

# Russia

Specification Restrictive measures in view of Russia's actions destabilising the situation in Ukraine (sectoral restrictive measures)

Acronym Economic

Adopted by EU

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Notes	<p>Since March 2014, the EU has progressively imposed restrictive measures (sanctions) against Russia targeting specific economic sectors in response to the illegal annexation of Crimea and Sevastopol and the deliberate destabilisation of Ukraine.</p> <p>The restrictive measures were expanded following Russia's military aggression against Ukraine in February 2022 with the aim of weakening Russia's economic base, depriving it of critical technologies and markets and significantly curtailing its ability to wage war. The first packages adopted by the EU included measures such as banning the export of dual-use and defence-related goods, blocking public financing for trade or investment with Russia, restricting oil refining-related exports, imposing aviation sector restrictions, and prohibiting various financial interactions and transactions with Russia. Additionally, they involved banning Russia from the SWIFT system, prohibiting the transmission and distribution of certain Russian State-owned information outlets, and limiting the export of maritime navigation goods and radio communication technology.</p> <p>In March and April 2022 further measures were introduced, including a full prohibition on transactions with certain Russian State-owned enterprises and four key Russian banks, a ban on imports of iron and steel products, export of luxury goods, a coal ban, a port access ban and a ban on any Russian and Belarusian road transport of sanctioned goods.</p> <p>In June and July 2022, in response to Russia's ongoing military efforts, the Council imposed oil import restrictions, oil transport services restrictions, including transport to third countries, additional financial and business services and export measures, a broadcasting suspension, and a ban on the import of Russian gold.</p> <p>In order to curb Russia's revenues to finance its war of aggression and to deprive its military and industrial complex of key components, the Council continued to expand the measures in 2022, including with new export and import restrictions and additional bans for Russian banks and media outlets.</p> <p>On 3 December 2022, the Council set an oil price cap for crude oil, petroleum oils and oils obtained from bituminous minerals from Russia. Following this, on 4 February 2023, the Council set two price caps for petroleum products from Russia.</p> <p>During 2023 the Council imposed further trade, transport and energy measures, such as additional export restrictions on sensitive dual-use goods and advanced technologies and measures to facilitate divestment from Russia by EU operators. The Council also adopted several measures to tackle the circumvention of sanctions.</p> <p>On 18 December 2023, the Council imposed a new import ban on Russian diamonds and on raw materials for steel production, processed aluminium products and other metal goods. Moreover, it introduced stricter energy measures and stronger anti-circumvention measures, including an obligation for operators to contractually prohibit the re-export of certain sensitive goods to Russia.</p> <p>The latest package of measures adopted on 23 February 2024 enhanced the EU's actions to stop Russia from acquiring Western sensitive technologies for Russian military.</p> <p>Derogations and exemptions to the restrictive measures are possible, including the delivery of humanitarian aid.</p>
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## Measures



### Arms export

It is prohibited to export arms and related materiel to Russia. Related technical or financial assistance and brokering services are also prohibited.



### **Arms import**

It is prohibited to import, purchase or transport arms and related materiel from Russia.



### **Dual-use goods export**

It is prohibited to sell, supply, transfer or export dual-use goods and technology to any person or entity in Russia or for use in Russia. The sale, supply, transfer or export of goods and technology, which might contribute to Russia's military and technological enhancement or the development of the defence and security sector, as listed in Annex VII of Regulation (EU) 833/2014, is also prohibited. The transit via the territory of Russia of these goods and technology as well as of firearms, their parts and essential components and ammunition exported from the Union is also prohibited. Related technical or financial assistance and brokering or other services are also prohibited.



### **Financial measures**

It is prohibited to purchase, sell, provide investment services for or assistance in the issuance of, or otherwise deal with transferable securities and money market instruments with a maturity exceeding 30 days, issued after 12.9.2014 to 12.4.2022 or any transferable securities and money market instruments issued after 12.4.2022 by an entity established in Russia engaged in the conception, production, sales or export of military equipment or services, as listed in Annex V of Regulation (EU) 833/2014; or by an entity established in Russia listed in Annex VI of Regulation (EU) 833/2014.



### **Financial measures**

It is prohibited to provide trust services to Russian nationals or persons residing in Russia and entities established in Russia.



### **Financial measures**

It is prohibited for any Russian nationals or entities established in Russia to participate in procurement contracts in the Union.



