

Since the Russian invasion of Ukraine in February and March 2014 and the subsequent annexation of Crimea and Sevastopol to the Russian Federation (Russia) on 16 March 2014, declared illegal also by the UN General Assembly (UNGA/11493, 27 March 2014), the EU has adopted, under articles 29 of the TEU and 215 of the TFEU, a series of restrictive measures against persons and entities for their role in actions threatening the territorial integrity, sovereignty and independence of Ukraine<sup>1</sup>.

Following Russia's recognition of the Luhansk and Donetsk People's Republics' independence on 21 February 2022 and its further invasion of Ukraine on 24 February 2022, the EU adopted a first package of sanctions.

In view of the gravity of the situation, and in response to Russia's continued military aggression against Ukraine, the EU has adopted a series of new restrictive measures.

**More than two years after Russia's invasion and war of aggression against Ukraine, on June 24, 2024, the EU adopted its 14th package of sanctions against Russia. The following are among the main measures implemented:**

### 14<sup>th</sup> package of sanctions

Council Decision (CFSP) 2024/1744 of 24 June 2024 amending Decision 2014/512/CFSP and Council Regulation (EU) 2024/1745 of 24 June 2024 amending Regulation (EU) No 833/2014<sup>2</sup>:

Transport sector:

- **Aviation - Widened EU flight ban:** Prohibition to land in, take off from or overfly the territory of the EU will also apply to any aircraft used for a **non-scheduled flight**, and **where a Russian natural or legal person, entity or body, is in a position to effectively determine the place or time for its take-off or landing** to reach, for instance, a holiday destination or a business meeting.
  - Obligation for operators to provide any information requested by member states' national competent authorities about non-scheduled flights, including ownership of the aircraft and possibly passengers, to verify compliance with the flight ban.
- **Road - Broadened prohibition on the transport of goods by road** within the territory of the EU, including in transit, so as to cover **EU operators which are owned 25% or more by a Russian natural or legal person**, to minimise the risk of circumvention;

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<sup>1</sup> Council Decision 2014/145/CFSP of 17 March 2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 78, 17.3.2014, p. 16–21; and Council Regulation (EU) No 269/2014 of 17 March 2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 78, 17.3.2014, p. 6–15;

Council Decision 2014/512/CFSP of 31 July 2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine OJ L 229, 31.7.2014, p. 13–17; and Council Regulation (EU) No 833/2014 of 31 July 2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 229, 31.7.2014, p. 1–11.

<sup>2</sup> Council Decision (CFSP) 2024/1744 of 24 June 2024 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L, 2024/1744, 24.6.2024; Council Regulation (EU) 2024/1745 of 24 June 2024 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L, 2024/1745, 24.6.2024.

- The prohibition does not apply to road transport undertakings owned by dual nationals or Russian nationals having a temporary or permanent residence permit in a Member State.
- **Maritime – Prohibition on port access and provision of services for listed vessels contributing to Russia’s ability to wage war against Ukraine.**
  - Vessels subject to the restrictive measures are listed in Annex XVI to Decision 2014/512/CFSP (*27 vessels have been listed for their involvement in the transport of military equipment for Russia, transport of stolen Ukrainian grain, support in the development of Russia's energy sector, tankers part of Putin's dark fleet transporting Russian oil which circumvents the EU and Price Cap Coalition's caps*).

#### Energy sector:

- **Ban on using EU ports for the transshipment of Russian LNG.**
  - **Except** in the case of such **transshipments to Member States** (the prohibition should cover both ship-to-ship transfers and ship-to-shore transfers and re-loading operations. Ancillary services related to such transshipments are also banned).
  - The prohibitions shall not apply until 26 March 2025 for the execution of contracts concluded before 25 June 2024.
- **Ban on new investment**, as well as the provisions of goods, technology and services, **for the completion of LNG projects** such as Arctic LNG 2 and Murmansk LNG.
- **Import restrictions on Russian LNG through Union LNG terminals** that are **not connected to the EU natural gas system**.

#### Cultural goods:

- **Prohibition on purchasing, importing, transferring or exporting Ukrainian cultural property goods** and other goods of archaeological, historical, cultural, rare scientific or religious importance, and prohibition on related services, where there are reasonable grounds to suspect that the goods have been **unlawfully removed from Ukraine**.

#### Protection of EU operators:

- **Transaction ban for listed companies using those provisions of Russian law** (such as Article 248 of the Arbitration Procedure Code of the Russian Federation) **establishing the exclusive jurisdiction of courts in Russia for disputes concerning restrictive measures**, and which therefore interfere with jurisdiction in matters of arbitration and justice.
- Creation of a **legal basis for compensation claims from EU operators in the EU** for damages caused by Russian companies **linked to sanctions implementation and expropriation**.

#### Financial sector:

- **Ban for EU banks outside Russia to use the “System for Transfer of Financial Messages” (SPFS, the Russian equivalent of SWIFT) from 25 June 2024.**
  - Targeted exceptions are introduced allowing Union entities to connect to the SPFS for various justified purposes (e.g., purchase, import or transport of natural gas, titanium, aluminium, copper, nickel, palladium and iron ore from or through Russia into the Union, a country member of the European Economic Area, Switzerland, or the Western Balkans).

- **Ban on transactions with banks and crypto assets providers**, established outside of the Union, **that facilitate transactions supporting Russia’s defence-industrial base** through the export, supply, sale, transfer or transport towards Russia of dual-use goods and technology, sensitive goods and technology, common high priority items or firearms and ammunition.
- **Extended ban on providing support**, including funding and financial assistance or any other benefit, **from a Union, Euratom or Member State programme to any legal person, entity or body established in Russia or majority owned by them.**

#### Intellectual property rights:

- **Restrictions on accepting applications for registrations in the EU of certain intellectual property rights by Russian nationals and companies**, with the aim of offsetting the actions of the Russian government and courts illegitimately depriving EU intellectual property rights holders of their protection in Russia.

#### Funding of political parties and other organisations:

- **Prohibition of political parties and foundations, NGOs, including think tanks, or media service providers in the EU, from receiving funding from the Russian state and its proxies** to counter interference with democratic processes and undermining of democratic foundations.

#### Reporting obligation on penalties:

- Addition of reporting obligation on penalties applied for infringements of the provisions of Council Regulation (EU) 833/2014.

#### Anti-circumvention measures:

- **Due diligence requirements for Common High Priority (CHP) items:** EU companies will have to implement due diligence mechanisms capable of identifying and assessing risks of re-exportation of CHP items to Russia and mitigating such risks, as well as ensuring that their subsidiaries in third countries implement the same requirements to avoid undermining EU sanctions.
- **“No Russia” clause for intellectual property rights transfers:** Union operators shall contractually **ensure** that the industrial know-how transferred outside the Union **is not used to manufacture CHP goods intended for Russia**. Union operators should include an obligation to adopt proper remedies in such agreements and report any breaches detected to the national competent authorities.

#### Trade-related measures:

- **Addition of 61 new entities to the list**, set out in Annex IV to Decision 2014/512/CFSP, **of those directly supporting Russia’s military and industrial complex** on which tighter export restrictions regarding dual-use goods and technology, as well as goods and technology which might contribute to the technological enhancement of Russia’s defence and security sector, are imposed (*including 33 entities registered in third countries: 19 in China/Hong Kong, 9 in Türkiye, 2 in Kyrgyzstan, 1 in India, 1 in Kazakhstan, 1 in UAE*).
- **Addition of 9 dual-use/advanced technology items to the list of items subject to export restrictions** (e.g., “quadbikes”, microwave and aerial amplifiers and digital flight data recorders), to further weaken Russia's military capabilities.
- **Reinforcement of the current export bans on industrial goods**, as set out in Annex XXIII to Regulation (EU) No 833/2014, focusing on **four sectors** which are key to

Russia's war economy: **chemicals** (e.g., manganese ores and compounds of rare-earths), **plastics, vehicles parts and machinery** (e.g., excavating machinery, monitors and electrical equipment), worth EUR 5 billion of annual exports before the invasion, in 2021.

- **Prohibition on export and transfer of manganese ore.**
- **Import ban on helium**, generating significant revenues for Russia.
- Extension of the list of partner countries, set out in Annex VIII to Regulation (EU) No 833/2014, which are applying a set of export control measures substantially equivalent to those set out in Regulation (EU) No 833/2014.
  - *The current list includes: The United States Of America, Japan, United Kingdom, South Korea, Australia, Canada, New Zealand, Norway, Switzerland, Liechtenstein, Iceland.*

Council Decision (CFSP) 2024/1738 of 24 June 2024 amending Decision 2014/145/CFSP, Council Regulation (EU) 2024/1739 of 24 June 2024 amending Regulation (EU) No 269/2014, and Council Implementing Regulation (EU) 2024/1746 of 24 June 2024 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine<sup>3</sup>:

Individual listing of people and entities:

- **Addition of 69 individuals and 47 entities to the list of persons/entities subject to restrictive measures** set out in Annex I to Regulation (EU) No 269/2014 and consisting in:
  - **Businesspersons, propagandists and public figures, members of the army and the judiciary, persons responsible for deportation of Ukrainian children**, as well as **members of the Federal Security Service of the Russian Federation (FSB)** involved in religious persecution in illegally annexed Crimea, and of the government.
  - Several Russian military and defence industry companies; **Volga Dnepr Group** and its **subsidiaries** for their role in providing services to the Russia's military-industrial complex, as well as its shareholders; **Sovcomflot**, Russia's largest shipping company specialising in the transportation of liquefied gas, crude oil, and petroleum products; **International Children's Center Artek**, which organises camps for children from Ukraine, including in the illegally occupied territories, the **Kadyrov Foundation** carrying out re-educational programmes for Ukrainian children and teenagers, and the **Belarusian Republican Youth Union**, which is active in the deportation of Ukrainian children from the illegally occupied territories.

