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Moscow, May 15, 2014

UPDATE: New US and EU Sanctions. How to Stay on the Safe Side

On May 13th, the EU published an extended sanctions list concerning the Ukrainian crisis. An additional 13 persons have been added to the existing list and for the first time, the EU placed two legal entities on it. Both the EU and the US lists collectively contain now 97 persons and legal entities, which makes the situation confusing for many companies. After receiving positive feedback on RUSSIA CONSULTING's first Newsletter on this topic, we gladly offer this update and bring a **CASE STUDY** on how to deal with the sanctions.

Who is on the List and What Does it Mean?

The sanctions introduced by the US and the EU adversely affect specific Russian and Ukrainian individuals and legal entities (see below "Overview of persons affected by the US and the EU sanctions..."). Both the US and the EU sanctions **forbid any economic interactions** (for example, buying or selling goods, offering financial services, etc.) with listed persons as well as with all companies in which a listed person is **in possession of 50% or more of the proprietary rights or has the power or right to exercise dominant influence** (EU wording) **or owns, directly or indirectly, a 50% or greater interest** (US wording). In any case, caution is needed and any business partner should be thoroughly checked for his or her connections.

Who Must Follow the Sanctions?

The US and the EU sanctions are to be followed by companies established under US or EU legislation, respectively, as well as by their foreign branches and representative offices. Subsidiaries of the EU or US companies registered outside of the EU or US, respectively, are not regarded as EU or US companies for the purpose of the sanctions. EU and the US citizens, as well as foreign citizens with permanent residence in the US are obliged to follow the EU or US sanctions, respectively, even if they act outside of the EU or US. You can find more information in Appendix 1 ("A Sanctions' Matrix: What is Forbidden?")

An interesting situation could occur if an EU or US citizen runs a company in Russia which is not a subsidiary or a branch of an EU or US company. Such a company is legally a Russian company and does not need to comply with the EU or US regulations while acting in Russia. However, if the owner or the General Director of the Russian company is an EU or US citizen, the company is obligated to comply with the sanctions.

What if I Break the Rules?

The fines for breaking the sanctions regime can be substantial and (according to the US law) persons who willingly and knowingly violate sanctions can even face imprisonment. In addition to the legal consequences, there might also be reputational risks for those companies that are publicly named as sanction violators by the EU or US authorities or by the mass media regardless of whether these allegations are even legitimate.



Executive Order 13608, "Prohibiting Certain Transactions With and Suspending Entry Into the United States of Foreign Sanctions Evaders With Respect to Iran and Syria" gives Treasury the authority to impose sanctions on foreign persons (individuals and entities) determined (1) to have violated, attempted to violate, conspired to violate, or caused a

8175, Windlach, Switzerland; 8174 Stadel b., Niederglatt, Switzerland [FSE-IR] EUROPEAN OIL TRADERS SA (a.k.a. EUROPEAN OIL TRADERS), Kaiserliihenstrasse 91, 8175, Windlach, Switzerland; 8174 Stadel b., Niederglatt, Switzerland [FSE-IR] FARSOUDEH, Houshang (a.k.a. FARSOUDEH,

KSN FOUNDATION, Muehleholz 3, Vaduz 9440, Liechtenstein [FSE-IR] LLC CAUCASUS ENERGY (a.k.a. CAUCASUS ENERGY; a.k.a. CAUCASUS ENERGY OF GEORGIA), Georgia; Registration ID 406075081 [FSE-IR] NAYEBI, Pourya (a.k.a. NAYEBI, Pourya Ali Asghar), DOB 25 Jul 1974; POB Tehran, Iran;

The above is an example of a "Foreign Sanctions Evaders (FSE) List" that is regularly published by the US Treasury Department. This list contains the names of the companies and individuals who willingly violate US sanctions. As a result of being placed on the list, US citizens, residents, companies and their foreign branches are not allowed to have economic relationships with them.

