

## **Overview of EU sanctions against Russia and Belarus** *EU reaction to Russia's war of aggression against Ukraine*

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 four years after Russia's invasion and war of aggression against Ukraine, on April 23, 2026, the EU adopted its 20<sup>th</sup> package of sanctions against Russia, as well as further measures against Belarus mirroring some of those adopted against Russia. The following are among the main measures implemented to restrict Russia's access to battlefield technologies and its ability to wage war, to protect EU operators, and to crack down on Russia's shadow fleet, thus cutting Russian energy imports and fighting against sanctions circumvention:**

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

[Council Regulation \(EU\) 2026/506 of 23 April 2026 amending Regulation \(EU\) 833/2014, and Council Decision \(CFSP\) 2026/508 of 23 April 2026 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine:](#)<sup>2</sup>

**Military industry:**

- **Addition of 60 entities** to the list, set out in Annex IV to Decision 2014/512/CFSP, of those directly **supporting Russia's military and industrial complex** and subject to tighter export restrictions regarding dual-use goods and technology, as well as goods

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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) 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 L229, 31.7.2014, p. 13–17; and Council Regulation (EU) 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 Regulation (EU) 2026/506 of 23 April 2026 amending Regulation (EU) 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L, 2026/506, 23.4.2026; and Council Decision (CFSP) 2026/508 of 23 April 2026 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L, 2026/508, 23.4.2026.

and technology which might contribute to the technological enhancement of Russia's defence and security sector, including:

- Entities in third countries other than Russia (i.e., Türkiye, UAE, China, Hong Kong, Thailand) that indirectly contribute to Russia's military and technological enhancement by circumventing export restrictions, including those on computer numerical controlled (CNC) machine tools, microelectronics, components for unmanned aerial vehicles, microelectronic products, maritime equipment, and components for other vehicles and machinery.
- **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 (Annex VII to Regulation (EU) 833/2014), including:
  - Laboratory glassware;
  - Certain high performance lubricants and their additives;
  - Energetic materials.
- **Further restrictions on imports of goods which generate significant revenues for Russia**—worth over €570 million—as listed in Annex XXI to Regulation (EU) 833/2014, including restrictions on certain raw materials, metals, certain minerals, on scrap of steel and other metals, on chemicals, on articles of vulcanised rubber and on tanned furskins.
- Broadening of the transit ban through Russia of certain goods and technologies (Annex XXXVII to Regulation (EU) 833/2014) to minimise the risk of circumvention of restrictive measures.
- **Further restrictions on exports of goods which contribute to the enhancement of Russian industrial capabilities**, such as **chemicals, rubber and articles of vulcanised rubber, articles of steel, tools for metal production and industrial tractors** (as listed in Annex XXIII to Regulation (EU) 833/2014).
- **Expansion** of the existing **broadcasting prohibition to include sites which disseminate** or facilitate the broadcasting of **the same content as the prohibited entities**, thus circumventing EU measures.

*In accordance with the Charter of Fundamental Rights, this measure does not prevent the listed media outlets from carrying out other activities in the Union than broadcasting, such as research and interviews.*

Energy-related measures:

- Introduction of a **prohibition on providing liquefied natural gas (LNG) terminal services to Russian entities** or to entities owned or controlled by Russian nationals or operators. The relevant **contracts for the LNG terminal services** concerned are to **terminate automatically on 1 January 2027**.
- Introduction of a **legal basis** (Article 3n, end of paragraph 6 of Regulation (EU) 833/2014) **for a future full ban on maritime services for Russian crude oil and petroleum products**, to be implemented in coordination with the G7 and the Price Cap Coalition.
- **Obligation for importers of polished diamonds**, including diamonds polished in third countries, **to provide a due-diligence statement** confirming that the diamonds were not mined, processed or produced in Russia.
- **New listing mechanism for Russian companies benefiting from “temporary management”** (i.e. de facto expropriation of EU-owned assets in Russia), which are made subject to a **transaction ban**.

Financial measures:

- **Transaction ban extended to four financial institutions that enable the performance of international transactions to Russian entities** through mechanisms such as netting, set-off or settlement arrangements that avoid any actual transfer of funds across Russia's borders (i.e., "payment agents"), and so **circumventing EU sanctions**, as listed in part D of the new Annex XLV to Regulation (EU) 833/2014 and with effect from 14 May 2026:
  - Arneis;
  - Asia Import Group;
  - GPAgent;
  - Platejka.
- **Prohibition of any transaction involving crypto-assets and central bank digital currencies**, as listed in Annex LIII to Regulation (EU) 833/2014 (i.e., A7A5, RUBx, Digital rouble), **or providing support to the development of such projects.**
- **Expansion of the list of crypto-assets** the use of which is **prohibited** in transactions (addition of RUBx), as those crypto-assets pose a risk of circumventing prohibitions.
- **Total sectoral ban on providers and platforms established in Russia that allow the transfer and exchange of crypto assets.**
- **Addition of 20 Russian financial institutions** to the list of entities subject to a **transaction ban** (Annex XIV to Regulation (EU) 833/2014), bringing the total to 70. *The transaction ban targets selected Russian credit and financial institutions—and certain related entities—that are significant to Russia's financial system. This includes major and regional banks, entities facilitating cross-border payments, institutions operating in or supporting activities in occupied Ukrainian territories, banks servicing Russian military personnel, and entities already subject to EU or partner-country restrictive measures.*
  - Addition of some exceptions for: the reception of payments due pursuant to **obligations performed before 24 April 2026**; the payment of reasonable **professional fees** or the reimbursement of incurred expenses **associated with the provision of legal services**; the needs of state-funded intermediate organisations for the **foreign cultural policy of the Member States in Russia.**
- **Extension of the existing prohibition on the provision of certain services** to the Russian Federation, **now including managed security services** (an exception is made for the functioning of a consular or diplomatic representation of Russia located in a Member State).
- **Extension of the existing prohibition on the acceptance of financing, donations or any other economic benefits or support from Russia, to a broad range of actors** (and associated persons) **that carry out research and innovation action** (as defined in Regulation (EU) 2021/695), including public and private research institutions, universities, NGOs, public bodies, and companies of all sizes. *Accepting Russian public funding may entail direct or indirect support to Russian actors, as it can involve the transfer of knowledge, access to infrastructure, training, and other activities carried out in the context of research and innovation, or be used for influence campaigns and the promotion of disinformation.*
- It is clarified that **reporting obligations** concerning information which would facilitate the implementation of EU restrictive measures should **encompass the duty to report about persons that engage in attempts at circumvention schemes**, or on transactions deemed suspicious.

Protection of EU operators:

- Modification of the *forum necessitatis* clause to enable Union courts to issue orders not to initiate or to discontinue legal proceedings (before Russian courts relating to contracts affected by EU restrictive measures), and to impose penalties, upon request of Union persons.
- Extension of the *forum necessitatis* clause to remedy possible situations of denial of justice allowing a court of a Member State, on an exceptional basis, to rule on a claim for damages brought pursuant to Article 11ca of Regulation (EU) 833/2014.
- Introduction of the **possibility for EU operators to seek damages against actors seeking to enforce claims related to sanction-affected contracts in third countries other than Russia.**
- **New listing mechanism for persons or entities seeking or involved in the enforcement outside the Union of judgments related to sanction-affected contracts or unlawful expropriations**, as well as on those who own or control them, which are **subject to a transaction ban** (as listed in Annex LV to Regulation (EU) 833/20214), with the exception of lawyers and members of the judiciary.
- **Addition of 46 vessels** to the list of vessels set out in Annex XLII to Regulation (EU) 833/2014 (bringing the total of Putin’s **shadow fleet** of oil tankers to 632 vessels), which are **banned from Member States’ ports and locks**, as well as from receiving a broad range of **services related to maritime transport.**
- **Tighter conditions on the sale of tanker vessels** for the transport of crude oil or petroleum products listed in Annex XXV **to third-country operators**:
  - **Mandatory contractual clause prohibiting resale or transfer to Russia or for use in Russia;**
  - Proportionate **due diligence**—such as screening all parties.
- **Prohibition to provide technical, financial or brokering support to ice-breaker or LNG tanker vessels** that are Russian-flagged, certified, owned, managed, operated in, or intended for use in Russia.
- **Extension of the prohibition on satisfying claims related to sanction-affected contracts to include claims brought by third-country entities** (other than Russia and partner countries listed in Annex VIII to Regulation (EU) 833/2014) **involved in prohibited trade under Regulation (EU) 833/2014**, whether or not originating in the Union.
- **Transaction ban on entities** incorporated under Russian law **that use without their consent the intellectual property rights of subsidiaries incorporated in Russia of Union companies.**
- **First application of the anti-circumvention mechanism** (Article 12f to Regulation (EU) 833/2014), **extending controls against Kyrgyzstan.** The listings contained in Annex XXXIII to Regulation (EU) 833/2014 concern:
  - Machining centres for working metal;
  - Machines for the reception, conversion and transmission or regeneration of voice, images or other data, including switching and routing apparatus.
- **Addition of Liechtenstein to the list of partner countries for importation of petroleum products** exempted from the obligation to provide evidence of the country of origin of the crude oil (as listed in Annex LI to Regulation (EU)833/2014).
- **Addition of three ports and locks that are used for the circumvention of the oil price cap** by vessels practicing irregular and high-risk shipping practices, **and subject**

to a **transaction ban**, as listed in Part A—for ports and locks in Russia—and Part C—for ports and locks in third countries other than Russia—of Annex XLVII to Regulation (EU) 833/2014:

- Murmansk and Tuapse (Russia);
- Karimun Oil Terminal (Indonesia).

