

## EU Restrictive Measures vs Russia (Ukraine); as at 19/04/2022

Sanction	Content of the sanction	Carve-outs / Exceptions/ Derogations decided by competent authorities	Addressees and subjects (parent company; subsidiaries incorporated in the territory, other subsidiaries /branches)	Start date
<b>Sanctions affecting the Central Bank, Russia and Government</b>				
<b>Dealing with securities and money market instruments (MMI) issued by CBR, Russia and Government</b>	Prohibition on directly or indirectly purchasing, selling, providing investment services for or assistance in issuance of or otherwise deal with transferable securities and money market instruments issued after 9 March 2022 by the CBR (or any legal person, entity or body acting on behalf or at the direction of the CBR), as well as by Russia and its government. (Art 5a(1) CR No 833/2014)		Russia and its government, the CBR and any legal person, entity or body acting on behalf or at the direction of the CBR.	Regulation entered into force on 23 February 2022  Application to securities / instruments issued after 9 March 2022
<b>New loans and credit</b>	Prohibition on directly or indirectly making or being part of any arrangement to make any new loans or credit to the CBR (or any legal person, entity or body acting on behalf or at the direction of the CBR), as well as by Russia and its government. (Art 5a(2) CR No 833/2014)	Prohibition does not apply to (i) financing for non-prohibited imports or exports of goods and non-financial services between the Union and any third State (including expenditure for goods and services from another third State that is necessary for executing the export or import contracts); or (ii) to drawdown or disbursements made to contracts concluded before 23 February 2022, provided certain conditions are met regarding the terms and conditions of the contract. (Art 5a(2),(3) CR No 833/2014)	Russia and its Government, the CBR and any legal person, entity or body acting on behalf or at the direction of the CBR.	Regulation entered into force on 23 February 2022  Limited application to contracts concluded before 23 February 2022
<b>Asset freezes (Central Bank)</b>	Prohibition on transactions related to the management of reserves as well as of assets of the CBR (including transactions with any legal person, entity or body acting on behalf of or at its direction). (Art 5a(4) CR No 833/2014)	The competent authorities in the Member States of the EU may grant authorizations for such transactions only if it is strictly necessary to ensure the financial stability of the EU as a whole or of the Member State concerned and must inform the other Member States and Commission of its intention. (Art 5a(5), (6) CR No 833/2014)	CBR, including any legal person, entity or body acting on behalf of or at its direction.	Regulation entered into force on 28 February 2022
<b>Russian Direct Investment Fund (RDIF)</b>	Prohibition to invest, participate or otherwise contribute to projects co-financed by the RDIF. (Art 2e(3), (4) CR No 833/2014)	The competent authorities may authorize investment participation in or contribution to projects co-financed by the RDIF, if this is due under contracts concluded before 2 March 2022 or ancillary contracts necessary for the execution of such contracts.	RDIF	Regulation entered into force on 2 March 2022  Until 15 May 2022, it shall not apply to the performance of contracts concluded before 16 March 2022
<b>Sanctions affecting entities under public control of the Central Bank, the Russian Federation and the Government</b>				
<b>Transactions with entities under public control</b>	Prohibition on direct or indirect participation in any transaction (new Article 5aa in conjunction with Annex XIX)	Exempted are: - transactions necessary for the purchase, import or transport of fossil fuels, in particular coal, oil and natural gas, titanium, aluminium, copper, nickel, palladium and iron ore, from or via Russia to the Union, <a href="#">country member of the EEA, Switzerland, or the Western Balkans</a> ;	Legal persons, entities or bodies established in Russia that are publicly controlled or more than 50 % publicly owned These are: OPK OBORONPROM UNITED AIRCRAFT CORPORATION URALVAGONZAVOD ROSNEFT	16 March 2022  Until 15 May 2022, it shall not apply to the performance of contracts concluded before 16 March 2022

