

EU Imposes Wide-Ranging Sectoral Sanctions Against Russia

I. OVERVIEW

On July 31, 2014, the Council of the European Union ("EU") adopted Council Regulation (EU) 833/2014 ("Regulation 833/2014"), implementing Council Decision 2014/512/CFSP ("Decision 2014/512") of July 31, 2014.¹

Regulation 833/2014 is the latest of a series of recent measures tightening the EU's economic sanctions in connection with the situation in Ukraine. Other recent measures include: (i) Council Decision 2014/507/CFSP ("Decision 2014/507") and Council Regulation (EU) 825/2014 ("Regulation 825/2014") prohibiting investments in and exports of technologies for certain sectors in Crimea or Sevastopol;² and (ii) Council Decision 2014/508/CFSP ("Decision 2014/508") and Council Implementing Regulation (EU) 826/2014 ("Regulation 826/2014"),³ listing additional individuals and entities that are considered responsible for action against Ukraine's territorial integrity and subjecting them to an asset freeze and, in the case of the individuals, a visa ban.

This memorandum provides an overview of the EU's most recent expansion of its sanctions program in connection with the situation in Ukraine.

II. SECTORAL SANCTIONS

A. Restrictions on Access to the Capital Markets for Certain Financial Institutions

Regulation 833/2014 prohibits the purchase or sale of transferable securities and money-market instruments with a maturity exceeding 90 days, issued after August 1, 2014 by: (i) five major state-owned Russian banks and development banks; (ii) their

¹ Council Regulation (EU) 833/2014 of July 31, 2014, OJ 2014 L229/13 and Council Decision 2014/512/CFSP of July 31, 2014, OJ 2014 L229/1.

² Council Decision 2014/386/CFSP of July 30, 2014, OJ 2014 L226/20 and Council Regulation (EU) 692/2014 of July 30, 2014, OJ 2014 L226/2.

³ Council Decision 2014/508/CFSP of July 30, 2014, OJ 2014 L226/23 and Council Implementing Regulation (EU) 826/2014 of July 30, 2014, OJ 2014 L226/16.

subsidiaries established outside of the EU;⁴ and (iii) those acting on behalf of such subsidiaries.

The financial institutions listed are: Sberbank, VTB Bank, Gazprombank, Vnesheconombank, and Rosselkhozbank.

Regulation 833/2014 defines “transferable securities” as the classes of securities which are negotiable on the capital market, with the exception of instruments of payment,⁵ such as:

- (i) shares in companies and other securities equivalent to shares in companies, partnerships or other entities, and depositary receipts in respect of shares;
- (ii) bonds or other forms of securitised debt, including depositary receipts in respect of such securities; and
- (iii) any other securities giving the right to acquire or sell any such transferable securities or giving rise to a cash settlement.

Regulation 833/2014 defines “money-market instruments” as the classes of instruments which are normally dealt in on the money market such as treasury bills, certificates of deposit, and commercial papers and excluding instruments of payment.

Services related to the issuing of such transferable securities and money-market instruments, *e.g.*, brokering,⁶ are also prohibited.

Other financial services such as deposit business, payment services and loans to and from Sberbank, VTB Bank, Gazprombank, Vnesheconombank, and Rosselkhozbank and their subsidiaries remains permissible.

⁴ Subsidiaries in the EU of the five major state-owned Russian banks and development banks are not covered by Regulation 833/2014.

⁵ Regulation 833/2014 does not define instruments of payments.

⁶ Regulation 833/2014 defines brokering as the following services and activities: “(i) reception and transmission of orders in relation to one or more financial instrument, (ii) execution of orders on behalf of clients, (iii) dealing on own account, (iv) portfolio management, (v) investment advice, (vi) underwriting of financial instruments and/or placing of financial instruments on a firm commitment basis, (vii) placing a financial instrument without a firm commitment basis, (viii) any service in relation the admission to trading on a regulated market or trading on a multilateral trading facility.”

B. Energy-related Export Control Restrictions

Regulation 833/2014 subjects to prior authorisation by the Member States' competent authorities⁷ the sale, supply, transfer, or exports of certain energy-related equipment and technology (listed in Annex II) to Russia or for use in Russia, whether or not originating in the EU.⁸ The Regulation states that Annex II shall include technologies for use in deep water or Arctic oil exploration and production, or shale oil projects in Russia.

