

# Sanctions Comparison Chart

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**From:** (b)(6)  
**To:** \_DL\_TFI\_Ukraine\_Russia <dl\_tfi\_ukraine\_russia@do.treas.gov>  
**Date:** Tue, 02 Dec 2014 08:26:57 -0500  
**Attachments:** 20141201 Comparison of Country Sanctions\_Russia\_Ukraine.pdf (341.02 kB)

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All,

FYI. Attached is the latest unclassified Comparison Chart. This includes the new EU designations from this weekend (13 individual separatists and 5 separatist political organizations) as well as those Japanese measures which have been publically released.

As it is a working document, please do not forward this outside of Treasury without consulting our office first.

Please let me know if you have any questions.

Thanks!

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Policy Advisor  
U.S. Department of the Treasury  
Office of Terrorist Financing and Financial Crimes  
Office: (b)(6) | Blackberry: (b)(6)  
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**Russia/Former Government of Ukraine-related Designations - Persons (as of December 1, 2014)**

US: United States  
 EU: European Union  
 SUI: Switzerland\*  
 CAN: Canada  
 LIE: Liechtenstein\*  
 AUS: Austria\*\*  
 AUST: Australia  
 JPN: Japan  
 NOR: Norway

\*Switzerland and Liechtenstein have issued "anti-circumvention" measures for many of the EU designated individuals and entities. These measures prohibit their financial institutions from entering into new business relationships with these individuals and entities (these measures short of asset freezes are denoted by black stripes). Likewise, in Switzerland, "new issue of long term financial instruments" for the five banks listed by the EU for debt and equity prohibitions will require authorization, only given if they are within the average financial engagement of the past three years. \*\*Austria's original list was superceded by the shorter EU list; however, Austria has stated that it plans to add back those from original list (in gray)

| Executive Orders 13660 and 13661 - Asset Freezes |    |    |     |     |     |     |      |     |  |
|--|----|----|-----|-----|-----|-----|------|-----|--|
| Russian Officials                                |    |    |     |     |     |     |      |     |  |
| Viktor Alekseevich Ozerov                        | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Vladimir Michailovich Dzhubarov                  | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Andrei Aleksandrovich Klisshas                   | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Nikolai Ivanovich Ryzhkov                        | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Evegni Viktorovich Bushmin                       | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Aleksandr Borisovich Tootonov                    | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Oleg Evgenefich Panteleev                        | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Sergei Mikhailovich Mironov                      | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Sergei Vladimirovich Zheleznyak                  | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Leonid Eduardovich Slutski                       | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Dmitry Olegovich Rogozin                         | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Sergey Yur'yevich Glazhev                        | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Vladislav Yuryevich Surkov                       | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Yelena Borisovna Mizulina                        | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Valentina Ivaonovna Matvienko                    | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Sergey Naryshkin                                 | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Victor Ivanov                                    | US |    |     | CAN |     |     |      |     |  |
| Igor Sergun                                      | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Sergei Ivanov                                    | US |    |     | CAN |     |     | AUST |     |  |
| Alexei Gromov                                    | US | EU | SUI | CAN |     | AUS | AUST | NOR |  |
| Andrei Fursenko                                  | US |    |     | CAN |     |     | AUST |     |  |
| Vladimir Yakunin                                 | US |    |     |     |     |     | AUST |     |  |
| Vladimir Kozhin                                  | US |    |     | CAN |     |     | AUST |     |  |
| Mikhail Vitalevich Margelov                      |    |    |     | CAN |     |     |      |     |  |
| Vladimir Pligin                                  |    | EU | SUI | CAN | LIE | AUS |      | NOR |  |
| Yury Viktorovich Ushakov                         |    |    |     | CAN |     |     |      |     |  |
| Dmitry Konstantinovich Kiselyov                  |    | EU | SUI |     | LIE | AUS |      | NOR |  |
| Vitalii Nikitich Ignatenko                       |    |    |     | CAN |     |     |      |     |  |
| Arkadii Viktorovich Bahkin                       |    |    |     | CAN |     |     |      |     |  |
| Vyaacheslav Volodin                              | US | EU | SUI | CAN | LIE |     | AUST | NOR |  |
| Dmitry Kozak                                     | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Aleksey Pushkov                                  | US |    |     | CAN |     |     | AUST |     |  |
| Alexander Babakov                                |    |    |     | CAN |     |     |      |     |  |
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| Yevgeniy Murov                                   | US |    |     | CAN |     |     |      |     |  |
| Oleg Savelyev                                    | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Ludmila Shvetsova                                |    | EU | SUI | CAN | LIE | AUS |      | NOR |  |
| Sergei Neverov                                   | US | EU | SUI | CAN | LIE | AUS |      | NOR |  |
| Vladimir Zhirinovsky                             |    |    |     | CAN |     |     |      |     |  |
| Sergey Beseda                                    | US | EU | SUI | CAN |     | AUS |      | NOR |  |
| Igor Shchegolev                                  | US |    |     | CAN |     |     |      |     |  |
| Mikhail Efimovich Fradkov                        |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Nikolai Platonovich Patrushev                    |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Aleksandr Vaillevich Bortnikov                   |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Rashid Gumarovich Nurgaliev                      |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Boris Vyacheslavovich Gryzlov                    |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Mikhail Vladimirovich Degtyarev                  |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Ramzan Akhmadovitch Kadyrov                      |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Alexander Nikolayevich Tkachyov                  |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Vladimir Georgyevich Kulishov                    |    |    |     | CAN |     |     |      |     |  |
| Valerii Yuriovych Travkin                        |    |    |     | CAN |     |     |      |     |  |
| Yuri Leonidovich Vorobiov                        |    | EU | SUI |     |     | AUS |      | NOR |  |
| Vladimir Volfovich Zhirinovsky                   |    | EU | SUI |     |     | AUS |      | NOR |  |

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| Viktor Petrovich Vodolatsky   |    | EU | SUI |     |     | AUS  |      | NOR |     |  |  |  |
| Leonid Ivanovich Kalashnikov  |    | EU | SUI |     |     | AUS  |      | NOR |     |  |  |  |
| Vladimir Stepanovich Nikitin  |    | EU | SUI |     |     | AUS  |      | NOR |     |  |  |  |
| Oleg Vladimirovich Lebedev  |    | EU | SUI |     |     | AUS  |      | NOR |     |  |  |  |
| Ivan Ivanovich Melnikov   |    | EU | SUI |     |     | AUS  |      | NOR |     |  |  |  |
| Igor Vladimirovich Lebedev  |    | EU | SUI |     |     | AUS  |      | NOR |     |  |  |  |
| Nikolai Vladimirovich Levichev  |    | EU | SUI |     |     | AUS  |      | NOR |     |  |  |  |
| Svetlana Sergeevna Zhurova  |    | EU | SUI |     |     | AUS  |      | NOR |     |  |  |  |
| Aleksey Vasilevich Naumets  |    | EU | SUI |     |     | AUS  |      | NOR |     |  |  |  |
| <b>Russian Cronies</b>  |    |    |     |     |     |      |      |     |     |  |  |  |
| Gennady Timchenko   | US |    |     | CAN |     | AUST |      |     |     |  |  |  |
| Arkady Rotenberg  | US | EU | SUI | CAN |     | AUS  | AUST | NOR |     |  |  |  |
| Boris Rotenberg   | US |    |     | CAN |     | AUST |      |     |     |  |  |  |
| Yuri Kovalchuk  | US | EU | SUI | CAN |     | AUS  | AUST | NOR |     |  |  |  |
| Igor Sechin   | US |    |     |     |     |      |      |     |     |  |  |  |
| Sergey Chemezov   | US | EU | SUI |     |     | AUS  |      |     |     |  |  |  |
| Konstantin Malofayev  |    | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |
| Nikolay Shamalov  |    | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |
| Alexander Mikhailovich Babakov  |    | EU | SUI |     |     | AUS  |      |     |     |  |  |  |
| <b>Russian Military</b>   |    |    |     |     |     |      |      |     |     |  |  |  |
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| Aleksandr Galkin  |    | EU | SUI |     | LIE | AUS  | AUST | NOR |     |  |  |  |
| Alexander Mikhailovich Nosatov  |    | EU | SUI |     | LIE | AUS  |      | NOR |     |  |  |  |
| Valery Vladimirovich Kulikov  |    | EU | SUI |     | LIE | AUS  |      | NOR |     |  |  |  |
| Lt. Gen. Igor Turchenyuk  |    | EU | SUI |     | LIE | AUS  |      | NOR |     |  |  |  |
| Valery Gerasimov  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |
| Vladimir Shamanov   |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |
| General Dmitry Vitalievich Bulgakov   |    |    |     | CAN |     |      |      |     |     |  |  |  |
| Lieutenant-General Yuriy Eduardovich Sadovenko                                  |    |    |     | CAN |     |      |      |     |     |  |  |  |
| Colonel-General Oleg Leonidovich Salyukov                                       |    |    |     | CAN |     |      |      |     |     |  |  |  |
| Colonel-General Nikolay Bogdanovskiy  |    |    |     | CAN |     |      |      |     |     |  |  |  |
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| Sergei Ivanovich Menyailo   | US | EU | SUI | CAN | LIE | AUS  |      | NOR | JPN |  |  |  |
| Mikhail Malyshev  | US | EU | SUI | CAN | LIE | AUS  | AUST | NOR | JPN |  |  |  |
| Valery Medvedev   | US | EU | SUI | CAN | LIE | AUS  | AUST | NOR | JPN |  |  |  |
| Sergey Aksyonov   | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |  |
| Vladimir Konsantinov  | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |  |
| Viktor Medvedchuck  | US |    |     |     |     |      | AUST |     |     |  |  |  |
| Rustam Illmirovich Ternigaliev  | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |  |
| Deniz Valentinovich Berezovskiy   |    | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |  |
| Aleksei Mikhailovich Chaily   | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |  |
| Pyotr Anatoliyovych Zima  | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |  |
| Yuriy Zherebtsov  | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |  |
| Sergei Pavlovych Tsekov   | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |  |
| Viktor Fedorovych Yanukovich  | US | EU | SUI | CAN | LIE | AUS  | AUST | NOR | JPN |  |  |  |
| Vitalii Yuriyovych Zakharchenko   |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |
| Viktor Pavlovych Pshonka  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |
| Oleksandr Hryhorovych Yakymenko   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |
| Andriy Volodymyrovych Portnov   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |
| Olena Leonidivna Lukash   |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |
| Andrii Petrovych Kliuiev  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |
| Viktor Ivanovych Ratushniak   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |
| Oleksandr Viktorovych Yanukovich  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |
| Viktor Viktorovych Yanukovich   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |
| Artem Viktorovych Pshonka   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |
| Serhii Petrovych Kliuiev  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |
| Mykola Yanovych Azarov  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |
| Oleksii Mykolayovych Azarov   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |
| Serhiy Vitaliyovych Kurchenko   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |
| Dmytro Volodymyrovych Tabachnyk   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |
| Raisa Vasyilivna Bohatyrivna  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |
| Ihor Oleksandrovych Kalinin   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |
| Serhiy Abruzov  |    | EU | SUI |     | LIE | AUS  |      | NOR |     |  |  |  |
| Mykhaylo (Mikhail) Markovych Dobkin   |    |    | SUI |     | LIE | AUS  |      |     |     |  |  |  |
| Yuriy Ivanyushchenko  |    |    | SUI |     | LIE | AUS  |      |     |     |  |  |  |
| Hennadiy Adolfovyh Kernes   |    |    | SUI |     | LIE | AUS  |      |     |     |  |  |  |
| Borys Viktorovych Kolesnikov  |    |    | SUI |     | LIE |      |      |     |     |  |  |  |
| Yuriy Volodymyrovych Kolobov  |    |    | SUI |     | LIE |      |      |     |     |  |  |  |
| Volodymyr Vasylovych Kozak  |    |    | SUI |     | LIE |      |      |     |     |  |  |  |
| Mykola Volodymyrovych Prsyazhnyuk   |    |    | SUI |     | LIE |      |      |     |     |  |  |  |
| Eduard Anatoliyovych Stavitsky  |    | EU | SUI |     | LIE | AUS  |      | NOR |     |  |  |  |
| Oleksander Serhiyovych Yefremov   |    |    | SUI |     | LIE |      |      |     |     |  |  |  |
| Oleksander Victorovych Klymenko   |    | EU | SUI |     | LIE | AUS  |      | NOR |     |  |  |  |
| Valery Koryak   |    |    |     |     |     | AUS  |      |     |     |  |  |  |
| Oleksandr Popov   |    |    |     |     |     | AUS  |      |     |     |  |  |  |
| Stanislav Schulyak  |    |    |     |     |     | AUS  |      |     |     |  |  |  |
| Volodymyr Sivkovych   |    |    |     |     |     | AUS  |      |     |     |  |  |  |