Council Regulation (EU) 2026/511 of 23 April 2026 amending Regulation (EU) 269/2014, Council Decision (CFSP) 2026/504 of 23 April 2026 amending Decision 2014/145/CFSP, and Council Implementing Regulation (EU) 2026/509 of 23 April 2026 implementing Regulation (EU) 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine:<sup>3</sup>

- **Addition of 37 persons and 80 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 Annex I to Regulation (EU) No 269/2014.
- **Extension of the listing criteria targeting the “shadow fleet”**, with grounds for designation now including persons, entities or bodies owning, controlling, managing or operating vessels involved in certain activities or that otherwise provide material, technical or financial support to the operations of such vessels.
- **Extension of the prohibition on satisfying claims related to sanction-affected contracts to include claims brought by third-country entities** (other than Russia and partner countries listed in Annex VIII to Regulation (EU) 833/2014)
- Introduction of the **possibility for EU operators to seek damages against actors seeking to enforce claims related to sanction-affected contracts in third countries other than Russia**.

Additional derogations:

- From the asset freeze for the work of state-funded intermediators for the foreign cultural policy of the Member States in Russia;
- To enable the release of frozen funds solely for the payment of costs of arbitral proceedings awarded against a listed persons;
- To enable the release of frozen funds of certain entities to reduce dependence on Russian crude oil;

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

Council Decision (CFSP) 2025/2032 of 23 October 2025 amending Decision 2014/512/CFSP, and Council Regulation (EU) 2025/2033 of 23 October 2025 amending Regulation (EU)

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<sup>3</sup> Council Regulation (EU) 2026/511 of 23 April 2026 amending Regulation (EU) 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 2026/511, 23.4.2026;

Council Decision (CFSP) 2026/504 of 23 April 2026 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, 2026/504, 23.4.2026; and

Council Implementing Regulation (EU) 2026/509 of 23 April 2026 implementing Regulation (EU) 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 2026/509, 23.4.2026.

833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine:<sup>4</sup>

Military industry:

- **Addition of 45 entities** to the list, set out in Annex IV to Decision 2014/512/CFSP, of those directly **supporting Russia's military and industrial complex** and 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:
  - **28 entities established in Russia** and 17 in third countries (**12 in China**, including Hong Kong, **3 in India** and **2 in Thailand**).
- **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 (Annex VII to Regulation (EU) 833/2014), including:
  - Electronic components;
  - Rangefinders;
  - Additional chemicals used in the preparation of propellants;
  - Additional metals, oxides and alloys used in the manufacturing of military systems.
- **Further restrictions on exports of goods** which contribute to the **enhancement of Russian industrial capabilities**, such as **salts and ores**, articles of **rubber, tubes, tyres, millstones** and **construction materials** (Annex XXIII to Regulation (EU) 833/2014).
- **Prohibition to purchase**, import or transfer, directly or indirectly, **goods which generate significant revenues** for Russia, as listed in Annex XXI to Regulation (EU) 833/2014, **extended to all acyclic hydrocarbons**.

Energy-related measures:

- **Extension of the list of partner countries**, set out in Annex XXIV to Decision 2014/512, **exempted from the obligation to provide**, at the moment of importation of petroleum products, **evidence of the country of origin of the crude oil** used for the refining of the product in a third country (i.e., Canada, Norway, United Kingdom, United States of America, Switzerland, **Australia, Japan, New Zealand**).
- **New ban on imports of Russian liquefied natural gas (LNG)**: prohibition, **as of 25 April 2026**, on the purchase, import, or transfer, directly or indirectly into the Union of liquified natural gas originating or exported from Russia, as well as on the provision of related technical or financial assistance. The prohibition shall apply **as of 1 January 2027 for contract exceeding one year and concluded before 17 June 2025**.
- **Addition of 117 vessels** to the list of vessels set out in Annex XVI to Decision 2014/512 (bringing the total of Putin's **shadow fleet** of oil tankers to 557 vessels), which are **banned from Member States' ports and locks**, as well as from receiving a broad range of **services related to maritime transport**.

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<sup>4</sup> Council Decision (CFSP) 2025/2032 of 23 October 2025 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L, 2025/2032, 23.10.2025; and Council Regulation (EU) 2025/2033 of 23 October 2025 amending Regulation (EU) 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L, 2025/2033, 23.10.2025.

- **Amendment** of one of the **designation criteria**: Annex XVI to Decision 2014/512 shall now include **vessels that transport mineral products** that originate in Russia or are exported from Russia).
- **Amendment** of related provisions on **prohibited services for designated vessels**: addition of “reinsurance” to Article 4x of Decision 2014/512.  
*Regarding the prohibition on Union operators to provide insurance and reinsurance to designated vessels, the designation of a vessel is without prejudice to the payment of pay-outs from the relevant insurer of the vessel to persons and entities having suffered damage caused by the vessel in respect of claims arising from events before the vessel was designated.*
- **Full transaction ban on the two state-owned enterprises Rosneft and Gazprom Neft**: elimination of the previous exemption for Rosneft's and Gazprom Neft's oil and gas imports into the EU.

Financial measures:

- **Expansion of the transaction ban** that applies, as from 25 January 2026, to legal persons, entities or **bodies that are connecting to the system for transfer of financial messages ('SPFS')** of the Central Bank of the Russian Federation ('Central Bank of Russia') or **equivalent specialised financial messaging services** set up by the Central Bank of Russia, **to other payment services, such as the Russian National Payment Card System (in Russian, 'Mir') or the Fast Payments System ('SBP')**, set up by the Central Bank of Russia or by other Russian entities.
  - **New exemptions** for transactions (as specified in Article 1ad to Decision 2014/512):
    - Necessary for the functioning of diplomatic and consular representations of the Union and of the Member States in third countries;
    - Made by nationals of a Member State who are residents of a third country;
    - Necessary for existing contracts and the reception of payments;
    - Necessary for Member States' ethnic minorities in Russia.
- **Expansion of the transaction ban on third-country credit and financial institutions and crypto-asset service providers to:**
  - **Entities that provide payment services**, and in particular entities that provide crypto-asset and payment services **to listed entities**;
  - **Entities that operate as a mirror or successor entity of the listed ones**, if certain criteria are met (as specified in Article 1ae, paragraph 2a to Decision 2014/512).
- **Addition of 8 new entities** to the **list of third country financial institutions subject to transaction ban** set out in Annex XIX to Decision 2014/512 (i.e., **banks and oil traders from Tajikistan, Kyrgyzstan, the UAE and Hong Kong** circumventing EU sanctions).
- New exemptions for transactions that are necessary for existing contracts and the reception of payments (as specified in Article 1ae, paragraph 3 (d) and (e) to Decision 2014/512).
- **Restrictions on Russian special economic zones**: prohibition on **maintaining** (as of 25 January 2026) or **initiating any new participation** in, the **creation of joint ventures** with, and the provision of **financing** to, any enterprise established in or operating through certain special economic, innovation or preferential zones, as well as on **entering into new contracts** with such enterprises, as listed in Part A or B of Annex XXV to Decision 2014/512.

*These Special Economic Zones and innovation regimes are central to Russia's industrial and technological capacity, hosting enterprises engaged in the production or development of dual-use goods, advanced electronics, robotics, software, vehicles, aviation components, unmanned aerial systems and other goods and technology contributing to the Russian war effort.*

- **Restrictions on the provision of crypto-asset services:** prohibition on provision, directly or indirectly, of the following services to **Russian nationals or natural persons residing in Russia**, or to legal persons, **entities** or bodies established in **Russia**:
  - a) **Crypto-asset services**, as defined in Regulation (EU) 2023/1114;
  - b) **Issuing of payment instruments**, acquiring of payment transactions, or payment initiation services, as defined in Directive (EU) 2015/2366;
  - c) **Issuing of electronic money**, as defined in Directive 2009/110/EC.
- **Prohibition on transactions involving crypto-assets** listed in Annex XXVI to Decision 2014/512 (i.e., rouble-backed stablecoin **A7A5**).
- **Addition of 5 Russian banks to the list of entities subject to a transaction ban** (Annex VIII to Decision 2014/512/CFSP), bringing the total to 50.

Infrastructure-related measures:

- **Extension of the transaction ban to any ports and locks in third countries other than Russia** that are **used for the transfer** of unmanned aerial vehicles (UAVs) or **missiles or related technology or components thereof to Russia**, or for the **circumvention of the Oil Price Cap** by vessels practicing irregular and high-risk shipping practices, or for the circumvention of other restrictive measures (as listed in Part A—for ports and locks in Russia—and Part C—for ports and locks in third countries other than Russia—of Annex XXI to Decision 2014/512).

Service-related measures:

- **Restriction on the provision, to the Government of Russia or to legal persons, entities or bodies established in Russia, of services** that contribute to enhancing Russia's technological capabilities, as listed in Article 1k to Decision 2014/512 (e.g., **commercial space-based services, AI services, high-performance computing and quantum computing services**).
- **Prohibition** to provide **services** directly related to **tourism activities in Russia**.
- **Introduction of a new requirement for prior authorisation** by the competent authority **for any services provided to the Government of Russia** in order to mitigate the risk of a service contributing to Russia's military, technological or industrial capacity.
- **Prohibition to provide reinsurance services** regarding **used vessels and aircraft of the Russian government** or Russian persons for up to five years after their sale or lease arrangement to third countries.

Russian diplomats-related measures:

- **Obligation for Russian diplomats to inform in advance of their travel to a Member State other than the receiving State** and, where deemed appropriate by the Member States, to require authorisation for the travel to its territories of such individuals, based on visas or residence permits issued by another State.

Council Decision (CFSP) 2025/2036 of 23 October 2025 amending Decision 2014/145/CFSP, and Council Regulation (EU) 2025/2037 of 23 October 2025 amending Regulation (EU)

269/2014, and Council Implementing Regulation (EU) 2025/2035 of 23 October 2025 implementing Regulation (EU) 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine:<sup>5</sup>

- **Addition of 22 persons and 42 entities to the list of persons/entities subject to restrictive measures** (asset freezes and prohibition to make economic resources available, as well as travel bans for individuals) set out in Annex I to Regulation (EU) 269/2014.