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<sup>3</sup> Council Decision (CFSP) 2024/1738 of 24 June 2024 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 2024/1738, 24.6.2024;

Council Regulation (EU) 2024/1739 of 24 June 2024 amending Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 2024/1739, 24.6.2024; and

Council Implementing Regulation (EU) 2024/1746 of 24 June 2024 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 2024/1746, 24.6.2024.

## 1<sup>st</sup> package of sanctions<sup>4</sup>

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<sup>4</sup> Council Decision (CFSP) 2022/264 of 23 February 2022 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 42I, 23.2.2022, p. 95–97; and Council Regulation (EU) 2022/262 of 23 February 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 42I, 23.2.2022, p. 74–76;

Council Decision (CFSP) 2022/265 of 23 February 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 42I, 23.2.2022, p. 98–108; and Council Regulation (EU) 2022/259 of 23 February 2022 amending Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 42I, 23.2.2022, p. 1–2;

Council Decision (CFSP) 2022/266 of 23 February 2022 concerning restrictive measures in response to the recognition of the non-government controlled areas of the Donetsk and Luhansk oblasts of Ukraine and the ordering of Russian armed forces into those areas, OJ L 42I, 23.2.2022, p. 109–113; and Council Regulation (EU) 2022/263 of 23 February 2022 concerning restrictive measures in response to the recognition of the non-government controlled areas of the Donetsk and Luhansk oblasts of Ukraine and the ordering of Russian armed forces into those areas, OJ L 42I, 23.2.2022, p. 77–94;

Council Decision (CFSP) 2022/267 of 23 February 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 42I, 23.2.2022, p. 114–172;

Council Implementing Regulation (EU) 2022/260 of 23 February 2022 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 42I, 23.2.2022, p. 3–14;

Council Implementing Regulation (EU) 2022/261 of 23 February 2022 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 42I, 23.2.2022, p. 15–73;

Council Decision (CFSP) 2022/327 of 25 February 2022 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 48, 25.2.2022, p. 1–16; and Council Regulation (EU) 2022/328 of 25 February 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 49, 25.2.2022, p. 1–140;

Council Decision (CFSP) 2022/329 of 25 February 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 50, 25.2.2022, p. 1–3; and Council Regulation (EU) 2022/330 of 25 February 2022 amending Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 51, 25.2.2022, p. 1–2;

Council Decision (CFSP) 2022/331 of 25 February 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 52, 25.2.2022, p. 1–44;

Council Implementing Regulation (EU) 2022/332 of 25 February 2022 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 53, 25.2.2022, p. 1–44;

Council Decision (EU) 2022/333 of 25 February 2022 on the partial suspension of the application of the Agreement between the European Community and the Russian Federation on the facilitation of the issuance of visas to the citizens of the European Union and the Russian Federation, OJ L 54, 25.2.2022, p. 1–3;

Council Regulation (EU) 2022/334 of 28 February 2022 amending Council Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 57, 28.2.2022, p. 1–3;

Council Decision (CFSP) 2022/335 of 28 February 2022 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 57, 28.2.2022, p. 4–6;

Council Implementing Regulation (EU) 2022/336 of 28 February 2022 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 58, 28.2.2022, p. 1–18;

Council Decision (CFSP) 2022/337 of 28 February 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 59, 28.2.2022, p. 1–17.

## **INDIVIDUAL SANCTIONS**

- **Assets freezing** of:
  - the **Russian President**, Vladimir Putin, and **Minister of Foreign Affairs**, Sergey Lavrov;
  - the members of the National Security Council of the Russian Federation who supported Russia's immediate recognition of the two non-government-controlled areas of the Donetsk and Luhansk oblasts of Ukraine as independent entities;
  - the members of the Russian State Duma who ratified the government decision of the Treaty of Friendship, Cooperation and Mutual Assistance between the Russian Federation and the two entities;
  - the individuals who facilitated the Russian military aggression from Belarus;
  - Oligarchs, associates and advisors having particularly close ties to Russian President Vladimir Putin;
- **Prohibition from making funds available** to the listed individuals and entities;
- **Travel ban** applicable to the listed persons prevents these from entering or transiting through EU territory.

## **ECONOMIC SANCTIONS**

- **Financial sanctions** targeting 70% of the Russian **banking market** and **key state-owned companies**, such as:
  - restrictions on access by certain Russian entities to capital markets;
  - Prohibiting the acceptance of deposits exceeding certain values from Russian nationals or residents;
  - Prohibiting the holding of accounts of Russian clients by the Union central securities depositories;
  - Prohibiting the selling of euro-denominated securities to Russian clients;
  - **Prohibiting the transactions of Russia's central bank and freezing all its assets;**
- **Energy sector**
  - Prohibition of the sale, supply, transfer or export to Russia of specific goods and technologies in **oil refining**.
- **Transport sector**
  - **Export ban** covering goods and technology in the **aviation and space industry**;
  - Prohibition on the provision of insurance and reinsurance and maintenance services related to those goods and technology;
  - **Prohibition for Russian aircrafts** or controlled by any Russian natural or legal person, entity or body from landing in, taking off from, or overflying, the **territory (airspace) of the Union**.
- **Technology sector**
  - Restrictions on **exports of dual-use goods and technology** and on the provision of related services;
  - Restrictions on exports of certain goods and **technology which might contribute to Russia's technological enhancement of its defence and security sector**, such as semiconductors or cutting-edge technologies.
- **Visa policy**

- Stop of benefit from visa facilitation provisions, for diplomats, other Russian officials, and business people (“this decision will not affect ordinary Russian citizens”).

Further sanctions are also being discussed, such as removing Russian banks from SWIFT (Society for Worldwide Interbank Financial Telecommunication) and some measures have already been taken to support the Union’s external policy towards Ukraine, such as the **macro-financial assistance of a maximum amount of €1,2 billion** available to Ukraine<sup>5</sup> and another €500 million military aid provided through the EU off-budget funding mechanism “**European Peace Facility**”<sup>6</sup>.

## 2<sup>nd</sup> package of sanctions

Council Decision (CFSP) 2022/346 of 1 March 2022 amending Decision 2014/512/CFSP and Council Regulation (EU) 2022/345 of 1 March 2022 amending Regulation (EU) No 833/2014:

- The EU Member States competent authorities shall **exchange information on dual-use goods and technology's authorisations granted and denials** issued with the other Member States and the Commission, as well as, where appropriate and on the basis of reciprocity, with partner countries;
- Prohibition to invest, participate or otherwise contribute to projects co-financed by the **Russian Direct Investment Fund**;
- **Prohibition** to provide **SWIFT services** to:
  - Bank Otkritie;
  - Novikombank;
  - Promsvyazbank;
  - Bank Rossiya;
  - Sovcombank;
  - VNESHECONOMBANK (VEB);
  - VTB BANK;
  - or to any person/entity established in Russia whose proprietary rights are directly or indirectly owned for more than 50 % by a listed entity;
- **Prohibition** to sell, supply, transfer or export **euro denominated banknotes to Russia** or to any person/entity in Russia.

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<sup>5</sup> Decision (EU) 2022/313 of the European Parliament and of the Council of 24 February 2022 providing macro-financial assistance to Ukraine, OJ L 55, 28.2.2022, p. 4–11.

<sup>6</sup> Council Decision (CFSP) 2022/338 of 28 February 2022 on an assistance measure under the European Peace Facility for the supply to the Ukrainian Armed Forces of military equipment, and platforms, designed to deliver lethal force, OJ L 60, 28.2.2022, p. 1–4; and Council Decision (CFSP) 2022/339 of 28 February 2022 on an assistance measure under the European Peace Facility to support the Ukrainian Armed Forces, OJ L 61, 28.2.2022, p. 1–4.

<sup>7</sup> Council Regulation (EU) 2022/345 of 1 March 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine, OJ L 63, 2.3.2022, p. 1–4; Council Decision (CFSP) 2022/346 of 1 March 2022 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine, OJ L 63, 2.3.2022, p. 5–7.

Council Decision (CFSP) 2022/351 of 1 March 2022 amending Decision 2014/512/CFSP and Council Regulation (EU) 2022/350 of 1 March 2022 amending Regulation (EU) No 833/2014<sup>8</sup>:

- **Prohibition to broadcast** or to enable, facilitate or otherwise contribute to broadcast, any content by the **following media channels**:
  - RT- Russia Today English
  - RT- Russia Today UK
  - RT - Russia Today Germany
  - RT - Russia Today France
  - RT- Russia Today Spanish
  - Sputnik
- **Suspension of any broadcasting licence or authorisation**, transmission and distribution arrangement with the listed entities.

### 3<sup>rd</sup> package of sanctions

Council Regulation (EU) 2022/394 of 9 March 2022 amending Regulation (EU) No 833/2014 and Council Decision (CFSP) 2022/395 of 9 March 2022 amending Decision 2014/512/CFSP<sup>9</sup>:

- Restrictions on **exports of maritime navigation goods and technology** and on the provision of related services;
- Prohibition of transactions related to the management of reserves as well as of assets of the Central Bank of Russia.

Council Implementing Regulation (EU) 2022/396 of 9 March 2022 implementing Regulation (EU) No 269/2014 and Council Decision (CFSP) 2022/397 of 9 March 2022 amending Decision 2014/145/CFSP<sup>10</sup>:

- Individual sanctions for:
  - 146 members of the Russian Federation Council who ratified the Treaties of Friendship, Cooperation and Mutual Assistance between the Russian Federation and the Donetsk People's Republic and the Luhansk People's Republic;
  - 14 persons supporting and benefitting from the Government of the Russian Federation or providing a substantial source of revenue to it, or associated with

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<sup>8</sup> Council Regulation (EU) 2022/350 of 1 March 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 65, 2.3.2022, p. 1–4; Council Decision (CFSP) 2022/351 of 1 March 2022 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 65, 2.3.2022, p. 5–7.