|   |    |    |     |     |     |     |      |     |     |  |  |  |  |  |  |  |  |
|---|----|----|-----|-----|-----|-----|------|-----|-----|--|--|--|--|--|--|--|--|
| Yuriy Ivanyushchenko  |    | EU | SUI |     | LIE | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Olga Fedorovna Kovalidi                                     |    | EU | SUI | CAN | LIE | AUS | AUST | NOR | JPN |  |  |  |  |  |  |  |  |
| German Prokopiv   |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |
| Valeriy Bolotov   | US | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |
| Andriy Purgin   | US | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |
| Denys Pushylin  | US | EU | SUI | CAN | LIE | AUS | AUST | NOR | JPN |  |  |  |  |  |  |  |  |
| Sergey Gennadevich Tsyplakov                                |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |
| Petr Grigorievich Jarosh                                    |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |
| Oleg Grigorievich Kozyura                                   |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |
| Viacheslav Ponomariov                                       | US | EU | SUI | CAN | LIE | AUS | AUST | NOR | JPN |  |  |  |  |  |  |  |  |
| Igor Mykolaiovych Bezler                                    |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |
| Igor Kakidzyanov  |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |
| Oleg Tsariov  |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |
| Roman Lyagin  |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |
| Aleksandr Malykhin  |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |
| Natalia Vladimirovna Poklonskaya                            |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |
| Igor Sergeievich Chetchenko (aka Shevchenko)                |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |
| Valery Vladimirovich Kaurov                                 | US | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Alexander Borodai   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |
| Alexander Khodakovskiy                                      |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |
| Alexandr Alexandrovich Kalyusky                             |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |
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| Marat Bashirov  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |
| Vasyl Nikitin   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |
| Aleksey Karyakin  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |
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| Igor Plotnitsky   |    | EU | SUI |     |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |
| Nikolay (Mykola) Kozitsyn                                   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |
| Oleksiy Mozgovy   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |
| Victor Yuriiovych Anosov                                    |    |    |     |     | CAN |     |      |     |     |  |  |  |  |  |  |  |  |
| Viacheslav Anatoliiovych Apraksimov                         |    |    |     |     | CAN |     |      |     |     |  |  |  |  |  |  |  |  |
| Fedir Dmytrovych Berezin                                    |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Ruslan Yunirovich Ilkaev                                    |    |    |     |     | CAN |     |      |     |     |  |  |  |  |  |  |  |  |
| Valerii Kostiantynovych Mussienko                           |    |    |     |     | CAN |     |      |     |     |  |  |  |  |  |  |  |  |
| Viacheslav Mykolaiovych Petrov                              |    |    |     |     | CAN |     |      |     |     |  |  |  |  |  |  |  |  |
| Ihor Venedyktovych Plotnitsky                               |    |    |     |     | CAN |     |      |     |     |  |  |  |  |  |  |  |  |
| Yurii Oleksandrovykh Protsenko                              |    |    |     |     | CAN |     |      |     |     |  |  |  |  |  |  |  |  |
| Oleh Anatoliiovych Vasin                                    |    |    |     |     | CAN |     |      |     |     |  |  |  |  |  |  |  |  |
| Serhii Anatoliiovych Zdriliuk                               |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Luhansk People's Republic                                   | US | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Donetsk People's Republic                                   | US | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Pavel Gubarev   |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Ekaterina Gubareva  |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Federal State of Novorossiia                                |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| International Union of Public Associations "Great Don Army" |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Sobol   |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Lugansk Guard   |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Army of the Southeast                                       |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Donbass People's Republic                                   |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Vostok Battalion  |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Vladimir Antyufeyev (aka Vladimir Shevtsov)                 |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Oksana Tchigrina  |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Boris Litvinov  |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Sergey Abisov   |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Alexander Zakharchenko                                      |    | EU | SUI |     |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Vladimir Kononov  |    | EU | SUI |     |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Miroslav Vladimirovich Rudenko                              |    | EU | SUI |     |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Gennadiy Nikolaiovych Tsytkalov                             |    | EU | SUI |     |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Andrey Yurevich Pinchuk                                     |    | EU | SUI |     |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Oleg Bereza   |    | EU | SUI |     |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Andrei Nikolaevich  |    | EU | SUI |     |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Aleksandr Karaman   |    | EU | SUI |     |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Georgiy L'vovich Muradov                                    |    | EU | SUI |     |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Mikhail Sergeievich Sheremet                                |    | EU | SUI |     |     | AUS |      | NOR |     |  |  |  |  |  |  |  |  |
| Serhiy Kozyakov   |    | EU |     |     |     |     |      |     |     |  |  |  |  |  |  |  |  |
| Oleg Akimov   |    | EU |     |     |     |     |      |     |     |  |  |  |  |  |  |  |  |
| Larisa Airapetyan   |    | EU |     |     |     |     |      |     |     |  |  |  |  |  |  |  |  |
| Yuriy Sivokonenko   |    | EU |     |     |     |     |      |     |     |  |  |  |  |  |  |  |  |
| Aleksandr Kofman  |    | EU |     |     |     |     |      |     |     |  |  |  |  |  |  |  |  |
| Ravil Khalikov  |    | EU |     |     |     |     |      |     |     |  |  |  |  |  |  |  |  |
| Dmitry Semyonov   |    | EU |     |     |     |     |      |     |     |  |  |  |  |  |  |  |  |
| Oleg Bugrov   |    | EU |     |     |     |     |      |     |     |  |  |  |  |  |  |  |  |
| Lesya Lapteva   |    | EU |     |     |     |     |      |     |     |  |  |  |  |  |  |  |  |
| Ihor Vladymyrovych Kostenok                                 |    | EU |     |     |     |     |      |     |     |  |  |  |  |  |  |  |  |
| Yevgeniy Vyasheslavovich Orlov                              |    | EU |     |     |     |     |      |     |     |  |  |  |  |  |  |  |  |
| Vladyslav Nykolayevych Deynego                              |    | EU |     |     |     |     |      |     |     |  |  |  |  |  |  |  |  |
| Donetsk Republic  |    | EU |     |     |     |     |      |     |     |  |  |  |  |  |  |  |  |
| Peace to Luhansk Region                                     |    | EU |     |     |     |     |      |     |     |  |  |  |  |  |  |  |  |
| Free Donbass  |    | EU |     |     |     |     |      |     |     |  |  |  |  |  |  |  |  |
| People's Union  |    | EU |     |     |     |     |      |     |     |  |  |  |  |  |  |  |  |
| Luhansk Economic Union                                      |    | EU |     |     |     |     |      |     |     |  |  |  |  |  |  |  |  |