		<ul style="list-style-type: none"> <li>- transactions related to energy projects outside Russia in which a legal person, entity or body listed in Annex XIX is a minority shareholder</li> <li>- transactions for the purchase, import or transport into the Union of coal and other solid fossil fuels listed in Annex XXII until 10 August 2022.</li> </ul>	TRANSNEFT GAZPROM NEFT ALMAZ-ANTEY KAMAZ ROSTEC (RUSSIAN TECHNOLOGIES STATE CORPORATION) JSC PO SEVMASH SOVCOMFLOT UNITED SHIPBUILDING CORPORATION	
<b>Sanctions affecting financial institutions</b>				
<b>Asset freezes (financial Institutions)</b>	<p>An 'asset freeze' means (i) all funds and economic resources belonging to, owned, held or controlled by the listed person or their associates must be frozen; and (ii) no funds or economic resources shall be made available, directly or indirectly to or for the benefit of the listed persons or their associates. (Art 2, CR No 269/2014).</p> <p>The listed persons are included in Annex I to CR No 269/2014.</p>	<p>Competent authorities may authorize the release of certain frozen funds or economic resources if certain conditions are met (basic needs, professional fees, bank fees and service charges, extraordinary expenses, arbitral or judicial decisions, meeting certain contractual payment obligations, payments to Crimean Sea Port) (Arts4-6a CR No 269/2014).</p> <p>Asset freezing does not prevent financial or credit institutions from crediting the frozen accounts with funds from third parties, interest or earnings, payments due under contracts pre-dating the listing or arbitral, administrative or judicial decisions, provided that the additional amounts are also frozen (Arts 7-8 CR No 269/2014)</p> <p>A new derogation allows Member States to authorize the release of frozen funds or economic resources belonging to three Russian banks or the making available of funds or economic resources to them, if this is necessary for the termination by 24 August 2022 of operations, contracts, or other agreements, including correspondent banking relations, concluded with those banks before 23 February 2022 (new Art 6b in CR No 2022/259)</p>	<p>Annex I includes three Russian banks (parent entities) listed on 23 February 2022  <b>VEB.RF (a.k.a Vnesheconombank), Bank Rossiya, Promsvyazban</b>, (CIR 2022/260)</p> <p>One Russian bank (parent entity) was listed on 30 July 2014  <b>Russian National Commercial Bank (which operates mostly in Crimea)</b></p> <p>On 8 April 2022, 4 more Russian banks were added to the list:  <b>Otkritie FC Bank, Novikombank, Sovcombank VTB Bank</b></p> <p>EU and Non-EU subsidiaries and branches of these entities are covered. The asset freeze applies to funds and economic resources controlled by the entities or any natural or legal persons, entities or bodies associated with them. It therefore applies to funds and economic resources of all subsidiaries and branches of the entities within the territory of the Union and prevents funds or economic resources being made available to them by any person to whom CR 269/2014 applies (see Territorial Scope further below)</p>	<p>Regulation entered into force on 17 March 2014</p> <p>Three Russian banks were listed on 23 February 2022 and one on 30 July 2014.</p> <p>Asset freeze applies from date of listing.</p> <p>Derogation in favor of national authorities until 24 August 2022.</p>
<b>Dealing with securities and money market instruments (MMIs) (Credit institutions and non-financial institutions)</b>	<p>It is prohibited to purchase, sell, provide investment services for or assistance in the issuance of, or otherwise deal with certain transferable securities and MMIs issued by certain Russian institutions (or by non-EU entities more than 50% owned by them or by entities acting on their behalf / at their direction).</p> <p>Prohibition applies to securities and MMIs:</p> <ol style="list-style-type: none"> <li>Issued after 1 August 2014 to 12 September 2014 with a maturity exceeding 90 days;</li> <li>Issued after 12 September 2014 to 12 April 2022 with a maturity exceeding 30 days;</li> </ol>	<p>Prohibition does not apply to the subsidiaries and branches (legal person, entity or body) established in the Union even if more than 50% owned by banks to which the prohibition applies.