### Financial measures

It is prohibited to provide credit rating services and access to any subscription services in relation to credit rating activities to any Russian national or person residing in Russia or an entity established in Russia.



### Financial measures

It is prohibited to sell, supply, transfer or export banknotes denominated in any official currency of a Member State to Russia or to any person or entity in Russia, including the government and the Central Bank of Russia, or for use in Russia.



### Financial measures

It is prohibited as of 12.3.2022 to provide specialised financial messaging services to the entities listed in Annex XIV of Regulation (EU) 833/2014 or to any entity established in Russia whose proprietary rights are owned for more than 50% by an entity listed in Annex XIV.



### Financial measures

It is prohibited to sell transferable securities denominated in any official currency of a Member State issued after 12.4.2022, or denominated in any other currency after 6.8.2023, to any Russian national or person residing in Russia or an entity established in Russia.



### Financial measures

It is prohibited for Union central securities depositories to provide any services as defined in the Annex of Regulation (EU) 909/2014 for transferable securities issued after 12.4.2022 to any Russian national or person residing in Russia or an entity established in Russia.



### Financial measures

It is prohibited to accept any deposits from Russian nationals or persons residing in Russia or entities established in Russia or from an entity outside the Union if its

proprietary rights are owned for more than 50% by Russian nationals or persons residing in Russia, if the total value of deposits of the person or entity per credit institution exceeds EUR 100 000. It is also prohibited to provide crypto-asset wallet, account or custody services to Russian nationals or persons residing in Russia or entities established in Russia.



### **Financial measures**

It is prohibited to engage in any transaction with an entity established in Russia, which is publically controlled or with over 50% public ownership, as listed in Annex XIX of Regulation (EU) 833/2014; or with an entity established outside the union whose proprietary rights are owned for more than 50% by an entity listed in Annex XIX. Certain exemptions apply. It is also prohibited as from 22.10.2022 to hold any posts in the governing bodies of any entity referred to above.



### **Financial measures**

Transactions related to the management of reserves as well as of assets of the Central Bank of Russia are prohibited.



### **Financial measures**

It is prohibited to list and provide services for, as of 12.4.2022, and to admit to trading as of 29.01.2023, on trading venues registered or recognised in the Union for the transferable securities of any entity established in Russia and with over 50% public ownership.



### **Financial measures**

It is prohibited to purchase, sell, provide investment services for or assistance in the issuance of, or otherwise deal with transferable securities and money market instruments, issued after 12.4.2022 by an entity established in Russia, which is publicly controlled or with over 50% public ownership, as listed in Annex XIII of Regulation (EU) 833/2014, or by an entity established outside the Union whose proprietary rights are owned for more than 50% by an entity listed in Annex XIII.



### **Financial measures**

It is prohibited to purchase, sell, provide investment services for or assistance in the issuance of, or otherwise deal with transferable securities and money-market instruments issued after 9.3.2022 by Russia and its government, Central Bank of Russia or any entity acting on behalf of it. It is also prohibited to make or be part of any arrangement to make new loans or credit to the previously mentioned entities after 23.2.2022.



### Financial measures

It is prohibited to purchase, sell, provide investment services for or assistance in the issuance of, or otherwise deal with transferable securities and money-market instruments issued after 12.4.2022 by any major credit institution or other institution with over 50% public ownership or control as of 26.2.2022 or any other credit institution as listed in Annex XII of Regulation (EU) 833/2014; or an entity established outside the Union whose proprietary rights are owned for more than 50% by an entity listed in Annex XII.



### Financial measures

It is prohibited to engage in any transaction with entities as listed in Annex XLIII of Regulation (EU) 833/2014 to obtain an injunction, order, relief, judgment or other Court decision pursuant to Article 248 of the Arbitration Procedure Code of the Russian Federation or equivalent Russian legislation, in connection with any contract or transaction the performance of which has been affected, directly or indirectly, in whole or in part, by the restrictive measures imposed by the EU.



### Financial measures

It is prohibited to make or be part of any arrangement to make new loans or credit with a maturity exceeding 30 days to any person or entity listed in Annex III, V or VI of Regulation (EU) 833/2014, after 12.9.2014 to 26.2.2022; or to any person or entity listed in Annex III, V, VI, XII or XIII of Regulation (EU) 833/2014, after 26.2.2022.



### Financial measures

Financial measures are very different in nature across restrictive measures regimes. Insert the specific description of the measure. For reference see DPRK, Russia, Crimea or Syria restrictive measures regimes.