<sup>9</sup> Council Regulation (EU) 2022/394 of 9 March 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 81, 9.3.2022, p. 1–7; Council Decision (CFSP) 2022/395 of 9 March 2022 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 81, 9.3.2022, p. 8–11.

<sup>10</sup> Council Implementing Regulation (EU) 2022/396 of 9 March 2022 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 80, 9.3.2022, p. 1–30; Council Decision (CFSP) 2022/397 of 9 March 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 80, 9.3.2022, p. 31–60.



listed persons or entities (oligarchs, prominent business people and their family members).

#### **4<sup>th</sup> package of sanctions**

Council Implementing Regulation (EU) 2022/427 of 15 March 2022 implementing Regulation (EU) No 269/2014 and Council Decision (CFSP) 2022/429 of 15 March 2022 amending Decision 2014/145/CFSP<sup>11</sup>:

- Addition of 15 individuals and 9 entities to the list of persons/entities subject to restrictive measures set out in the Annex to Decision 2014/145/CFSP.

Council Regulation (EU) 2022/428 of 15 March 2022 amending Regulation (EU) No 833/2014 and Council Decision (CFSP) 2022/430 of 15 March 2022 amending Decision 2014/512/CFSP<sup>12</sup>:

- Prohibition of all transactions with certain state-owned companies which are already subject to refinancing restrictions.
- Prohibition of the provision of any credit rating services, as well as access to any subscription services in relation to credit rating activities, to any Russian person or entity.
- Tightening of the export restrictions regarding dual-use goods and technology as well as goods and technology which might contribute to the technological enhancement of Russia's defence and security sector;
  - The competent authorities of the Member States may only authorise the transfer of the above mentioned goods and technology or the provision of related technical or financial assistance to the persons/entities listed in Annex IV after having determined:
    - a) that they are necessary for the urgent prevention or mitigation of an event likely to have a serious and significant impact on human health and safety or the environment; or

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<sup>11</sup> Council Implementing Regulation (EU) 2022/427 of 15 March 2022 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 87I, 15.3.2022, p. 1–12;  
Council Decision (CFSP) 2022/429 of 15 March 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 87I, 15.3.2022, p. 44–55.

<sup>12</sup> Council Regulation (EU) 2022/428 of 15 March 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 87I, 15.3.2022, p. 13–43;  
Council Decision (CFSP) 2022/430 of 15 March 2022 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 87I, 15.3.2022, p. 56–63.

- b) that they are due under contracts concluded before 26 February 2022, or ancillary contracts necessary for the execution of such a contract, provided that the authorisation is requested before 1 May 2022);
- Expansion of the list of persons connected to Russia's defence and industrial base, which are subject to the mentioned export restrictions (dual-use, and defence and security sector related goods and technology).
  - Prohibition of new investments in the Russian energy sector;
  - Introduction of a comprehensive export restriction on equipment, technology and services for the energy industry in Russia, with the exception of nuclear industry and the downstream sector of energy transport.
  - Further trade restrictions concerning iron and steel;
  - Trade restrictions on certain luxury goods.

### 5<sup>th</sup> package of sanctions

Council Regulation (EU) 2022/576 of 8 April 2022 amending Regulation (EU) No 833/2014 and Council Decision (CFSP) 2022/578 of 8 April 2022 amending Decision 2014/512/CFSP<sup>13</sup>:

- **Prohibition to purchase**, import or transfer **coal and other solid fossil fuels** into the EU, if they originate in Russia or are exported from Russia, as from 10 August 2022;
- Extension of the **prohibition to accept deposits** from Russian nationals or persons/entities residing or established in Russia, if the total credit exceeds €100.000, as well as to **provide crypto-asset wallet**, account or custody services, if the total value of the crypto-assets exceeds €10.000;
- **Extension of prohibition to sell transferable securities** issued after 12 April 2022 and to sell, supply, transfer or export **banknotes denominated in any official currency of a Member State** to Russia or to any person/entity in Russia or for use in Russia;
- **Prohibition to award or continue the execution of any public or concession contract** to or with Russian nationals, persons/entities established in Russia or whose proprietary rights are directly or indirectly owned for more than 50 % by a listed entity (some exceptions may be authorized by the MS, *e.g.* civil nuclear facilities, natural gas and oil, intergovernmental cooperation in space programmes);
- **Prohibition to provide** direct or indirect support, including **financing and financial assistance** or any other benefit under a Union, Euratom or Member State programme and contracts to any legal person, entity or body established in Russia with over 50 % public ownership or public control (with some exceptions, *e.g.* humanitarian purposes, intergovernmental cooperation in space programmes, civil nuclear capabilities, climate and environmental programmes);
- **Prohibition to act as a trustee** or in similar capacities for, and prohibition to register, provide a registered office, business or administrative address as well as management services to, a trust or any similar legal arrangement having as a trustor or a beneficiary

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<sup>13</sup> Council Regulation (EU) 2022/576 of 8 April 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 111, 8.4.2022, p. 1–66;

Council Decision (CFSP) 2022/578 of 8 April 2022 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 111, 8.4.2022, p. 70–80.

Russian persons or entities established in Russia or whose proprietary rights are directly or indirectly owned for more than 50 % by a Russian person/entity.

- **Prohibition** to sell, supply, transfer, or **export**, directly or indirectly, **goods and technology** suited for use in **oil refining and liquefaction of natural gas, aviation or the space industry**, as well as **jet fuel** and fuel additives, and other goods listed in Annex I to Regulation (EU) 2022/576 (*e.g.* **quantum computers and advanced semiconductors, high-end electronics, software, sensitive machinery**), whether or not originating in the Union, to any person/entity in Russia or for use in Russia;
- **Prohibition** after 16 April 2022 to provide **access to EU ports** to vessels registered under the flag of Russia (this applies also to vessels that have changed their Russian flag or their registration, to the flag or register of any other State after 24 February 2022. Some derogations are granted for pharmaceutical, medical, agricultural and food products, humanitarian aid, and energy);
- **Prohibition to purchase**, import or transfer, directly or indirectly, **goods which generate significant revenues** for Russia as listed in Annex XXI to Regulation (EU) 2022/576 (*e.g.* wood, cement, fertilisers, seafood and liquor) or which could **contribute** in particular **to the enhancement of Russia’s industrial capacities** as listed in Annex XXIII to Regulation (EU) 2022/576, as from 10 July 2022;
- **Prohibition** for any Russian road transport undertaking **to transport goods by road within the EU**, including in transit (some derogations are granted for certain products, *e.g.* pharmaceutical, medical, agricultural and food products, including wheat, and for road transport for humanitarian purposes);
- **Extension of the exemption** from the prohibition to engage in **transactions with certain State-owned entities** as regards transactions for the purchase, import or transport of **fossil fuels and certain minerals into Switzerland, the European Economic Area and the Western Balkans**;
- **Extension of the exemption** from the prohibition on transaction **with certain Russian State-owned enterprises and their subsidiaries** to countries in the European Economic Area and Switzerland as well as to the Western Balkans;

Council Regulation (EU) 2022/580 of 8 April 2022 amending Regulation (EU) No 269/2014, Council Implementing Regulation (EU) 2022/581 of 8 April 2022 implementing Regulation (EU) No 269/2014, and Council Decision (CFSP) 2022/582 of 8 April 2022 amending Decision 2014/145/CFSP<sup>14</sup>:

- Addition of 216 individuals and 18 entities to the list of persons/entities subject to restrictive measures set out in Annex I to Regulation (EU) No 269/2014 and consisting in:
  - **Leading businesspersons** involved in economic sectors providing a substantial source of revenue to, and on persons supporting or benefitting from, the Government of the Russian Federation and on natural persons associated with

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<sup>14</sup> Council Regulation (EU) 2022/580 of 8 April 2022 amending Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 110, 8.4.2022, p. 1–2;

Council Implementing Regulation (EU) 2022/581 of 8 April 2022 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 110, 8.4.2022, p. 3–54;

Council Decision (CFSP) 2022/582 of 8 April 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 110, 8.4.2022, p. 55–105.

- those persons, including family members unduly benefitting from them (including the adult daughters of Vladimir Putin);
- The **Ministers and members of the ‘People’s Council’ of the so-called ‘Donetsk People’s Republic’ and ‘Luhansk People’s Republic’;**
  - **Companies supporting, materially or financially, or benefitting from the Government of the Russian Federation** and materially or financially supporting actions which undermine or threaten the territorial integrity, sovereignty and independence of Ukraine (including the four following banks representing 23% of market share in the Russian banking sector: Otkritie FC Bank, Novikombank, Sovcombank, VTB Bank).
- Introduction of further derogation options from the asset freeze and the prohibition to make funds and economic resources available to designated persons and entities.

### 6<sup>th</sup> package of sanctions

Council Implementing Regulation (EU) 2022/878 of 3 June 2022 implementing Regulation (EU) No 269/2014 and Council Decision (CFSP) 2022/883 of 3 June 2022 amending Decision 2014/145/CFSP<sup>15</sup>:

- Addition of 65 individuals and 18 entities to the list of persons/entities subject to restrictive measures set out in Annex I to Regulation (EU) No 269/2014.

Council Regulation (EU) 2022/879 of 3 June 2022 amending Regulation (EU) No 833/2014 and Council Decision (CFSP) 2022/884 of 3 June 2022 amending Decision 2014/512/CFSP<sup>16</sup>:

- **Extended prohibition** on the provision of specialised financial messaging (**SWIFT**) services to three additional Russian credit institutions, **including** the largest bank **Sberbank**;
- **Expanded list of persons connected to Russia’s defence and industrial base** subject to **tighter export restrictions** regarding **dual-use goods and technology**, as well as **goods and technology** which might **contribute to the technological enhancement of Russia’s defence and security sector**;
- **Extended list of controlled items** which might **contribute to Russia’s military and technological enhancement** or the development of its defence and security sector, whose export or supply to Russia is prohibited, **to include *inter alia* additional chemicals** that could be used in the process of **manufacture of chemical weapons**, as set out in Annex II to Council Regulation (EU) 2022/879;

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<sup>15</sup> Council Implementing Regulation (EU) 2022/878 of 3 June 2022 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 153, 3.6.2022, p. 15–52;  
Council Decision (CFSP) 2022/883 of 3 June 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 153, 3.6.2022, p. 92–127.