*These listings include:*

- Russia’s largest gold producer, Poluys;
  - Senior DPRK military commander deployed to Russia;
  - An individual responsible for the inhumane treatment of Ukrainian prisoners of war;
  - 11 individuals responsible for the illegal deportation and military re-education of Ukrainian children.
- **Introduction of a new criterion for the listing of natural or legal persons, entities or bodies responsible for, supporting or implementing actions or policies contributing to the deportation, forced transfer, forced assimilation, including indoctrination, or militarised education of Ukrainian minors.**
  - Inclusion in Regulation (EU) 269/2014 of the definitions of ‘owning’ and ‘controlling’ a legal person, entity or body, to align with the definitions used in Council Regulation (EC) No 2580/2001.

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

Council Decision (CFSP) 2025/1495 of 18 July 2025 amending Decision 2014/512/CFSP, and Council Regulation (EU) 2025/1494 of 18 July 2025 amending Regulation (EU) 833/2014 concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine:<sup>6</sup>

Military industry:

- **Addition of 26 entities** to the list, set out in Annex IV to Decision 2014/512/CFSP, of those directly **supporting Russia’s military and industrial complex** and 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:

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<sup>5</sup> Council Decision (CFSP) 2025/2036 of 23 October 2025 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, 2025/2036, 23.10.2025;

Council Regulation (EU) 2025/2037 of 23 October 2025 amending Regulation (EU) 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 2025/2037, 23.10.2025; and

Council Implementing Regulation (EU) 2025/2035 of 23 October 2025 implementing Regulation (EU) 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 2025/2035, 23.10.2025.

<sup>6</sup> Council Decision (CFSP) 2025/1495 of 18 July 2025 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine, OJ L, 2025/1495, 19.7.2025; and Council Regulation (EU) 2025/1494 of 18 July 2025 amending Regulation (EU) 833/2014 concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine, OJ L, 2025/1494, 19.7.2025.

- **15 entities established in Russia** and 11 in other third countries (**4 in Türkiye** and **7 in China/Hong Kong**) **enabling the circumvention of export restrictions**, including on unmanned aerial vehicles.
- **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 (Annex VII to Regulation (EU) 833/2014), including:
  - Computer numerical control (CNC) machines;
  - Constituent chemicals for propellants.
- **Catch-all provision to address the risk of circumvention** of those measures through indirect exports via third countries: it is **introduced** of an **optional administrative mechanism** that enables national competent authorities to **require prior authorisation for exports of items listed in Annex VII to Regulation (EU) 833/2014 to any third country**, where the **exporter** has been **informed** that there is sufficient reason to **suspect** that the end **destination** of the items may be **in Russia** or that the **end-use** of the items may be **for Russian entities**.
- **Further restrictions on exports of goods** which contribute to the **enhancement of Russian industrial capabilities**, such as machinery, chemicals, some metals and plastics (Annex XXIII to Regulation (EU) 833/2014), as well as **their transit through Russia** in order to minimise the risk of circumvention of restrictive measures.

Energy-related measures:

- **Prohibition**, as of 21 January 2026, on the purchase, **import**, or transfer, **directly or indirectly** into the Union, **of petroleum products obtained in a third country from Russian crude oil**, as well as on the provision of related technical or financial assistance.
  - *At the moment of importation, **importers shall provide evidence of the country of origin of the crude oil used for the refining of the product in a third country unless the product is imported from a partner country listed in Annex XXIV to Decision 2014/512/CFSP (i.e., Canada, Norway, United Kingdom, United States of America, Switzerland).***
- **Full transaction ban for Nord Stream 1 and 2**, including for the purchase of natural gas transported via either pipeline and for the provision of goods or services.
- **Introduction of a new automatic procedure to modify the price cap for Russian crude oil depending on the average market price of Russian crude oil**, and consequent adoption of a **lowered price cap** closer to the production costs of oil, thus further reducing Russia’s revenues from oil exports (*the new system ensures that the price cap is always 15% lower than the average market price for Urals crude in the previous period of six months*).
- **Addition of 105 vessels** to the list of vessels set out in Annex XVI to Decision 2014/512/CFSP (bringing the total of Putin’s **shadow fleet** of oil tankers to 444 vessels), which are **banned from Member States’ ports and locks**, as well as from receiving a broad range of **services related to maritime transport**.

Financial measures:

- **Expansion of the existing transaction ban on third-country financial operators and crypto-asset providers to include:**
  - Entities that are **significantly frustrating EU sanctions**;
  - Entities that **support Russia's war of aggression against Ukraine**;

- Any third-country legal person, entity or body that is **not a credit or financial institution or a crypto assets provider, including oil traders, that is significantly frustrating EU sanctions;**

As listed in Parts A, B, and C of Annex XIX to Decision 2014/512/CFSP (two Chinese banks have been added to the list of third country financial institutions subject to transaction ban).

- **Expansion of the transaction ban on third-country financial operators that use the System for Transfer of Financial Messages (SPFS) of the Central Bank of Russia** or equivalent specialised financial messaging services set up by the Central Bank of Russia to shield its banks from the impact of EU sanctions, as listed in Annex XVIII to Decision 2014/512.
- Expansion into a **full transaction ban** the existing prohibition **on the provision of specialised financial messaging services to certain Russian credit or financial institutions** or other entities subscribing to financial messaging services or to Russian subsidiaries of third-country credit or financial institutions.

- **Addition of another 22 Russian banks to the list of entities subject to this transaction ban** (Annex VIII to Decision 2014/512/CFSP), bringing the total to 45.

No EU operator will be able to engage with any of the listed banks directly or indirectly, or with any legal person, entity or body **established in Russia** whose proprietary rights are directly or indirectly **owned for more than 50 % by an entity listed** in Annex VIII to Decision 2014/512/CFSP.

- **New exemptions** related to transactions:
  - Necessary for the **functioning of diplomatic and consular representations of the Union and of the Member States** or of partner countries in Russia
  - **Made by nationals of a Member State who are residents in Russia and were so before 24 February 2022.**
  - **Strictly necessary for divestment from Russia** or for the wind-down of business activities in Russia (subject to authorization by the competent authority of the Member state).

*It is recalled that Union restrictive measures do not have extra-territorial effect and do not bind operators incorporated under the laws of third countries, including those of Russia.*

- **Introduce of a new transaction ban targeting:**
  - a) **The Russian Direct Investment Fund (RDIF);**
  - b) **Its subsidiaries** (i.e., entities owned or controlled by the RDIF);
  - c) **Its significant investments** (*an investment is to be considered as ‘significant’ if it appears to be underpinned by a governmental economic policy or strategy or if it concerns a sector that is relevant for Russia’s long-term geopolitical manoeuvrability, in particular finance and banking, transport, telecommunications, defence, industrial manufacturing, advanced technology, energy, or the prospection, exploration and production of oil, gas and mineral resources, including related intellectual property or research and development*), as listed in Annex XXII to Decision 2014/512/CFSP;
  - d) Anyone **providing** those entities with **investment services or other financial services**, as listed in Annex XXIII to Decision 2014/512/CFSP;
  - e) A legal person, **entity** or body **acting on behalf or at the direction** of an entity referred to in point (a), (b), (c) or (d).

- Addition of four entities to the list of legal persons, entities and bodies set out in Annex IV to Decision 2014/512/CFSP, in which RDIF has made significant investments, that are subject to the transaction ban (Annex XXIII to Decision 2014/512/CFSP).
- **New ban on provision of software management systems and software with certain uses in the banking and financial sector as listed in Annex XXXIX to Regulation (EU) 833/2014 to the Government of Russia or legal persons, entities or bodies established in Russia.**

Protection of Member States from arbitration:

- **Protection for Member States from sanctions-related claims under their bilateral investment treaties:** Prohibition to recognize or enforce injunction, order, relief, judgment of a judicial court or authority other than a court of a Member State pursuant to or derived from investor-State dispute settlement proceedings against a Member State launched by listed persons in relation to EU sanctions.
- **Possibility for Member States to recover any damages** incurred as a consequence of investor-to-state dispute settlement proceedings brought against them in judicial proceedings before the competent courts of a Member State.
  - **Extension of the *forum necessitatis* clause to remedy possible situations of denial of justice** allowing a court of a Member State, on an exceptional basis, to rule on a claim for damages brought pursuant to Articles 11e of Regulation (EU) 833/2014, where Union law or the law of a Member State does not establish the jurisdiction of a court of any Member State in particular (provided that the case has a sufficient connection with the Member State of the court seised).

Council Decision (CFSP) 2025/1478 of 18 July 2025 amending Decision 2014/145/CFSP, and Council Implementing Regulation (EU) 2025/1476 of 18 July 2025 implementing Regulation (EU) 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine:<sup>7</sup>

- **Addition of 14 persons and 41 entities to the list of persons/entities subject to restrictive measures** (asset freezes and prohibition to make economic resources available, as well as travel bans for individuals) set out in Annex I to Regulation (EU) 269/2014.

*These listings target:*

- *the **supply chain of the Russian military industrial complex**, including through the listing of **companies in China** supplying goods used on the battlefield;*
- ***8 companies operating in the Belarusian military industrial complex**, which is supporting Russia's war efforts;*
- *Another individual actively involved in Russia's "**military education**" of **Ukrainian children** (the total number of listings in relation to the deportation and indoctrination of Ukrainian children accounts to over 90);*

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<sup>7</sup> Council Decision (CFSP) 2025/1478 of 18 July 2025 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, 2025/1478, 19.7.2025; and Council Implementing Regulation (EU) 2025/1476 of 18 July 2025 implementing Regulation (EU) 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 2025/1476, 19.7.2025.

- *Several Russian proxies in occupied territories, including a person responsible for **manipulating Ukrainian cultural heritage**, another leading Russian businessperson and a prominent Russian propagandist.*

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

Council Decision (CFSP) 2025/931 of 20 May 2025 amending Decision 2014/512/CFSP, and Council Regulation (EU) 2025/932 of 20 May 2025 amending Regulation (EU) 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine:<sup>8</sup>

- **Addition of 31 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** and 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:
  - **13 companies established in third countries** (6 Turkey, 3 Vietnam, 2 UAE, 1 Serbia and 1 Uzbekistan) involved in the **circumvention of export restrictions**, notably on **unmanned aerial vehicles or computer numerical control machine tools**.
- **Addition of 189 vessels** to the list, set out in Annex XVI to Decision 2014/512/CFSP, of those subject to a **port access ban** and **ban** on provision of a **broad range of services related to maritime transport** (bringing the total of Putin's shadow fleet to 342 vessels).
- **Expanded 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 (EU) 833/2014), including:
  - **Chemical precursors to energetic materials** (such as sodium chlorate, potassium chlorate, aluminium powder, magnesium powder and boron powder, being used, directly or indirectly, as propellants for Russian missiles);
  - **spare parts and components of high-precision Computer Numerical Control (CNC) machine tools** (e.g., ball screws and encoders).
- Extension of the **exemption from the oil price cap**, allowing for the transport, by vessel, of crude oil originating in the **Sakhalin-2 Project in Russia to Japan**, based on energy security concerns. The extension is granted for one year **until 28 June 2026**.

