

**Sanctions Status of Certain Russian Entities and Individuals
Prepared by Cleary Gottlieb Steen & Hamilton LLP (updated as of May 23, 2022)**

This chart summarizes the sanctions status of certain Russian entities and individuals that have been sanctioned in connection with the ongoing conflict in Ukraine since February 21, 2022. Some of the parties previously had been subject to sanctions. The chart is not intended to provide a comprehensive list of all Russia-related sanctions designations by the United States, European Union, United Kingdom and Switzerland and may not reflect the most recent sanctions designations, is not an official government list and should not be relied upon as such, and does not constitute legal advice or establish an attorney-client relationship between Cleary Gottlieb and any party.

Key for Relevant Abbreviations

Term	Meaning
SDN	U.S. Specially Designated Nationals and Blocked Persons List
SSI	U.S. Sectoral Sanctions Identifications List
AF	EU, UK or Swiss Asset Freezes
RCB	EU or UK Russian Central Bank Restrictions ¹
FSS	EU, UK or Swiss Financial Sector Sanctions ²
SWIFT	EU or Swiss Financial Messaging Services Restrictions
RD	EU Restricted Dealings ³

¹ This coding refers to EU or UK restrictions on certain transactions relating to the foreign currency/reserves and asset management activities of the designated entities, including the Russian Central Bank. Please consult our blog post for further information about these restrictions.

² This coding refers to EU, UK or Swiss restrictions on certain financial transactions (for example, certain dealings in debt and equity) with or involving the designated entities (i.e., certain financial restrictions short of asset freezes). Please consult our blog post for further information about these restrictions.

³ This coding refers to EU prohibitions on all transactions with the designated entities (i.e., a prohibition on all transactions separate and apart from, or notwithstanding the lack of, as applicable, any asset freeze designation). Please consult our blog post for further information about these restrictions.

Entities

Company	United States	European Union	United Kingdom/British Overseas Territories and Crown Dependencies	Switzerland
Alfa-Bank	<u>SDN</u> ; <u>Directive 3 (E.O. 14024)</u>	<u>FSS</u>	<u>AF</u>	<u>FSS</u>
Almaz-Antey	<u>SDN</u> (Pre-2022)	<u>FSS</u> ; <u>RD</u>	<u>AF</u> (pre-2022)	<u>FSS</u> (Pre-2022)
Alrosa	<u>SDN</u> ; <u>Directive 3 (E.O. 14024)</u>	N/A	<u>AF</u>	N/A
Bank Rossiya	<u>SDN</u> (Pre-2022)	<u>AF</u> ; <u>FSS</u> ; <u>SWIFT</u>	<u>AF</u>	<u>AF</u> ; <u>FSS</u> ; <u>SWIFT</u>
Black Sea Bank for Development and Reconstruction	<u>SDN</u> (Pre-2022)	N/A	<u>AF</u>	N/A
Central Bank of Russia (CBR; RCB)	<u>Directives 1A, 4 (E.O. 14024)</u>	<u>RCB</u>	<u>RCB</u>	N/A
Credit Bank of Moscow	<u>Directive 3 (E.O. 14024)</u>	N/A	<u>AF</u>	N/A
Concern Sea Underwater Weapon Gidropribor JSC	<u>SDN</u>	N/A	N/A	N/A
Gazprom	<u>Directive 3 (E.O. 14024)</u> ; <u>SSI (Directive 4) (Pre-2022)</u>	N/A	N/A	N/A
Gazprom Neft	<u>Directive 3 (E.O. 14024)</u> ; <u>SSI (Directives 2, 4) (Pre-2022)</u>	<u>FSS</u> (Pre-2022); <u>RD</u>	<u>FSS</u> (Pre-2022)	<u>FSS</u> (Pre-2022)
Gazprombank	<u>Directive 3 (E.O. 14024)</u> ; <u>SSI (Directive 1) (Pre-2022)</u>	<u>FSS</u> (Pre-2022)	<u>AF</u> ; <u>FSS</u> (Pre-2022)	<u>FSS</u> (Pre-2022)