| Crimean Entities   |    |    |     |     |     |     |      |     |     |  |  |  |
|--|----|----|-----|-----|-----|-----|------|-----|-----|--|--|--|
| Chernomorneftegaz  | US | EU | SUI | CAN | LIE | AUS | AUST | NOR | JPN |  |  |  |
| Feodosia (Feodosiya Enterprise)  | US | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |
| State ferry enterprise "Kerch ferry"   |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |
| State enterprise "Sevastopol commercial seaport"   |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |
| State enterprise "Kerch commercial seaport"  |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |
| State enterprise Universal - Avia  |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |
| Resort Nizhnaya Oreanda  |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |
| Crimean enterprise "Azov distillery plant"   |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |
| State concern "National Association of producers Massandra"  |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |
| State enterprise Magarach of the national institute of wine  |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |
| State enterprise "Factory of sparkling wine Novy Svet"   |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |
| Russian National Commercial Bank   |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |
| Russian Entities (*Captured in EU sectoral measure, see below)   |    |    |     |     |     |     |      |     |     |  |  |  |
| Bank Rossiya   | US |    |     | CAN |     |     | AUST |     |     |  |  |  |
| SMP Bank   | US |    |     | CAN |     |     | AUST |     |     |  |  |  |
| InvestKapitalBank  | US |    |     | CAN |     |     | AUST |     |     |  |  |  |
| Volga Group  | US |    |     | CAN |     |     | AUST |     |     |  |  |  |
| Aquanika   | US |    |     | CAN |     |     | AUST |     |     |  |  |  |
| CISC Zest  | US |    |     | CAN |     |     |      |     |     |  |  |  |
| JSB Sobin Bank   | US |    |     | CAN |     |     |      |     |     |  |  |  |
| Avia Group LLC   | US |    |     | CAN |     |     | AUST |     |     |  |  |  |
| Avia Group Nord LLC  | US |    |     | CAN |     |     | AUST |     |     |  |  |  |
| Sakhatrans LLC   | US |    |     | CAN |     |     |      |     |     |  |  |  |
| Stroytransgaz Group  | US |    |     | CAN |     |     | AUST |     |     |  |  |  |
| Stroytransgaz Holding  | US |    |     | CAN |     |     |      |     |     |  |  |  |
| Stroytransgaz LLC  | US |    |     | CAN |     |     |      |     |     |  |  |  |
| Stroytransgaz OJSC   | US |    |     | CAN |     |     |      |     |     |  |  |  |
| Stroytransgaz-M LLC  | US |    |     | CAN |     |     |      |     |     |  |  |  |
| Limited Liability Company Investment Company   | US |    |     | CAN |     |     |      |     |     |  |  |  |
| Transoil   | US |    |     |     |     |     | AUST |     |     |  |  |  |
| Stroygazmontazh  | US |    |     | CAN |     |     | AUST |     |     |  |  |  |
| ExpoBank   |    |    |     | CAN |     |     |      |     |     |  |  |  |
| RosEnergobank  |    |    |     | CAN |     |     |      |     |     |  |  |  |
| Almaz-Antey  | US | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |
| Federal State Unitary Enterprise State Research and Production Enterprise Bazalt   | US |    |     | CAN |     |     |      |     |     |  |  |  |
| JSC Concern Sozvezdie  | US |    |     | CAN |     |     |      |     |     |  |  |  |
| JSC MIC NPO Mashinostroyeniya  | US |    |     | CAN |     |     |      |     |     |  |  |  |
| Kalishnikov Concern  | US | *  |     | CAN |     |     |      |     |     |  |  |  |
| KBP Instrument Design Bureau   | US |    |     | CAN |     |     |      |     |     |  |  |  |
| Radio-Electronic Technologies  | US |    |     | CAN |     |     |      |     |     |  |  |  |
| Uralvagonzavod   | US | *  |     |     |     |     |      |     |     |  |  |  |
| United Shipbuilding Corporation  | US |    |     | CAN |     |     |      |     |     |  |  |  |
| Dobrolet (aka Dobrolyot)   |    | EU | SUI | CAN |     | AUS |      | NOR |     |  |  |  |
| OAO Dolgoprudny Research Production Enterprise   | US |    |     | CAN |     |     |      |     |     |  |  |  |
| Mytishchinski Mashinostroitelny Zavod, OAO   | US |    |     | CAN |     |     |      |     |     |  |  |  |
| Kalinin Machine Plan JSC   | US |    |     | CAN |     |     |      |     |     |  |  |  |
| Almaz-Antey GSKB   | US |    |     |     |     |     |      |     |     |  |  |  |
| JSC NIIP   | US |    |     | CAN |     |     |      |     |     |  |  |  |
| Marine Scientific Research Institute of Radioelectronics Altair (MNIIRE "Altair")  |    |    |     | CAN |     |     |      |     |     |  |  |  |
| Executive Order 13662 - Sectoral Sanctions   |    |    |     |     |     |     |      |     |     |  |  |  |
| Financial Institutions - New Debt and Equity Prohibition (*Not specifically listed but covered as 50%-owned subsidiary of a designated bank)   |    |    |     |     |     |     |      |     |     |  |  |  |
| Sberbank   | US | EU | SUI | CAN |     |     |      | NOR | JPN |  |  |  |
| VTB Bank OAO   | US | EU | SUI | CAN |     |     |      | NOR | JPN |  |  |  |
| VEB  | US | EU | SUI | CAN |     |     |      | NOR | JPN |  |  |  |
| Gazprombank OAO  | US | EU | SUI | CAN |     |     |      | NOR | JPN |  |  |  |
| Bank of Moscow   | US | *  | *   | CAN |     |     |      | *   | *   |  |  |  |
| Russian Agricultural Bank (aka Rosselkhozbank)   | US | EU | SUI | CAN |     |     |      | NOR | JPN |  |  |  |
| Energy Companies - Debt Prohibition  |    |    |     |     |     |     |      |     |     |  |  |  |
| Rosneft  | US | EU | SUI |     |     | AUS |      | NOR |     |  |  |  |
| OAO Novatek  | US |    |     | CAN |     |     |      |     |     |  |  |  |
| Gazprom Neft   | US | EU | SUI |     |     | AUS |      | NOR |     |  |  |  |
| AK Transneft OAO   | US | EU | SUI |     |     | AUS |      | NOR |     |  |  |  |
| Energy Companies - Goods, Services and Technology in Oil Sector Activities (*EU and Norwegian restrictions on provision of goods, services and technology apply are not applied to specific companies but cover their provision "in Russia") |    |    |     |     |     |     |      |     |     |  |  |  |
| OAO Gazprom  | US | *  |     |     |     | *   |      | *   |     |  |  |  |
| Gazprom Neft   | US | *  |     |     |     | *   |      | *   |     |  |  |  |
| Lukoil OAO   | US | *  |     |     |     | *   |      | *   |     |  |  |  |
| Surgutneftegas   | US | *  |     |     |     | *   |      | *   |     |  |  |  |
| Defense and Related Material Companies - Debt Prohibition (*Captured as 50%-owned subsidiary of Rostec; **Designated as full asset freeze, noted above)  |    |    |     |     |     |     |      |     |     |  |  |  |
| Rostec   | US |    |     |     |     |     |      |     |     |  |  |  |
| OPK Oboronprom   | *  | EU | SUI |     |     | AUS |      | NOR |     |  |  |  |
| United Aircraft Corporation  |    | EU | SUI |     |     | AUS |      | NOR |     |  |  |  |
| Uralvagonzavod   | ** | EU | SUI |     |     | AUS |      | NOR |     |  |  |  |
| Defense and Related Material Companies - Prohibition on technical assistance, brokering services, financing, and financial assistance for dual-use goods and technology (*Designated as full asset freeze, noted above)                      |    |    |     |     |     |     |      |     |     |  |  |  |
| JSC Sirius   |    | EU | SUI |     |     | AUS |      | NOR |     |  |  |  |
| OJSC Stankoinstrument  |    | EU | SUI |     |     | AUS |      | NOR |     |  |  |  |
| OAO JSC Chemcomposite  |    | EU | SUI |     |     | AUS |      | NOR |     |  |  |  |

|                                   |   |    |     |  |     |     |  |  |  |  |  |  |
|-----------------------------------|---|----|-----|--|-----|-----|--|--|--|--|--|--|
| JSC Kalashnikov                   | * | EU | SUI |  | AUS | NOR |  |  |  |  |  |  |
| JSC Tula Arms Plant               |   | EU | SUI |  | AUS | NOR |  |  |  |  |  |  |
| NPK Tchnologii Maschinostrojenija |   | EU | SUI |  | AUS | NOR |  |  |  |  |  |  |
| OAO Wysokototschnye Kompleksi     |   | EU | SUI |  | AUS | NOR |  |  |  |  |  |  |
| OAO Almaz Antey                   |   | EU | SUI |  | AUS | NOR |  |  |  |  |  |  |
| OAO NPO Bazalt                    |   | EU | SUI |  | AUS | NOR |  |  |  |  |  |  |

## FW: Published Regulation on Ukraine Sanctions Technical Points

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**From:** (b)(6)  
**To:** (b)(6) "Manfull, Alexandre" (b)(6)  
(b)(6)

**Date:** Tue, 09 Dec 2014 09:45:52 -0500

**Attachments:** Reg.1290.12.4.14.pdf (337.6 kB)

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FYI on the EU's updated Ukraine regs.

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**From:** State (b)(6)  
**Sent:** Tuesday, December 09, 2014 8:31 AM  
**To:** Fried, Daniel; State (b)(6)  
**Cc:** State (b)(6); State (b)(6); Treasury (b)(6); State (b)(6)  
Mortlock, David; State (b)(6)  
**Subject:** Published Regulation on Ukraine Sanctions Technical Points

All,  
On Friday the EU published the latest Ukraine sanctions legislation, Reg. 1290, attached, which covers the technicalities previously raised- what is Russia, what is shale, etc.  
I believe you may have seen the draft of this.  
Please let me know if you have any questions.  
State (b)(6)

State (b)(6)  
Economic Officer  
United States Mission to the European Union  
Rue Zinner 13  
1000 Brussels, Belgium

State (b)(6)

This email is UNCLASSIFIED.



## Sanctions Comparison Chart

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**From:** (b)(6)  
**To:** \_DL\_TFI\_Ukraine\_Russia <dl\_tfi\_ukraine\_russia@do.treas.gov>  
**Cc:** (b)(6)  
**Date:** Fri, 19 Dec 2014 17:18:34 -0500  
**Attachments:** 20141219 Comparison of Country Sanctions\_Russia\_Ukraine.pdf (348.8 kB)

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Good evening,

Please find attached an updated comparison chart, which includes today's U.S. separatist designations as well as additional separatist designations announced by Japan last week.

As before, since this is a working document, please do not forward outside of Treasury without consulting our office.

Have a merry Christmas and happy holidays!

(b)(6)

(b)(6)

Policy Advisor  
U.S. Department of the Treasury  
Office of Terrorist Financing and Financial Crimes  
Office: (b)(6) Blackberry: (b)(6)  
(b)(6)

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**From:** (b)(6)  
**Sent:** Tuesday, December 02, 2014 8:27 AM  
**To:** \_DL\_TFI\_Ukraine\_Russia  
**Subject:** Sanctions Comparison Chart

All,

FYI. Attached is the latest unclassified Comparison Chart. This includes the new EU designations from this weekend (13 individual separatists and 5 separatist political organizations) as well as those Japanese measures which have been publically released.

As it is a working document, please do not forward this outside of Treasury without consulting our office first.

Please let me know if you have any questions.

Thanks!

(b)(6)

(b)(6)

Policy Advisor  
U.S. Department of the Treasury  
Office of Terrorist Financing and Financial Crimes  
Office: (b)(6) Blackberry: (b)(6)  
(b)(6)

|  |   |   |
|--|---|---|
| <p><b>Russia/Former Government of Ukraine-related Designations - Persons (as of December 19, 2014)</b></p> | <p>US: United States<br/>                 EU: European Union<br/>                 SUI: Switzerland*<br/>                 CAN: Canada<br/>                 LIE: Liechtenstein*<br/>                 AUS: Austria**<br/>                 AUST: Australia<br/>                 JPN: Japan<br/>                 NOR: Norway</p> | <p>*Switzerland and Liechtenstein have issued "anti-circumvention" measures for many of the EU designated individuals and entities. These measures prohibit their financial institutions from entering into new business relationships with these individuals and entities (these measures short of asset freezes are denoted by black stripes). Likewise, in Switzerland, "new issue of long term financial instruments" for the five banks listed by the EU for debt and equity prohibitions will require authorization, only given if they are within the average financial engagement of the past three years.<br/>                 **Austria's original list was superceded by the shorter EU list; however, Austria has stated that it plans to add back those from original list (in gray)</p> |
|--|---|---|