</p>	<p>The prohibition applies to:</p> <ol style="list-style-type: none"> <li><b>Sberbank, VTB Bank, Gazprombank, Vnesheconombank (VEB) and Rosselkhozbank</b> (parent companies in Annex III) after 1 August 2014</li> <li><b>Alfa Bank, Bank Otkritie, Bank Rossiya and Promsvyazbank</b> (parent companies in Annex XII) from 26 February 2022 in relation to securities and MMIs issued after 12 April 2022.</li> <li><b>OPK Oboronprom, United Aircraft Corporation, Uralvagonzavod, Rosneft, Transneft, Gazprom Neft</b> (parent companies)</li> </ol>	<p>Regulation entered into force and has applied to since 1 August 2014 (subject to several expansions in scope).</p> <p>New expanded prohibition entered into force on 26 February 2022 and applies to securities and MMIs issued after 12 April 2022.</p>

	<p>c. Issued after 12 April 2022 (with no maturity threshold) (criterion added by new Art 5(1) in CR 2022/328)</p> <p>(New Art 5(1) – (4) of CR No 833/2014).</p>		<p>(see Annexes V and VI) from 12 September 2014</p> <p>d. <b>Almaz-Antey, Kamaz Novorossiysk Commercial Sea Port, Rostec (Russian Technologies and State Corporation), Russian Railways, JSC PO Sevmash, Sovcomflot and United Shipbuilding Corporation</b> (parent companies) (see Annex XIII) from 26 February 2022 in relation to securities and MMIs issued after 12 April 2022.</p> <p>The prohibition also applies to securities and MMIs issued by non-EU entities more than 50% owned by them or entities acting on their behalf/at their direction. The prohibition therefore applies to securities and MMIs issued by subsidiaries which are non-EU entities, but NOT subsidiaries and branches within the EU (see carve-out box).</p>	
<b>New loans and credits</b>	<p>Prohibition on making or being part of any arrangement to make a new loan or credit to any of the afore-mentioned credit institutions and strategic non-financial institutions (or to non-EU entities more than 50% owned by them or entities acting on their behalf / at their direction).</p> <p>Prohibition applies to new loans and credit:</p> <ol style="list-style-type: none"> <li>with a maturity exceeding 30 days after 12 September 2014 to 26 February 2022;</li> <li>with no maturity threshold after 26 February 2022 (criterion added by new Art 5(6) in CR 833/2014)</li> </ol>	<p>The prohibition does not apply to the subsidiaries and branches (legal person, entity or body) established in the Union even if more than 50% is owned by banks to which the prohibition applies.</p> <p>The prohibition does not apply to:</p> <ol style="list-style-type: none"> <li>loans or credit to provide financing for non-prohibited imports or exports of goods and non-financial services between the Union and any third State, including the expenditure for goods and services from another third State that is necessary for executing the export or import contracts;</li> <li>loans that provide emergency funding to meet solvency and liquidity criteria for legal persons established in the Union (with more than 50% ownership by <b>Sberbank, VTB Bank, Gazprombank, VEB and Rosselkhozbank</b>)</li> <li>drawdowns or disbursements under contracts concluded before 26 February 2022 where certain conditions are met (see conditions added by new Art 5(7) in CR 2022/328)</li> </ol>	<p>The prohibition in (a) applies to:</p> <ol style="list-style-type: none"> <li><b>Sberbank, VTB Bank, Gazprombank, Vnesheconombank (VEB) and Rosselkhozbank</b> (parent companies in Annex III); and</li> <li><b>OPK Oboronprom, United Aircraft Corporation, Uralvagonzavod, Rosneft, Transneft, Gazprom Neft</b> (parent companies) (see Annexes V and VI) from 12 September 2014</li> </ol> <p>The prohibition in (b) applies to (1) and (2) above and:</p> <ol style="list-style-type: none"> <li><b>Alfa Bank, Bank Otkritie, Bank Rossiya and Promsvyazbank</b> (parent companies in Annex XII); and</li> <li><b>Almaz-Antey, Kamaz Novorossiysk Commercial Sea Port, Rostec (Russian Technologies and State Corporation), Russian Railways, JSC PO Sevmash, Sovcomflot and United Shipbuilding Corporation</b> (parent companies) (see Annex XIII) from 26 February 2022 in relation to securities and MMIs issued after 12 April 2022.</li> </ol> <p>The prohibition also applies to securities and MMIs issued by non-EU entities more than 50% owned by them or entities acting on their behalf/at their direction. The prohibition therefore applies to securities and MMIs issued by subsidiaries which are non-EU entities, but NOT subsidiaries and branches within the EU (see carve-out box).</p>	<p>Original prohibition entered into force on 12 September 2014.</p> <p>New prohibition entered into force on 26 February 2022.</p>