Council Decision (CFSP) 2025/963 of 20 May 2025 amending Decision (CFSP) 2024/2643 and Council Regulation (EU) 2025/964 of 20 May 2025 amending Regulation (EU) 2024/2642; and Council Decision (CFSP) 2025/966 of 20 May 2025 amending Decision (CFSP) 2024/2643 and Council Implementing Regulation (EU) 2025/965 of 20 May 2025 implementing Regulation (EU) 2024/2642 concerning restrictive measures in view of Russia's destabilising activities:<sup>9</sup>

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<sup>8</sup> Council Decision (CFSP) 2025/931 of 20 May 2025 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L, 2025/931, 20.5.2025; and Council Regulation (EU) 2025/932 of 20 May 2025 amending Regulation (EU) 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L, 2025/932, 20.5.2025.

<sup>9</sup> Council Decision (CFSP) 2025/963 of 20 May 2025 amending Decision (CFSP) 2024/2643 concerning restrictive measures in view of Russia's destabilising activities, OJ L, 2025/963, 20.5.2025;

- **Prohibition on transactions related to tangible assets linked to Russia’s destabilising activities**, including vessels, aircraft, real estate, and physical elements of digital and communication networks, as listed in Annex II to Decision (CFSP) 2024/2643.
- **Prohibition on transactions of credit institutions, financial institutions and entities providing crypto-assets services that directly or indirectly facilitate activities by, or otherwise benefit, persons, entities or bodies engaged in Russia’s destabilising activities.**
- **Suspension of the EU broadcasting licences of Russian media outlets under the permanent control of the Russian leadership**, and the prohibition on broadcasting their content, listed in Annex IV to Decision (CFSP) 2024/2643.
- Addition of 21 persons and 6 entities to the list of natural and legal persons, entities and bodies, set out in Annex I to Regulation (EU) 2024/2642, responsible for, implementing, supporting, or benefitting from Russia’s hybrid threats.

Council Decision (CFSP) 2025/936 of 20 May 2025 amending Decision 2014/145/CFSP, and Council Implementing Regulation (EU) 2025/933 of 20 May 2025 implementing Regulation (EU) 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine:<sup>10</sup>

- Addition of 17 persons and 58 entities to the list of persons/entities subject to restrictive measures (asset freezes and prohibition to make economic resources available, as well as travel bans for individuals) set out in Annex I to Regulation (EU) 269/2014.
  - The new listings, mostly affecting Russian military and defence sectors, make **use of the two additional listing criteria adopted under the 16<sup>th</sup> package of sanctions and applying to:**<sup>11</sup>
    - Persons, entities or bodies owning, controlling, **managing or operating vessels that transport crude oil or petroleum products**, originating in Russia or **exported from Russia**, while practicing irregular and high-risk shipping practices (e.g., operating with inadequate or inexistent insurance) or that otherwise provide material, technical or financial support to the operations of such vessels (Putin’s shadow fleet).
    - Persons, entities or bodies forming part of, **supporting**, materially or financially, or **benefitting from Russia’s military and industrial complex.**

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Council Regulation (EU) 2025/964 of 20 May 2025 amending Regulation (EU) 2024/2642 concerning restrictive measures in view of Russia’s destabilizing activities, OJ L, 2025/964, 20.5.2025;

Council Decision (CFSP) 2025/966 of 20 May 2025 amending Decision (CFSP) 2024/2643 concerning restrictive measures in view of Russia’s destabilising activities, OJ L, 2025/966, 20.5.2025; and

Council Implementing Regulation (EU) 2025/965 of 20 May 2025 implementing Regulation (EU) 2024/2642 concerning restrictive measures in view of Russia’s destabilising activities, OJ L, 2025/965, 20.5.2025.

<sup>10</sup> Council Decision (CFSP) 2025/936 of 20 May 2025 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, 2025/936, 20.5.2025 ; and

Council Implementing Regulation (EU) 2025/933 of 20 May 2025 implementing Regulation (EU) 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 2025/933, 20.5.2025.

<sup>11</sup> Article 1 of Council Decision (CFSP) 2025/388 of 24 February 2025 amending Decision 2014/145/CFSP.

Council Decision (CFSP) 2025/957 of 20 May 2025 amending Decision (CFSP) 2024/1484, and Council Implementing Regulation (EU) 2025/958 of 20 May 2025 implementing Regulation (EU) 2024/1485 concerning restrictive measures in view of the situation in Russia:<sup>12</sup>

- On May 27, 2024, Council Regulation (EU) 2024/1485 established a new framework for restrictive measures against those responsible for **serious human rights violations** or abuses, **repression of civil society** and democratic opposition, and undermining democracy and the rule of law **in Russia**, and listed 1 entity (the Federal Penitentiary Service of the Russian Federation) and 19 natural persons under the new regime (judges, prosecutors and members of the judiciary). This new sanctions regime introduces **trade restrictions on exporting equipment, which might be used for internal repression**, as well as on equipment, technology or software intended primarily for use in information security and the monitoring or interception of telecommunication.
  - On May 20, 2025, 28 individuals have been added to the list of natural and legal persons, entities and bodies set out in Annex IV to Regulation (EU) 2024/1485.

Council Decision (CFSP) 2025/960 of 20 May 2025 amending Decision (CFSP) 2018/1544, and Council Implementing Regulation (EU) 2025/959 of 20 May 2025 implementing Regulation (EU) 2018/1542 concerning restrictive measures against the proliferation and use of chemical weapons:<sup>13</sup>

- Following the **OPCW reports**, based on two Technical Assistance Visits, on 18 November 2024 and 14 February 2025, confirming the presence of the riot control agent CS and related compounds in the samples collected—**pointing to a pattern of riot control use as a method of warfare on the front-lines in Ukraine**, which is **prohibited under** Article I, paragraph 5, of the **Chemical Weapons Convention**:
  - **3 entities** have been **added to the list** of natural and legal persons, entities and bodies subject to restrictive measures (travel restrictions, freezing of funds and economic resources) set out in the Annex I to Regulation (EU) 2018/1542.

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

Council Decision (CFSP) 2025/388 of 24 February 2025 amending Decision 2014/145/CFSP, Council Regulation (EU) 2025/390 of 24 February 2025 amending Regulation (EU) 269/2014, and Council Implementing Regulation (EU) 2025/389 of 24 February 2025 implementing

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<sup>12</sup> Council Decision (CFSP) 2025/957 of 20 May 2025 amending Decision (CFSP) 2024/1484 concerning restrictive measures in view of the situation in Russia, OJ L, 2025/957, 20.5.2025 ; and Council Implementing Regulation (EU) 2025/958 of 20 May 2025 implementing Regulation (EU) 2024/1485 concerning restrictive measures in view of the situation in Russia, OJ L, 2025/958, 20.5.2025.

<sup>13</sup> Council Decision (CFSP) 2025/960 of 20 May 2025 amending Decision (CFSP) 2018/1544 concerning restrictive measures against the proliferation and use of chemical weapons, OJ L, 2025/960, 20.5.2025 ; and Council Implementing Regulation (EU) 2025/959 of 20 May 2025 implementing Regulation (EU) 2018/1542 concerning restrictive measures against the proliferation and use of chemical weapons, OJ L, 2025/959, 20.5.2025.

Regulation (EU) 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine:<sup>14</sup>

- **Addition of 48 persons and 35 entities** to the list of persons/entities subject to restrictive measures (asset freezes and travel bans) set out in Annex I to Regulation (EU) 269/2014 for supporting the Russian military complex, circumventing sanctions, trading in Russian crypto-assets and the maritime sector;
- **Two additional listing criteria** applying to:
  - Persons, entities or bodies **owning**, controlling, managing or **operating vessels that transport crude oil or petroleum products**, originating in Russia or exported **from Russia**, while **practicing irregular and high-risk shipping practices** (e.g., operating with inadequate or inexistent insurance) **or** that otherwise **provide** material, technical or financial **support to the operations of such vessels (Putin’s shadow fleet)**.
  - Persons, entities or bodies forming part of, **supporting**, materially or financially, **or benefitting from Russia’s military and industrial complex**.
- From May 2025,<sup>15</sup> **obligation for “obliged entities”** referred to in Article 2(1) of Directive (EU) 2015/849 (such as credit and financial institutions, auditors, estate agents) **to report to Financial Intelligence Units (FIUs) all suspicious transactions related to suspected criminal activity linked to the violation of Union restrictive measures** pursuant to Directive (EU) 2024/1226 and article 33 of Directive (EU) 2015/849.
- **Introduction of a *forum necessitatis* clause to remedy possible situations of denial of justice** allowing a court of a Member State, on an exceptional basis, to rule on a claim for damages brought pursuant to Article 11a of Regulation (EU) 269/2014<sup>16</sup> where Union law or the law of a Member State does not establish the jurisdiction of a court of any Member State in particular (provided that the case has a sufficient connection with the Member State of the court seised).
- **EU operators** are required to undertake their **best efforts to ensure that legal persons, entities and bodies established outside the Union that they own or control do not participate in activities that undermine the restrictive measures** provided for in Regulation (EU) 269/2014.
  - *Best efforts can include the implementation of appropriate policies, controls and procedures to mitigate and manage risk effectively, considering factors such as the third country of establishment, the business sector and the type of activity of the legal person, entity or body that is owned or controlled by the Union operator, while being feasible for the Union operator in view of its*

<sup>14</sup> Council Decision (CFSP) 2025/388 of 24 February 2025 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, 2025/388, 24.2.2025;

Council Regulation (EU) 2025/390 of 24 February 2025 amending Regulation (EU) 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 2025/390, 24.2.2025; and

Council Implementing Regulation (EU) 2025/389 of 24 February 2025 implementing Regulation (EU) 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 2025/389, 24.2.2025.