| Executive Orders 13660 and 13661 - Asset Freezes |    |    |     |     |     |     |      |     |  |
|--|----|----|-----|-----|-----|-----|------|-----|--|
| Russian Officials                                |    |    |     |     |     |     |      |     |  |
| Viktor Alekseevich Ozerov                        | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Vladimir Michailovich Dzhubarov                  | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Andrei Aleksandrovich Klshas                     | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Nikolai Ivanovich Ryzhkov                        | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Evegni Viktorovich Bushmin                       | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Aleksandr Borisovich Tootonov                    | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Oleg Evgenefich Panteleev                        | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Sergei Mikhailovich Mironov                      | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Sergei Vladimirovich Zheleznyak                  | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Leonid Eduardovich Slutski                       | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Dmitry Olegovich Rogozin                         | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Sergey Yur'yevich Glazhev                        | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Vladislav Yuryevich Surkov                       | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Yelena Borisovna Mizulina                        | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Valentina Ivaonovna Matvienko                    | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Sergey Naryshkin                                 | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Victor Ivanov                                    | US |    |     | CAN |     |     |      |     |  |
| Igor Sergun                                      | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Sergei Ivanov                                    | US |    |     | CAN |     |     | AUST |     |  |
| Alexei Gromov                                    | US | EU | SUI | CAN |     | AUS | AUST | NOR |  |
| Andrei Fursenko                                  | US |    |     | CAN |     |     | AUST |     |  |
| Vladimir Yakunin                                 | US |    |     |     |     |     | AUST |     |  |
| Vladimir Kozhin                                  | US |    |     | CAN |     |     | AUST |     |  |
| Mikhail Vitalevich Margelov                      |    |    |     | CAN |     |     |      |     |  |
| Vladimir Pligin                                  |    | EU | SUI | CAN | LIE | AUS |      | NOR |  |
| Yury Viktorovich Ushakov                         |    |    |     | CAN |     |     |      |     |  |
| Dmitry Konstantinovich Kiselyov                  |    | EU | SUI |     | LIE | AUS |      | NOR |  |
| Vitalii Nikitich Ignatenko                       |    |    |     | CAN |     |     |      |     |  |
| Arkadii Viktorovich Bahkin                       |    |    |     | CAN |     |     |      |     |  |
| Vyaacheslav Volodin                              | US | EU | SUI | CAN | LIE |     | AUST | NOR |  |
| Dmitry Kozak                                     | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Aleksey Pushkov                                  | US |    |     | CAN |     |     | AUST |     |  |
| Alexander Babakov                                |    |    |     | CAN |     |     |      |     |  |
| Oleg Belaventsev                                 | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Yevgeniy Murov                                   | US |    |     | CAN |     |     |      |     |  |
| Oleg Savelyev                                    | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Ludmila Shvetsova                                |    | EU | SUI | CAN | LIE | AUS |      | NOR |  |
| Sergei Neverov                                   | US | EU | SUI | CAN | LIE | AUS |      | NOR |  |
| Vladimir Zhirinovsky                             |    |    |     | CAN |     |     |      |     |  |
| Sergey Beseda                                    | US | EU | SUI | CAN |     | AUS |      | NOR |  |
| Igor Shchegolev                                  | US |    |     | CAN |     |     |      |     |  |
| Mikhail Efimovich Fradkov                        |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Nikolai Platonovich Patrushev                    |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Aleksandr Vaillevich Bortnikov                   |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Rashid Gumarovich Nurgaliev                      |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Boris Vyacheslavovich Gryzlov                    |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Mikhail Vladimirovich Degtyarev                  |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Ramzan Akhmadovitch Kadyrov                      |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Alexander Nikolayevich Tkachyov                  |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Vladimir Georgyevich Kulishov                    |    |    |     | CAN |     |     |      |     |  |
| Valerii Yuriovich Travkin                        |    |    |     | CAN |     |     |      |     |  |
| Yuri Leonidovich Vorobiov                        |    | EU | SUI |     |     | AUS |      | NOR |  |
| Vladimir Volfovich Zhirinovsky                   |    | EU | SUI |     |     | AUS |      | NOR |  |

|   |    |    |     |     |     |      |      |     |     |  |  |
|---|----|----|-----|-----|-----|------|------|-----|-----|--|--|
| Vladimir Abdulyayevich Vasilyev   |    | EU | SUI |     |     | AUS  |      | NOR |     |  |  |
| Viktor Petrovich Vodolatsky   |    | EU | SUI |     |     | AUS  |      | NOR |     |  |  |
| Leonid Ivanovich Kalashnikov  |    | EU | SUI |     |     | AUS  |      | NOR |     |  |  |
| Vladimir Stepanovich Nikitin  |    | EU | SUI |     |     | AUS  |      | NOR |     |  |  |
| Oleg Vladimirovich Lebedev  |    | EU | SUI |     |     | AUS  |      | NOR |     |  |  |
| Ivan Ivanovich Melnikov   |    | EU | SUI |     |     | AUS  |      | NOR |     |  |  |
| Igor Vladimirovich Lebedev  |    | EU | SUI |     |     | AUS  |      | NOR |     |  |  |
| Nikolai Vladimirovich Levichev  |    | EU | SUI |     |     | AUS  |      | NOR |     |  |  |
| Svetlana Sergeevna Zhurova  |    | EU | SUI |     |     | AUS  |      | NOR |     |  |  |
| Aleksey Vasilevich Naumets  |    | EU | SUI |     |     | AUS  |      | NOR |     |  |  |
| <b>Russian Cronies</b>  |    |    |     |     |     |      |      |     |     |  |  |
| Gennady Timchenko   | US |    |     | CAN |     | AUST |      |     |     |  |  |
| Arkady Rotenberg  | US | EU | SUI | CAN |     | AUS  | AUST | NOR |     |  |  |
| Boris Rotenberg   | US |    |     | CAN |     | AUST |      |     |     |  |  |
| Yuri Kovalchuk  | US | EU | SUI | CAN |     | AUS  | AUST | NOR |     |  |  |
| Igor Sechin   | US |    |     |     |     |      |      |     |     |  |  |
| Sergey Chemezov   | US | EU | SUI |     |     | AUS  |      |     |     |  |  |
| Konstantin Malofayev  | US | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |
| Nikolay Shamalov  |    | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |
| Alexander Mikhailovich Babakov  |    | EU | SUI |     |     | AUS  |      |     |     |  |  |
| <b>Russian Military</b>   |    |    |     |     |     |      |      |     |     |  |  |
| Alexander Vitko   |    | EU | SUI |     | LIE | AUS  | AUST | NOR |     |  |  |
| Anatoly Alekseevich Sidorov   |    | EU | SUI |     | LIE | AUS  | AUST | NOR |     |  |  |
| Aleksandr Galkin  |    | EU | SUI |     | LIE | AUS  | AUST | NOR |     |  |  |
| Alexander Mihailovich Nosatov   |    | EU | SUI |     | LIE | AUS  |      | NOR |     |  |  |
| Valery Vladimirovich Kulikov  |    | EU | SUI |     | LIE | AUS  |      | NOR |     |  |  |
| Lt. Gen. Igor Turchenyuk  |    | EU | SUI |     | LIE | AUS  |      | NOR |     |  |  |
| Valery Gerasimov  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |
| Vladimir Shamanov   |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |
| General Dmitry Vitalievich Bulgakov   |    |    |     | CAN |     |      |      |     |     |  |  |
| Lieutenant-General Yuriy Eduardovich Sadovenko                                  |    |    |     | CAN |     |      |      |     |     |  |  |
| Colonel-General Oleg Leonidovich Salyukov                                       |    |    |     | CAN |     |      |      |     |     |  |  |
| Colonel-General Nikolay Bogdanovskiy  |    |    |     | CAN |     |      |      |     |     |  |  |
| <b>Former Ukrainian Government/ Ukrainian Separatists / Separatist Entities</b> |    |    |     |     |     |      |      |     |     |  |  |
| Igor Strelkov (Ihor Strielkov)  | US | EU | SUI | CAN | LIE | AUS  | AUST | NOR | JPN |  |  |
| Sergei Ivanovich Menyailo   | US | EU | SUI | CAN | LIE | AUS  |      | NOR | JPN |  |  |
| Mikhail Malyshev  | US | EU | SUI | CAN | LIE | AUS  | AUST | NOR | JPN |  |  |
| Valery Medvedev   | US | EU | SUI | CAN | LIE | AUS  | AUST | NOR | JPN |  |  |
| Sergey Aksyonov   | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |
| Vladimir Konsantinov  | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |
| Viktor Medvechuck   | US |    |     |     |     |      | AUST |     |     |  |  |
| Rustam Illmirovich Ternigaliev  | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |
| Deniz Valentinovich Berezovskiy   |    | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |
| Aleksei Mikhailovich Chaily   | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |
| Pyotr Anatoliyovych Zima  | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |
| Yuriy Zhrebttsov  | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |
| Sergei Pavlovych Tsekov   | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |
| Viktor Fedorovych Yanukovych  | US | EU | SUI | CAN | LIE | AUS  | AUST | NOR | JPN |  |  |
| Vitalii Yuriyovych Zakharchenko   |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |
| Viktor Pavlovych Pshonka  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |
| Oleksandr Hryhorovych Yakymenko   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |
| Andriy Volodymyrovych Portnov   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |
| Olena Leonidivna Lukash   |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |
| Andrii Petrovych Kliuiev  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |
| Viktor Ivanovych Ratushniak   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |
| Oleksandr Viktorovych Yanukovych  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |
| Viktor Viktorovych Yanukovych   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |
| Artem Viktorovych Pshonka   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |
| Serhii Petrovych Kliuiev  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |
| Mykola Yanovych Azarov  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |
| Oleksii Mykolayovych Azarov   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |
| Serhiy Vitaliyovych Kurchenko   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |
| Dmytro Volodymyrovych Tabachnyk   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |
| Raisa Vasyilivna Bohatyriova  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |
| Ihor Oleksandrovych Kalinin   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |
| Serhiy Abruzov  |    | EU | SUI |     | LIE | AUS  |      | NOR |     |  |  |
| Mykhaylo (Mikhail) Markovych Dobkin   |    |    | SUI |     | LIE | AUS  |      |     |     |  |  |
| Yuriy Ivanyushchenko  |    |    | SUI |     | LIE | AUS  |      |     |     |  |  |
| Hennadiy Adolfovych Kernes  |    |    | SUI |     | LIE | AUS  |      |     |     |  |  |
| Borys Viktorovych Kolesnikov  |    |    | SUI |     | LIE |      |      |     |     |  |  |
| Yuriy Volodymyrovych Kolobov  |    |    | SUI |     | LIE |      |      |     |     |  |  |
| Volodymyr Vasylovych Kozak  |    |    | SUI |     | LIE |      |      |     |     |  |  |
| Mykola Volodymyrovych Prisyazhnyuk  |    |    | SUI |     | LIE |      |      |     |     |  |  |
| Eduard Anatoliyovych Stavvitsky   |    | EU | SUI |     | LIE | AUS  |      | NOR |     |  |  |
| Oleksander Serhiyovych Yefremov   |    |    | SUI |     | LIE |      |      |     |     |  |  |
| Oleksander Viktorovych Klymenko   |    | EU | SUI |     | LIE | AUS  |      | NOR |     |  |  |
| Valery Koryak   |    |    |     |     |     | AUS  |      |     |     |  |  |
| Oleksandr Popov   |    |    |     |     |     | AUS  |      |     |     |  |  |
| Stanislav Schulyak  |    |    |     |     |     | AUS  |      |     |     |  |  |
| Volodymyr Sivkovich   |    |    |     |     |     | AUS  |      |     |     |  |  |