<sup>16</sup> Council Regulation (EU) 2022/879 of 3 June 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine, OJ L 153, 3.6.2022, p. 53–74;  
Council Decision (CFSP) 2022/884 of 3 June 2022 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine, OJ L 153, 3.6.2022, p. 128–138.

- **Extended prohibition to broadcast to three additional Russian media outlets:**
  - Rossiya RTR / RTR Planeta;
  - Rossiya 24 / Russia 24;
  - TV Centre International;
- **Import ban on all Russian seaborne crude oil and petroleum products, representing around 90% of EU oil imports from Russia, with some transitional periods and exceptions:**
  - *Such prohibition will not apply until 5 December 2022 to one-off transactions for near-term delivery, concluded and executed before that date, or to the execution of contracts for the purchase, import or transfer of goods falling under CN 2709 00 (Petroleum oils and oils obtained from bituminous minerals, crude) concluded before 4 June 2022; and until 5 February 2023 to those falling under CN 2710 (Petroleum oils and oils obtained from bituminous minerals, other than crude) concluded before 4 June 2022;*
  - *If the supply of crude oil by pipeline from Russia to a landlocked Member State is interrupted for reasons outside the control of that Member State, seaborne crude oil from Russia falling under CN 2709 00 may be imported into that Member State, by way of an exceptional temporary derogation;*
  - *Due to its specific geographical exposure, **Bulgaria** may authorise the execution **until 31 December 2024** of contracts concluded before 4 June 2022 for the import of crude oil via maritime transport and of petroleum products.*
  - ***Croatia** may authorise **until 31 December 2023** the purchase, import or transfer of vacuum gas oil falling under CN 2710 19 71 originating in Russia or exported from Russia, **provided that** the no alternative supply of vacuum gas oil is available; and the Commission has been notified at least two weeks prior to the authorization and has not objected within that period.*
- **Prohibition to transfer, transport or sale crude oil falling under CN 2709 00 which is delivered by pipeline from Russia into Member States to Member States or to third countries** (such prohibition will not apply to Czechia until 5 December 2023);
- **Prohibition to provide**, directly or indirectly, technical assistance, brokering services or financing **or financial assistance, related to the transport**, including through ship-to-ship transfers, **to third countries of Russian crude oil or petroleum products;**
- **Prohibition to provide** to Russia accounting, auditing, bookkeeping and tax consulting services, as well as business and management consulting and public relations services.

### **7<sup>th</sup> package of sanctions (maintenance and alignment sanctions package)**

Council Decision (CFSP) 2022/1271 of 21 July 2022 amending Decision 2014/512/CFSP and Council Regulation (EU) 2022/1269 of 21 July 2022 amending Regulation (EU) No 833/2014<sup>17</sup>:

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<sup>17</sup> Council Regulation (EU) 2022/1269 of 21 July 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 193, 21.7.2022, p. 1–132;

Council Decision (CFSP) 2022/1271 of 21 July 2022 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 193, 21.7.2022, p. 196–218.

- **Prohibit the direct or indirect import, purchase or transfer of Russian-origin gold** (Russia’s most significant export after energy), including jewellery, exported from Russia after the entry into force of the Decision;
- **Extend the port access ban to locks** in order to ensure full implementation of the measure and avoid circumvention;
- Expand the scope of the prohibition on accepting deposits to include those from legal persons, entities or bodies established in third countries and majority-owned by Russian nationals or natural persons residing in Russia;
- Subject the acceptance of deposits for non-prohibited cross-border trade to a prior authorisation by the national competent authorities;
- Prohibit to award or continue the execution of some public or concession contract, to or with:
  - a Russian or a person/entity residing or established in Russia;
  - a person/entity whose proprietary rights are directly or indirectly owned for more than 50 % by a Russian or a person/entity residing or established in Russia;
  - a person/entity acting on behalf or at the direction of an entity referred to in point (a) or (b) of this paragraph;
- **Allow the sharing of technical assistance with Russia for aviation goods and technology** in order to **guarantee technical standards** in the framework of the International Civil Aviation Organization (ICAO);
- Introduce an **exemption from the prohibition to enter into any transactions with Russian public entities** where this is necessary to **ensure access to judicial, administrative or arbitral proceedings**;
- **Extend the exemption from the prohibition to engage in transactions with certain State-owned entities as regards transactions for agricultural products** – avoiding all measures which might lead to food insecurity around the globe – and the supply of oil and petroleum products to third countries.

Council Implementing Regulation (EU) 2022/1270 of 21 July 2022 implementing Regulation (EU) No 269/2014, Council Decision (CFSP) 2022/1272 of 21 July 2022 amending Decision 2014/145/CFSP, and Council Regulation (EU) 2022/1273 of 21 July 2022 amending Regulation (EU) No 269/2014<sup>18</sup>:

- **Addition of 48 people and 9 entities to the list of persons/entities subject to restrictive measures** set out in Annex I to Regulation (EU) No 269/2014. These people and entities are senior members of the **political or cultural establishment, high ranking military leaders** and staff, **Nightwolves** and some of its members, propagandists and **leading businesspersons**;

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<sup>18</sup> Council Implementing Regulation (EU) 2022/1270 of 21 July 2022 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 193, 21.7.2022, p. 133–195; Council Decision (CFSP) 2022/1272 of 21 July 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 193, 21.7.2022, p. 219–285; Council Regulation (EU) 2022/1273 of 21 July 2022 amending Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 194, 21.7.2022, p. 1–4.

- Introduce **further derogations from the asset freeze and the prohibition to make funds and economic resources available to designated persons and entities in order to:**
  - prevent or mitigate an event likely to have a serious and significant impact on human health and safety or the environment;
  - **avoid disruptions in the payment channels for agricultural products;**
  - allow the orderly wind-down of operations, including correspondent banking relations, with one designated bank;
- **Oblige designated persons and entities with assets within the jurisdiction of a Member State to report these assets** and to cooperate with the competent authority in the verification of this reporting;
- **Strengthen reporting requirements for EU operators** with a view to preventing the breach and circumvention of the asset freezes.

Council Implementing Regulation (EU) 2022/1274 of 21 July 2022 implementing Regulation (EU) No 269/2014 and Council Decision (CFSP) 2022/1276 of 21 July 2022 amending Decision 2014/145/CFSP<sup>19</sup>:

- Addition of **six individuals and one entity involved in the recruitment of Syrian mercenaries to fight in Ukraine alongside Russian troops** to the list of persons/entities subject to restrictive measures set out in Annex I to Regulation (EU) No 269/2014.

### 8<sup>th</sup> package of sanctions

Council Decision (CFSP) 2022/1907 of 6 October 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, Council Regulation (EU) 2022/1905 of 6 October 2022, and Council Implementing Regulation (EU) 2022/1906 of 6 October 2022 implementing Regulation (EU) No 269/2014<sup>20</sup>:

- **Addition of 30 persons and 7 entities** responsible for actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine to the list of persons, entities and bodies subject to restrictive measures set out in the Annex to Decision 2014/145/CFSP. This targets those involved in Russia's occupation, illegal

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<sup>19</sup> Council Implementing Regulation (EU) 2022/1274 of 21 July 2022 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 194, 21.7.2022, p. 5–7;

Council Decision (CFSP) 2022/1276 of 21 July 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 194, 21.7.2022, p. 11–14.

<sup>20</sup> Council Decision (CFSP) 2022/1907 of 6 October 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 259I, 6.10.2022, p. 98–117;

Council Regulation (EU) 2022/1905 of 6 October 2022 amending Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 259I, 6.10.2022, p. 76–78;

Council Implementing Regulation (EU) 2022/1906 of 6 October 2022 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 259I, 6.10.2022, p. 79–97.

annexation, and sham “referenda” in the occupied territories/oblasts of Donetsk, Luhansk, Kherson, and Zaporizhzhia regions. It also includes individuals and entities working in the defence sector, such as high-ranking and military officials, as well as companies supporting the Russian armed forces;

- **New listing criterion for deterring sanctions circumvention:** persons who facilitate the infringements of the prohibition against circumvention of sanctions will now be listed.

Council Decision (CFSP) 2022/1908 of 6 October 2022 amending Decision (CFSP) 2022/266 concerning restrictive measures in response to the recognition of the non-government controlled areas of the Donetsk and Luhansk oblasts of Ukraine and the ordering of Russian armed forces into those areas and Council Regulation (EU) 2022/1903 of 6 October 2022 amending Regulation (EU) 2022/263<sup>21</sup>:

- **Extension of the geographical scope of the restrictive measures to cover** all the non-government controlled areas of Ukraine in the **oblasts of Donetsk, Luhansk, Zaporizhzhia and Kherson.**

Council Decision (CFSP) 2022/1909 of 6 October 2022 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine and Council Regulation (EU) 2022/1904 of 6 October 2022 amending Regulation (EU) No 833/2014<sup>22</sup>:

- **Ban on EU nationals from holding posts in the governing bodies** of certain state-owned or State-controlled legal persons, entities or bodies;
- **Addition of the Russian Maritime Register of Shipping to the list of state-owned enterprises subject to a transaction ban**, withdrawal of authorisations granted by Member State, and extension of the port access and lock ban in the territory of the Union to vessels certified by the Russian Maritime Register of Shipping;
- Tightened prohibitions on crypto assets by banning all crypto-asset wallets, accounts, or custody services, irrespective of the amount of the wallet (previously allowed up to €10,000);
- **Extension of the existing prohibition on the provision of certain services** to the Russian Federation, **now including IT consultancy, legal advisory, architecture and engineering services;**
  - *‘Legal advisory services’ covers: the provision of legal advice to customers in non-contentious matters, including commercial transactions, involving the*

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<sup>21</sup> Council Decision (CFSP) 2022/1908 of 6 October 2022 amending Decision (CFSP) 2022/266 concerning restrictive measures in response to the recognition of the non-government controlled areas of the Donetsk and Luhansk oblasts of Ukraine and the ordering of Russian armed forces into those areas, OJ L 259I, 6.10.2022, p. 118–121;

Council Regulation (EU) 2022/1903 of 6 October 2022 amending Regulation (EU) 2022/263 concerning restrictive measures in response to the recognition of the non-government controlled areas of the Donetsk and Luhansk oblasts of Ukraine and the ordering of Russian armed forces into those areas, OJ L 259I, 6.10.2022, p. 1–2.