<b>Deposits</b>	Prohibition on accepting any deposits from Russian nationals or natural persons residing in Russia or entities established in Russia if the total value of the deposit of these persons / entities exceeds EUR 100,000 (per credit institution) (new Art 5b in CR 833/2014)	<p>The prohibition does not apply to nationals of a Member State, EEA member states or Switzerland or natural persons having a temporary or permanent residence permit in a Member State, EEA member states or Switzerland.</p> <p>The prohibition does not apply to deposits which are necessary for non-prohibited cross-border trade in goods and services between the Union and Russia.</p> <p>The prohibition does not apply to transfers from existing accounts (of otherwise non-sanctioned persons), nor does it require that existing deposits over the threshold are reduced. But for accounts already exceeding the threshold of EUR 100,000, no additional funds can be received into those accounts.</p> <p>Under certain circumstances, the competent authorities in the Member States of the EU may grant relevant authorizations for exemptions on a case-by-case basis. Information obligations have also been introduced, requiring credit institutions to provide their competent national authorities by no later than 27 May 2022 with lists of relevant deposits exceeding EUR 100,000. There is a broad circumvention prohibition, which means deposits from non-Russian entities on behalf of Russian persons or entities will also be prohibited.</p>	Russian nationals or natural persons residing in Russia or entities established in Russia	<p>26 February 2022</p> <p>(exemption for EEA members and Switzerland applies from 9 March 2022)</p>
<b>SWIFT payments</b>	Prohibition to provide specialized messaging services used to exchange financial data to listed persons (or any legal person, entity or body established in Russia whose proprietary rights are directly or indirectly owned for more than 50% by a listed entity) (Art. 5h of Regulation 833/2014)		Bank Otkritie, Novikombank, Promsvyazbank, Bank Rossiya, Sovcombank, VNESCHECONOMBANK (VEB) VTB Bank	<p>2 March 2022</p> <p>(Effective from 12 March 2022)</p>
<b>Supply of euro banknotes</b>	Prohibition to sell, supply, transfer or export euro denominated banknotes to Russia or to any natural legal person, entity or body in Russia, including the government and central bank of Russia or for use in Russia From 9 April 2022, the ban applies to banknotes denominated in any currency of EU Member States (amended Article 5i of Regulation 833/2014)	Does not apply where necessary for the personal use of natural persons travelling to Russia or members of their immediate families travelling with them or the official purposes of diplomatic missions, consular posts or international organisations in Russia enjoying immunities in accordance with international law.	Any natural legal person, entity or body in Russia, including the government and central bank of Russia or for use in Russia	<p>2 March 2022 (euro banknotes)</p> <p>9 April 2022 (any currency of EU MS)</p>
<b>Sanctions affecting capital markets</b>				
<b>Trading venues</b>	Prohibition on listing or providing services on trading venues registered or recognized in the EU		Issuers of transferable securities which are entities established in Russia with over 50% public ownership. Note importance of monitoring change of ownership of issuers not only prior to listing but during the provision of services.	<p>25 February 2022, for operations on or after and for securities issued as of 12 April 2022</p>

