

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

The tables provide a snapshot of key entities and individuals subject to sanctions imposed in the U.S., EU and/or U.K. in connection with Russia’s invasion of Ukraine and Crimea. Although the table focuses primarily on sanctions imposed since February 21, 2022, the U.S., EU and U.K. sanctions regimes against Russian entities and individuals date back to the 2014 annexation of Crimea by Russia and, in some cases, earlier. Certain major companies (e.g., Lukoil) were therefore subject to sanctions and other restrictive measures prior to 2022 and have been included in this table to provide broader information. However, **the information in this table is not a comprehensive list of Russia sanctions and should not be relied on as legal advice.** These measures may change at short notice in light of the evolving situation. Sanctions may apply to entities and individuals that have not been expressly designated on sanctions lists and may be listed as “not designated” on this table as: (a) entities owned, held or controlled by a sanctioned entity or individual may also be subject to sanctions; and (b) some sanctions may apply broadly to entities or individuals connected with Russia or the Russian regime more generally. Certain key companies which are considered controlled by sanctioned persons or businesses are listed here (e.g., Chelsea Football Club and Evraz PLC), but on a non-exhaustive basis. Further details of how sanctions are applied in each of the three covered jurisdictions may be found in our client note, “US, EU And UK Expand Russian Sanctions Amid Ongoing Ukraine Conflict.”

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

ii In the EU, if a person or entity is designated, their name will be recorded on the [Consolidated List](#). An asset freeze covers all funds and economic resources owned or controlled, directly or indirectly, by designated persons and entities. The criterion for assessing whether a legal person or entity is “owned” by another person or entity is the possession of more than 50% of the proprietary rights of an entity or having a majority interest in it. The criteria for assessing

whether a legal person or entity is “controlled” by another person or entity, alone or pursuant to an agreement with another shareholder or other third party, include e.g., having the right to exercise a dominant influence over a legal person or entity. Recent [European Commission FAQs](#) on how ownership should be assessed provide that the interests of sanctioned persons should be aggregated (e.g. if one sanctioned individual owns 30% of a company and another sanctioned individual owns 25% of a company, the company should be considered as jointly owned and controlled by listed persons). Some companies who have such an ownership structure have however asserted that they are not treated as sanctioned entities, citing confirmation by public officials. This particular area of the rules therefore is controversial and requires careful consideration. These entities may not be designated in their own right, and therefore may not appear on the Consolidated List.

- iii In the U.K., if a person or entity is designated, their name will be recorded on the [Consolidated List](#). An asset freeze and some financial services restrictions will apply to entities (meaning a body of persons corporate or unincorporated, or any organisation or association or combination of persons) that are owned or controlled, directly or indirectly, by a designated person. Those entities may not be designated in their own right, so their names may not appear on the Consolidated List. However, those entities are similarly subject to financial sanctions. [Guidance](#) from HM Treasury’s Office of Financial Sanctions Implementation (OFSI) provides further details on how ownership and control should be assessed. For U.K. purposes, companies which are sanctioned as a result of the holdings of a sanctioned individual are usually mentioned within the OFSI designation instrument for the relevant individual. Notably Evraz PLC has been deemed effectively controlled by a sanctioned person in the U.K., even though the sanctioned individual only holds a minority shareholding and minority board appointment rights. Its status as a sanctioned entity was confirmed in the relevant text in the HMT sanctioning measure related to the individual controller.
- * On March 3, 2022, Mikhail Fridman and Petr Aven resigned from the boards of Alfa Bank and the holding company that owns it, ABH Holdings. Fridman and Aven had been sanctioned in the EU the previous day and were sanctioned in the U.K. on March 15, 2022.
- ** “Subsidiaries” are any entity owned or controlled by the Designated Person in the General License.

SHEARMAN & STERLING

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

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

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