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|---|----|----|-----|-----|-----|-----|------|-----|-----|--|--|--|--|--|--|--|--|--|--|
| Yuriy Ivanyushchenko  |    | EU | SUI |     | LIE | AUS |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Olga Fedorovna Kovalidi                                     |    | EU | SUI | CAN | LIE | AUS | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| German Prokopiv   |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Valeriy Bolotov   | US | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Andriy Purgin   | US | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Denys Pushylin  | US | EU | SUI | CAN | LIE | AUS | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Sergey Gennadevich Tsyplakov                                |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Petr Grigorievich Jarosh                                    |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Oleg Grigorievich Kozyura                                   |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Viacheslav Ponomariov                                       | US | EU | SUI | CAN | LIE | AUS | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Igor Mykolaiovych Bezler                                    | US | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Igor Kakidzyanov  |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Oleg Tsariov  |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Roman Lyagin  |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Aleksandr Malykhin  |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Natalia Vladimirovna Poklonskaya                            | US | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Igor Sergeievich Chetchenko (aka Shevchenko)                |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Valery Vladimirovich Kaurov                                 | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Alexander Borodai   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Alexander Khodakovskiy                                      |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Alexandr Aleksandrovich Kalyusky                            |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Alexandr Khryakov   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Marat Bashirov  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Vasyl Nikitin   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Aleksey Karyakin  | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Yuriy Ivakin  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Igor Plotnitsky   | US | EU | SUI |     |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Nikolay (Mykola) Kozitsyn                                   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Oleksiy (Aleksey) Mozgovy                                   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Victor Yuriyovich Anosov                                    |    |    |     |     | CAN |     |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Viacheslav Anatoliyovich Apraksimov                         |    |    |     |     | CAN |     |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Fedir Dmytrovych Berezin                                    | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Ruslan Yunirovich Ilkaev                                    |    |    |     |     | CAN |     |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Valerii Kostiantynovych Mussienko                           |    |    |     |     | CAN |     |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Viacheslav Mykolaiovych Petrov                              |    |    |     |     | CAN |     |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Ihor Venedyktovych Plotnitsky                               |    |    |     |     | CAN |     |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Yurii Oleksandrovykh Protsenko                              |    |    |     |     | CAN |     |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Oleh Anatoliyovich Vasin                                    |    |    |     |     | CAN |     |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Serhii Anatoliyovych Zdriliuk                               |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Luhansk People's Republic                                   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Donetsk People's Republic                                   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Pavel Gubarev   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Ekaterina Gubareva  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Federal State of Novorossiia                                |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| International Union of Public Associations "Great Don Army" |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Sobol   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Lugansk Guard   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Army of the Southeast                                       |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Donbass People's Republic                                   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Vostok Battalion  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Vladimir Antyufeyev (aka Vladimir Shevtsov)                 | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Oksana Tchigrina  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Boris Litvinov  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Sergey Abisov   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Alexander Zakharchenko                                      | US | EU | SUI |     |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Vladimir Kononov  |    | EU | SUI |     |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Miroslav Vladimirovich Rudenko                              | US | EU | SUI |     |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Gennadiy Nikolaiovych Tsytkalov                             |    | EU | SUI |     |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Andrey Yurevich Pinchuk                                     |    | EU | SUI |     |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Oleg Bereza   |    | EU | SUI |     |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Andrei Nikolaevich  |    | EU | SUI |     |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Aleksandr Karaman   |    | EU | SUI |     |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Georgiy L'vovich Muradov                                    |    | EU | SUI |     |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Mikhail Sergeevich Sheremet                                 |    | EU | SUI |     |     | AUS |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Serhiy Kozyakov   |    | EU |     |     |     |     |      |     | JPN |  |  |  |  |  |  |  |  |  |  |
| Oleg Akimov   |    | EU |     |     |     |     |      |     | JPN |  |  |  |  |  |  |  |  |  |  |
| Larisa Airapetyan   |    | EU |     |     |     |     |      |     | JPN |  |  |  |  |  |  |  |  |  |  |
| Yuriy Sivokonenko   |    | EU |     |     |     |     |      |     | JPN |  |  |  |  |  |  |  |  |  |  |
| Aleksandr Kofman  |    | EU |     |     |     |     |      |     | JPN |  |  |  |  |  |  |  |  |  |  |
| Ravil Khalikov  |    | EU |     |     |     |     |      |     | JPN |  |  |  |  |  |  |  |  |  |  |
| Dmitry Semyonov   |    | EU |     |     |     |     |      |     | JPN |  |  |  |  |  |  |  |  |  |  |
| Oleg Bugrov   |    | EU |     |     |     |     |      |     | JPN |  |  |  |  |  |  |  |  |  |  |
| Lesya Lapteva   |    | EU |     |     |     |     |      |     | JPN |  |  |  |  |  |  |  |  |  |  |
| Yevgeniy Eduardovich Mihalov                                |    | EU |     |     |     |     |      |     | JPN |  |  |  |  |  |  |  |  |  |  |
| Ihor Vladymyrovych Kostenok                                 |    | EU |     |     |     |     |      |     | JPN |  |  |  |  |  |  |  |  |  |  |
| Yevgeniy Vyasheslavovich Orlov                              |    | EU |     |     |     |     |      |     | JPN |  |  |  |  |  |  |  |  |  |  |
| Vladyslav Nykolayevych Deynego                              |    | EU |     |     |     |     |      |     | JPN |  |  |  |  |  |  |  |  |  |  |
| Donetsk Republic  |    | EU |     |     |     |     |      |     | JPN |  |  |  |  |  |  |  |  |  |  |
| Peace to Luhansk Region                                     |    | EU |     |     |     |     |      |     | JPN |  |  |  |  |  |  |  |  |  |  |
| Free Donbass  |    | EU |     |     |     |     |      |     | JPN |  |  |  |  |  |  |  |  |  |  |
| People's Union  |    | EU |     |     |     |     |      |     | JPN |  |  |  |  |  |  |  |  |  |  |

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| Luhansk Economic Union  |    | EU |       |     |     |     |      |     |     | JPN |  |  |  |  |  |  |  |
| Donbass People's Militia  | US |    |       |     |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Marshall Capital Fund   | US |    |       |     |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Dmitry Neklyudov  | US |    |       |     |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Novorossiia Party   | US |    |       |     |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Oplot   | US |    |       |     |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Petr Savchenko  | US |    |       |     |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Oleh Tsaryov  | US |    |       |     |     |     |      |     |     |     |  |  |  |  |  |  |  |
| South-East Movement (Yugo-Vostok Movement)  | US |    |       |     |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Night Wolves  | US |    |       |     |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Aleksandr Zaldostanov   | US |    |       |     |     |     |      |     |     |     |  |  |  |  |  |  |  |
| <b>Crimean Entities</b>   |    |    |       |     |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Chernomorneftegaz   | US | EU | SUI   | CAN | LIE | AUS | AUST | NOR | JPN |     |  |  |  |  |  |  |  |
| Feodosia (Feodosiya Enterprise)   | US | EU | SUI   | CAN | LIE | AUS |      | NOR | JPN |     |  |  |  |  |  |  |  |
| State ferry enterprise "Kerch ferry"  |    | EU | SUI   | CAN |     | AUS |      | NOR |     |     |  |  |  |  |  |  |  |
| State enterprise "Sevastopol commercial seaport"  |    | EU | SUI   | CAN |     | AUS |      | NOR |     |     |  |  |  |  |  |  |  |
| State enterprise "Kerch commercial seaport"   |    | EU | SUI   | CAN |     | AUS |      | NOR |     |     |  |  |  |  |  |  |  |
| State enterprise Universal - Avia   |    | EU | SUI   | CAN |     | AUS |      | NOR |     |     |  |  |  |  |  |  |  |
| Resort Nizhnaya Oreanda   |    | EU | SUI   | CAN |     | AUS |      | NOR |     |     |  |  |  |  |  |  |  |
| Crimean enterprise "Azov distillery plant"  |    | EU | SUI   | CAN |     | AUS |      | NOR |     |     |  |  |  |  |  |  |  |
| State concern "National Association of producers Massandra"   |    | EU | SUI   | CAN |     | AUS |      | NOR |     |     |  |  |  |  |  |  |  |
| State enterprise Magarach of the national institute of wine   |    | EU | SUI   | CAN |     | AUS |      | NOR |     |     |  |  |  |  |  |  |  |
| State enterprise "Factory of sparkling wine Novy Svet"  |    | EU | SUI   | CAN |     | AUS |      | NOR |     |     |  |  |  |  |  |  |  |
| Russian National Commercial Bank  |    | EU | SUI   | CAN |     | AUS |      | NOR |     |     |  |  |  |  |  |  |  |
| <b>Russian Entities (*Captured in EU sectoral measure, see below)</b>   |    |    |       |     |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Bank Rossiya  | US |    |       | CAN |     |     | AUST |     |     |     |  |  |  |  |  |  |  |
| SMP Bank  | US |    |       | CAN |     |     | AUST |     |     |     |  |  |  |  |  |  |  |
| InvestKapitalBank   | US |    |       | CAN |     |     | AUST |     |     |     |  |  |  |  |  |  |  |
| Volga Group   | US |    |       | CAN |     |     | AUST |     |     |     |  |  |  |  |  |  |  |
| Aquanika  | US |    |       | CAN |     |     | AUST |     |     |     |  |  |  |  |  |  |  |
| CJSC Zest   | US |    |       | CAN |     |     |      |     |     |     |  |  |  |  |  |  |  |
| JSB Sobin Bank  | US |    |       | CAN |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Avia Group LLC  | US |    |       | CAN |     |     | AUST |     |     |     |  |  |  |  |  |  |  |
| Avia Group Nord LLC   | US |    |       | CAN |     |     | AUST |     |     |     |  |  |  |  |  |  |  |
| Sakhatrans LLC  | US |    |       | CAN |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Stroytransgaz Group   | US |    |       | CAN |     |     | AUST |     |     |     |  |  |  |  |  |  |  |
| Stroytransgaz Holding   | US |    |       | CAN |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Stroytransgaz LLC   | US |    |       | CAN |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Stroytransgaz OJSC  | US |    |       | CAN |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Stroytransgaz-M LLC   | US |    |       | CAN |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Limited Liability Company Investment Company  | US |    |       | CAN |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Transoil  | US |    |       |     |     |     | AUST |     |     |     |  |  |  |  |  |  |  |
| Stroygazmontazh   | US |    |       |     |     |     | AUST |     |     |     |  |  |  |  |  |  |  |
| ExpoBank  |    |    |       | CAN |     |     |      |     |     |     |  |  |  |  |  |  |  |
| RosEnergoBank   |    |    |       | CAN |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Almaz-Antey   | US | EU | SUI   | CAN |     | AUS |      | NOR |     |     |  |  |  |  |  |  |  |
| Federal State Unitary Enterprise State Research and Production Enterprise Bazalt  | US |    |       | CAN |     |     |      |     |     |     |  |  |  |  |  |  |  |
| JSC Concern Sozvezdie   | US |    |       | CAN |     |     |      |     |     |     |  |  |  |  |  |  |  |
| JSC MIC NPO Mashinostroyeniya   | US |    |       | CAN |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Kalishnikov Concern   | US | *  |       | CAN |     |     |      |     |     |     |  |  |  |  |  |  |  |
| KBP Instrument Design Bureau  | US |    |       | CAN |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Radio-Electronic Technologies   | US |    |       | CAN |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Uralvagonzavod  | US | *  |       |     |     |     |      |     |     |     |  |  |  |  |  |  |  |
| United Shipbuilding Corporation   | US |    |       | CAN |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Dobrolet (aka Dobrolyot)  |    | EU | SUI   | CAN |     | AUS |      | NOR |     |     |  |  |  |  |  |  |  |
| OAO Dolgoprudny Research Production Enterprise  | US |    |       | CAN |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Mytishchinski Mashinostroitelny Zavod, OAO  | US |    |       | CAN |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Kalinin Machine Plant JSC   | US |    |       | CAN |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Almaz-Antey GSKB  | US |    |       |     |     |     |      |     |     |     |  |  |  |  |  |  |  |
| JSC NIIP  | US |    |       | CAN |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Marine Scientific Research Institute of Radioelectronics Altair (MNIIRE "Altair")   |    |    |       | CAN |     |     |      |     |     |     |  |  |  |  |  |  |  |
| <b>Executive Order 13662 - Sectoral Sanctions</b>   |    |    |       |     |     |     |      |     |     |     |  |  |  |  |  |  |  |
| <b>Financial Institutions - New Debt and Equity Prohibition (*Not specifically listed but covered as 50%-owned subsidiary of a designated bank)</b>   |    |    |       |     |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Sberbank  | US | EU | SUI   | CAN |     |     |      | NOR | JPN |     |  |  |  |  |  |  |  |
| VTB Bank OAO  | US | EU | SUI   | CAN |     |     |      | NOR | JPN |     |  |  |  |  |  |  |  |
| VEB   | US | EU | SUI   | CAN |     |     |      | NOR | JPN |     |  |  |  |  |  |  |  |
| Gazprombank OAO   | US | EU | SUI   | CAN |     |     |      | NOR | JPN |     |  |  |  |  |  |  |  |
| Bank of Moscow  | US | *  | * CAN |     |     |     |      | *   | *   |     |  |  |  |  |  |  |  |
| Russian Agricultural Bank (aka Rosselkhozbank)  | US | EU | SUI   | CAN |     |     |      | NOR | JPN |     |  |  |  |  |  |  |  |
| <b>Energy Companies - Debt Prohibition</b>  |    |    |       |     |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Rosneft   | US | EU | SUI   |     |     | AUS |      | NOR |     |     |  |  |  |  |  |  |  |
| OAO Novatek   | US |    |       | CAN |     |     |      |     |     |     |  |  |  |  |  |  |  |
| Gazprom Neft  | US | EU | SUI   |     |     | AUS |      | NOR |     |     |  |  |  |  |  |  |  |
| AK Transneft OAO  | US | EU | SUI   |     |     | AUS |      | NOR |     |     |  |  |  |  |  |  |  |
| <b>Energy Companies - Goods, Services and Technology in Oil Sector Activities (*EU and Norwegian restrictions on provision of goods, services and technology apply are not applied to specific companies but cover their provision "in Russia")</b> |    |    |       |     |     |     |      |     |     |     |  |  |  |  |  |  |  |
| OAO Gazprom   | US | *  |       |     |     | *   |      | *   |     |     |  |  |  |  |  |  |  |
| Gazprom Neft  | US | *  |       |     |     | *   |      | *   |     |     |  |  |  |  |  |  |  |
| Lukoil OAO  | US | *  |       |     |     | *   |      | *   |     |     |  |  |  |  |  |  |  |
| Surgutneftegas  | US | *  |       |     |     | *   |      | *   |     |     |  |  |  |  |  |  |  |