Regulation 833/2014 provides that export licenses will be denied if the competent authorities have reasonable grounds to determine that the listed equipment and technology are for deep water or Arctic oil exploration and production, or shale oil projects in Russia. The competent authorities may grant an authorisation where the export concerns the execution of an obligation arising from a contract or an agreement concluded before August 1, 2014. The regulation does not provide further guidance as to what constitutes an obligation arising from a contract or an agreement concluded prior to the adoption of the export-control restrictions.

Regulation 833/2014 further prohibits providing certain services related to energy-related equipment and technology without prior authorisation. Specifically, the Regulation prohibits providing, directly or indirectly:

- (i) technical assistance or brokering services; and
- (ii) financing or financial assistance.

Where these services are related to deep water or Arctic oil exploration and production, or shale oil projects in Russia, the export licenses will be denied.

C. Ban on Exports and Imports of Arms to and from Russia

Decision 2014/512 and Regulation 833/2014 impose an embargo on the export and import of arms to and from Russia. Accordingly, the direct or indirect sale, supply, transfer, or export of arms and related materiel⁹ to Russia by nationals or from the territories of the Member States or using their flag vessels or aircraft is prohibited, regardless of their origin. The import of such arms and materiel from Russia by

⁷ Regulation 833/2014 specifies that the competent authority is the one of the Member State in which the exporter is established.

⁸ Or to any other country, if such equipment or technology is for use in Russia.

⁹ Including weapons and ammunition, military vehicles and equipment, paramilitary equipment, and spare parts therefor.

nationals of the Member States or using their flag vessels or aircraft is similarly prohibited.

Decision 2014/512 and Regulation 833/2014 further prohibits the provision of certain services related to arms to persons in Russia or for use in Russia. Specifically, the Regulation prohibits providing, directly or indirectly:

- (i) technical assistance¹⁰ related to the goods and technology listed in the Common Military List,¹¹ or related to the provision, manufacture, and use of such goods or technology; and
- (ii) financing or financial assistance for any sale, supply, transfer, or export of goods and technology listed in the Common Military List or for providing related technical assistance.

Regulation 833/2014 provides that these prohibitions “shall be without prejudice to the execution of an obligation arising from a contract or an agreement concluded before” August 1, 2014. In addition, these prohibitions “shall be without prejudice [...] to the provision of assistance necessary to the maintenance and safety of existing capabilities within the EU.”

D. Ban on Exports of Dual-Use Goods and Technologies for Military Use in Russia, and Related Technical, Brokering, or Financial Assistance

Regulation 833/2014 prohibits the sale, supply, transfer, or export, directly or indirectly, of dual-use goods and technology to Russia or for use in Russia, if the dual-use items are or may be intended for military use or for a military end-user.¹² Whether the goods and technology are of EU-origin, or whether they are entirely or partly intended for military use or use by a military end-user is irrelevant under the regulation.

¹⁰ Regulation 833/2014 defines technical assistance as “any technical support related to repairs, development, manufacture, assembly, testing, maintenance, or any other technical service, and may take forms such as instruction, advice, training, transmission of working knowledge or skills or consulting services; including verbal forms of assistance.”

¹¹ The Member States have defined common criteria for their arms export controls, and drafted a common list of military equipment, attached to Council Declaration of June 13, 2000, issued on the occasion of the adoption of the common list of military equipment covered by the European Union code of conduct on arms export, OJ 2000 C191. The latest version was published in OJ 2014 C107/1.

¹² Where the end-user is the Russian military, the use will be deemed to be military.

The specific dual-use goods and technology are those listed in the EU's dual-use regime legislation (the "Dual-Use Regulation").¹³ When deciding on requests for export authorisations in accordance with the Dual-Use Regulation, Regulation 833/2014 provides that the Member States' competent authorities "shall not grant an authorisation for exports [...] if they have reasonable grounds to believe that the end-user might be a military end-user or that the goods might have a military end-use." The competent authorities may however grant an authorisation "where the export concerns the execution of an obligation arising from a contract or an agreement concluded before" August 1, 2014.