<sup>22</sup> Council Decision (CFSP) 2022/1909 of 6 October 2022 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine, OJ L 259I, 6.10.2022, p. 122–134;

Council Regulation (EU) 2022/1904 of 6 October 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 259I , 6.10.2022, p. 3–75.



*application or interpretation of law; participation with or on behalf of clients in commercial transactions, negotiations and other dealings with third parties; and preparation, execution and verification of legal documents. ‘Legal advisory services’ does not include any representation, advice, preparation of documents or verification of documents in the context of legal representation services, namely in matters or proceedings before administrative agencies, courts or other duly constituted official tribunals, or in arbitral or mediation proceedings.*

- **Prohibition on the sale, supply, transfer or export of firearms, their parts and essential components and ammunition.** Goods subject to that prohibition are also covered by Regulation (EU) No 258/2012.

*(In this context, Regulation (EU) No 833/2014 is to be treated as *lex specialis* and therefore, in the event of a conflict, takes precedence over Regulation (EU) No 258/2012);*

- Extension of the list of restricted items which might contribute to the Russian Federation’s military and technological enhancement or to the development of its defence and security sector, by including in that list **certain chemical substances, nerve agents and goods** which have no practical use other than for capital punishment, torture or other cruel, inhuman or degrading treatment or punishment, or which could be used for those purposes. Goods subject to that prohibition are also **covered by Regulation (EU) 2019/125 (“Anti-torture Regulation”).**

*In this context, Regulation (EU) No 833/2014 is to be treated as *lex specialis* and therefore, in the event of a conflict, takes precedence over Regulation (EU) 2019/125.*

- Almost €7 billion worth of additional import restrictions: **a ban on the import of Russian finished and semi-finished steel products** (subject to a transition period for some semi-finished), machinery and appliances, plastics, vehicles, textiles, footwear, leather, ceramics, certain chemical products, and non-gold jewellery.
- **Ban on the export of coal** including coking coal (which is used in Russian industrial plants), **specific electronic components (found in Russian weapons), technical items used in the aviation sector**, as well as **certain chemicals.**

- Introduction of an **exemption from the prohibition to provide technical assistance, brokering services or financing or financial assistance, related to the maritime transport to third countries of crude oil or petroleum products which originate in or are exported from Russia, purchased at or below a pre-established price cap agreed by the Price Cap Coalition.** That exemption should mitigate adverse consequences on energy supply to third countries and reduce price surges driven by extraordinary market conditions, while limiting Russian oil revenues.

**The exemption from the prohibition to provide maritime services is conditional upon the Council introducing the price cap into Annex XI to Decision 2014/512/CFSP.** It would take effect after 5 December 2022 for crude and 5 February 2023 for refined petroleum products, after a further decision by the Council.

### 9<sup>th</sup> package of sanctions

Council Decision (CFSP) 2022/2478 of 16 December 2022 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine and Council Regulation (EU) 2022/2474 of 16 December 2022 amending

Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine<sup>23</sup>:

- **Extension of the list of restricted items** which might contribute to Russia's military and technological enhancement or the development of its defence and security sector, **by adding aircraft engines and parts of engines, both manned and unmanned so including drone engines, further chemical and biological equipment, riot control agents, generators, toy drones, laptops, hard drives, IT components, night-vision and radio-navigation equipment, cameras and lenses;**
- **Addition of 168 new entries to the list of entities connected to Russia's military and industrial complex** including certain Russian-controlled entities based in Crimea or Sevastopol due to a concrete risk that certain goods or technology are redirected from these Ukrainian regions to the Russian Federation (which brings the total number of entities sanctioned to 410);
- **Suspension of the broadcasting licences** in the Union of Russian of four additional **media outlets under the permanent control of the Russian leadership (i.e. NTV/NTV Mir, Rossiya 1, REN TV and Pervyi Kanal)**, and the prohibition against broadcasting their content;
- **Extension of the prohibition targeting new investments in the Russian energy sector** by adding the Russian **mining sector**, with the exception of mining and quarrying activities involving certain critical raw materials.
- **Addition of the Russian Regional Development Bank** to the list of Russian State-owned or controlled entities that are subject to the **transaction ban, and asset freeze against two additional Russian banks;**
- **Ban on EU nationals from holding any posts on the governing bodies of all Russian State-owned or controlled legal persons, entities or bodies that are established in Russia;**
- **Ban on the provision of EU advertising, market research and public opinion polling services, as well as product testing and technical inspection services to the Russian Federation;**
- **Reporting obligation by no later than 27 May 2023 on deposits exceeding EUR 100 000 from legal persons, entities or bodies established in third countries and majority-owned by Russian nationals or natural persons residing in Russia.** Updates regarding the amounts of such deposits shall be provided every 12 months.
- **Extension of the duration of the exemption from the prohibition to enter into any transactions with certain Russian state-owned entities until 30 September 2023, if such a transaction is strictly necessary for the wind-down of a joint venture or similar legal arrangement.**

Council Decision (CFSP) 2022/2479 of 16 December 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine and Council

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<sup>23</sup> Council Decision (CFSP) 2022/2478 of 16 December 2022 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 322I, 16.12.2022, p. 614–686;

Council Regulation (EU) 2022/2474 of 16 December 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 322I, 16.12.2022, p. 1–314.

Regulation (EU) 2022/2475 of 16 December 2022 amending Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine<sup>24</sup>:

- Introduction of a new deadline for the derogation allowing the divestment by a specific listed entity, so unfreezing assets of, and to making funds and economic resources available to, certain individuals who held a significant role in international trade in agricultural and food products, including wheat and fertilisers, prior to their listing.

Council Decision (CFSP) 2022/2477 of 16 December 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, and Council Implementing Regulation (EU) 2022/2476 of 16 December 2022 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine<sup>25</sup>:

- Addition of 141 persons and 49 entities responsible for actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine to list of persons subject to a freezing of their assets. This includes, *inter alia*, the Russian armed forces, as well as individual officers and defence industrial companies, members of the State Duma and Federation Council, ministers, Russian proxy authorities in occupied areas of Ukraine and political parties.

### **10<sup>th</sup> package of sanctions**

Council Decision (CFSP) 2023/434 of 25 February 2023 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine and Council Regulation (EU) 2023/427 of 25 February 2023 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine:<sup>26</sup>

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<sup>24</sup> Council Decision (CFSP) 2022/2479 of 16 December 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 322I, 16.12.2022, p. 687–688;

Council Regulation (EU) 2022/2475 of 16 December 2022 amending Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 322I, 16.12.2022, p. 315–317.

<sup>25</sup> Council Decision (CFSP) 2022/2477 of 16 December 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 322I, 16.12.2022, p. 466–613;

Council Implementing Regulation (EU) 2022/2476 of 16 December 2022 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 322I, 16.12.2022, p. 318–465.

<sup>26</sup> Council Decision (CFSP) 2023/434 of 25 February 2023 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 59I , 25.2.2023, p. 593–641;

Council Regulation (EU) 2023/427 of 25 February 2023 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L 59I , 25.2.2023, p. 6–274.

- **Prohibition** as of 27 March 2023 to allow Russian nationals or natural persons residing in Russia **to hold any posts in the governing bodies** of the owners or operators of critical infrastructures<sup>27</sup>, European critical infrastructure<sup>28</sup> and critical entities<sup>29</sup> (except for nationals of a Member State, of a country member of the European Economic Area or of Switzerland).
- **Prohibition to provide gas storage capacity** in the Union to Russian nationals, natural persons residing in Russia or legal persons or entities established in Russia (with the exclusion of the part of LNG facilities).

*However, the competent authorities may authorise the provision of storage capacity after having determined that it is necessary for ensuring critical energy supply within the Union. If so, the concerned MS shall inform the other Member States and the Commission of any granted authorisation within two weeks of the authorisation.*
- **Prohibition of transit via the territory of Russia of dual-use goods and technology and of arms** exported from the Union in order to minimise the risk of circumvention of restrictive measures.
- Addition of **96 new entries** to the **list of entities connected to Russia’s military and industrial complex**.

*This is notably the case of several Iranian manufacturers of Unmanned Aerial Vehicles in reason of their direct connection with the Russian military and industrial complex.*
- Extension of the **suspension of broadcasting licences in the Union** of the following Russian media outlets under the permanent control of the Russian leadership and prohibition against broadcasting their content:
  - **RT Arabic;**
  - **Sputnik Arabic.**
- **Extension of the list of restricted items** which might contribute to Russia’s military and technological enhancement or the development of its defence and security sector, **by adding rare-earths and compounds, electronic integrated circuits and thermographic cameras**, among others.
- Further **restrictions on exports of industrial goods** which could contribute in particular to the enhancement of Russian industrial capacities.
- Further **bans on imports** of goods which generate significant revenues for Russia by adding **asphalt and synthetic rubber**.
- Introduction of an **obligation for aircraft operators to notify non-scheduled flights** to their competent authorities, which will then inform other member states, in order to avoid circumvention of the prohibition on any non-Russian-registered aircraft which is owned, chartered or controlled by any Russians from landing in, taking off from, or overflying, the territory of the Union.
- Introduction of **new and more detailed reporting obligations to ensure the effectiveness of the asset freeze prohibitions**, notably on immobilized reserves and assets of the Central Bank of Russia.