| Defense and Related Material Companies - Debt Prohibition (*Captured as 50%-owned subsidiary of Rostec; **Designated as full asset freeze, noted above)   |    |    |     |  |  |     |     |  |  |  |
|---|----|----|-----|--|--|-----|-----|--|--|--|
| Rostec  | US |    |     |  |  |     |     |  |  |  |
| OPK Oboronprom  | *  | EU | SUI |  |  | AUS | NOR |  |  |  |
| United Aircraft Corporation   |    | EU | SUI |  |  | AUS | NOR |  |  |  |
| Uralvagonzavod  | ** | EU | SUI |  |  | AUS | NOR |  |  |  |
| Defense and Related Material Companies - Prohibition on technical assistance, brokering services, financing, and financial assistance for dual-use goods and technology (*Designated as full asset freeze, noted above) |    |    |     |  |  |     |     |  |  |  |
| JSC Sirius  |    | EU | SUI |  |  | AUS | NOR |  |  |  |
| OJSC Stankoinstrument   |    | EU | SUI |  |  | AUS | NOR |  |  |  |
| OAO JSC Chemcomposite   |    | EU | SUI |  |  | AUS | NOR |  |  |  |
| JSC Kalashnikov   | *  | EU | SUI |  |  | AUS | NOR |  |  |  |
| JSC Tula Arms Plant   |    | EU | SUI |  |  | AUS | NOR |  |  |  |
| NPK Tchnologii Maschinostrojenija   |    | EU | SUI |  |  | AUS | NOR |  |  |  |
| OAO Wysokototschnye Komplexi  |    | EU | SUI |  |  | AUS | NOR |  |  |  |
| OAO Almaz Antey   |    | EU | SUI |  |  | AUS | NOR |  |  |  |
| OAO NPO Bazalt  |    | EU | SUI |  |  | AUS | NOR |  |  |  |

**Russia/Former Government of Ukraine-related Designations - Persons (as of January 5, 2014)**

\*Switzerland and Liechtenstein have issued "anti-circumvention" measures for many of the EU designated individuals and entities. These measures prohibit their financial institutions from entering into new business relationships with these individuals and entities (these measures short of asset freezes are denoted by black stripes). Likewise, in Switzerland, "new issue of long term financial instruments" for the five banks listed by the EU for debt and equity prohibitions will require authorization, only given if they are within the average financial engagement of the past three years. \*\*Austria's original list was superceded by the shorter EU list; however, Austria has stated that it plans to add back those from original list (in gray)

US: United States  
 EU: European Union  
 SUI: Switzerland\*  
 CAN: Canada  
 LIE: Liechtenstein\*  
 AUS: Austria\*\*  
 AUST: Australia  
 JPN: Japan  
 NOR: Norway

| Executive Orders 13660 and 13661 - Asset Freezes |    |    |     |     |     |     |      |     |  |
|--|----|----|-----|-----|-----|-----|------|-----|--|
| Russian Officials                                |    |    |     |     |     |     |      |     |  |
| Viktor Alekseevich Ozerov                        | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Vladimir Michailovich Dzhubarov                  | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Andrei Aleksandrovich Klshas                     | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Nikolai Ivanovich Ryzhkov                        | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Evegni Viktorovich Bushmin                       | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Aleksandr Borisovich Tootonov                    | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Oleg Evgenefich Panteleev                        | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Sergei Mikhailovich Mironov                      | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Sergei Vladimirovich Zheleznyak                  | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Leonid Eduardovich Slutski                       | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Dmitry Olegovich Rogozin                         | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Sergey Yur'yevich Glazhev                        | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Vladislav Yuryevich Surkov                       | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Yelena Borisovna Mizulina                        | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Valentina Ivaonovna Matvienko                    | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Sergey Naryshkin                                 | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Victor Ivanov                                    | US |    |     | CAN |     |     |      |     |  |
| Igor Sergun                                      | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Sergei Ivanov                                    | US |    |     | CAN |     |     | AUST |     |  |
| Alexei Gromov                                    | US | EU | SUI | CAN |     | AUS | AUST | NOR |  |
| Andrei Fursenko                                  | US |    |     | CAN |     |     | AUST |     |  |
| Vladimir Yakunin                                 | US |    |     |     |     |     | AUST |     |  |
| Vladimir Kozhin                                  | US |    |     | CAN |     |     | AUST |     |  |
| Mikhail Vitalevich Margelov                      |    |    |     | CAN |     |     |      |     |  |
| Vladimir Pligin                                  |    | EU | SUI | CAN | LIE | AUS |      | NOR |  |
| Yury Viktorovich Ushakov                         |    |    |     | CAN |     |     |      |     |  |
| Dmitry Konstantinovich Kiselyov                  |    | EU | SUI |     | LIE | AUS |      | NOR |  |
| Vitalii Nikitich Ignatenko                       |    |    |     | CAN |     |     |      |     |  |
| Arkadii Viktorovich Bahkin                       |    |    |     | CAN |     |     |      |     |  |
| Vyaacheslav Volodin                              | US | EU | SUI | CAN | LIE |     | AUST | NOR |  |
| Dmitry Kozak                                     | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Aleksey Pushkov                                  | US |    |     | CAN |     |     | AUST |     |  |
| Alexander Babakov                                |    |    |     | CAN |     |     |      |     |  |
| Oleg Belaventsev                                 | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Yevgeniy Murov                                   | US |    |     | CAN |     |     |      |     |  |
| Oleg Savelyev                                    | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Ludmila Shvetsova                                |    | EU | SUI | CAN | LIE | AUS |      | NOR |  |
| Sergei Neverov                                   | US | EU | SUI | CAN | LIE | AUS |      | NOR |  |
| Vladimir Zhirinovsky                             |    |    |     | CAN |     |     |      |     |  |
| Sergey Beseda                                    | US | EU | SUI | CAN |     | AUS |      | NOR |  |
| Igor Shchegolev                                  | US |    |     | CAN |     |     |      |     |  |
| Mikhail Efimovich Fradkov                        |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Nikolai Platonovich Patrushev                    |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Aleksandr Vailievich Bortnikov                   |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Rashid Gumarovich Nurgaliev                      |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Boris Vyacheslavovich Gryzlov                    |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Mikhail Vladimirovich Degtyarev                  |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Ramzan Akhmadovitch Kadyrov                      |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Alexander Nikolayevich Tkachyov                  |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Vladimir Georgyevich Kulishov                    |    |    |     | CAN |     |     |      |     |  |
| Valerii Yuriovich Travkin                        |    |    |     | CAN |     |     |      |     |  |
| Yuri Leonidovich Vorobiov                        |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Vladimir Volfovich Zhirinovsky                   |    | EU | SUI |     |     | AUS |      | NOR |  |