### Financial measures

It is prohibited to accept donations, economic benefits or support, including financial assistance, from the Government of Russia, an entity established in Russia publicly controlled or with over 50 % public ownership and from certain other entities .



### Financial measures

It is prohibited to purchase, sell, provide investment services for or assistance in the issuance of, or otherwise deal with transferable securities and money market instruments with a maturity exceeding 90 days (issued after 1.8.2014 to 12.9.2014), or with a maturity exceeding 30 days (issued after 12.9.2014 to 12.4.2022) or any transferable securities and money market instruments issued after 12.4.2022 by major credit institution established in Russia with over 50% public ownership or control as of 1.8.2014, as listed in Annex III of Regulation (EU) 833/2014, or an entity established outside the Union whose proprietary rights are owned for more than 50%, as listed in Annex III.



### Financial measures

It is prohibited to provide public financing or financial assistance for trade with, or investment in, Russia. It is also prohibited to invest, participate or otherwise contribute to projects co-financed by the Russian Direct Investment Fund.



### Financial measures

It is prohibited to provide EU funding or Member State national programme funding to any entity established in Russia or to any entity owned for more than 50 % by an entity established in Russia.



### Financial measures

It is prohibited for EU operators to engage in any transaction with credit or financial institutions and crypto assets providers (in Russia and third countries) as listed in Annex XLV of Regulation (EU) 833/2014.



### Financial measures

It is prohibited to acquire new or extend existing participation in any entity operating in the energy sector or in the mining and quarrying sector in Russia. It is also prohibited to grant new loan or credit or otherwise provide financing to, or create any joint venture with, any entity operating in the energy sector or in the mining and quarrying sector in Russia. The provision of related investment services is also prohibited.



## Financial measures

It is prohibited for EU operators outside Russia to directly connect to the System for Transfer of Financial Messages (SPFS) or equivalent services set up by the Central Bank of Russia and to engage in any transaction with third country operators using SPFS, as listed in Annex XLIV of Regulation (EU) 833/2014.



## Flights, airports, aircrafts

It is prohibited for any aircraft operated by Russian air carriers or for any non-Russian-registered aircraft which is owned or chartered, or otherwise controlled by any Russian person or entity, to take off from, land in or overfly the territory of the Union. The prohibition also applies to any other aircraft which is used for a non-scheduled flight and with regard to which a Russian person or entity is in a position to effectively determine the place or time of its take-off or landing.



## Intellectual Property Rights

Intellectual property offices and other competent institutions constituted under the law of a Member State or the Union shall not accept applications for registration of new trademarks and patents by Russian nationals or persons residing in Russia, or by entities established in Russia.



## Liquefied Natural Gas

It is prohibited to purchase, import or transfer liquefied natural gas falling under CN code 2711 11 00, originating in Russia or exported from Russia, through liquefied natural gas terminals in the Union that are not connected to the interconnected natural gas system. Related technical or financial assistance and brokering services are also prohibited.



## Liquefied Natural Gas

It is prohibited to sell, supply, transfer, or export, goods and technology and to provide services to any person or entity in Russia when such goods, technology and services are for the completion of liquefied natural gas projects, such as terminals and plants. Related technical or financial assistance and brokering services are also prohibited.





## Liquified Natural Gas

It is prohibited to provide reloading services in the territory of the Union for the purposes of transshipment operations of liquified natural gas falling under CN code 2711 11 00, originating in Russia or exported from Russia. Related technical or financial assistance and brokering services are also prohibited.



## Critical infrastructure

It is prohibited as of 27.03.2023 to allow Russian nationals or persons residing in Russia to hold any posts in the governing bodies of the owners or operators of critical infrastructures, European critical infrastructures and critical entities.



## Media ban

It is prohibited for operators to broadcast or to enable, facilitate or otherwise contribute to broadcast, any content by the entities listed in Annex XV of Regulation (EU) 833/2014. It is also prohibited to advertise products or services in any content produced or broadcast by the entities listed in Annex XV.



## Road transport

It is prohibited for any road transport undertaking established in Russia to transport goods by road within the Union, including in transit. The prohibition applies also to transport carried out by means of trailers or semi-trailers registered in Russia, including if those trailers or semi-trailers are hauled by trucks registered in other countries.



## Road transport

It is prohibited for any entity established in the Union which is owned for 25 % or more by a Russian person or entity to be admitted to become a road transport undertaking which transports goods by road within the territory of the Union, including in transit. It is also prohibited as of 26 July 2024 for any road transport undertaking established in the Union after 8 April 2022 which is owned for 25 % or more by a Russian person or entity to transport goods by road within the territory of the Union, including in transit.