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<sup>27</sup> As defined in Directive 2008/114/EC and Directive (EU) 2022/2557.

<sup>28</sup> As defined in Council Directive 2008/114/EC.

<sup>29</sup> As defined in Directive (EU) 2022/2557. Directive (EU) 2022/2557 establishes an obligation for Member States to identify by 17 July 2026 in their national law the critical entities for the sectors and subsectors set out in the Annex thereto. Therefore, as from 17 July 2026, the new prohibition on holding any posts in the governing bodies will concern all the critical entities identified or designated as such by Member States.

- **Addition of 96 entities to the list of entities supporting directly Russia’s military and industrial complex** in its war of aggression **thereby imposing tighter export restrictions regarding dual-use goods and technology** as well as goods and technology which might contribute to the technological enhancement of Russia’s defence and security sector.

Council Decision (CFSP) 2023/432 of 25 February 2023 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine and Council Implementing Regulation (EU) 2023/429 of 25 February 2023 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine:<sup>30</sup>

- Addition of 87 individuals and 34 entities, including key decision makers, military leaders, military commanders of the Wagner group and drone manufacturers to the list of persons, entities and bodies subject to restrictive measures set out in the Annex to Decision 2014/145/CFSP.

### 11<sup>th</sup> package of sanctions

Council Decision (CFSP) 2023/1217 of 23 June 2023 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine, and Council Regulation (EU) 2023/1214 of 23 June 2023 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine:<sup>31</sup>

- **New anti-circumvention tool: Possibility to take exceptional, last-resort measures restricting the sale, supply, transfer or export of sensitive dual-use goods and technology, and other restricted goods whose export to Russia is prohibited under Regulation (EU) No 833/2014 to third countries whose jurisdiction is demonstrated to be at a continuing and particularly high risk of circumvention.**
  - **Before a proposal is submitted to the Council** to proceed to those last-resort measures, **the High Representative of the Union for Foreign Affairs and Security Policy and the Commission will brief the Council on the technical details**, on the outreach actions taken and on enforcement measures.
  - **Before including a third country on the list** of countries concerned by that measure, **the Union should inform and actively seek the views of**

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<sup>30</sup> Council Decision (CFSP) 2023/432 of 25 February 2023 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 59I , 25.2.2023, p. 437–582;

Council Implementing Regulation (EU) 2023/429 of 25 February 2023 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 59I , 25.2.2023, p. 278–422.

<sup>31</sup> Council Decision (CFSP) 2023/1217 of 23 June 2023 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine, OJ L 159I, 23.6.2023, p. 451–525; Council Regulation (EU) 2023/1214 of 23 June 2023 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine, OJ L 159I, 23.6.2023, p. 1–329.

**the government of that third country** on the basis of the preliminary findings set out in the technical analysis by the Commission and the Union's intended remedial action. **The Council will only adopt such a decision after the final outreach to that third country has been concluded.**

- Such **decisions** should be based on the inclusion **by the Council, acting unanimously**, of the relevant country and goods or technology in Annex XIV to Decision 2014/512/CFSP.
- In order to minimise the risk of circumvention of the restrictive measures, it is **prohibited the transit via the territory of Russia of goods and technology** which might contribute to Russia's military and technological enhancement or to the development of its defence and security sector, goods and technology **suited for use in aviation or space industry and jet fuel and fuel additives**, exported from the Union;
- **Addition of 87 new entities** to the list of those directly supporting Russia's military and industrial complex in its war of aggression against Ukraine (in addition to the Russian and Iranian manufacturers of military UAVs already listed, the list now includes **three Chinese companies**, and other **entities in third countries involved in the circumvention of trade restrictions such as Armenia, Syria, the United Arab Emirates, and Uzbekistan**).
- **Addition of 15 items, which have been used by Russia for its war of aggression against Ukraine**, to the list of items which contribute to Russia's military and technological enhancement or to the development of its defence and security sector (these items include **electronic components, semiconductor materials, manufacturing and testing equipment for electronic integrated circuits and printed circuit boards, precursors to energetic materials and precursors to chemical weapons, optical components, navigational instruments, metals used in the defence sector and marine equipment**).
- **Expansion of the list of restricted firearms**, their parts, essential components and ammunition, and addition of other types of arms.
- Further restrictions on exports of goods which could contribute to the enhancement of Russian industrial capacities (machinery components).
- **Prohibition on the sale, license or transfer in any other way of intellectual property rights or trade secrets** (as well as the granting of rights to access or re-use any material or information) **related to the goods and technology** whose sale, supply, transfer or export, to a person, entity or body in Russia or for use **in Russia is prohibited, in order to prevent being manufactured outside the Union**.
- **Tighter restrictions on imports of iron and steel goods** by requiring importers of sanctioned iron and steel goods that have been processed in a third country to **prove that the inputs used do not come from Russia**.
- **Suspension of the broadcasting licences in the Union of five additional Russian media outlets (RT Balkan, Oriental Review, Tsargrad, New Eastern Outlook and Katehon)** under the permanent control of the Russian leadership, and the prohibition against broadcasting their content. Such suspension should be maintained until the war of aggression against Ukraine is put to an end, and until Russia, and its associated media outlets, cease to conduct propaganda actions against the Union and its Member States.
- **A full ban on the transport of goods by road in the Union by trailers and semi-trailers registered in Russia**, including when hauled by trucks registered outside of Russia.

- **Prohibition to access EU ports and locks by vessels:**
  - **Suspected** by competent authorities **of illegally interfering with, switching off or otherwise disabling their navigation tracking system** (shipborne automatic identification systems - AIS) when transporting Russian crude oil and petroleum products.
  - **Suspected** by competent authorities **of transporting Russian oil or petroleum products purchased above the price cap agreed by the (G7) Price Cap Coalition**. This prohibition applies to all vessels, irrespective of their flag of registration, and to any ship-to-ship transfers carried out at any point during the voyage to a Member State's ports or locks.
  - That **do not notify the competent authority at least 48 hours in advance about a ship-to-ship transfer** occurring within the Exclusive Economic Zone of a Member State or within 12 nautical miles from the baseline of that Member State's coast.
- In order to mitigate forum shopping, competent authorities in a Member State which deny access to a vessel should immediately exchange information on such denial with the other competent authorities of the Member States.
- The **prohibition on providing transferable securities** to persons in **Russia** is extended to **financial instruments** denominated in any currency.
- **Enhanced exchange of information among Member States and with the Commission on the application and enforcement of export restrictions on sensitive items** that may be used to support Russia's war of aggression against Ukraine, such as dual-use goods and goods listed in Annex VII to Regulation (EU) No 833/2014.
- **End of the temporary derogation granted to Germany and Poland for the supply of crude oil by pipeline from Russia** through the northern section of the Druzhba oil pipeline (the import of oil originated in Kazakhstan or another third country and transiting through Russia via the Druzhba oil pipeline is not prohibited).
- Derogation from the prohibition on purchasing, importing or transferring certain items which generate significant revenues for Russia and which are necessary for the operation, maintenance or repair of Budapest metro line 3 cars.
- Extension of the exception to the oil price cap for Sakhalin oil for Japan (until 31 March 2024).
- Extension of the list of partner countries (Switzerland) which are applying a set of export control measures substantially equivalent to those set out in Regulation (EU) No 833/2014.

Council Decision (CFSP) 2023/1218 of 23 June 2023 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, Council Regulation (EU) 2023/1215 of 23 June 2023 amending Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, and Council Implementing Regulation (EU) 2023/1216 of 23 June 2023 implementing Regulation (EU) No 269/2014:<sup>32</sup>

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<sup>32</sup> Council Decision (CFSP) 2023/1218 of 23 June 2023 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 159I, 23.6.2023, p. 526–644;  
Council Regulation (EU) 2023/1215 of 23 June 2023 amending Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 159I, 23.6.2023, p. 330–334;

- Introduction of a **new listing criterion in response to information warfare to allow the designation of persons and entities operating in the Russian IT sector holding a license administered by the Federal Security Service of the Russian Federation (FSB Center for Licensing, Certification, and Protection of State Secrets) or a ‘weapons and military equipment’ license administered by the Russian Ministry of Industry and Trade** (providing critical technology and software to the Russian intelligence community).
- **Revision of the listing criterion for persons and entities** engaged in circumventing EU sanctions to **include those significantly frustrating EU sanctions**.
- **Addition of 71 persons and 33 entities subject to asset freezes**. This includes senior military officials, decision makers on the war, persons involved in the illegal deportation of Ukrainian children to Russia, judges who took politically motivated decisions against Ukrainian citizens, persons responsible for the looting of cultural heritage, businesspersons, propagandists, as well as Russian IT companies providing critical technology and software to the Russian intelligence, banks operating in the occupied territories and entities working with the Russian armed forces.

### 12<sup>th</sup> package of sanctions

Council Decision (CFSP) 2023/2871 of 18 December 2023 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, Council Regulation (EU) 2023/2873 of 18 December 2023 amending Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, and Council Implementing Regulation (EU) 2023/2875 of 18 December 2023 implementing Regulation (EU) No 269/2014.<sup>33</sup>

- **New listing criterion:** Extension of the listing criteria to cover natural or legal persons, who benefit from the compulsory transfer of ownership or control over entities established in Russia that were previously owned or controlled by EU entities, where such transfer is made by the Government of the Russian Federation.
- **Possibility to keep deceased persons on the asset freeze list** and prohibition on making funds and economic resources available, where it considers there is a likelihood that the assets concerned would otherwise be used to finance Russia’s war of aggression against Ukraine.
- **New obligation for Member States to proactively trace assets of listed persons:** Definition of the scope of certain reporting obligations and introduction of an

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Council Implementing Regulation (EU) 2023/1216 of 23 June 2023 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 159I, 23.6.2023, p. 335–450.