Regulation 833/2014 further prohibits the provision of certain services related to the dual-use goods or technology, to Russia or for use in Russia, if the dual-use items are or may be intended for military use or for a military end-user. Specifically, the Regulation prohibits providing, directly or indirectly:

- (i) technical assistance related to dual-use goods and technology, or related to the provision, manufacture, and use of such goods or technology;¹⁴
- (ii) brokering services related to dual-use goods and technology, or related to the provision, manufacture, and use of such goods or technology;¹⁵ and
- (iii) financing or financial assistance for any sale, supply, transfer, or export of dual-use goods and technology or for providing related technical assistance.

Regulation 833/2014 provides that these prohibitions "shall be without prejudice to the execution of an obligation arising from a contract or an agreement concluded before" August 1, 2014. In addition, these prohibitions "shall be without prejudice [...] to

¹³ Council Regulation (EC) No 428/2009 of May 5, 2009 setting up a Community regime for the control of exports, transfer, brokering and transit of dual-use items, OJ 2009 L134/1. The dual-use items are listed in Annex I to the regulation.

¹⁴ Regulation 833/2014 defines technical assistance as "any technical support related to repairs, development, manufacture, assembly, testing, maintenance, or any other technical service, and may take forms such as instruction, advice, training, transmission of working knowledge or skills or consulting services; including verbal forms of assistance."

¹⁵ Regulation 833/2014 defines brokering services as "(i) the negotiation or arrangement of transactions for the purchase, sale or supply of goods and technology or of financial and technical services, including from a third country to any other third country, or (ii) the selling or buying of goods and technology or of financial and technical services, including where they are located in third countries for their transfer to another third country."

the provision of assistance necessary to the maintenance and safety of existing capabilities within the EU.”

III. SANCTIONS RELATED TO CRIMEA AND SEVASTOPOL

On July 30, 2014, the Council extended its sanctions regarding Crimea and Sevastopol by prohibiting investments and credits related to infrastructure projects in the sectors of (i) transport, (ii) telecommunications, (iii) energy, and (iv) the exploitation of oil, gas, and minerals.

Decision 2014/507 and Regulation 825/2014, published on July 30, 2014, amend Decision 2014/386/CFSP and Regulation (EU) 692/2014 of June 23, 2014,¹⁶ which prohibited the import into the EU of goods originating in Crimea or Sevastopol and financing, financial assistance, insurance, and reinsurance related to the import of such goods.¹⁷

Decision 2014/507 and Regulation 825/2014 prohibit: (i) the creation acquisition, or development of infrastructure in the areas of transport, telecommunications, or energy in Crimea or Sevastopol; and (ii) the exploitation of oil, gas, or mineral resources.^{18 19}

- (i) The granting of any financial loan or credit relating to such activities;
- (ii) The acquisition or extension of a participation, including the acquisition in full and the acquisition of shares and securities of a participating nature, in companies established in Crimea or Sevastopol engaging in such activities;
- (iii) The creation of any joint venture relating to such activities; and

¹⁶ Council Decision 2014/386/CFSP of June 23, 2014, OJ 2014 L183/70 and Council Regulation (EU) 692/2014 of June 23, 2014, OJ 2014 L183/9.

¹⁷ The amended documents are Council Decision 2014/386/CFSP of June 23, 2014, OJ 2014 L183/70 and Council Regulation (EU) 692/2014 of June 23, 2014, OJ 2014 L183/9.

¹⁸ Regulation 825/2014 defines exploitation as “exploration, prospection, extraction, refining and management of oil, gas and mineral resources and provision of related geological services but does not include maintenance to ensure safety of existing infrastructure,” where refining is defined as “the processing, conditioning and preparation for sale.” Further, the “mineral resources” concerned are listed in the Annex to Regulation 825/2014.

¹⁹ The “mineral resources” concerned are listed in the Annex to Regulation 825/2014, which contains Annexes II and III to be added to amended Council Regulation 692/2014. Annex II lists the relevant mineral resources.

- (iv) The provision, directly or indirectly, of technical assistance²⁰ or brokering service²¹ related to the investment activities described in (i) to (iii).