<sup>15</sup> End of the transposition period of Directive (EU) 2024/1226 of the European Parliament and of the Council of 24 April 2024 on the definition of criminal offences and penalties for the violation of Union restrictive measures and amending Directive (EU) 2018/1673 by its article 20.

<sup>16</sup> Namely, contract or transaction the performance of which has been affected, directly or indirectly, in whole or in part, by the measures imposed under Regulation (EU) 269/2014.

*nature, its size and the relevant factual circumstances, in particular the degree of effective control over the legal person, entity or body established outside the Union.*

Council Decision (CFSP) 2025/394 of 24 February 2025 amending Decision 2014/512/CFSP, and Council Regulation (EU) 2025/395 of 24 February 2025 amending Regulation (EU) 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine:<sup>17</sup>

- **Suspension of the EU broadcasting licences** of the following **eight Russian media outlets under the permanent control of the Russian leadership**, and the prohibition on broadcasting their content:
  - 'EADaily / Eurasia Daily
  - Fondsk
  - Lenta
  - NewsFront
  - RuBaltic
  - SouthFront
  - Strategic Culture Foundation
  - Krasnaya Zvezda / Tvzvezda
- **Introduction of a *forum necessitatis* clause to remedy possible situations of denial of justice** allowing a court of a Member State, on an exceptional basis, to rule on a claim for damages brought pursuant to Articles 11a and 11b of Regulation (EU) 833/2014,<sup>18</sup> where Union law or the law of a Member State does not establish the jurisdiction of a court of any Member State in particular (provided that the case has a sufficient connection with the Member State of the court seised).

Trade-related measures:

- **Addition of 53 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:
  - Two thirds of these entities are located in third countries other than Russia (namely: **China including Hong Kong, India, Kazakhstan, Singapore Türkiye, the United Arab Emirates and Uzbekistan**) and indirectly contributed to Russia's military and technological enhancement through the **circumvention of export restrictions, including on unmanned aerial vehicles (UAVs) or missiles**.
- **Addition of 74 vessels** to the list, set out in Annex XVI to Decision 2014/512/CFSP, of those subject to a **port access ban and ban on provision** of a broad range of **services related to maritime transport** (bringing the total of Putin's shadow fleet to 153 vessels).

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<sup>17</sup> Council Decision (CFSP) 2025/394 of 24 February 2025 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L, 2025/394, 24.2.2025; and Council Regulation (EU) 2025/395 of 24 February 2025 amending Regulation (EU) 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L, 2025/395, 24.2.2025.

<sup>18</sup> Namely, contract or transaction the performance of which has been affected, directly or indirectly, in whole or in part, by the measures imposed under Council Regulation (EU) 833/2014.

- **Expanded 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 (EU) 833/2014) by adding:
  - **Chemical precursors** to produce chloropicrin and other **riot control agents** used as chemical weapons by Russia in violation of the Chemical Weapons Convention.
  - **Software** related to Computer Numerical Control (CNC) **machine tools** used to manufacture weapons, and **video-game controllers** used by the Russian army **to pilot drones** on the battlefield.
  - **Chromium ores and compounds** due to their military applications.
- **Further restrictions on exports of goods** which contribute to the **enhancement of Russian industrial capabilities**, such as chemicals, some plastics and rubber (Annex XXIII to Regulation (EU) 833/2014), as well as **their transit through Russia**.
- **Further restrictions on the import of primary aluminium**, which generates significant revenues for Russia, in addition to the current import ban on processed aluminum goods from Russia.
- **EU operators exporting to third countries**—other than the partner countries listed in Annex VIII to Regulation (EU) 833/2014 as applying a set of export control measures substantially equivalent to those of Regulation (EU) 833/2014—**are required to implement due diligence mechanisms** (capable of identifying, assessing and mitigating the risks of re-exportation to Russia), as well as **to ensure** that legal persons, **entities** or bodies **established outside of the Union** and over whose conduct they can exercise decisive influence **implement such mechanisms to prevent them from undermining EU restrictive measures**.

Transport-related measures:

- **Extended flight ban to listed air carriers operating domestic flights within Russia** or selling, supplying, transferring **or exporting**, directly or indirectly, **aircraft or other aviation goods** and technology **to Russian air carriers** and their controlled entities.
- **Tightening of the existing ban on the transport of goods by road** within the territory of the EU, **including in transit, by EU operators owned for 25% or more by a Russian** natural or legal person.

Energy-related measures:

- **Further restriction on exports of goods and technology**, in particular **software related to oil and gas exploration**, in order to further restrict Russia's oil and gas exploration and production capacities.
- **Prohibition on the provision of temporary storage for Russian crude oil and petroleum products within the Union**, irrespective of the purchase price of the oil and of the final destination of those products.
- **Extended prohibition to provide goods, technology and services for the completion of crude oil projects in Russia** (such as the Vostok oil one), in addition to the completion of LNG projects already in place (*without prejudice to the temporary derogations granted to certain landlocked Member States for the purchase and import of Russian crude oil*).

Infrastructure-related measures:

- **Ban on construction services provided by EU operators in Russia** (as already in place in illegally occupied parts of Ukraine), except for services strictly necessary for

the functioning of a Russian consular or diplomatic representation located in a Member State.

- **Prohibition on any transaction with the following ports and locks and airports in Russia** that are used for the transfer of UAVs, missiles and related technology and components to Russia, **or for the circumvention of the Oil Price Cap** by vessels practicing irregular and high-risk shipping practices or of other restrictive measures:
  - Moscow’s two airports Vnukovo and Zhukovsky, and four regional airports (Begishevo, Perm, Koltsovo, and Pskov Airport);
  - The Volga port Astrakhan and Makhachkala port on the Caspian Sea;
  - The sea ports Ust-Luga and Primorsk on the Baltic Sea and Novorossiysk on the Black Sea.

Financial measures:

- From May 2025,<sup>19</sup> **obligation for “obliged entities”** referred to in Article 2(1) of Directive (EU) 2015/849 (such as credit and financial institutions, auditors, estate agents) **to report to Financial Intelligence Units (FIUs) all suspicious transactions related to suspected** criminal activity linked to the **violation of Union restrictive measures** pursuant to Directive (EU) 2024/1226 and article 33 of Directive (EU) 2015/849.
- **Transaction ban on credit or financial institutions established outside Russia** using the ‘System for Transfer of Financial Messages’ (SPFS) of the Central Bank of Russia to circumvent EU sanctions.
- **Extended prohibition** on the **provision of specialised financial messaging services to 13 Russian regional banks** facilitating significant cross-border payments.
- Further **extension of the transaction ban on credit and financial institutions** and entities **providing crypto assets services** that support transactions related to any listed vessel, so facilitating the circumvention of EU restrictive measures.

Council Decision (CFSP) 2025/396 of 24 February 2025 amending Decision (CFSP) 2022/266 and Council Regulation (EU) 2025/398 of 24 February 2025 amending Regulation (EU) 2022/263 concerning restrictive measures **in response to the illegal recognition, occupation or annexation by the Russian Federation of certain non-government controlled areas of Ukraine**; and Council Decision (CFSP) 2025/397 of 24 February 2025 amending Decision 2014/386/CFSP and Council Regulation (EU) 2025/401 of 24 February 2025 amending Regulation (EU) 692/2014 concerning restrictive measures **in response to the illegal annexation of Crimea and Sevastopol**.<sup>20</sup>

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<sup>19</sup> End of the transposition period of Directive (EU) 2024/1226 of the European Parliament and of the Council of 24 April 2024 on the definition of criminal offences and penalties for the violation of Union restrictive measures and amending Directive (EU) 2018/1673 by its article 20.

<sup>20</sup> Council Decision (CFSP) 2025/396 of 24 February 2025 amending Decision (CFSP) 2022/266 concerning restrictive measures in response to the illegal recognition, occupation or annexation by the Russian Federation of certain non-government controlled areas of Ukraine, OJ L, 2025/396, 24.2.2025; Council Regulation (EU) 2025/398 of 24 February 2025 amending Regulation (EU) 2022/263 concerning restrictive measures in response to the illegal recognition, occupation or annexation by the Russian Federation of certain non-government controlled areas of Ukraine, OJ L, 2025/398, 24.2.2025; Council Decision (CFSP) 2025/397 of 24 February 2025 amending Decision 2014/386/CFSP concerning restrictive measures in response to the illegal annexation of Crimea and Sevastopol, OJ L, 2025/397, 24.2.2025; and Council Regulation (EU) 2025/401 of 24 February 2025 amending Regulation (EU) 692/2014 concerning restrictive measures in response to the illegal annexation of Crimea and Sevastopol, OJ L, 2025/401, 24.2.2025.