Company	United States	European Union	United Kingdom/British Overseas Territories and Crown Dependencies	Switzerland
Genbank	<u>SDN</u> (Pre-2022)	N/A	<u>AF</u>	N/A
Internet Research Agency	<u>SDN</u> (Pre-2022)	<u>AF</u>	<u>AF</u>	<u>AF</u>
IS Bank	N/A	N/A	<u>AF</u>	N/A
JSC PO Sevmash	<u>SDN</u>	<u>FSS</u> ; <u>RD</u>	N/A	<u>FSS</u>
Kamaz	N/A	<u>FSS</u> ; <u>RD</u>	<u>AF</u>	<u>FSS</u>
Kronshtadt	<u>SDN</u>	N/A	<u>AF</u>	<u>AF</u>
Novikombank	<u>SDN</u> ; <u>SSI (Directive 3)</u> (Pre-2022)	<u>AF</u> ; <u>SWIFT</u>	N/A	<u>SWIFT</u>
Novorossiysk Commercial Sea Port	N/A	<u>FSS</u>	N/A	<u>FSS</u>
NPK Tekhmash OAO	<u>SDN</u> ; <u>SSI (Directive 3)</u> (Pre-2022)	N/A	N/A	N/A
NPO High Precision Systems	<u>SDN</u> ; <u>SSI (Directive 3)</u> (Pre-2022)	<u>AF</u>	N/A	<u>AF</u>
OPK Oboronprom	<u>SSI (Directive 3)</u> (Pre-2022)	<u>FSS</u> (Pre-2022); <u>RD</u>	<u>FSS</u> (Pre-2022)	<u>FSS</u> (Pre-2022)
Otkritie	<u>SDN</u>	<u>AF</u> ; <u>FSS</u> ; <u>SWIFT</u>	<u>AF</u>	<u>FSS</u> ; <u>SWIFT</u>
Promsvyazbank (PSB)	<u>SDN</u>	<u>AF</u> ; <u>FSS</u> ; <u>SWIFT</u>	<u>AF</u>	<u>AF</u> ; <u>FSS</u> ; <u>SWIFT</u>
Rosneft	<u>SSI (Directives 2, 4)</u> (Pre-2022)	<u>FSS</u> (Pre-2022); <u>RD</u>	<u>FSS</u> (Pre-2022)	<u>FSS</u> (Pre-2022)
Rosoboronexport	<u>SDN</u> (Pre-2022); <u>SSI (Directive 3)</u> (Pre-2022)	<u>AF</u>	N/A	<u>AF</u>

Company	United States	European Union	United Kingdom/British Overseas Territories and Crown Dependencies	Switzerland
Rostec	<u>Directive 3 (E.O. 14024)</u>	<u>FSS</u> ; <u>RD</u>	<u>AF</u>	<u>FSS</u>
Rostelecom	<u>Directive 3 (E.O. 14024)</u>	N/A	N/A	N/A
RusHydro	<u>Directive 3 (E.O. 14024)</u>	N/A	<u>AF</u>	N/A
Russian Agricultural Bank (Rosselkhozbank)	<u>Directive 3 (E.O. 14024)</u> ; <u>SSI (Directive 1) (Pre-2022)</u>	<u>FSS</u> (Pre-2022)	<u>FSS</u> (Pre-2022); <u>AF</u>	<u>FSS</u> (Pre-2022)
Russian Direct Investment Fund (RDIF)	<u>SDN</u>	N/A	<u>AF</u>	N/A
Russian Helicopters	<u>SDN</u> ; <u>SSI (Directive 3) (Pre-2022)</u>	<u>AF</u>	N/A	<u>AF</u>
Russian Ministry of Finance	<u>Directives 1A, 4 (E.O. 14024)</u>	N/A	<u>RCB</u>	N/A
Russian National Wealth Fund	<u>Directives 1A, 4 (E.O. 14024)</u>	N/A	<u>RCB</u>	N/A
Russian Railways	<u>Directive 3 (E.O. 14024)</u>	<u>FSS</u>	<u>AF</u>	<u>FSS</u>
Sberbank	<u>SDN</u> ; <u>Directives 2 and 3 (E.O. 14024)</u> ; <u>SSI (Directive 1) (Pre-2022)</u>	<u>FSS</u> (Pre-2022)	<u>AF</u> ; <u>FSS</u>	<u>FSS</u> (Pre-2022)
SOGAZ	N/A	<u>AF</u>	<u>AF</u>	<u>AF</u>
Sovcombank	<u>SDN</u>	<u>AF</u> ; <u>SWIFT</u>	<u>AF</u>	<u>SWIFT</u>
Sovcomflot	<u>Directive 3 (E.O. 14024)</u>	<u>FSS</u> ; <u>RD</u>	<u>AF</u>	<u>FSS</u>

Company	United States	European Union	United Kingdom/British Overseas Territories and Crown Dependencies	Switzerland
Tactical Missiles Corporation	<u>SDN</u>	<u>AF</u>	<u>AF</u>	<u>AF</u>
Transkapitalbank	<u>SDN</u>	N/A	N/A	N/A
Transneft	<u>Directive 3 (E.O. 14024); SSI (Directive 2) (Pre-2022)</u>	<u>FSS (Pre-2022); RD</u>	<u>FSS(Pre-2022)</u>	<u>FSS (Pre-2022)</u>
United Aircraft Corporation	N/A	<u>AF; FSS (Pre-2022)</u>	<u>AF; FSS(Pre-2022)</u>	<u>FSS (Pre-2022);</u>
United Shipbuilding Corporation	<u>SDN</u>	<u>AF; FSS; RD</u>	<u>AF</u>	<u>AF; FSS</u>
Ural Bank for Reconstruction and Development	N/A	N/A	<u>AF</u>	N/A
Uralvagonzavod	<u>SDN (Pre-2022)</u>	<u>FSS (Pre-2022); RD</u>	<u>AF; FSS (Pre-2022)</u>	<u>FSS (Pre-2022)</u>
Vnesheconom-bank (VEB)	<u>SDN; SSI (Directive 1) (Pre-2022)</u>	<u>AF; FSS (Pre-2022); SWIFT</u>	<u>AF; FSS (Pre-2022)</u>	<u>AF; FSS (Pre-2022); SWIFT</u>
VTB Bank	<u>SDN; SSI (Directive 1) (pre-2022)</u>	<u>AF; FSS (Pre-2022); SWIFT</u>	<u>AF; FSS (Pre-2022)</u>	<u>FSS (Pre-2022); SWIFT</u>