The prohibitions above will not apply to the granting of a financial loan or credit, to the extension of a participation, or the creation of any joint venture where such transaction is required by an agreement or contract concluded before July 30, 2014, if the competent authority has been informed at least 10 working days in advance. Decision 2014/507 also provides an exemption for transactions “related to maintenance in order to ensure safety of existing infrastructure” for the exploitation of oil, gas, or mineral resources.

Decision 2014/507 and Regulation 825/2014 further prohibit the sale, supply, transfer, export, directly or indirectly, to any person in Crimea or Sevastopol, or for use in Crimea or Sevastopol, of key equipment and technology related to the creation, acquisition, or development of infrastructure in the sectors of: (i) transport, (ii) telecommunications, (iii) energy, and (iv) the exploitation of oil, gas, and minerals. The relevant key equipment and technology are listed in the Annex to Regulation 825/2014.²² It is also prohibited to provide, directly or indirectly, to any person in Crimea or Sevastopol or for use in Crimea or Sevastopol:

- (i) technical assistance related to such key equipment and technology or related to the provision, manufacture, and use of such goods or technology;
- (ii) brokering services related to such key equipment and technology, or related to the provision, manufacture, and use of such key equipment and technology; and
- (iii) financing or financial assistance related to such key equipment and technology.

²⁰ Regulation 825/2014 defines technical assistance as any technical support related to repairs, development, manufacture, assembly, testing, maintenance, or any other technical service, and may take forms such as instruction, advice, training, transmission of working knowledge or skills or consulting services; technical assistance includes verbal forms of assistance.”

²¹ Regulation 825/2014 defines brokering services as “(i) the negotiation or arrangement of transactions for the purchase, sale or supply of goods and technology or of financial and technical services, including from a third country to any other third country; or (ii) the selling or buying of goods and technology or of financial and technical services, including where they are located in third countries for their transfer to another third country.”

²² Annex III lists the relevant key equipment and technology.

Until October 28, 2014, the prohibitions will not apply to the execution of transactions required “by a trade contract concluded before” July 30, 2014 or “by ancillary contracts necessary for the execution” of a trade contract concluded before July 30, 2014, if the party engaging in or providing assistance to such transactions notifies at least 10 working days in advance, the competent authority of the Member State in which it is established. Finally, Council Decision 2014/507 provides again an exemption for transactions “related to maintenance in order to ensure safety of existing infrastructure” for the exploitation of oil, gas, or mineral resources.

IV. ADDITIONAL DESIGNATED INDIVIDUALS AND ENTITIES

On July 30, 2014, the Council extended its list of non-Ukrainian natural and legal persons, entities, and bodies subject to asset freezes and travel bans.

Decision 2014/508 and Regulation 826/2014, published on July 30, 2014, add eight individuals and three entities to the lists of individuals and entities considered responsible for actions which undermine or threaten the territorial integrity, sovereignty, and independence of Ukraine, and who are subject to restrictive measures under Council Decision 2014/145/CFSP and Council Regulation (EU) 269/2014 of March 17, 2014.²³ (See Appendix for full list.)

As detailed in Cleary Gottlieb’s [alert memorandum of March 17, 2014](#), Council Decision 2014/145/CFSP required Member States to take measures to prevent the entry into or transit through their territories of the sanctioned individuals. Council Regulation (EU) 269/2014 imposed the freezing of funds and economic resources²⁴ belonging to, owned, held, or controlled by sanctioned individuals and entities. Council Regulation (EU) 269/2014 also lists exceptions under which the Member States’ competent authorities may authorize the release or making available of certain frozen funds or economic resources, such as for payment due under a contract or agreement concluded or under an obligation that arose before the listing of the sanctioned individual or entity.²⁵

²³ Council Decision 2014/145/CFSP, OJ 2014 L78/16 and Council Regulation (EU) 269/2014, OJ 2014 L78/6.

²⁴ Council Regulation 269/2014 defines (i) funds as “financial assets and benefits of every kind” and provides a non-exhaustive list of examples; and (ii) economic resources as “assets of every kind, tangible or intangible, movable or immovable, which are not funds but may be used to obtain funds, goods, or services.”