<b>CSDs</b>	Prohibition to EU central securities depositories providing relevant services (as defined in the Annex of Regulation (EU) No 909/2014) for transferable securities.	There is an exception for nationals of a Member State or natural persons having a temporary or permanent residence permit in a Member State.	Applies to any Russian national or natural person residing in Russia or any legal person, entity or body established in Russia.	25 February 2022
<b>Sale of securities</b>	Prohibition on selling euro denominated (from 9 April 2022 on in any official currency of the EU Member States) transferable securities issued after 12 April 2022 or units in collective investment undertakings providing exposure to such securities. (Art. 5f(1) of Regulation 833/2014)	The prohibition does not apply to nationals of a Member State or natural persons having a temporary or permanent residence permit in a Member State.	Any Russian national or natural person residing in Russia or any entity established in Russia.	25 February 2022 (euro)  9 April 2022 (any currency of EU MS)
<b>Other prohibitions on financing or financial assistance relating to trade sanctions</b>				
<b>Public financing</b>	Prohibition on public financing or financial assistance for trade with, or investment in, Russia. (Art. 2e(1) of Regulation 833/2014)	Exceptions apply to (i) binding financing or financial assistance commitments established prior to 26 February 2022; (ii) commitments up to a total value of EUR 10 million per project to SMEs; and (iii) trade in food, agricultural, medical or humanitarian purposes.		25 February 2022
<b>Supply of goods and technology</b>	Prohibitions apply to the supply of goods and technology to the energy industry, aviation industry, defence and security technology and dual-use goods and technology. Financing or financial assistance related to the goods and technology subject to the sanctions is also covered.	A range of exceptions apply, usually depending on the dates of the contracts.		1 August 2014
<b>Crimea &amp; Sevastopol</b>	Prohibitions apply to investments in Crimea and Sevastopol and supply of goods and technology to the transport, telecommunications, energy and resources industries. Financing or financial assistance related to the goods and technology subject to the sanctions is also covered.	Exceptions apply (in particular to contracts concluded before certain dates)		20 December 2014.
<b>Joint investment and provision of loans or credits - energy sector</b>	The ban applies to the energy sector. Investments and joint ventures with Russian entities operating in the energy sector, as well as the financing and provision of loans or credits to such entities, are prohibited, as is the joint establishment of such entities. (Art. 3a(1) of Regulation 833/2014)	Exemptions shall apply where necessary to ensure critical energy supplies in the Union, as well as for the transport of fossil fuels, in particular coal, oil and natural gas, from or via Russia to the Union; or where it relates exclusively to a legal person, entity or body operating in the energy sector in Russia which is owned by a legal person, entity or body incorporateP or constituted under the law of a Member State.	Legal persons, entities or bodies incorporated or constituted under the law of Russia or any third country and operating in the energy sector in Russia.	16 March 2022

<b>Import, purchase, transport of products</b>	<p>a) Prohibition on the import, purchase and transport of <b>iron and steel products</b> if they originate in Russia or have been exported from Russia. Prohibition on the purchase of iron and steel products located in Russia or originating in Russia (Art. 3g in conjunction with Annex XVII).</p> <p>b) The prohibition shall also apply from 9.4.2022 to goods which <b>generate substantial revenue</b> for Russia (Article 3i in conjunction with Annex XXI) and to <b>coal and other solid fossil fuels</b> (Article 3j in conjunction with Annex XXII).</p>	The prohibitions in paragraph 1 shall not apply to the execution until 17 June 2022 of contracts concluded before 16 March 2022.		<p>a) 16 March 2022 b) 9 April 2022</p> <p>Until 10 July 2022 shall not apply to the performance of contracts concluded before 9 April 2022.</p>