<sup>33</sup> Council Decision (CFSP) 2023/2871 of 18 December 2023 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 2023/2871, 18.12.2023;

Council Regulation (EU) 2023/2873 of 18 December 2023 amending Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 2023/2873, 18.12.2023;

Council Implementing Regulation (EU) 2023/2875 of 18 December 2023 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 2023/2875, 18.12.2023.



**obligation** for national competent authorities of Member States **to designate by 31 October 2024 the national authorities competent to identify and trace**, where appropriate, **funds and economic resources** belonging to, or owned, held or controlled by, **listed** natural or legal **persons**, to prevent or detect instances of a breach or circumvention, or attempts at a breach or circumvention, of Regulation (EU) No 269/2014.

- **Addition of 61 persons and 86 entities** responsible for actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine **to the list of persons subject to restrictive measures** set out in the Annex to Decision 2014/145/CFSP.

*This covers actors in the Russian military and defence, including military industry companies and Private Military Companies, actors from the IT sector, as well as other important economic actors. The measures also target those who have orchestrated the recent illegal so-called “elections” in the territories of Ukraine that Russia has temporarily occupied, and those responsible for the forced “re-education” of Ukrainian children, as well as actors spreading disinformation/propaganda in support of Russia’s war of aggression against Ukraine.*

Council Decision (CFSP) 2023/2874 of 18 December 2023 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine, and Council Regulation (EU) 2023/2878 of 18 December 2023 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine.<sup>34</sup>

- **Import ban on Russian diamonds (G7-agreed ban** estimated at €4 billion per year): prohibition on the direct or indirect import, purchase or transfer of diamonds from Russia (*i.e.*, originating in Russia, exported from Russia, transiting Russia, and Russian diamonds when processed in third countries other than Russia).

*The prohibition applies to non-industrial natural and synthetic diamonds, as well as diamond jewellery, as of 1 January 2024, and includes a progressive phasing-in, from 1 March 2024 until 1 September 2024, of an indirect import ban on Russian diamonds when processed in third countries other than Russia, to deploy an appropriate traceability and certification mechanism for rough diamonds within the G7 that enables effective enforcement measures.*

- Addition of **29 new entities** to the list of entities **associated to Russia’s military-industrial complex** set out in Annex IV to Decision 2014/512/CFSP (**including Russian entities involved in the development, production and supply of electronic components, and entities registered in Uzbekistan and Singapore involved in the circumvention of trade restrictions**).
- **New export controls on dual-use and advanced technologies**: expansion of the list of items which contribute to the development or production of Russia’s military systems, including:
  - Chemicals;
  - Lithium batteries;
  - Thermostats;

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<sup>34</sup> Council Decision (CFSP) 2023/2874 of 18 December 2023 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine, OJ L, 2023/2874, 18.12.2023;

Council Regulation (EU) 2023/2878 of 18 December 2023 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine, OJ L, 2023/2878, 18.12.2023.

- DC motors and servomotors for unmanned aerial vehicles;
  - Machine tools; and
  - Machinery parts.
- **New export bans on EU industrial goods:** further restrictions on exports of goods which could contribute to the enhancement of Russian industrial capacities, including:
  - Machinery and parts;
  - Construction-related goods;
  - Processed steel;
  - Copper and aluminium goods;
  - Lasers; and
  - Batteries.
- **Further restrictions on imports of goods generating significant revenues for Russia** (estimated at €2.2 billion per year - certain exceptions and transitional periods are provided for), such as:
  - Liquefied propane gas;
  - Pig iron and spiegeleisen;
  - Copper wires;
  - Aluminium wires;
  - Foil;
  - Tubes; and
  - Pipes.
- **Addition of Switzerland to the list of partner countries** applying a set of restrictive measures on imports of iron and steel from Russia, and a set of import control measures that are **substantially equivalent to those of the EU** (established by Decision 2014/512/CFSP and Council Regulation (EU) No 833/2014).
- **New import ban on liquified petroleum gas (LPG)** (estimated at over €1 billion per year) with a 12-month transitional period.
- **Tightened G7+ oil price cap:** introduction of a **notification obligation for the sale of tankers to any third country**, as well as **require more detailed attestation requirements**.
- **Strengthened information sharing for the enforcement of the price cap mechanism:** Strengthened information sharing between the Commission, with the support of the European Maritime Safety Agency, and the Member States to identify vessels and entities carrying out deceptive practices, such as ship-to-ship transfers used to conceal the origin or destination of cargo and manipulations of the automatic identification system (AIS), while transporting Russian crude oil or petroleum products.
- **Broadening of the transit ban through Russia** of dual-use goods and technologies to certain goods and technology which could contribute in particular to the enhancement of Russian industrial capacities.
- **New notification requirements for the transfer of funds out of the EU** from EU entities directly or indirectly **owned by more than 40% by Russians** or entities established in Russia.
- **Ban on Russian nationals from owning, controlling or holding any posts on the governing bodies of the legal entities** or bodies **providing crypto-asset wallet, account or custody services to Russian** persons and residents.
- Extension of the existing **prohibition** on the provision of services to the **provision of software for the management of enterprises and software for industrial design and manufacture to the Russian government or Russian companies**.

- **No Russia clause: Obligation for exporters to contractually prohibit the re-export of certain sensitive goods and technology to Russia or for use in Russia**, including:
  - Goods related to aviation, jet fuel (as listed in Annexes XI, XX and XXXV to Regulation (EU) No 833/2014);
  - Firearms and ammunition as listed in Annex I to Regulation (EU) No 258/2012); and

Goods on the Common High Priority list (*list of prohibited dual-use goods and advanced technology items used in Russian military systems found on the battlefield in Ukraine or critical to the development, production or use of those systems*).

### 13<sup>th</sup> package of sanctions

Council Decision (CFSP) 2024/746 of 23 February 2024 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine, and Council Regulation (EU) 2024/745 of 23 February 2024 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine:<sup>35</sup>

- **Addition of 27 new entities to the list of persons and entities**, set out in Annex IV to Decision 2014/512/CFSP, **connected to Russia’s military and industrial complex subject to tighter export restrictions regarding dual-use goods and technology**, as well as goods and technology which might contribute to the technological enhancement of Russia’s defence and security sector, including:
  - *17 Russian companies involved in the development, production and supply of electronic components, particularly used in connection with drone production;*
  - *4 companies registered in China and 6 others registered in Kazakhstan, India, Serbia, Thailand, Sri Lanka, and Türkiye, supporting indirectly Russia’s military and industrial complex by trading such electronic components, including of EU-origin.*
- **Addition of components for the development and production of unmanned aerial vehicles** to the list of advanced technology items that may contribute to Russia’s military and technological enhancement or to the development of its defence and security sector (Annex VII to Regulation 833/2014).
- **Further restrictions on exports of goods** which contribute in particular to the **enhancement of Russian industrial capabilities**, such as electric transformers, static converters, inductors, and aluminium capacitors (Annex XXIII to Regulation 833/2014).
- **Addition of the United Kingdom to the list of partner countries** (already including Norway, and Switzerland since the 12<sup>th</sup> package of sanctions on December 18, 2023) which **apply a set of restrictive measures** on imports of iron and steel from Russia and a set of import control measures that are **substantially equivalent to those of the**

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<sup>35</sup> Council Decision (CFSP) 2024/746 of 23 February 2024 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine, OJ L, 2024/746, 23.02.2024; and Council Regulation (EU) 2024/745 of 23 February 2024 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine, OJ L, 2024/745, 23.02.2024.

EU (established by Decision 2014/512/CFSP and Council Regulation (EU) No 833/2014).

Council Decision (CFSP) 2024/747 of 23 February 2024 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, and Council Implementing Regulation (EU) 2024/753 of 23 February 2024 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine:<sup>36</sup>

- **Addition of 106 persons and 88 entities** to the list of persons/entities subject to restrictive measures (**travel restrictions and the freezing of funds and economic resources**) set out in the Annex to Decision 2014/145/CFSP and **Annex I to Regulation (EU) No 269/2014**.

The new listing, which now applies to over 2000 individuals and entities altogether, targets:

- *More than 140 companies and associated individuals from the Russian military and defence sectors;*
- *10 Russian companies and individuals involved in DPRK armament supply to Russia, including the Defence Minister of the DPRK, and several Belarusian companies and individuals providing support to the Russian armed forces;*
- *6 judges and 10 officials involved in the occupation and illegal annexation of areas of Ukraine;*

*15 individuals and 2 entities responsible for the illegal deportation and military re-education of Ukrainian children.*

**In response to Belarus's involvement in Russia's unprovoked invasion against Ukraine, the EU has introduced the following new measures.**

### **6th package of sanctions**

Council Decision (CFSP) 2024/1864 of 29 June 2024 amending Decision 2012/642/CFSP concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine, and Council Regulation (EU) 2024/1865 of 29 June 2024 amending Regulation (EC) No 765/2006 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine<sup>37</sup>:

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<sup>36</sup> Council Decision (CFSP) 2024/747 of 23 February 2024 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 2024/747, 23.02.2024; and Council Implementing Regulation (EU) 2024/753 of 23 February 2024 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 2024/753, 23.02.2024.

<sup>37</sup> Council Decision (CFSP) 2024/1864 of 29 June 2024 amending Decision 2012/642/CFSP concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine, OJ L, 2024/1864, 30.6.2024; Council Regulation (EU) 2024/1865 of 29 June 2024 amending Regulation (EC) No 765/2006 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine, OJ L, 2024/1865, 30.6.2024.