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Are There any Exceptions?

In general, selling goods or services that do not foresee a customer's identity check could obviously be an exception as long as the owner or General Director (EU or US national) does not willingly and knowingly violate the sanctions. The EU sanctions allow the collection of payments from listed persons due to contracts that were concluded before the persons or entities were placed on the sanction lists. However, payments to listed persons for goods or services are prohibited regardless of when the contract was concluded. The US sanctions go further and prohibit any activity even when the contracts were concluded before the persons or entities were placed on the sanction lists. In this case, special licenses are required for fulfilling such contracts.

What do I have to do?

It is very important for any European or US company which is active in Russia or CIS, to properly check all its business contacts to find out if there are persons or companies from the sanctions lists among the owners of company's clients or suppliers. Although the volume of information that has to be checked is big, the check can be done very effectively.

A CASE STUDY: Be on the Safe Side

A European construction company, a client of RUSSIA CONSULTING, works in Russia via its branch office. This company has some hundreds of clients and suppliers which should be checked regarding the sanctions. RUSSIA CONSULTING used its own search engine, exclusively developed for this research and checked all business ties, analyzing the ownership structure of every company's contact, including the second-level ownership (parent companies of the company's contacts). Very soon it became clear that one of the suppliers of the client, an enterprise which used to sell screws and other household hardware, belonged to a listed person. As a result, the European client was forewarned and was able to cancel this forbidden business relations, remaining on the safe side.

The search engine developed by RUSSIA CONSULTING also allows us to find out if a customer or a supplier of the client has a General Director who is named on the sanctions lists. Although neither the US nor the EU sanctions regimes forbid dealing with such companies, it is good to know about this state of affairs to prevent possible reputational risks.

RUSSIA CONSULTING advises companies on how to maintain compliance in a complicated and changing environment and provides services to ensure your company steers clear of any listed company or individual.

For further questions, please contact:

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Kind regards,

RUSSIA CONSULTING Group

Per-Olof Egli

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Appendix 1:

A Sanctions' Matrix: What is Forbidden

	EU company* or ▪ its foreign branch ▪ its foreign representative office or an EU citizen or resident**		US company* or ▪ its foreign branch ▪ its foreign representative office or a US citizen or resident		Non-EU and Non-US company		Non-EU and Non US-citizen, who resides neither in the US nor in EU***	
and acts in the EU		EU list applies		EU list applies		EU list applies		EU list applies
		US list does not apply		US list applies		US list does not apply		US list does not apply
and acts in the US		EU list applies		EU list does not apply		EU list does not apply		EU list does not apply
		US list applies		US list applies		US list applies		US list applies
and acts in a third country (for example, in Russia)		EU list applies		EU list does not apply		EU list does not apply		EU list does not apply
		US list does not apply		US list applies		US list does not apply		US list does not apply

* Subsidiaries of EU or US companies registered outside of the EU or US, respectively, are not regarded as EU or US companies, but as non-EU and non-US companies.

** A foreign citizen who is a EU resident must comply with the EU sanctions as long as he or she acts from the EU or within the EU territory. Sanctions regime does not apply as soon as this person acts on a territory of a third country.

*** For example: a Russian national residing in Russia wants to sell his house that is located in the US or EU to a listed person.

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Appendix 2:

Overview of persons affected by sanctions issued by the US and the EU due to the Crimea crisis

(as of May 14, 2014. Names of the persons and legal entities which have been added to the list on May 13th, **are marked with yellow**)