## Storage capacity

It is prohibited to provide storage capacity as defined in Article 2(1), point 28 of Regulation (EC) No 715/2009, except for the part of liquefied natural gas facilities used for storage, to Russian nationals or persons residing in Russia or entities established in Russia.



### Ports and vessels

It is prohibited to provide access to ports and other maritime services to vessels listed in Annex XLII of Regulation (EU) 833/2014.



### Ports and vessels

It is prohibited, as of 24.07.2023, to provide access to EU ports and locks by any vessel performing ship-to-ship transfers, if there is reasonable cause to suspect that the vessel is in breach of sanctions, as well as by any vessel suspected of illegally interfering with, switching off or otherwise disabling its shipborne automatic identification system when transporting crude oil or petroleum products subject to the prohibitions in Article 3m and 3n of Regulation (EU) No 833/2014.



### Ports and vessels

Member States shall prohibit the entry into their ports and to locks of any Russian registered vessels.



### Ports and vessels

It is prohibited, as of 24.07.2023, to provide access to EU ports and locks by any vessel performing ship-to-ship transfers, if there is reasonable cause to suspect that the vessel is in breach of sanctions, as well as by any vessel suspected of illegally interfering with, switching off or otherwise disabling its shipborne automatic identification system when transporting crude oil or petroleum products subject to the prohibitions in Article 3m and 3n of Regulation (EU) No 833/2014.



### Ports and vessels

It shall be prohibited to engage in any transaction, directly or indirectly, with ports and locks listed in Part A of Annex XLVII. Part A of Annex XLVII shall include ports and locks in Russia that are used:

- (a) for the transfer of unmanned aerial vehicles (UAVs) or missiles, related technologies or components thereof in support of Russia's war of aggression against Ukraine;
- (b) for the transport of goods and technology used in the defence and security sector, from or to Russia, for use in Russia or for Russia's warfare in Ukraine;
- (c) for the maritime transport of crude oil or petroleum products, as listed in Annex XXV, that originate in Russia or are exported from Russia by vessels practicing irregular and high-risk shipping practices as set out in the International Maritime Organisation General Assembly resolution A.1192(33);

(d) for the transport of goods originating in or exported from the Union, as listed in Annexes XI, XX and XXIII to this Regulation, or goods originating in Russia or exported from Russia and imported into the Union, as listed in Annex XXI to this Regulation, and thereby enabling Russia's actions destabilising the situation in Ukraine;

(e) in such a way as to facilitate or engage in the violation or circumvention or otherwise significantly frustrate the provisions of this Regulation or of Regulations (EU) No 269/2014, (EU) No 692/2014 or (EU) 2022/263.



### **Prohibition to satisfy claims**

It is prohibited to satisfy claims in connection with any contract or transaction the performance of which has been affected by any of the measures imposed under this restrictive measures regime, if they are made by entities listed in the Annexes of Regulation (EU) 833/2014 or entities established outside the Union whose proprietary rights are owned for more than 50% by them; by any Russian person, entity or body; or by any person, entity or body acting through or on behalf of one of the aforementioned.



### **Restrictions on goods**

It is prohibited to sell, supply, transfer or export goods which could contribute to the enhancement of Russian industrial capacities, as listed in Annex XXIII of regulation (EU) 833/2014, to any person or entity in Russia or for use in Russia. Related technical or financial assistance and brokering or other services are also prohibited.



### **Restrictions on goods**

It is prohibited to purchase, import or transfer goods which generate significant revenues for Russia thereby enabling its actions destabilising the situation in Ukraine, such as caviar, cement and wood products, as listed in Annex XXI of Regulation (EU) 833/2014, from Russia. Related technical or financial assistance and brokering services are also prohibited.



### **Aviation or the space industry**

It is prohibited to sell, supply, transfer or export goods and technology suited for use in aviation or the space industry, as listed in Annex XI, and jet fuel and fuel additives as listed in Annex XX of Regulation (EU) 833/2014, to Russia. The transit of such goods and technology via Russia is also prohibited. It is also prohibited to provide any related insurance and reinsurance and certain related maintenance activities. Related technical or financial assistance and brokering or other services are also prohibited.