- **New restrictions on the provision to the “non-government controlled areas”** (i.e., the oblasts of Donetsk, Kherson, Luhansk and Zaporizhzhia illegally occupied by Russia) of accounting, auditing, bookkeeping, tax consulting, business and management consulting, public relations, construction, architectural, engineering, legal advisory, IT consultancy, market research and public opinion polling, technical testing and analysis and advertising services, **with the objective of inhibiting their integration into the Russian Federation, and preventing circumvention of EU sanctions.**
- **Prohibition on providing** the non-government controlled areas with **certain software** for the management of enterprises and software for industrial design and manufacture, and of related intellectual property rights or trade secrets.
- **Prohibition on supplying** the non-government controlled areas with **banknotes** denominated in any official **currency of a Member State.**
- **Restrictions on the export** to the non-government controlled areas of **certain goods and technology** that are also **restricted by Decision 2014/512/CFSP and Council Regulation (EU) 833/2014.**

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

Council Decision (CFSP) 2024/3174 of 16 December 2024 amending Decision (CFSP) 2024/2643 concerning restrictive measures in view of Russia’s destabilising activities, and Council Implementing Regulation (EU) 2024/3188 of 16 December 2024 implementing Regulation (EU) 2024/2642 concerning restrictive measures in view of Russia’s destabilizing activities<sup>21</sup>:

First listings under the new sanctions regime in response to Russia’s hybrid threats:

- Following the establishment, on **8 October 2024**, of a **new sanctions regime in response to Russia’s hybrid threats**<sup>22</sup>, the Council imposed **for the first time** restrictive measures against **16 individuals and 3 entities responsible for Russia’s destabilising actions abroad.**
  - The listed persons and entities are subject to **asset freeze** and EU citizens and companies are **forbidden from making funds available to them**, while natural persons are also subject to a **travel ban** which prevent them from entering or transiting through EU territories
  - Among those listed there are<sup>23</sup>:

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<sup>21</sup> Council Decision (CFSP) 2024/3174 of 16 December 2024 amending Decision (CFSP) 2024/2643 concerning restrictive measures in view of Russia’s destabilising activities, OJ L, 2024/3174, 16.12.2024; Council Implementing Regulation (EU) 2024/3188 of 16 December 2024 implementing Regulation (EU) 2024/2642 concerning restrictive measures in view of Russia’s destabilizing activities, OJ L, 2024/3188, 16.12.2024.

<sup>22</sup> The new sanctions regime was established to target those engaged in actions or policies by the Government of the Russian Federation which undermine the fundamental values of the EU and its member states, their security, stability, independence and integrity, as well as those of international organisations and third countries through hybrid activities of various kinds, including the use of coordinated information manipulation and interference (Legal bases: Council Decision (CFSP) 2024/2643 of 8 October 2024 concerning restrictive measures in view of Russia’s destabilising activities, OJ L, 2024/2643, 9.10.2024; and Council Regulation (EU) 2024/2642 of 8 October 2024 concerning restrictive measures in view of Russia’s destabilizing activities, OJ L, 2024/2642, 9.10.2024).

<sup>23</sup> Council of the EU, Press release, “Russian hybrid threats: EU agrees first listings in response to destabilising activities against the EU, its member states and partners”, 16 December 2024 (available [here](#)).

- **GRU Unit 29155**, a covert unit within the Russian military intelligence agency (GRU), known for its involvement in foreign assassinations and destabilisation activities such as bombings and cyber-attacks across Europe;
- **Groupe Panafricain pour le Commerce et l'Investissement**, a disinformation network carrying out pro-Russian covert influence operations;
- **African Initiative**, a news agency involved in spreading Russian propaganda and disinformation on the African continent;
- Sofia Zakharova, the **department head** in the Office of the President of the **Russian Federation** for the **Development of Information and Communication Technologies and Communications Infrastructure**, and **Nikolai Tupikin**, head and founder of GK Struktura;
- Vladimir Sergiyenko, a **former parliamentary assistant of the Member of the German Bundestag**, Eugen Schmidt, who actively colluded with Russian intelligence officers;
- Visa Mizaev, a Russian entrepreneur and his business partner and wife, who played a key role in a Russian intelligence operation against the German Federal Intelligence Service (BND) in which highly classified information was passed to the FSB;
- **Collaborators of the Government of the Russian Federation in France**: Alesya Miloradovich, a Russian government employee, and Anatolii Prizenko, a Moldovan businessman who coordinated the dispatch of several Moldovan citizens to France in October 2023.

Council Decision (CFSP) 2024/3182 of 16 December 2024 amending Decision 2014/145/CFSP, Council Regulation (EU) 2024/3189 of 16 December 2024 amending Regulation (EU) 269/2014, and Council Implementing Regulation (EU) 2024/3183 of 16 December 2024 implementing Regulation (EU) 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine<sup>24</sup>:

- **Addition of 54 persons and 30 entities** to the list of persons/entities subject to restrictive measures (asset freezes and travel bans) set out in Annex I to Regulation (EU) 269/2014 and consisting of:
  - Russian military **companies that manufacture aircraft parts, drones, electronics**, engines, high-tech components for weapons, and other military equipment;
  - Senior managers in **companies active in the Russian energy sector** (including shipping companies), providing important revenues to the Russian government;

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<sup>24</sup> Council Decision (CFSP) 2024/3182 of 16 December 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, 2024/3182, 16.12.2024;  
Council Regulation (EU) 2024/3189 of 16 December 2024 amending Regulation (EU) 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 2024/3189, 16.12.2024;  
Council Implementing Regulation (EU) 2024/3183 of 16 December 2024 implementing Regulation (EU) 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 2024/3183, 16.12.2024.

- The **military unit responsible for the striking of the Okhmadyt children hospital in Kyiv** as well as individuals responsible for children deportation and propaganda;
  - **Seven Chinese persons and entities, facilitating the circumvention of EU sanctions, and supplying sensitive drone components and microelectronic component** to the Russian military industry in support of Russia's war of aggression against Ukraine;
  - **Two senior officials from the Democratic People's Republic of Korea.**
- Introduction of a **derogation** in Article 6b of Regulation (EU) 269/2014 allowing the **release of (frozen) cash balances that are held by central securities depositories in the Union and attributable to designated entities** as a response to increasing litigation and retaliatory measures in Russia.

Council Decision (CFSP) 2024/3187 of 16 December 2024 amending Decision 2014/512/CFSP and Council Regulation (EU) 2024/3192 of 16 December 2024 amending Regulation (EU) 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine<sup>25</sup>:

Trade-related measures:

- **Addition of 32 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 **20 Russian firms, 7 under Chinese/Hong Kong jurisdiction, 2 from Serbia, and 1 each from Iran, India and United Arab Emirates**).

Anti-circumvention measures:

- Addition of **52 vessels** to the list set out in Annex XVI to Decision 2014/512/CFSP, targeting **Russia's shadow fleet** (a total of 79 listed non-EU vessels) subject to a port access ban and a ban on provision of services.

Protection of EU operators:

- **Prohibition to recognise or enforce in the EU injunctions**, orders, judgments or other court decisions pursuant to or in relation to Article 248 of the Arbitration Procedure Code of the Russian Federation or equivalent Russian legislation **that give exclusive mandatory competence to Russian courts in disputes between Russian and EU companies (anti suit injunctions)**. This measure will protect EU companies from the recognition of damages illegally awarded against them in Russia.
- **Extension of certain derogations enabling EU operators to divest from Russia**, granted on a case-by-case basis by Member States and focused on allowing an orderly divestment process from the Russian market.

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<sup>25</sup> Council Decision (CFSP) 2024/3187 of 16 December 2024 amending Decision 2014/512/CFSP concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L, 2024/3187, 16.12.2024;

Council Regulation (EU) 2024/3192 of 16 December 2024 amending Regulation (EU) 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L, 2024/3192, 16.12.2024.

- A **loss recovery derogation enabling EU central securities depositories to request** competent authorities of the Member States **to unfreeze cash balances** and use them to meet their legal obligations with their clients.

A **no liability clause for EU central securities depositories** clarifying that EU CSDs are not liable to pay interest or any other form of compensation to the Central Bank of Russia, beyond interest contractually due.

### 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) 833/2014<sup>26</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;
  - 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).

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<sup>26</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) 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L, 2024/1745, 24.6.2024.

- 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) 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) 833/2014, which are applying a set of export control measures substantially equivalent to those set out in Regulation (EU) 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) 269/2014, and Council Implementing Regulation (EU) 2024/1746 of 24 June 2024 implementing

Regulation (EU) 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine<sup>27</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) 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.

### 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) 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine:<sup>28</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:

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<sup>27</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) 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) 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.

<sup>28</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) 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L, 2024/745, 23.02.2024.

- *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 (EU) 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 (EU) 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 EU** (established by Decision 2014/512/CFSP and Council Regulation (EU) 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) 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine:<sup>29</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) 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.*

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<sup>29</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) 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.

## 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) 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) 269/2014.<sup>30</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 **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) 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, entities, and bodies 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

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<sup>30</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) 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) 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.

Regulation (EU) 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine.<sup>31</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;
  - 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

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<sup>31</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) 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, OJ L, 2023/2878, 18.12.2023.

- 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) 833/2014).
- **New import ban on liquefied 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** (article 12g of Regulation (EU) 833/2014): **Obligation for EU operators exporting to third countries**—other than the partner countries listed in Annex VIII to Regulation (EU) 833/2014—**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) 833/2014);
  - Firearms and ammunition as listed in Annex I to Regulation (EU) 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*).

### 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)

833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine:<sup>32</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) 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 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**).

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<sup>32</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) 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.

- **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) 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) 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) 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) 269/2014:<sup>33</sup>

- 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.

### 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

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<sup>33</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) 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;  
Council Implementing Regulation (EU) 2023/1216 of 23 June 2023 implementing Regulation (EU) 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.

(EU) 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine:<sup>34</sup>

- **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>35</sup>, European critical infrastructure<sup>36</sup> and critical entities<sup>37</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**.

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<sup>34</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) 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.

<sup>35</sup> As defined in Directive 2008/114/EC and Directive (EU) 2022/2557.

<sup>36</sup> As defined in Council Directive 2008/114/EC.

<sup>37</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.

- 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.
- **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) 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine:<sup>38</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.

### 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) 833/2014 concerning restrictive measures in view of Russia’s actions destabilising the situation in Ukraine:<sup>39</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**

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<sup>38</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) 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>39</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) 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.

**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 Regulation (EU) 2022/2475 of 16 December 2022 amending Regulation (EU) 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine:<sup>40</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

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<sup>40</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) 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.

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) 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine:<sup>41</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.

### 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) 269/2014:<sup>42</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 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;

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<sup>41</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) 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>42</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) 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) 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.

- **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>43</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) 833/2014:<sup>44</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 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*

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<sup>43</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>44</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) 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.

*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) 258/2012.  
*(In this context, Regulation (EU) 833/2014 is to be treated as lex specialis and therefore, in the event of a conflict, takes precedence over Regulation (EU) 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) 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.