№	Name and Russian spelling	Position/function	US sanctions	EU sanctions
Politicians/bureaucrats				
1	AKSENOV, Sergei Valeryevich АКСЁНОВ Сергей Валерьевич	Prime Minister of Crimea	Yes	Yes
2	BELAVENCEV, Oleg Evgenyevich БЕЛАВЕНЦЕВ, Олег Евгеньевич	Russian Presidential Envoy to the Crimean District	Yes	Yes
3	BUSHMIN, Evgeny Viktorovich БУШМИН Евгений Викторович	Deputy Chairman of the Russian Federation Council	Yes	Yes
4	CHALY, Alexei Mikhailovich ЧАЛЫЙ Алексей Михайлович	De-facto Mayor of Sevastopol (23.02.-14.04.2014)	Yes	Yes
5	DZHAVAROV, Vladimir Mikhailovich ДЖАВАРОВ Владимир Михайлович	Deputy Chairman of a Committee of the Russian Federation Council	Yes	Yes
6	FURSENKO, Andrey Aleksandrovich ФУРСЕНКО Андрей Александрович	Aide to the Russian President	Yes	No
7	GLAZYEV, Sergei Yuryevich ГЛАЗЬЕВ Сергей Юрьевич	Advisor to the Russian President	Yes	Yes
8	GROMOV, Alexei Alekseevich ГРОМОВ Алексей Алексеевич	First Deputy Head of the Russian Presidential Administration	Yes	No
9	IVANOV, Sergey Borisovich ИВАНОВ Сергей Борисович	Head of the Russian Presidential Administration	Yes	No
10	IVANOV, Viktor Petrovich ИВАНОВ Виктор Петрович	Director of the Russian Federal Drugs Control Service	Yes	No
11	JAROSH, Petr Grigorievich* ЯРОШ, Петр Григорьевич	Acting Head of the Federal Migration Service for Crimea	No	Yes
12	KLISHAS, Andrey Aleksandrovich КЛИШАС Андрей Александрович	Chairman of a Committee of the Russian Federation Council	Yes	Yes
13	KONSTANTINOV, Vladimir Andreevich КОНСТАНТИНОВ Владимир Андреевич	Chairman of the Crimean parliament	Yes	Yes
14	KOVATIDI, Olga Fedorovna КОВАТИДИ, Ольга Федоровна	Member of Russian Federal Assembly for the Crimea Region	No	Yes
15	KOZAK, Dmitry Nikolaevich КОЗАК, Дмитрий Николаевич	Deputy Prime Minister of the Russian Federation	Yes	Yes
16	KOZHIN, Vladimir Igorevich КОЖИН Владимир Игоревич	Head of the Russian Presidential Property Management Department	Yes	No
17	KOZYURA, Oleg Grigorievich КОЗЮРА, Олег Григорьевич	Acting Head of the Federal Migration Service office for Sevastopol	No	Yes
18	LYAGIN, Roman ЛЯГИН, Роман	Head of the 'Donetsk People's Republic' Central Electoral Commission	No	Yes
19	MALYSHEV, Mikhail Grigoryevich МАЛЫШЕВ Михаил Григорьевич	Head of the Crimean electoral commission	Yes	Yes
20	MATVIENKO, Valentina Ivanovna МАТВИЕНКО Валентина Ивановна	Chairwoman of the Russian Federation Council	Yes	Yes
21	MEDVEDCHUK, Viktor Vladimirovich МЕДВЕДЧУК Виктор Владимирович	Leader of the pro-Russian/anti-EU Ukrainian Party "Ukrainian Choice"	Yes	No
22	MEDVEDEV, Valery Kirillovich МЕДВЕДЕВ Валерий Кириллович	Head of the Sevastopol electoral commission	Yes	Yes

*Should not be confused with Dmyrto Jarosh (Дми́трий Ярош), a leader of Ukrainian right-wing organization "Pravy Sektor" ("right sector")