<b>Sale, supply, transfer, export - luxury goods</b>	<p>a) It shall be prohibited to sell, supply, transfer or export, directly or indirectly, <b>luxury goods</b> to any natural or legal person, entity or body in Russia or for use in Russia (if their value exceeds EUR 300 per item) (new Art. 3h in conjunction with Annex XVIII).</p> <p>b) Since 9 April 2022 the prohibition applies also for goods which could contribute in particular to the enhancement of Russian industrial capacities as listed in Annex XXIII.</p>	Goods which are necessary for the official purposes of diplomatic or consular missions of Member States or partner countries in Russia or of international organisations enjoying immunities in accordance with international law, or to the personal effects of their staff		<p>a) 16 March 2022 b) 9 April 2022</p> <p>Until 10 July 2022 shall not apply to the performance of contracts concluded before 9 April 2022.</p>
<b>Sanctions affecting Cryptocurrencies</b>				
<b>The term "transferable securities" also includes cryptocurrencies</b>	<p>Prohibitions that now also apply to cryptocurrencies:</p> <p>Prohibition on directly or indirectly purchasing, selling, providing investment services for or assistance in issuance of or otherwise deal with transferable securities and money market instruments issued after 9 March 2022 by the CBR (or any legal person, entity or body acting on behalf or at the direction of the CBR), as well as by Russia and its government. (Art 5a(1) CR No 833/2014)</p> <p>Prohibition to purchase, sell, provide investment services for or assistance in the issuance of, or otherwise deal with certain transferable securities and MMIs issued by certain Russian institutions (or by non-EU entities more than 50% owned by them or by entities acting on their behalf / at their direction).</p> <p>Prohibition applies to securities and MMIs:</p> <p>d. Issued after 1 August 2014 to 12 September 2014 with a maturity exceeding 90 days;</p>	see for transferable VPs	see for transferable VPs	10 March 2022

	<p>e. Issued after 12 September 2014 to 12 April 2022 with a maturity exceeding 30 days;</p> <p>f. Issued after 12 April 2022 (with no maturity threshold) (criterion added by new Art 5(1) in CR 2022/328) (New Art 5(1) – (4) of CR No 833/2014).</p> <p>Prohibition on listing or providing services on trading venues registered or recognized in the EU. (Applicable for: Issuers of transferable securities which are entities established in Russia with over 50% public ownership. Note importance of monitoring change of ownership of issuers not only prior to listing but during the provision of services.</p> <p>Prohibition to EU central securities depositories providing relevant services (as defined in the Annex of Regulation (EU) No 909/2014) for transferable securities.</p> <p>Prohibition on selling euro denominated transferable securities issued after 12 April 2022 or units in collective investment undertakings providing exposure to such securities.</p>			
<b>Providing services in concerning cryptocurrencies</b>	<p>Prohibition on the provision of wallets, banking or custodial services in relation to cryptocurrencies where the total value of cryptocurrencies held by a natural or legal person, entity or body per wallet, banking or custodial service exceeds EUR 10,000 (Article 5b of Regulation (EU) 833/2014).</p>	<p>The ban does not apply to nationals of a Member State or natural persons holding a temporary or permanent residence permit in a Member State. The prohibition shall not apply to nationals of a Member State, an EEA Member State or Switzerland or natural persons holding a temporary or permanent residence permit in a Member State, an EEA Member State or Switzerland.";</p> <p>The prohibition shall not apply to deposits/currency balances necessary for unannounced cross-border trade in goods and services between the Union and Russia.</p> <p>In certain circumstances, the competent authorities in EU Member States may grant appropriate exemptions on a case-by-case basis.</p>	<p>Applies to any Russian national or natural person residing in Russia or any legal person, entity or body established in Russia.</p>	<p>9 April 2022</p>
<b>Other sanctions</b>				