### **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) 833/2014:<sup>45</sup>

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<sup>45</sup> Council Regulation (EU) 2022/1269 of 21 July 2022 amending Regulation (EU) 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) 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) 269/2014:<sup>46</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) 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>46</sup> Council Implementing Regulation (EU) 2022/1270 of 21 July 2022 implementing Regulation (EU) 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) 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) 269/2014 and Council Decision (CFSP) 2022/1276 of 21 July 2022 amending Decision 2014/145/CFSP:<sup>47</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) 269/2014.

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

Council Implementing Regulation (EU) 2022/878 of 3 June 2022 implementing Regulation (EU) 269/2014 and Council Decision (CFSP) 2022/883 of 3 June 2022 amending Decision 2014/145/CFSP:<sup>48</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) 269/2014.

Council Regulation (EU) 2022/879 of 3 June 2022 amending Regulation (EU) 833/2014 and Council Decision (CFSP) 2022/884 of 3 June 2022 amending Decision 2014/512/CFSP:<sup>49</sup>

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<sup>47</sup> Council Implementing Regulation (EU) 2022/1274 of 21 July 2022 implementing Regulation (EU) 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>48</sup> Council Implementing Regulation (EU) 2022/878 of 3 June 2022 implementing Regulation (EU) 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>49</sup> Council Regulation (EU) 2022/879 of 3 June 2022 amending Regulation (EU) 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;

- **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;
- **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.

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

Council Regulation (EU) 2022/576 of 8 April 2022 amending Regulation (EU) 833/2014 and Council Decision (CFSP) 2022/578 of 8 April 2022 amending Decision 2014/512/CFSP:<sup>50</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 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);

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<sup>50</sup> Council Regulation (EU) 2022/576 of 8 April 2022 amending Regulation (EU) 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.

- **Prohibition to purchase**, import or transfer, directly or indirectly, **goods which generate significant revenues** for Russia as listed in Annex XXI to Regulation (EU) 833/2014 (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) 269/2014, Council Implementing Regulation (EU) 2022/581 of 8 April 2022 implementing Regulation (EU) 269/2014, and Council Decision (CFSP) 2022/582 of 8 April 2022 amending Decision 2014/145/CFSP.<sup>51</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) 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 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.

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<sup>51</sup> Council Regulation (EU) 2022/580 of 8 April 2022 amending Regulation (EU) 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) 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.

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

Council Implementing Regulation (EU) 2022/427 of 15 March 2022 implementing Regulation (EU) 269/2014 and Council Decision (CFSP) 2022/429 of 15 March 2022 amending Decision 2014/145/CFSP.<sup>52</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) 833/2014 and Council Decision (CFSP) 2022/430 of 15 March 2022 amending Decision 2014/512/CFSP.<sup>53</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
    - 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.

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<sup>52</sup> Council Implementing Regulation (EU) 2022/427 of 15 March 2022 implementing Regulation (EU) 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>53</sup> Council Regulation (EU) 2022/428 of 15 March 2022 amending Regulation (EU) 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.

- Further trade restrictions concerning iron and steel;
- Trade restrictions on certain luxury goods.

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

Council Regulation (EU) 2022/394 of 9 March 2022 amending Regulation (EU) 833/2014 and Council Decision (CFSP) 2022/395 of 9 March 2022 amending Decision 2014/512/CFSP:<sup>54</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) 269/2014 and Council Decision (CFSP) 2022/397 of 9 March 2022 amending Decision 2014/145/CFSP:<sup>55</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 listed persons or entities (oligarchs, prominent business people and their family members).

### 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) 833/2014:<sup>56</sup>

- The EU Member States competent authorities shall **exchange information on dual-use goods and technology's authorisations granted and denials** issued with the other

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<sup>54</sup> Council Regulation (EU) 2022/394 of 9 March 2022 amending Regulation (EU) 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>55</sup> Council Implementing Regulation (EU) 2022/396 of 9 March 2022 implementing Regulation (EU) 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.

<sup>56</sup> Council Regulation (EU) 2022/345 of 1 March 2022 amending Regulation (EU) 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.

- 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.

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) 833/2014<sup>57</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.

### 1<sup>st</sup> package of sanctions<sup>58</sup>

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<sup>57</sup> Council Regulation (EU) 2022/350 of 1 March 2022 amending Regulation (EU) 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>58</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) 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) 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-

## **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;

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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) 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) 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) 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) 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) 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) 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) 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.

- **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>59</sup> and another

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<sup>59</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.

€500 million military aid provided through the EU off-budget funding mechanism “**European Peace Facility**”.<sup>60</sup>

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<sup>60</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.

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

### 11th package of sanctions

Council Decision (CFSP) 2026/512 of 23 April 2026 amending Decision 2012/642/CFSP, Council Regulation (EU) 2026/513 of 23 April 2026 amending Regulation (EC) 765/2006, Council Implementing Decision (CFSP) 2026/503 of 23 April 2026 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, and Council Implementing Regulation (EU) 2026/505 of 23 April 2026 implementing Article 8a(1) of Regulation (EC) 765/2006 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine (further mirror Belarus' measures with the ones imposed on Russia):<sup>61</sup>

- **Extension of the list of restricted items** which might **contribute to Belarus's military and technological enhancement** or the development of its defence and security sector, by listing items which have been used by Russia in its war of aggression against Ukraine and items which contribute to the development or production of Belarus's military systems, including:
  - Laboratory glassware;
  - Certain high performance lubricants and their additives;
- **Further restrictions on exports of goods** which contribute to the **enhancement of Belarusian industrial capabilities**, such as chemicals, rubber and articles of vulcanised rubber, articles of steel, tools for metal production and industrial tractors.
- **Broadening of the transit ban through Belarus** of certain goods and technologies (Annex Annex XIVa to Regulation (EC) 765/2006) to minimise the risk of circumvention of restrictive measures.
- **Extension of the existing prohibition on the provision of certain services to Belarus, now including**
  - **Managed security services;**
  - Services directly related to **tourism activities.**
- An exception from the requirement for prior authorisation for services provided to Belarus is made for the functioning of a consular or diplomatic representation of Belarus located in a Member State.
- **Further import bans on goods which allow Belarus to diversify its sources of revenue**, including on certain raw materials, metals, certain minerals, scrap of steel and other metals, chemicals, articles of vulcanised rubber and tanned furskins.

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<sup>61</sup> Council Decision (CFSP) 2026/512 of 23 April 2026 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, 2026/512, 23.4.2026;

Council Regulation (EU) 2026/513 of 23 April 2026 amending Regulation (EC) 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, 2026/513, 23.4.2026;

Council Implementing Decision (CFSP) 2026/503 of 23 April 2026 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, 2026/503, 23.4.2026; and

Council Implementing Regulation (EU) 2026/505 of 23 April 2026 implementing Article 8a(1) of Regulation (EC) 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, 2026/505, 23.4.2026.

- Extension of the prohibition on satisfying claims linked to sanction-affected contracts to third-country claimants.
- Possibility for EU operators to claim damages against parties seeking to enforce Belarusian decisions abroad.
- **Prohibition of any transaction involving a Belarusian central bank digital currencies**, or providing support to the development of such projects.
- **Total sectoral ban on providers and platforms established in Belarus that allow the transfer and exchange of crypto assets**
- Strengthening of anti-circumvention tools, including possible transaction bans on actors facilitating sanctions evasion
- **Addition of three legal persons (including a Chinese state-owned entity)** related to the Belarusian military-industrial complex and the Lukashenka regime **to the list of persons, entities and bodies subject to restrictive measures** set out in Annex I to Regulation (EC) 765/2006.

### 10th package of sanctions

Council Decision (CFSP) 2025/2040 of 23 October 2025 amending Decision 2012/642/CFSP, Council Regulation (EU) 2025/2041 of 23 October 2025 amending Regulation (EC) 765/2006 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine (further mirror Belarus' trade measures with the ones imposed on Russia):<sup>62</sup>

- **Extension of the list of restricted items** which might **contribute to Belarus's military and technological enhancement** or the development of its defence and security sector, by listing items which have been used by Russia in its war of aggression against Ukraine and items which contribute to the development or production of Belarus's military systems, including:
  - Electronic components;
  - Rangefinders;
  - Additional chemicals used in the preparation of propellants;
  - Additional metals, oxides and alloys used in the manufacturing of military systems.
- **Further restrictions on exports of goods** which contribute to the **enhancement of Belarusian industrial capabilities**, such as **salts and ores, articles of rubber, tubes, tyres, millstones and construction materials**.
- **Restriction on the provision, to the Republic of Belarus**, its Government, its public bodies, corporations or agencies or to any natural or legal person, entity or body acting on their behalf or at their direction, of software with certain uses in the banking and financial sector and services that contribute to enhancing Belarus's technological capacities (e.g., **commercial space-based services, AI services, high-performance computing and quantum computing services**).

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<sup>62</sup> Council Decision (CFSP) 2025/2040 of 23 October 2025 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, 2025/2040, 23.10.2025; and Council Regulation (EU) 2025/2041 of 23 October 2025 amending Regulation (EC) 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, 2025/2041, 23.10.2025.

- **Introduction of a new requirement for prior authorisation** by the competent authority **for any services provided to the Republic of Belarus** in order to mitigate the risk of a service contributing to Belarus's military, technological or industrial capacity.
- **Restrictions on the provision of crypto-asset services:** prohibition on provision, directly or indirectly, of the following services **to Belarusian nationals or natural persons residing in Belarus**, or to legal persons, **entities or bodies established in Belarus**:
  - a) **Crypto-asset services**, as defined in Regulation (EU) 2023/1114;
  - b) **Issuing of payment instruments**, acquiring of payment transactions, or payment initiation services, as defined in Directive (EU) 2015/2366;
  - c) **Issuing of electronic money**, as defined in Directive 2009/110/EC
- **Prohibition to purchase, import or transfer, directly or indirectly, goods which generate significant revenues for Belarus, extended to all acyclic hydrocarbons.**

Council Implementing Decision (CFSP) 2025/2038 of 23 October 2025 implementing Decision 2012/642/CFSP, and Council Implementing Regulation (EU) 2025/2039 of 23 October 2025 implementing Article 8a(1) of Regulation (EC) 765/2006 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine:<sup>63</sup>

- **Addition of two natural persons and three legal persons** related to the Belarusian military-industrial complex and the Lukashenka regime (Annex I to Decision 2012/642/CFSP).