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№	Name and Russian spelling	Position/function	US sanctions	EU sanctions
23	MALYKHIN, Aleksandr МАЛЫХИН, Александр	Head of the 'Lugansk People's Republic' Central Electoral Commission	No	Yes
24	MENYAILO, Sergei Ivanovich МЕНЯЙЛО, Сергей Иванович	Governor of the City of Sevastopol	No	Yes
25	MIRONOV, Sergei Mikhailovich МИРОНОВ Сергей Михайлович	Member of the Executive Council of the Russian State Duma	Yes	Yes
26	MIZULINA, Elena Borisovna МИЗУЛИНА Елена Борисовна	Chairwoman of a Committee of the Russian State Duma	Yes	Yes
27	NARYSHKIN, Sergei Evgenyevich НАРЫШКИН Сергей Евгеньевич	Chairman of the Russian State Duma	Yes	Yes
28	NEVEROV, Sergei Ivanovich НЕВЕРОВ, Сергей Иванович	Deputy Chairman of „United Russia“ ruling party	No	Yes
29	OZEROV, Viktor Alekseevich ОЗЕРОВ Виктор Алексеевич	Chairman of a Committee of the Russian Federation Council	Yes	Yes
30	PANTELEEV, Oleg Evgenyevich ПАНТЕЛЕЕВ Олег Евгеньевич	Deputy Chairman of a Committee of the Russian Federation Council	Yes	Yes
31	PLIGIN, Vladimir Nikolaevich ПЛИГИН, Владимир Николаевич	Chair of the Duma Constitutional Law Committee	No	Yes
32	PONOMARIOV, Viacheslav Vladimirovich ПОНОМАРЕВ, Вячеслав Владимирович	Self-declared mayor of Slaviansk	No	Yes
33	POKLONSKAYA, Natalia Vladimirovna ПОКЛОНСКАЯ, Наталья Владимировна	Prosecutor of Crimea.	No	Yes
34	PURGIN, Andriy Evgenievich ПУРГИН, Андрей Евгеньевич	Chief of „Donetsk Republic“	No	Yes
35	PUSHILIN, Denis Vladimirovich ПУШИЛИН, Денис Владимирович	One of leaders of „Donetsk Republic“	No	Yes
36	PUSHKOV, Aleksei Konstantinovich ПУШКОВ, Алексей Константинович	Chairman of State Duma Committee on International Affairs	Yes	No
37	ROGOZIN, Dmitry Olegovich РОГОЗИН Дмитрий Олегович	Deputy Prime Minister of the Russian Federation	Yes	Yes
38	RYZHKOV, Nikolai Ivanovich РЫЖКОВ Николай Иванович	Member of a Committee of the Russian Federation Council	Yes	Yes
39	SAVELYEV, Oleg Genrikhovich САВЕЛЬЕВ, Олег Генрихович	Minister for the Crimea Affairs	No	Yes
40	SHEVCHENKO, Igor Sergeevich ШЕВЧЕНКО, Игорь Сергеевич	Acting Prosecutor of Sevastopol	No	Yes
41	SHVETSOVA, Ludmila Ivanovna ШВЕЦОВА, Людмила Ивановна	Deputy Chairwoman of „United Russia“ ruling party	No	Yes
42	SLUTSKY, Leonid Eduardovich СЛУЦКИЙ Леонид Эдуардович	Chairman of a Committee of the Russian State Duma	Yes	Yes
43	SURKOV, Vladislav Yuryevich СУРКОВ Владислав Юрьевич	Aide to the Russian President	Yes	Yes
44	TSARIOV, Oleg Anatolievich ЦАРЕВ, Олег Анатольевич	Member of the Rada	No	Yes
45	VOLODIN, Vyacheslav Viktorovich ВОЛОДИН, Вячеслав Викторович	First Deputy Chief of Staff of the Presidential Executive Office	Yes	Yes
46	TOTOONOV, Aleksandr Borisovich ТОТООНОВ Александр Борисович	Member of a Committee of the Russian Federation Council	Yes	Yes
47	TEMIRGALIEV, Rustam Ilmirovich ТЕМИРГАЛИЕВ Рустам Ильмирович	Deputy Prime Minister of Crimea	Yes	Yes
48	TSEKOV, Sergey Pavlovich ЦЕКОВ Сергей Павлович	First delegate from the Crimea to the Russian Federation Council	Yes	Yes