²⁵ Other examples include funds or economic resources that may be released or made available if (i) necessary to satisfy the basic needs of sanctioned individuals or entities, (ii) intended exclusively for payment of reasonable professional fees or reimbursement of incurred expenses associated with the provision of legal services, (iii) fees or service charges for routine holding or maintenance of frozen funds or economic resources, (iv) necessary for certain extraordinary expenses, or (v) subject to an arbitral decision, or a judicial or administrative decision. See Articles 4-6 of Regulation 269/2014.

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Please feel free to raise any concerns you may have with any of your regular contacts at the Firm, or with [Till Müller-Ibold](#) in our Brussels office or [Sunil Gadhia](#) in our London office regarding European sanctions, or [Paul Marquardt](#) in our Washington office regarding US sanctions.

CLEARY GOTTLIEB STEEN & HAMILTON LLP

APPENDIX**Lists of individuals and entities considered responsible for actions which undermine or threaten the territorial integrity, sovereignty, and independence of Ukraine****I. Sanctioned Individuals**

1. Sergey Valeryevich AKSYONOV, d.o.b. 26.11.1972
2. Vladimir Andreevich KONSTANTINOV, d.o.b. 19.11.1956, Vladimirovca, Slobozia District, Republic of Moldova
3. Rustam Ilmirovich TEMIRGALIEV, d.o.b. 15.08.1976
4. Deniz Valentinovich BEREZOVSKIY, d.o.b. 15.07.1974
5. Aleksei Mikhailovich CHALIY, d.o.b. 13.06.1961
6. Pyotr Anatolyevich ZIMA, d.o.b. 29.3.1965
7. Yuriy Gennadyevich ZHEREBTSOV, d.o.b. 19.11.1965
8. Sergey Pavlovych TSEKOV, d.o.b. 28.03.1953
9. OZEROV, Viktor Alekseevich, d.o.b. 5.1.1958 in Abakan, Khakassia
10. DZHABAROV, Vladimir Michailovich, d.o.b. 29.9.1952
11. KLISHAS, Andrei Aleksandrovich, d.o.b. 9.11.1972 in Sverdlovsk
12. RYZHKOV, Nikolai Ivanovich, d.o.b. 28.9.1929 in Duleevka, Donetsk region, Ukrainian SSR
13. BUSHMIN, Evgeni Viktorovich, d.o.b. 4.10.1958 in Lopatino, Sergachiisky region, RSFSR
14. TOTOONOV, Aleksandr Borisovich, d.o.b. 3.3.1957 in Ordzhonikidze, North Ossetia
15. PANTELEEV, Oleg Evgenevich, d.o.b. 21.7.1952 in Zhitnikovskoe, Kurgan region
16. MIRONOV, Sergei Mikhailovich, d.o.b. 14.2.1953 in Pushkin, Leningrad region
17. ZHELEZNYAK, Sergei Vladimirovich, d.o.b. 30.7.1970 in St Petersburg (former Leningrad)
18. SLUTSKI, Leonid Eduardovich, d.o.b. 4.01.1968 in Moscow
19. VITKO, Aleksandr Viktorovich, d.o.b. 13.9.1961 in Vitebsk (Belarusian SSR)