### 9th package of sanctions

Council Decision (CFSP) 2025/1471 of 18 July 2025 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) 2025/1472 of 18 July 2025 amending Regulation (EC) 765/2006 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine:<sup>64</sup>

- **Arms procurement ban:** prohibition of procurement from Belarus of arms and related materiel of all types.

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<sup>63</sup> Council Implementing Decision (CFSP) 2025/2038 of 23 October 2025 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, 2025/2038, 23.10.2025; and Council Implementing Regulation (EU) 2025/2039 of 23 October 2025 implementing Article 8a(1) of Regulation (EC) 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, 2025/2039, 23.10.2025.

<sup>64</sup> Council Decision (CFSP) 2025/1471 of 18 July 2025 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, 2025/1471, 19.7.2025; and Council Regulation (EU) 2025/1472 of 18 July 2025 amending Regulation (EC) 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, 2025/1472, 19.7.2025.

- **Catch-all provision to address the risk of circumvention** of those measures through indirect exports via third countries: it is **introduced** of an **optional administrative mechanism** that enables national competent authorities to **require prior authorisation for exports of items which might contribute to Belarus’s military and technological enhancement, or the development of the defence and security sector, to any third country**, where the exporter has been informed by their national authority that the items are, or might be, intended for use in Belarus or by individuals or entities in Belarus.
- Expansion into a **full transaction ban** the existing prohibition **on the provision of specialised financial messaging services to certain Belarusian credit institutions** and their Belarusian subsidiaries, which are relevant for the Belarusian financial system, and which are already the subject of restrictive measures imposed by the Union.
  - **New exemptions** related to transactions:
    - Necessary for the **functioning of diplomatic and consular representations of the Union and of the Member States** or of partner countries in Belarus;
    - **Made by nationals of a Member State who are residents in Belarus** and were so before 24 February 2022.
    - **Strictly necessary for divestment from Belarus** or for the wind-down of business activities in Belarus (subject to authorization by the competent authority of the Member state).

*It is recalled that Union restrictive measures do not have extra-territorial effect and do not bind operators incorporated under the laws of third countries, including those of Belarus.*
- **Extension of the list of restricted items** which might **contribute** to Belarus’s military and technological enhancement or to the development of its defence and security sector, by listing items which have been **used by Russia in its war of aggression against Ukraine** and items which contribute to the development or production of Belarus’s military systems, including **chemical precursors to energetic materials, spare parts for machine tools, additional computer numerical control (CNC) machines** and constituent **chemicals for propellants**.
- **Further restrictions on exports of goods** which contribute to the **enhancement of Belarusian industrial capabilities**, such as machinery, chemicals, some metals and plastics, as well as **their transit through Belarus** in order to minimise the risk of circumvention of restrictive measures.

#### Protection of Member States from arbitration:

- **Protection for Member States from sanctions-related claims under their bilateral investment treaties:** Prohibition to recognize or enforce injunction, order, relief, judgment of a judicial court or authority other than a court of a Member State pursuant to or derived from investor-State dispute settlement proceedings against a Member State launched by listed persons in relation to EU sanctions.
- **Possibility for Member States to recover any damages** incurred as a consequence of investor-to-state dispute settlement proceedings brought against them in judicial proceedings before the competent courts of a Member State.
  - **Extension of the *forum necessitatis* clause to remedy possible situations of denial of justice** allowing a court of a Member State, on an exceptional basis, to rule on a claim for damages brought pursuant to Article 81 of Regulation (EC) 765/2006, where Union law or the law of a Member State does not establish the

jurisdiction of a court of any Member State in particular (provided that the case has a sufficient connection with the Member State of the court seised).

Council Implementing Decision (CFSP) 2025/1461 of 18 July 2025 implementing Decision 2012/642/CFSP, and Council Implementing Regulation (EU) 2025/1469 of 18 July 2025 implementing Article 8a(1) of Regulation (EC) 765/2006 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine.<sup>65</sup>

- **Addition of eight entities** to the list of natural and legal persons, entities and bodies **subject to restrictive measures** (assets freezing) set out in Annex I to Decision 2012/642/CFSP.
- **Addition of a new entity to the list** of natural and legal persons, entities and bodies set out in Annex II to Decision 2012/642/CFSP, which is the list of persons, entities and bodies **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.

### 8th package of sanctions

Council Decision (CFSP) 2025/391 of 24 February 2025 amending Decision 2012/642/CFSP, and Council Regulation (EU) 2025/392 of 24 February 2025 amending Regulation (EC) 765/2006 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine:<sup>66</sup>

- **New listing criterion** applying to persons, entities or bodies **supporting or benefiting from the military and industrial complex of Belarus**.
- Restrictions concerning the sale or provision of services and software, deposits and crypto-asset wallets, and transports.
- **Restrictive measures mirroring those adopted against Russia in the 16<sup>th</sup> package of sanctions** in relation to trade, transport, energy, construction and finance sectors under Council Decision (CFSP) 2025/394 of 24 February 2025 amending Decision 2014/512/CFSP and Council Regulation (EU) 2025/395 of 24 February 2025 amending Regulation (EU) 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine.

Council Decision (CFSP) 2025/391 of 24 February 2025 amending Decision 2012/642/CFSP, and Council Regulation (EU) 2025/392 of 24 February 2025 amending Regulation (EC)

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<sup>65</sup> Council Implementing Decision (CFSP) 2025/1461 of 18 July 2025 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, 2025/1461, 19.7.2025; and Council Implementing Regulation (EU) 2025/1469 of 18 July 2025 implementing Article 8a(1) of Regulation (EC) 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, 2025/1469, 19.7.2025.

<sup>66</sup> Council Decision (CFSP) 2025/391 of 24 February 2025 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, 2025/391, 24.2.2025; and Council Regulation (EU) 2025/392 of 24 February 2025 amending Regulation (EC) 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, 2025/392, 24.2.2025.

765/2006 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine:<sup>67</sup>

- The **restrictive measures** set out in Council Decision 2012/642/CFSP are **prolonged until 28 February 2026**.

### 7th package of sanctions

Council Implementing Decision (CFSP) 2024/3175 of 16 December 2024 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, and Council Implementing Regulation (EU) 2024/3177 of 16 December 2024 implementing Article 8a(1) of Regulation (EC) 765/2006 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine:<sup>68</sup>

- Addition of 26 natural persons and 2 legal persons to the list of persons/entities subject to restrictive measures set out in Annex I to Regulation (EC) 765/2006.

### 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) 765/2006 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine:<sup>69</sup>

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**.

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<sup>67</sup> Council Decision (CFSP) 2025/391 of 24 February 2025 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, 2025/391, 24.2.2025; and Council Regulation (EU) 2025/392 of 24 February 2025 amending Regulation (EC) 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, 2025/392, 24.2.2025.

<sup>68</sup> Council Implementing Decision (CFSP) 2024/3175 of 16 December 2024 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, 2024/3175, 16.12.2024; Council Implementing Regulation (EU) 2024/3177 of 16 December 2024 implementing Article 8a(1) of Regulation (EC) 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, 2024/3177, 16.12.2024.

<sup>69</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) 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.

- **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) 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.

### **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) 765/2006 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine<sup>70</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) 765/2006, which currently apply to 195 individuals and 34 entities, including Alexandr Lukashenko.

### **4th package of sanctions**

Council Implementing Regulation (EU) 2022/876 of 3 June 2022 implementing Article 8a(1) of Regulation (EC) 765/2006 and Council Implementing Decision (CFSP) 2022/881 of 3 June 2022 implementing Decision 2012/642/CFSP:<sup>71</sup>

- 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) 765/2006.

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<sup>70</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) 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.

<sup>71</sup> Council Implementing Regulation (EU) 2022/876 of 3 June 2022 implementing Article 8a(1) of Regulation (EC) 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.

Council Regulation (EU) 2022/877 of 3 June 2022 amending Regulation (EC) 765/2006 and Council Decision (CFSP) 2022/882 of 3 June 2022 amending Decision 2012/642/CFSP:<sup>72</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.

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

Council Regulation (EU) 2022/577 of 8 April 2022 amending Regulation (EC) 765/2006 and Council Decision (CFSP) 2022/579 of 8 April 2022 amending Decision 2012/642/CFSP:<sup>73</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.

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

Council Regulation (EU) 2022/398 of 9 March 2022 amending Regulation (EC) 765/2006 and Council Decision (CFSP) 2022/399 of 9 March 2022 amending Decision 2012/642/CFSP:<sup>74</sup>

- Inclusion of **crypto-assets** under the scope of “transferable securities”
- **Prohibiting the transactions of Belarus's central bank** and freezing all its assets;

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<sup>72</sup> Council Regulation (EU) 2022/877 of 3 June 2022 amending Regulation (EC) 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>73</sup> Council Regulation (EU) 2022/577 of 8 April 2022 amending Regulation (EC) 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>74</sup> Council Regulation (EU) 2022/398 of 9 March 2022 amending Regulation (EC) 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;

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.

- **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.

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

Council Implementing Regulation (EU) 2022/353 of 2 March 2022 implementing Regulation (EU) 269/2014 and Council Decision (CFSP) 2022/354 of 2 March 2022 amending Decision 2014/145/CFSP:<sup>75</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) 765/2006 and Council Decision (CFSP) 2022/356 of 2 March 2022 amending Decision 2012/642/CFSP concerning restrictive measures in view of the situation in Belarus:<sup>76</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.

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<sup>75</sup> Council Implementing Regulation (EU) 2022/353 of 2 March 2022 implementing Regulation (EU) 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>76</sup> Council Regulation (EU) 2022/355 of 2 March 2022 amending Regulation (EC) 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.