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No	Name and Russian spelling	Position/function	US sanctions	EU sanctions
49	YANUKOVICH, Viktor Fedorovich ЯНУКОВИЧ Віктор Фёдорович	Ousted de-jure President of Ukraine	Yes	No
50	ZHELEZNYAK, Sergei Vladimirovich ЖЕЛЕЗНЯК Сергей Владимирович	Deputy Chairman of the Russian State Duma	Yes	Yes
51	ZHEREBTSOV, Yury Gennadyevich ЖЕРЕБЦОВ Юрий Геннадьевич	Counsellor to the Chairman of the Crimean Parliament	Yes	Yes
Military/security staff				
52	BELZER, Igor Mykolaiovich БЕЛЬЦЕР, Игорь Николаевич	Militia warlord in Horlivka	No	Yes
53	BEREZOVSKY, Denis Valentinovich БЕРЕЗОВСКИЙ Денис Валентинович	Chief of the Ukrainian Navy, swore his oath to the Crimean government	No	Yes
54	BOLOTOV, Valery БОЛОТОВ, Валерий	Militia warlord in Lugansk	No	Yes
55	GALKIN, Aleksandr Viktorovich ГАЛКИН Александр Викторович	Commander of Russia's Southern Military District	No	Yes
56	GERASIMOV, Valery Vasilevich ГЕРАСИМОВ, Валерий Васильевич	Chief of the General Staff of Russian Federation	No	Yes
57	KAIDZYANOV, Igor КАКИДЗЯНОВ, Игорь	Militia warlord in Donetsk	No	Yes
58	KULIKOV, Valery Vladimirovich КУЛИКОВ Валерий Владимирович	Deputy Commander of the Russian Black Sea Fleet	No	Yes
59	MUROV, Evgeniy Alekseyevich МУРОВ, Евгений Алексеевич	Director of the Federal Protective Service of the Russian Federation	Yes	No
60	NOSATOV, Aleksandr Mikhailovich НОСАТОВ Александр Михайлович	Deputy Commander of the Russian Black Sea Fleet	No	Yes
61	PROKOPIV, German ПРОКОПЬЕВ, Герман	Militia warlord in Lugansk	No	Yes
62	SERGUN, Igor Dmitrievich СЕРГУН Игорь Дмитриевич	Lieutenant General, Chief of the GRU of the Russian General Staff	Yes	Yes
63	SHAMANOV, Vladimir Anatolievich ШАМАНОВ, Владимир Анатольевич	Commander of the Russian Airborne Troops, Colonel-General	No	Yes
64	SIDOROV, Anatoly Alekseevich СИДОРОВ Анатолий Алексеевич	Commander of Russia's Western Military District	No	Yes
65	STRELKOV, Igor СТРЕЛКОВ, Игорь	Officer of Russian special forces GRU, security advisor of Crimea's Prime Minister Sergey Aksionov	No	Yes
66	TSYPLAKOV, Sergey Gennadevich ЦЫПЛАКОВ, Сергей Геннадиевич	Militia warlord in Donetsk	No	Yes
67	TURCHENYUK, Igor Nikolaevich ТУРЧЕНЮК Игорь Николаевич	Commander of the Russian troops deployed on the ground in Crimea	No	Yes
68	VITKO, Aleksandr Viktorovich ВИТКО Александр Викторович	Commander of the Russian Black Sea Fleet	No	Yes
69	ZIMA, Petr Anatolyevich ЗИМА Пётр Анатольевич	Head of the Crimean SBU branch (Security Service of Ukraine)	Yes	Yes
Journalists				
70	KISELEV, Dmitry Konstantinovich КИСЕЛЁВ Дмитрий Константинович	Head of the Russian Federal State News Agency "Rossiya Segodnya"	No	Yes
Businessmen				
71	CHEMEZOV, Sergei Viktorovich ЧЕМЕЗОВ, Сергей Викторович	General Director of the Rostekh Corporation	Yes	No
72	KOVALCHUK, Yury Valentinovich КОВАЛЬЧУК Юрий Валентинович	Chairman of the board of directors and co-owner of the Bank "Rossiya"	Yes	No