<b>Credit ratings</b>	<p>Prohibition on the assignment of credit ratings and access to subscriptions to credit rating information and analysis (new Article 5j).</p>	<p>Exempted are nationals of Member States or natural persons holding a temporary or permanent residence permit in a Member State.</p>	<p>Russian citizens or natural persons residing in Russia, legal persons, entities or bodies established in Russia.</p>	<p>The ban shall take effect from 15 April 2022</p>
<b>Public procurement and concessions</b>	<p>Prohibition on the award or continuation of any public procurement or concession contracts (new Article 5k of Regulation 833/2014)</p>	<p>The competent authorities may authorise the award and continuation of contracts.</p>	<p>- Russian citizens or natural persons residing in Russia, legal persons, entities or bodies established in Russia. The prohibition shall also apply to legal persons, entities or bodies of which more than 50 % is</p>	<p>9 April 2022</p> <p>Until 10 October 2022 shall not apply to the performance of</p>



			owned, directly or indirectly, by an entity referred to in the above indent, or to legal persons, entities or bodies acting on behalf of or at the direction of an entity referred to in the above indent..	<a href="#">contracts concluded before 9 April 2022.</a>
<b>Subsidising Union, Euratom or Member State programmes</b>	The provision of direct or indirect support, including funding and financial assistance, or any other benefit under a Union, Euratom or national programme and contracts of a Member State within the meaning of Regulation (EU, Euratom) 2018/1046 is prohibited. (new Article 5l of Regulation 833/2014)	The prohibition does not apply in certain cases (e.g. humanitarian purposes, climate, environmental, phytosanitary, veterinary programmes,...).	Legal persons, entities or bodies established in Russia which are more than 50 % publicly owned or controlled.	<a href="#">9 April 2022</a>
<b>Registration and services for funds</b>	Prohibition on the registration, provision of a registered office, registered business or administrative address and management services for the fund or any similar legal arrangement.  From 10 May 2022, it is prohibited to act as a trustee, authorised shareholder, director, secretary or hold any similar office or to arrange for another person to act as a trustee, authorised shareholder, director, secretary or hold any similar office for the Fund or any similar legal arrangement.  (new Article 5m of Regulation 833/2014)	The prohibitions do not apply to operations necessary to terminate, by 10 May 2022, contracts incompatible with this Article concluded before 9 April 2022 or ancillary contracts necessary for the performance of such contracts.  The competent authorities may grant exceptions (humanitarian purposes, civil society activities directly promoting democracy, human rights or the rule of law in Russia).	<ul style="list-style-type: none"> <li>a) Russian nationals or natural persons residing in Russia;</li> <li>b) legal persons, entities or bodies established in Russia;</li> <li>c) legal persons, entities or bodies whose proprietary rights are directly or indirectly owned for more than 50 % by a natural or legal person, entity or body referred to in points (a) or (b);</li> <li>d) legal persons, entities or bodies controlled by a natural or legal person, entity or body referred to in points (a), (b) or (c);</li> <li>(e) a natural or legal person, entity or body acting on behalf of or at the direction of a natural or legal person, entity or body referred to in points (a), (b), (c) or (d).</li> </ul>	<a href="#">9 April 2022</a>
<b>Territorial scope of application</b>	<p>According to Article 17 of CR No 269/2014 and Article 13 of CR No 833/2014, the EU restrictive measures shall apply:</p> <ul style="list-style-type: none"> <li>a. within the territory of the Union, including its airspace [or on board any aircraft or any vessel under the jurisdiction of a Member State in Art 13];</li> <li>b. on board any aircraft or any vessel under the jurisdiction of a Member State;</li> <li>c. to any person inside or outside the territory of the Union who is a national of a Member State;</li> <li>d. to any legal person, entity or body, inside or outside the territory of the Union, which is incorporated or constituted under the law of a Member State;</li> <li>e. to any legal person, entity or body in respect of any business done in whole or in part within the Union</li> </ul>			