|   |    |    |     |     |     |      |      |     |     |  |  |  |  |  |  |  |  |  |  |
|---|----|----|-----|-----|-----|------|------|-----|-----|--|--|--|--|--|--|--|--|--|--|
| Vladimir Abdualiyevich Vasilyev   |    | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Viktor Petrovich Vodolatsky   |    | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Leonid Ivanovich Kalashnikov  |    | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Vladimir Stepanovich Nikitin  |    | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Oleg Vladimirovich Lebedev  |    | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Ivan Ivanovich Melnikov   |    | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Igor Vladimirovich Lebedev  |    | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Nikolai Vladimirovich Levichev  |    | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Svetlana Sergeevna Zhurova  |    | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Aleksey Vasilevich Naumets  |    | EU | SUI |     |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| <b>Russian Cronies</b>  |    |    |     |     |     |      |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Gennady Timchenko   | US |    |     | CAN |     | AUST |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Arkady Rotenberg  | US | EU | SUI | CAN |     | AUS  | AUST | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Boris Rotenberg   | US |    |     | CAN |     | AUST |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Yuri Kovalchuk  | US | EU | SUI | CAN |     | AUS  | AUST | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Igor Sechin   | US |    |     |     |     |      |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Sergey Chemezov   | US | EU | SUI |     |     | AUS  |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Konstantin Malofayev  | US | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Nikolay Shamalov  |    | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Alexander Mikhailovich Babakov  |    | EU | SUI |     |     | AUS  |      |     |     |  |  |  |  |  |  |  |  |  |  |
| <b>Russian Military</b>   |    |    |     |     |     |      |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Alexander Vitko   |    | EU | SUI |     | LIE | AUS  | AUST | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Anatoly Alekseevich Sidorov   |    | EU | SUI |     | LIE | AUS  | AUST | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Aleksandr Galkin  |    | EU | SUI |     | LIE | AUS  | AUST | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Alexander Mihailovich Nosatov   |    | EU | SUI |     | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Valery Vladimirovich Kulikov  |    | EU | SUI |     | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Lt. Gen. Igor Turchenyuk  |    | EU | SUI |     | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Valery Gerasimov  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Vladimir Shamanov   |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| General Dmitry Vitalievich Bulgakov   |    |    |     | CAN |     |      |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Lieutenant-General Yuriy Eduardovich Sadovenko                                  |    |    |     | CAN |     |      |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Colonel-General Oleg Leonidovich Salyukov                                       |    |    |     | CAN |     |      |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Colonel-General Nikolay Bogdanovskiy  |    |    |     | CAN |     |      |      |     |     |  |  |  |  |  |  |  |  |  |  |
| <b>Former Ukrainian Government/ Ukrainian Separatists / Separatist Entities</b> |    |    |     |     |     |      |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Igor Strelkov (Ihor Strielkov)  | US | EU | SUI | CAN | LIE | AUS  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Sergei Ivanovich Menyailo   | US | EU | SUI | CAN | LIE | AUS  |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Mikhail Malyshev  | US | EU | SUI | CAN | LIE | AUS  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Valery Medvedev   | US | EU | SUI | CAN | LIE | AUS  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Sergey Aksyonov   | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Vladimir Konsantinov  | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Viktor Medvechuck   | US |    |     |     |     |      | AUST |     |     |  |  |  |  |  |  |  |  |  |  |
| Rustam Ilmirovich Ternigaliev   | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Deniz Valentinovich Berezovskiy   |    | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Aleksei Mikhailovich Chailly  | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Pyotr Anatoliyovych Zima  | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Yuriy Zharebtsov  | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Sergei Pavlovych Tsekov   | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Viktor Fedorovych Yanukovych  | US | EU | SUI | CAN | LIE | AUS  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Vitalii Yuriyovych Zakharchenko   |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Viktor Pavlovych Pshonka  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Oleksandr Hryhorovych Yakymenko   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Andriy Volodymyrovych Portnov   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Olena Leonidivna Lukash   |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Andrii Petrovych Kliuiev  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Viktor Ivanovych Ratushniak   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Oleksandr Viktorovych Yanukovych  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Viktor Viktorovych Yanukovych   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Artem Viktorovych Pshonka   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Serhii Petrovych Kliuiev  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Mykola Yanovych Azarov  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Oleksii Mykolayovych Azarov   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Serhiy Vitaliyovych Kurchenko   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Dmytro Volodymyrovych Tabachnyk   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Raisa Vasyilivna Bohatryiova  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Ihor Oleksandrovych Kalinin   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Serhiy Abruzov  |    | EU | SUI |     | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Mykhaylo (Mikhail) Markovych Dobkin   |    |    | SUI |     | LIE | AUS  |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Yuriy Ivanyushchenko  |    |    | SUI |     | LIE | AUS  |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Hennadiy Adolfovych Kernes  |    |    | SUI |     | LIE | AUS  |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Borys Viktorovych Kolesnikov  |    |    | SUI |     | LIE |      |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Yuriy Volodymyrovych Kolobov  |    |    | SUI |     | LIE |      |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Volodymyr Vasylovych Kozak  |    |    | SUI |     | LIE |      |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Mykola Volodymyrovych Prysyazhnyuk  |    |    | SUI |     | LIE |      |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Eduard Anatoliyovych Stavitsky  |    | EU | SUI |     | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Oleksander Serhiyovych Yefremov   |    |    | SUI |     | LIE |      |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Oleksander Viktorovych Klymenko   |    | EU | SUI |     | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Valeriy Koryak  |    |    |     |     |     | AUS  |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Oleksandr Popov   |    |    |     |     |     | AUS  |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Stanislav Schulyak  |    |    |     |     |     | AUS  |      |     |     |  |  |  |  |  |  |  |  |  |  |
| Volodymyr Sivkovych   |    |    |     |     |     | AUS  |      |     |     |  |  |  |  |  |  |  |  |  |  |



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|---|----|----|-----|-----|-----|-----|------|-----|-----|--|--|--|
| Yuriy Ivanyushchenko  |    | EU | SUI |     | LIE | AUS |      | NOR |     |  |  |  |
| Olga Fedorovna Kovalidi                                     |    | EU | SUI | CAN | LIE | AUS | AUST | NOR | JPN |  |  |  |
| German Prokopiv   |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |
| Valeriy Bolotov   | US | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |
| Andriy Purgin   | US | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |
| Denys Pushylin  | US | EU | SUI | CAN | LIE | AUS | AUST | NOR | JPN |  |  |  |
| Sergey Gennadevich Tsyplakov                                |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |
| Petr Grigorievich Jarosh                                    |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |
| Oleg Grigorievich Kozyura                                   |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |
| Vlacheslav Ponomariov                                       | US | EU | SUI | CAN | LIE | AUS | AUST | NOR | JPN |  |  |  |
| Igor Mykolaiovych Bezler                                    | US | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |
| Igor Kakidzyanov  |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |
| Oleg Tsariov  |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |
| Roman Lyagin  |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |
| Aleksandr Malyykhin   |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |
| Natalia Vladimirovna Poklonskaya                            | US | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |
| Igor Sergeievich Chetchenko (aka Shevchenko)                |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |  |
| Valery Vladimirovich Kaurov                                 | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Alexander Borodai   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Alexander Khodakovskiy                                      |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Alexandr Aleksandrovich Kalyusky                            |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Alexandr Khryakov   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Marat Bashirov  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Vasyl Nikitin   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Aleksey Karyakin  | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Yuriy Ivakin  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Igor Plotnitsky   | US | EU | SUI |     |     | AUS |      | NOR | JPN |  |  |  |
| Nikolay (Mykola) Kozitsyn                                   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Oleksiy (Aleksey) Mozgovy                                   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Victor Yuriyovich Anosov                                    |    |    |     |     | CAN |     |      |     |     |  |  |  |
| Vlacheslav Anatoliyovich Apraksimov                         |    |    |     |     | CAN |     |      |     |     |  |  |  |
| Fedir Dmytrovych Berezin                                    | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Ruslan Yunirovish Ilkaev                                    |    |    |     |     | CAN |     |      |     |     |  |  |  |
| Valeriy Kostiantynovych Mussienko                           |    |    |     |     | CAN |     |      |     |     |  |  |  |
| Vlacheslav Mykolaiovych Petrov                              |    |    |     |     | CAN |     |      |     |     |  |  |  |
| Ihor Venedyktovych Plotnitsky                               |    |    |     |     | CAN |     |      |     |     |  |  |  |
| Yurii Oleksandrovych Protsenko                              |    |    |     |     | CAN |     |      |     |     |  |  |  |
| Oleh Anatoliyovich Vasin                                    |    |    |     |     | CAN |     |      |     |     |  |  |  |
| Serhii Anatoliyovych Zdriliuk                               |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Luhansk People's Republic                                   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Donetsk People's Republic                                   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Pavel Gubarev   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Ekaterina Gubareva  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Federal State of Novorossiia                                |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| International Union of Public Associations "Great Don Army" |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Sobol   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Lugansk Guard   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Army of the Southeast                                       |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Donbass People's Republic                                   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Vostok Battalion  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Vladimir Antyufeyev (aka Vladimir Shevtsov)                 | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Oksana Tchigrina  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Boris Litvinov  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Sergey Abisov   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Alexander Zakharchenko                                      | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Vladimir Kononov  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Miroslav Vladimirovich Rudenko                              | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Gennadiy Nikolaiovych Tsytkalov                             |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Andrey Yurevich Pinchuk                                     |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Oleg Bereza   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Andrei Nikolaevich Rodkin                                   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Aleksandr Karaman   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Georgiy L'vovich Muradov                                    |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Mikhail Sergeyevich Sheremet                                |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |  |
| Serhiy Kozyakov   |    | EU |     |     |     |     |      |     | JPN |  |  |  |
| Oleg Akimov   |    | EU |     |     |     |     |      |     | JPN |  |  |  |
| Larisa Airapetyan   |    | EU |     |     |     |     |      |     | JPN |  |  |  |
| Yuriy Sivokononko   |    | EU |     |     |     |     |      |     | JPN |  |  |  |
| Aleksandr Kofman  |    | EU |     |     |     |     |      |     | JPN |  |  |  |
| Ravil Khalikov  |    | EU |     |     |     |     |      |     | JPN |  |  |  |
| Dmitry Semyonov   |    | EU |     |     |     |     |      |     | JPN |  |  |  |
| Oleg Bugrov   |    | EU |     |     |     |     |      |     | JPN |  |  |  |
| Lesya Lapteva   |    | EU |     |     |     |     |      |     | JPN |  |  |  |
| Yevgeniy Eduardovich Mihaylov                               |    | EU |     |     |     |     |      |     | JPN |  |  |  |
| Ihor Vladymyrovych Kostenok                                 |    | EU |     |     |     |     |      |     | JPN |  |  |  |
| Yevgeniy Vyasheslavovich Orlov                              |    | EU |     |     |     |     |      |     | JPN |  |  |  |
| Vladyslav Nykolayevych Deynego                              |    | EU |     |     |     |     |      |     | JPN |  |  |  |
| Donetsk Republic  |    | EU |     |     |     |     |      |     | JPN |  |  |  |
| Peace to Luhansk Region                                     |    | EU |     |     |     |     |      |     | JPN |  |  |  |
| Free Donbass  |    | EU |     |     |     |     |      |     | JPN |  |  |  |
| People's Union  |    | EU |     |     |     |     |      |     | JPN |  |  |  |