20. Anatoliy Alekseevich SIDOROV, d.o.b. 2.7.1958
21. Aleksandr Viktorovich GALKIN, d.o.b. 22.3.1958
22. ROGOZIN, Dmitry Olegovich, d.o.b. 21.12.1963; in Moscow
23. GLAZYEV, Sergey, d.o.b. 1.1.1961, Zaporozhye, (Ukrainian SSR)
24. MATVIYENKO, Valentina Ivanova, d.o.b. 7.4.1949, Shepetovka, Khmelnytskyi oblast (Ukrainian SSR)
25. NARYSHKIN, Sergei Evgenevich, d.o.b. 27.10.1954, St Petersburg (former Leningrad)
26. KISELYOV, Dmitry Konstantinovich, d.o.b. 26.4.1954
27. NOSATOV, Alexander Mihailovich, d.o.b. 27.3.1963 Sevastopol, (Ukrainian SSR)
28. KULIKOV, Valery Vladimirovich, d.o.b. 1.9.1956, Zaporozhye, (Ukrainian SSR)
29. SURKOV, Vladislav Yurievich, d.o.b. 21.9.1964, Solntsevo, Lipetsk
30. Mikhail Grigoryevich MALYSHEV, d.o.b. 10.10.1955
31. Valery Kirillovich MEDVEDEV, d.o.b. 21.8.1946, Russia
32. LTL. Gen. Igor Nikolaevich TURCHENYUK, d.o.b. 5.12.1959, Kirghizia/Osh
33. Elena Borisovna MIZULINA, d.o.b. 9.12.1954, Buly, Kostroma Oblast
34. Dmitry Nikolayevich KOZAK, Born 7.11.1958 in Kirovohrad, Ukrainian SSR
35. Oleg Yevgenyevich BELAVENTSEV, Born 15.9.1949 in Moscow
36. Oleg Genrikhovich SAVELYEV, Born 27.10.1965 in Leningrad
37. Sergei Ivanovich MENYAILO, Born 22.8.1960 in Alagir, North-Ossetian Autonomous SSR, RSFSR
38. Olga Fedorovna KOVATIDI, Born 7.5.1962 in Simferopol, Ukrainian SSR
39. Ludmila Ivanovna SHVETSOVA, Born 24.9.1949 in Alma-Ata, USSR
40. Sergei Ivanovich NEVEROV, Born 21.12.1961 in Tashtagol, USSR
41. Igor Dmitrievich SERGUN, Born 28.3.1957
42. Valery Vasilevich GERASIMOV, Born 8.9.1955 in Kazan
43. German PROKOPIV
44. Valeriy Dmitrievich BOLOTOV, d.o.b. 13.2.1970, Stachanov, Lugansk Oblast, Ukrainian SSR
45. Andriy Yevgenevich PURGIN, d.o.b. 26.1.1972
46. Denys PUSHYLIN, Born in Makiivka

47. Sergey Gennadevich TSYPLAKOV, d.o.b. 1.5.1983, Donetsk, Ukrainian SSR
48. Igor Vsevolodovich GIRKIN (a.k.a. Igor Strelkov), d.o.b. 17.12.1970, passport no. 4506460961
49. Vyacheslav Viktorovich VOLODIN, Born 4 February 1964 in Alekseevka, Saratov region
50. Vladimir SHAMANOV, Born 15.02.1954 in Barnaul
51. Vladimir Nikolaevich PLIGIN , Born 19.05.1960 in Ignatovo, Vologodsk Oblast, USSR
52. Petr Grigorievich JAROSH
53. Oleg Grigorievich KOZYURA, Born 19.12.1962 in Zaporozhye
54. Viacheslav PONOMARIOV (Vyacheslav Vladimirovich Ponomariov), d.o.b. 2.5.1965, Slovinsk
55. Igor Mykolaiovych BEZLER (Igor Nikolaevich Bezler), d.o.b. 30.12.1965, Simferopol
56. Igor KAKIDZYANOV
57. Oleg Anatolevich TSARIOV, d.o.b. 2.6.1970, Dnipropetrovsk
58. Roman LYAGIN, d.o.b. 30.5.1980, Donetsk
59. Aleksandr MALYKHIN
60. Natalia Vladimirovna POKLONSKAYA, Born 18.03.1980 in Eupatoria
61. Igor Sergeievich SHEVCHENKO,
62. Aleksandr Yurevich BORODAI, d.o.b. 25.7.1972 in Moscow
63. Alexander KHODAKOVSKY
64. Aleksandr Aleksandrovich KALYUSSKY
65. Alexander KHRYAKOV
66. Marat BASHIROV
67. Vasyl NIKITIN
68. Aleksey KARYAKIN, 1979
69. Yuriy IVAKIN
70. Igor PLOTNITSKY
71. Nikolay KOZITSYN, June 20, 1956 in Donetsk region
72. Oleksiy MOZGOVY
73. Mikhail Efimovich FRADKOV, Born on 1.9.1950 in Kurumoch, Kuibyshev region