Individuals

Individual	United States	European Union	United Kingdom/British Overseas Territories and Crown Dependencies	Switzerland
Abramovich, Roman Arkadyevich (Owner of Chelsea Football Club; Shareholder of Evraz PLC; Shareholder of Norilsk Nickel)	N/A	<u>AF</u>	<u>AF</u>	<u>AF</u>
Akimov, Andrey (CEO of Gazprombank)	<u>SDN</u>	N/A	<u>AF</u>	N/A
Aven, Petr (Shareholder of Alfa Bank)	N/A	<u>AF</u>	<u>AF</u>	<u>AF</u>
Bortnikov, Denis (Director of Russian Federal Security Service)	<u>SDN</u>	<u>AF</u>	<u>AF</u>	<u>AF</u>
Deripaska, Oleg Vladimirovich (Significant Shareholder in En+ Group)	<u>SDN</u>	<u>AF</u>	<u>AF</u>	<u>AF</u>
Fradkov, Petr (Chairman of Promsvyazbank)	<u>SDN</u>	<u>AF</u>	<u>AF</u>	<u>AF</u>
Friedman, Michael (Mikhail Fridman) (Founder of Alfa Group)	N/A	<u>AF</u>	<u>AF</u>	<u>AF</u>

Individual	United States	European Union	United Kingdom/British Overseas Territories and Crown Dependencies	Switzerland
Gref, Herman (German Gref) (CEO of Sberbank)	<u>SDN</u>	<u>AF</u>	<u>AF</u>	<u>AF</u>
Ivanov, Sergey B. (Russian Government Official)	<u>SDN</u>	<u>AF</u>	<u>AF</u>	<u>AF</u>
Ivanov, Sergey S. (CEO of Alrosa; Board Member of Gazprombank)	<u>SDN</u>	N/A	<u>AF</u>	N/A
Kostin, Andrei Leonidovich (Chairman of VTB)	<u>SDN</u>	<u>AF</u>	<u>AF</u>	<u>AF</u>
Lavrov, Sergey (Russian Minister of Foreign Affairs)	<u>SDN</u>	<u>AF</u>	<u>AF</u>	<u>AF</u>
Lebedev, Dmitri Alekseevich (Chairman of the Board of Directors of Rossiya)	<u>SDN</u>	N/A	<u>AF</u>	N/A
Medvedev, Dmitry (Former President)	<u>SDN</u>	<u>AF</u>	<u>AF</u>	<u>AF</u>
Mikheev, Alexander (Director General of Rosoboronexport)	<u>SDN</u>	<u>AF</u>	<u>AF</u>	<u>AF</u>
Mishustin, Mikhail (Former Prime Minister)	<u>SDN</u>	<u>AF</u>	<u>AF</u>	<u>AF</u>

Individual	United States	European Union	United Kingdom/British Overseas Territories and Crown Dependencies	Switzerland
Mikhelson, Leonid⁴	N/A	N/A	<u>AF</u>	N/A
Miller, Alexey Borisovich (CEO of Gazprom)	<u>SDN</u>	N/A	<u>AF</u>	N/A
Mordashov, Aleksey (Chairman of Severgroup; shareholder of Rossiya)	N/A	<u>AF</u>	N/A	<u>AF</u>
Putin, Vladimir (Russian President)	<u>SDN</u>	<u>AF</u>	<u>AF</u>	<u>AF</u>
Sechin, Igor (CEO of Rosneft)	<u>SDN</u>	<u>AF</u>	<u>AF</u>	<u>AF</u>
Shuvalov, Igor Ivanovich (Chairman of VEB)	<u>SDN</u>	<u>AF</u>	<u>AF</u>	<u>AF</u>
Soloviev, Yuriy (Executive of VTB)	<u>SDN</u>	N/A	<u>AF</u>	N/A
Timchenko, Gennady (Russian Minister of Transport; Board Member of Russian Railways)	<u>SDN</u> (Pre-2022)	<u>AF</u>	<u>AF</u>	<u>AF</u>
Tinkov, Oleg (founder of Tinkoff Bank)	N/A	N/A	<u>AF</u>	N/A
Tokarev, Nikolay (CEO of Transneft)	<u>SDN</u>	<u>AF</u>	<u>AF</u>	<u>AF</u>

⁴ Mikhelson is a notable Russian business figure identified in the U.S. Treasury's so-called "Oligarchs Report" under CAATSA Sec. 241. To date, Mikhelson has not been designated for any U.S. sanctions.

Individual	United States	European Union	United Kingdom/British Overseas Territories and Crown Dependencies	Switzerland
Usmanov, Alisher (Founder of USM Holdings)	<u>SDN</u>	<u>AF</u>	<u>AF</u>	<u>AF</u>