### **Crude oil**

It is prohibited to purchase, import or transfer crude oil or petroleum products, as listed in Annex XXV of Regulation (EU) No 833/2014, from Russia. Related technical or financial assistance and brokering services are also prohibited. Certain exemptions apply.



## Cultural property

It is prohibited to purchase, import, transfer, sell, supply or export, Ukrainian cultural property goods and other goods of archaeological, historical, cultural, rare scientific or religious importance, where there is suspicion that the goods have been removed from Ukraine without consent or have been removed in breach of Ukrainian or international law. Related technical or financial assistance and brokering or other services are also prohibited.



## Diamonds

It is prohibited, as of 1.1.2024, to purchase, import, or transfer diamonds and products incorporating diamonds, as listed in Parts A, B and C of Annex XXXVIII of Regulation (EU) 833/2014, from Russia into the Union or to any third country and if they transited via the territory of Russia. It is also prohibited, as of 1.3.2024, to purchase, import, or transfer, products listed in Part A of Annex XXXVIII, when processed in a third country, consisting of diamonds from Russia with a weight equal to or above 1.0 carats per diamond. It shall be prohibited, as of 1.9.2024, when a weight equal to or above 0.5 carats or 0.1 grams per diamond. Related technical or financial assistance and brokering or other services are also prohibited. Certain exceptions apply.



## Firearms, their parts and essential components and ammunition

It is prohibited to sell, supply, transfer or export firearms, their parts and essential components and ammunition, as listed in Annex I to Regulation (EU) No 258/2012, and firearms and other arms as listed in Annex XXXV to Regulation (EU) No 833/2014, to Russia. Related technical and financial assistance and brokering services is also prohibited.



## Gold

It is prohibited to purchase, import or transfer gold, as listed in Annex XXVI and Annex XXVII of Regulation (EU) No 833/2014, from Russia. Related technical or financial assistance and brokering services are also prohibited. Certain exceptions apply.



## Iron and steel

It is prohibited to import, purchase or transfer iron and steel products, as listed in Annex XVII of Regulation (EU) 833/2014, from Russia. Related technical or financial

assistance and brokering services are also prohibited.



### **Luxury goods**

It is prohibited to sell, supply, transfer or export luxury goods, as listed in Annex XVIII of Regulation (EU) 833/2014, to any person or entity in Russia or for use in Russia. Related technical or financial assistance or brokering services is also prohibited.



### **Maritime navigation**

It is prohibited to sell, supply, transfer or export maritime navigation goods and technology, as listed in Annex XVI of Regulation (EU) 833/2014, to any person or entity in Russia, for use in Russia or for the placing on board of a Russian-flagged vessel. Related technical or financial assistance and brokering or other services are also prohibited.



### **Oil refining**

It is prohibited to sell, supply, transfer or export goods and technology suited for use in oil refining and liquefaction of natural gas, as listed in Annex X of Regulation (EU) 833/2014, to any person or entity in Russia or for use in Russia. Related technical or financial assistance and brokering or other services are also prohibited.



### **Other items**

It is prohibited to sell, supply, transfer or export goods or technology, as listed in Annex II of Regulation (EU) 833/2014, to any person or entity in Russia or for use in Russia. It is also prohibited to sell, supply, transfer or export any goods or technology to any person or entity operating in the energy sector. Related technical or financial assistance and brokering or other services are also prohibited.



### **Restrictions for the export of dual-use and advanced technology items to entities**

This list includes natural or legal persons, entities or bodies which are military end-users, form part of Russia's military-industrial complex or which have commercial or other links with or which otherwise support Russia's defence and security sector. These natural or legal persons, entities or bodies contribute to Russia's military and technological enhancement or to the development of Russia's defence and security sector. The list also includes entities in third countries other than Russia. Their inclusion in this list (Annex IV of Regulation (EU) No 833/2014) does not entail any attribution of responsibility for their actions to the jurisdiction in which they are operating.



## Restrictions on services

It is prohibited to provide accounting, auditing, bookkeeping or tax consulting services, business and management consulting or public relations services, architectural and engineering services, legal advisory services and IT consultancy services, market research and public opinion polling services, technical testing and analysis services or advertising services to the Government of Russia or legal entities established in Russia. It is also prohibited to sell, supply, transfer, export, or provide software for the management of enterprises and software for industrial design and manufacture as listed in Annex XXXIX of Regulation (EU) 833/2014 to the Government of Russia or entities established in Russia. Related technical or financial assistance and brokering or other services are also prohibited. Certain exceptions apply.