74. Nikolai Platonovich PATRUSHEV, Born on 11.7.1951 in Leningrad (St Petersburg)
75. Aleksandr Vasilievich BORTNIKOV, Born on 15.11.1951 in Perm
76. Rashid Gumarovich NURGALIEV, Born on 8.10.1956 in Zhetikara, Kazakh Soviet Socialist Republic
77. Boris Vyacheslavovich GRYZLOV, Born on 15.12.1950 in Vladivostok
78. Sergei Orestovoch BESEDA, 1954
79. Mikhail Vladimirovich DEGTYAREV, Born on 10.7.1981 in Kuibyshev (Samara)
80. Ramzan Akhmadovitch KADYROV, Born on 5.10.1976 in Tsentaroy
81. Alexander Nikolayevich TKACHYOV, Born on 23.12.1960 in Vyselki
82. Pavel GUBAREV, Born on 10.2.1983 in Sievierodonetsk
83. Ekaterina GUBAREVA, Born on 5.7.1983 in Kakhovka
84. Fedor BEREZIN, Born on 7.2.1960 in Donetsk
85. Valery Vladimirovich KAUROV, Born on 2.4.1956 in Odessa
86. Serhii Anatoliyovych ZDRILIUK, Born on 23.6.1972 in Vinnytsia region
87. Vladimir ANTYUFEYEV (a.k.a. Vladimir SHEVTSOV, Vladimir Iurievici ANTIUFEEV, Vladimir Gheorghievici ALEXANDROV, Vadim Gheorghievici SHEVTSOV), Born on 19.2.1951 in Novosibirsk
88. Alexey Alexeyevich GROMOV, Born on 31.5.1960; in Zagorsk (Sergiev Posad)
89. Oksana TCHIGRINA
90. Boris LITVINOV
91. Sergey ABISOV, Born on 27.11.1967
92. Arkady Romanovich ROTENBERG, Born on 15.12.1951 in Leningrad (St Petersburg)
93. Konstantin Valerevich MALOFEEV, Born on 3.7.1974 in Puschino
94. Yuriy Valentinovich KOVALCHUK, Born on 25.7.1951 in Leningrad (St Petersburg)
95. Nikolay Terentievich SHAMALOV, Born on 24.1.1950

II. **Sanctioned Entities**

1. PJSC Chernomorneftegaz (a.k.a Chornomornaftogaz)
2. Feodosia (a.k.a Feodossyskoje Predpriyatije po obespetscheniju nefteproduktami)

3. State ferry enterprise 'Kerch ferry' (Gosudarstvenoye predpriyatiye Kerchenskaya paromnaya pereprava)
4. State enterprise 'Sevastopol commercial seaport' (Gosudarstvenoye predpriyatiye Sevastopolski morskoy trgovy port)
5. State enterprise 'Kerch commercial sea port' (Gosudarstvenoye predpriyatiye Kerchenski morskoy trgovy port)
6. State enterprise Universal–Avia (Gosudarstvenoye predpriyatiye 'Universal-Avia')
7. Resort 'Nizhnyaya Oreanda'
8. Crimean enterprise 'Azov distillery plant' (Azovsky likerovodochny zavod)
9. State concern 'National Association of producers "Massandra"' (Nacionalnoye proizvodstvenno agrarnoye obyedinenye Massandra)
10. 'State enterprise Magarach of the national institute of wine' (Gosudarstvenoye predpriyatiye 'Agrofirma Magarach' nacionalnogo instituta vinograda i vina 'Magarach')
11. State enterprise 'Factory of sparkling wine Novy Svet' (Gosudarstvenoye predpriyatiye 'Zavod shampanskykh vin Novy Svet')
12. So called 'Lugansk People's Republic' ('Luganskaya narodnaya respublika')
13. So called 'Donetsk People's Republic' ('Donétskaya národnaya respúblika')
14. So called 'Federal State of Novorossiya' ('Federativnoye Gosudarstvo Novorossiya')
15. International Union of Public Associations 'Great Don Army'
16. 'Sobol'
17. So-called 'Lugansk Guard'
18. So-called 'Army of the Southeast'
19. So-called 'Donbass People's Militia'
20. 'Vostok battalion'
21. Joint-Stock Company Concern Almaz-Antey (a.k.a. Almaz-Antey Corp; Almaz-Antey Defense Corporation; Almaz-Antey JSC)
22. Dobrolet (a.k.a. Dobrolyot)
23. Russian National Commercial Bank

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