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No	Name and Russian spelling	Position/function	US sanctions	EU sanctions
73	ROTENBERG, Arkady Romanovich РОТЕНБЕРГ Аркадий Романович	Co-owner and member of the board of directors of the "SMP Bank"	Yes	No
74	ROTENBERG, Boris Romanovich РОТЕНБЕРГ Борис Романович	Co-owner and member of the board of directors of the "SMP Bank"	Yes	No
75	SECHIN, Igor Ivanovich СЕЧИН, Игорь Иванович	President of „Rosneft“ oil company	Yes	No
76	ТИМЧЕНКО, Gennady Nikolaevich ТИМЧЕНКО Геннадий Николаевич	Owner of the private investment group "Volga Group"	Yes	No
77	YAKUNIN, Vladimir Ivanovich ЯКУНИН Владимир Иванович	President of the Russian State Railways company "RZHD"	Yes	No
Legal Entities				
78	AKTSIONERNY BANK ROSSIYA OAO АКЦИОНЕРНЫЙ БАНК РОССИЯ ОАО	Russian private bank, chaired by Yury Kovalchuk	Yes	No
79	AQUANIKA LLC aka RUSSKOYE VREMYA LLC АКВАНИКА ООО, или РУССКОЕ ВРЕМЯ ООО	Mineral water producer	Yes	No
80	AVIA GROUP LLC АВИА ГРУП ООО	Service company at the Sheremetyevo Airport Moscow	Yes	No
81	AVIA GROUP NORD LLC АВИА ГРУП НОРД ООО	Service company at the Pulkovo Airport Petersburg	Yes	No
82	CHERNOMORNEFTEGAZ GAO ЧЕРНОМОРНЕФТЕГАЗ ГАО	Crimean state oil and gas company	Yes	Yes
83	CJSC ZEST, aka ZEST LEASING ГК «ЗЕСТ»	Leasing company	Yes	No
84	FEODOSIA ФЕОДОСИЯ	A company confiscated by Crimean 'authorities'	No	Yes
85	INVESTCAPITALBANK ИНВЕСТКАПИТАЛБАНК, ОАО	Russian private bank	Yes	No
86	JSB SOBINBANK СОБИБАНК ОАО	Russian private bank	Yes	No
87	SAKHATRANS LLC САХАТРАНС ООО	Pipeline company	Yes	No
88	SMP BANK СМП БАНК, ОАО	Russian private bank	Yes	No
89	STROYGAZMONTAZH СТРОЙГАЗМОНТАЖ ООО	Pipeline construction company	Yes	No
90	STROYTRANSGAZ GROUP ГРУППА СТРОЙТРАНСГАЗ	Pipeline construction company	Yes	No
91	STROYTRANSGAZ HOLDING ХОЛДИНГ СТРОЙТРАНСГАЗ	Pipeline construction company	Yes	No
92	STROYTRANSGAZ LLC СТРОЙТРАНСГАЗ ООО	Pipeline construction company	Yes	No
93	STROYTRANSGAZ OJSC СТРОЙТРАНСГАЗ ОАО	Pipeline construction company	Yes	No
94	STROYTRANSGAZ-M LLC СТРОЙТРАНСГАЗ-М ООО	Pipeline construction company	Yes	No
95	THE LIMITED LLC IC ABROS ООО ИК АБРОС	Investment company	Yes	No
96	TRANSOIL LLC ТРАНСОЙЛ ООО	Pipeline company	Yes	No
97	VOLGA GROUP ВОЛГА ГРУП	Investment company, registered in Luxembourg	Yes	No

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