#### Trade:

- **Further export restrictions on dual-use and advanced technology goods.**
- **New restrictions on goods** which could **contribute to the enhancement of Belarusian industrial capacities**, as well as **maritime navigation equipment**, and other measures in the **energy and aviation sectors**.
- **Export ban on goods and technology** suitable for use in **oil refining and liquefaction of natural gas**.
- **Import ban on goods** allowing Belarus to **diversify its sources of revenue**, such as **coal, crude oil, gold and diamonds** (originating in Belarus, exported from Belarus and transiting Belarus).
  - *Exceptions: prohibitions relating to oil are without prejudice for the time being to the transit through Belarus of crude oil which is delivered by pipeline from Russia into Member States.*

#### Anti-circumvention:

- **EU operators** must from now undertake their **best efforts to prevent their foreign subsidiaries from engaging in activities that undermine** sanctions provided for in Regulation (EC) No 765/2006.
- **Prohibition of transit of certain sensitive goods** (e.g. dual-use, advanced technology, firearms, aviation related materials) **via Belarus** to reduce the risk of circumvention.
- **Obligation for EU exporters:**
  - to include a **"no-Belarus clause"** in new contracts, prohibiting the re-exportation to Belarus or re-exportation for use in Belarus of sensitive goods and technology, battlefield goods, firearms and ammunition.
  - And for EU operators trading in battlefield goods, to **implement due diligence mechanisms** capable of **identifying and assessing risks of re-exportation to Russia and mitigating such risks**.

#### Services:

- **Prohibition to provide certain services to Belarus**, its government and related entities acting on their behalf or at their direction is now restricted, **including accounting, auditing, statutory audit, bookkeeping, tax consulting, business and management consulting and public relations services** (covering advisory, guidance and operational assistance services, following Annex II to Regulation (EC) No 184/2005), **IT consultancy, legal advisory, architectural and engineering services, advertising, market research** and public opinion polling services.

#### Road transport:

- **Extended prohibition** on the transport of goods by road in the Union by **trailers or semi-trailers registered in Belarus**.
- **Addition of transit to the existing prohibition to transport goods by road in the EU**, applying to EU companies owned 25% or more by Belarusian persons.
  - *The prohibition does not apply to road transport undertakings owned by dual nationals or Belarusian nationals having a temporary or permanent residence permit in a Member State.*

#### Reporting obligation on penalties:

- Addition of reporting obligation for Member States on penalties applied for infringements of the restrictive measures to increase awareness of enforcement action.

#### New listing criterion:

- Possibility for the Council to impose **targeted measures against individuals or entities that circumvent the sanctions** or that significantly **undermine their purpose or effectiveness**.

#### Protection of EU operators:

- The new measures enable EU operators to claim compensation for damages caused by Belarusian entities linked to sanctions implementation and expropriation.

### 1<sup>st</sup> package of sanctions

Council Implementing Regulation (EU) 2022/353 of 2 March 2022 implementing Regulation (EU) No 269/2014 and Council Decision (CFSP) 2022/354 of 2 March 2022 amending Decision 2014/145/CFSP<sup>38</sup>:

- Assets freezing and travel ban applicable to 22 listed Belarussian persons working for the Belarussian Ministry of Defence and armed forces.

Council Regulation (EU) 2022/355 of 2 March 2022 amending Regulation (EC) No 765/2006 and Council Decision (CFSP) 2022/356 of 2 March 2022 amending Decision 2012/642/CFSP<sup>39</sup>:

- Restrictions on **exports of dual-use goods and technology**, whether or not originating in the Union, and on the provision of related services;
- Restrictions on exports of certain goods and **technology**, whether or not originating in the Union, **which might contribute to Belarus's technological enhancement of its defence and security sector**;
- **Prohibition to import** cement, wood, iron and steel, and rubber products.

### 2<sup>nd</sup> package of sanctions

Council Regulation (EU) 2022/398 of 9 March 2022 amending Regulation (EC) No 765/2006 and Council Decision (CFSP) 2022/399 of 9 March 2022 amending Decision 2012/642/CFSP<sup>40</sup>:

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<sup>38</sup> Council Implementing Regulation (EU) 2022/353 of 2 March 2022 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 66, 2.3.2022, p. 1–13;

Council Decision (CFSP) 2022/354 of 2 March 2022 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 66, 2.3.2022, p. 14–26.

<sup>39</sup> Council Regulation (EU) 2022/355 of 2 March 2022 amending Regulation (EC) No 765/2006 concerning restrictive measures in view of the situation in Belarus, OJ L 67, 2.3.2022, p. 1–102;

Council Decision (CFSP) 2022/356 of 2 March 2022 amending Decision 2012/642/CFSP concerning restrictive measures in view of the situation in Belarus, OJ L 67, 2.3.2022, p. 103–111.

<sup>40</sup> Council Regulation (EU) 2022/398 of 9 March 2022 amending Regulation (EC) No 765/2006 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine, OJ L 82, 9.3.2022, p. 1–8;

- Inclusion of **crypto-assets** under the scope of “transferable securities”
- **Prohibiting the transactions of Belarus's central bank** and freezing all its assets;
- **Prohibition to list and provide services as of 12 April 2022 on trading venues** registered or recognised in the Union **for the transferable securities of any person/entity established in Belarus and with over 50 % public ownership**;
- **Prohibition to provide public financing or financial assistance** for trade with, or investment in, Belarus;
- **Prohibition to accept any deposits** from Belarusian nationals or persons/entities residing or established in Belarus, if the total value of deposits per credit institution **exceeds EUR 100 000**;
- **Prohibition to sell euro denominated transferable securities** issued after 12 April 2022 and **to sell, supply, transfer or export euro denominated banknotes** to any Belarusian national or persons/entities residing or established in Belarus;
- **Prohibition to provide SWIFT services to:**
  - Belagroprombank;
  - Bank Dabrabyt;
  - Development Bank of the Republic of Belarus;
  - or to any person/entity established in Belarus whose proprietary rights are directly or indirectly owned for more than 50 % by a listed entity.

### 3<sup>rd</sup> package of sanctions

Council Regulation (EU) 2022/577 of 8 April 2022 amending Regulation (EC) No 765/2006 and Council Decision (CFSP) 2022/579 of 8 April 2022 amending Decision 2012/642/CFSP<sup>41</sup>:

- Extension of the prohibition to sell transferable securities and to sell, supply, transfer or export banknotes denominated in any official currency of a Member State to Belarus;
- Prohibition for any Belarusian road transport undertaking to transport goods by road within the EU, including in transit.

### 4<sup>th</sup> package of sanctions

Council Implementing Regulation (EU) 2022/876 of 3 June 2022 implementing Article 8a(1) of Regulation (EC) No 765/2006 and Council Implementing Decision (CFSP) 2022/881 of 3 June 2022 implementing Decision 2012/642/CFSP<sup>42</sup>:

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Council Decision (CFSP) 2022/399 of 9 March 2022 amending Decision 2012/642/CFSP concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine, OJ L 82, 9.3.2022, p. 9–13.

<sup>41</sup> Council Regulation (EU) 2022/577 of 8 April 2022 amending Regulation (EC) No 765/2006 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine, OJ L 111, 8.4.2022, p. 67–6;

Council Decision (CFSP) 2022/579 of 8 April 2022 amending Decision 2012/642/CFSP concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine, OJ L 111, 8.4.2022, p. 81–83.

<sup>42</sup> Council Implementing Regulation (EU) 2022/876 of 3 June 2022 implementing Article 8a(1) of Regulation (EC) No 765/2006 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine, OJ L 153, 3.6.2022, p. 1–10;

Council Implementing Decision (CFSP) 2022/881 of 3 June 2022 implementing Decision 2012/642/CFSP concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine, OJ L 153, 3.6.2022, p. 77–87.

- Addition of 12 individuals and eight entities to the list of persons/entities subject to restrictive measures set out in Annex I to Regulation (EC) No 765/2006.

Council Regulation (EU) 2022/877 of 3 June 2022 amending Regulation (EC) No 765/2006 and Council Decision (CFSP) 2022/882 of 3 June 2022 amending Decision 2012/642/CFSP<sup>43</sup>:

- Expanded list of entities (25) subject to restrictions with regard to authorisations for the sale, supply, transfer or export of **dual-use goods and technology**, and **goods and technology which might contribute to Belarus's military and technological enhancement**, or to the **development of its defence and security sector**, as set out in Annex I to the Council Regulation (EU) 2022/877;
- Expanded list of Belarusian credit institutions (4) and their Belarusian subsidiaries subject to restrictive measures with regard to the provision of specialised financial messaging (**SWIFT**) services, as set out in Annex II to the Council Regulation (EU) 2022/877.

### 5th package of sanctions

Council Decision (CFSP) 2023/421 of 24 February 2023 amending Decision 2012/642/CFSP concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine and Council Implementing Regulation (EU) 2023/419 of 24 February 2023 implementing Article 8a of Regulation (EC) No 765/2006 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine<sup>44</sup>:

- Extension of the restrictive measures linked to internal repression in Belarus and regime's support for the war against Ukraine for another year, thus applying until 28 February 2024.
- Modification of the entries relating to 21 natural and 2 legal persons to the list of persons/entities subject to restrictive measures set out in Annex I to Regulation (EC) No 765/2006, which currently apply to 195 individuals and 34 entities, including Alexandr Lukashenko.

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<sup>43</sup> Council Regulation (EU) 2022/877 of 3 June 2022 amending Regulation (EC) No 765/2006 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine, OJ L 153, 3.6.2022, p. 11–14;

Council Decision (CFSP) 2022/882 of 3 June 2022 amending Decision 2012/642/CFSP concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine, OJ L 153, 3.6.2022, p. 88–91.

<sup>44</sup> Council Decision (CFSP) 2023/421 of 24 February 2023 amending Decision 2012/642/CFSP concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine, OJ L 61, 27.2.2023, p. 41–57;

Council Implementing Regulation (EU) 2023/419 of 24 February 2023 implementing Article 8a of Regulation (EC) No 765/2006 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine, OJ L 61, 27.2.2023, p. 20–36.