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|---|----|----|-----|-----|-----|-----|------|-----|-----|-----|--|--|--|--|
| Luhansk Economic Union  |    | EU |     |     |     |     |      |     |     | JPN |  |  |  |  |
| Donbass People's Militia  | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Marshall Capital Fund   | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Dmitry Neklyudov  | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Novorossiia Party   | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Oplot   | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Petr Savchenko  | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Oleh Tsaryov  | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| South-East Movement (Yugo-Vostok Movement)  | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Night Wolves  | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Aleksandr Zaldostanov   | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| <b>Crimean Entities</b>   |    |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Chernomorneftegaz   | US | EU | SUI | CAN | LIE | AUS | AUST | NOR | JPN |     |  |  |  |  |
| Feodosia (Feodosiya Enterprise)   | US | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |     |  |  |  |  |
| State ferry enterprise "Kerch ferry"  |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| State enterprise "Sevastopol commercial seaport"  |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| State enterprise "Kerch commercial seaport"   |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| State enterprise Universal - Avia   |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| Resort Nizhnaya Oreanda   |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| Crimean enterprise "Azov distillery plant"  |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| State concern "National Association of producers Massandra"   |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| State enterprise Magarach of the national institute of wine   |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| State enterprise "Factory of sparkling wine Novy Svet"  |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| Russian National Commercial Bank  |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| <b>Russian Entities (*Captured in EU sectoral measure, see below)</b>   |    |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Bank Rossiya  | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| SMP Bank  | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| InvestKapitalBank   | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| Volga Group   | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| Aquanika  | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| CJSC Zest   | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| JSB Sobin Bank  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Avia Group LLC  | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| Avia Group Nord LLC   | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| Sakhatrans LLC  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Stroytransgaz Group   | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| Stroytransgaz Holding   | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Stroytransgaz LLC   | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Stroytransgaz OJSC  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Stroytransgaz-M LLC   | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Limited Liability Company Investment Company  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Transoil  | US |    |     |     |     |     | AUST |     |     |     |  |  |  |  |
| Stroygazmontazh   | US |    |     |     |     |     | AUST |     |     |     |  |  |  |  |
| ExpoBank  |    |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| RosEnergoBank   |    |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Almaz-Antey   | US | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| Federal State Unitary Enterprise State Research and Production Enterprise Bazalt  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| JSC Concern Sozvezdie   | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| JSC MIC NPO Mashinostroyeniya   | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Kalishnikov Concern   | US | *  |     | CAN |     |     |      |     |     |     |  |  |  |  |
| KBP Instrument Design Bureau  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Radio-Electronic Technologies   | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Uralvagonzavod  | US | *  |     |     |     |     |      |     |     |     |  |  |  |  |
| United Shipbuilding Corporation   | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Dobrolet (aka Dobrolyot)  |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| OAO Dolgoprudny Research Production Enterprise  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Mytishchinski Mashinostroitelny Zavod, OAO  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Kalinin Machine Plant JSC   | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Almaz-Antey GSKB  | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| JSC NIIP  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Marine Scientific Research Institute of Radioelectronics Altair (MNIIRE "Altair")   |    |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| <b>Executive Order 13662 - Sectoral Sanctions</b>   |    |    |     |     |     |     |      |     |     |     |  |  |  |  |
| <b>Financial Institutions - New Debt and Equity Prohibition (*Not specifically listed but covered as 50%-owned subsidiary of a designated bank)</b>   |    |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Sberbank  | US | EU | SUI | CAN |     |     |      | NOR | JPN |     |  |  |  |  |
| VTB Bank OAO  | US | EU | SUI | CAN |     |     |      | NOR | JPN |     |  |  |  |  |
| VEB   | US | EU | SUI | CAN |     |     |      | NOR | JPN |     |  |  |  |  |
| Gazprombank OAO   | US | EU | SUI | CAN |     |     |      | NOR | JPN |     |  |  |  |  |
| Bank of Moscow  | US | *  | *   | CAN |     |     |      | *   | *   |     |  |  |  |  |
| Russian Agricultural Bank (aka Rosselkhozbank)  | US | EU | SUI | CAN |     |     |      | NOR | JPN |     |  |  |  |  |
| <b>Energy Companies - Debt Prohibition</b>  |    |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Rosneft   | US | EU | SUI |     |     | AUS |      | NOR |     |     |  |  |  |  |
| OAO Novatek   | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Gazprom Neft  | US | EU | SUI |     |     | AUS |      | NOR |     |     |  |  |  |  |
| AK Transneft OAO  | US | EU | SUI |     |     | AUS |      | NOR |     |     |  |  |  |  |
| <b>Energy Companies - Goods, Services and Technology in Oil Sector Activities (*EU, Norwegian and Canadian restrictions on provision of goods, services and technology apply are not applied to specific companies but cover their provision "in Russia")</b> |    |    |     |     |     |     |      |     |     |     |  |  |  |  |
| OAO Gazprom   | US | *  |     | *   |     | *   |      | *   |     |     |  |  |  |  |
| Gazprom Neft  | US | *  |     | *   |     | *   |      | *   |     |     |  |  |  |  |
| Lukoil OAO  | US | *  |     | *   |     | *   |      | *   |     |     |  |  |  |  |
| Surgutneftegas  | US | *  |     | *   |     | *   |      | *   |     |     |  |  |  |  |

| Defense and Related Material Companies - Debt Prohibition (*Captured as 50%-owned subsidiary of Rostec; **Designated as full asset freeze, noted above)   |    |    |     |  |     |     |  |  |  |  |
|---|----|----|-----|--|-----|-----|--|--|--|--|
| Rostec  | US |    |     |  |     |     |  |  |  |  |
| OPK Oboronprom  | *  | EU | SUI |  | AUS | NOR |  |  |  |  |
| United Aircraft Corporation   |    | EU | SUI |  | AUS | NOR |  |  |  |  |
| Uralvagonzavod  | ** | EU | SUI |  | AUS | NOR |  |  |  |  |
| Defense and Related Material Companies - Prohibition on technical assistance, brokering services, financing, and financial assistance for dual-use goods and technology (*Designated as full asset freeze, noted above) |    |    |     |  |     |     |  |  |  |  |
| JSC Sirius  |    | EU | SUI |  | AUS | NOR |  |  |  |  |
| OJSC Stankoinstrument   |    | EU | SUI |  | AUS | NOR |  |  |  |  |
| OAO JSC Chemcomposite   |    | EU | SUI |  | AUS | NOR |  |  |  |  |
| JSC Kalashnikov   | *  | EU | SUI |  | AUS | NOR |  |  |  |  |
| JSC Tula Arms Plant   |    | EU | SUI |  | AUS | NOR |  |  |  |  |
| NPK Tchnologii Maschinostrojenija   |    | EU | SUI |  | AUS | NOR |  |  |  |  |
| OAO Wysokototschnye Komleski  |    | EU | SUI |  | AUS | NOR |  |  |  |  |
| OAO Almaz Antey   |    | EU | SUI |  | AUS | NOR |  |  |  |  |
| OAO NPO Bazalt  |    | EU | SUI |  | AUS | NOR |  |  |  |  |

## Comparison Sanctions Plans

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**From:** "Gatjanis, Gregory" (b)(6)  
**To:** (b)(6) (b)(6)  
**Cc:** (b)(6) "Baheri, Leila" (b)(6)  
**Date:** Thu, 19 Feb 2015 17:13:38 -0500  
**Attachments:** 20150218 Comparison of Country Sanctions\_Russia\_Ukraine.pdf (368.02 kB)

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(b)(6)

Here's the comparison chart I mentioned. Even though it's based on publicly available information (and classified Unclass/FOUO), please have your team treat it carefully and not circulate it.

**Russia/Former Government of Ukraine-related Designations - Persons (as of February 18, 2015)**

US: United States  
 EU: European Union  
 SUI: Switzerland\*  
 CAN: Canada  
 LIE: Liechtenstein\*  
 AUS: Austria\*\*  
 AUST: Australia  
 JPN: Japan  
 NOR: Norway

\*Switzerland and Liechtenstein have issued "anti-circumvention" measures for many of the EU designated individuals and entities. These measures prohibit their financial institutions from entering into new business relationships with these individuals and entities (these measures short of asset freezes are denoted by black stripes). Likewise, in Switzerland, "new issue of long term financial instruments" for the five banks listed by the EU for debt and equity prohibitions will require authorization, only given if they are within the average financial engagement of the past three years. \*\*Austria's original list was superceded by the shorter EU list; however, Austria has stated that it plans to add back those from original list (in gray)

| Executive Orders 13660 and 13661 - Asset Freezes |    |    |     |     |     |     |      |     |  |
|--|----|----|-----|-----|-----|-----|------|-----|--|
| Russian Officials                                |    |    |     |     |     |     |      |     |  |
| Viktor Alekseevich Ozerov                        | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Vladimir Michailovich Dzhabarov                  | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Andrei Aleksandrovich Klishas                    | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Nikolai Ivanovich Ryzhkov                        | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Evegni Viktorovich Bushmin                       | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Aleksandr Borisovich Tootonov                    | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Oleg Evgenefich Panteleev                        | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Sergei Mikhailovich Mironov                      | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Sergei Vladimirovich Zheleznyak                  | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Leonid Eduardovich Slutski                       | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Dmitry Olegovich Rogozin                         | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Sergey Yur'yevich Glazhev                        | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Vladislav Yuryevich Surkov                       | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Yelena Borisovna Mizulina                        | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Valentina Ivaonovna Matvienko                    | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Sergey Naryshkin                                 | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Victor Ivanov                                    | US |    |     | CAN |     |     |      |     |  |
| Igor Sergun                                      | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Sergei Ivanov                                    | US |    |     | CAN |     |     | AUST |     |  |
| Alexei Gromov                                    | US | EU | SUI | CAN |     | AUS | AUST | NOR |  |
| Andrei Fursenko                                  | US |    |     | CAN |     |     | AUST |     |  |
| Vladimir Yakunin                                 | US |    |     |     |     |     | AUST |     |  |
| Vladimir Kozhin                                  | US |    |     | CAN |     |     | AUST |     |  |
| Mikhail Vitalevich Margelov                      |    |    |     | CAN |     |     |      |     |  |
| Vladimir Pligin                                  |    | EU | SUI | CAN | LIE | AUS |      | NOR |  |
| Yury Viktorovich Ushakov                         |    |    |     | CAN |     |     |      |     |  |
| Dmitry Konstantinovich Kiselyov                  |    | EU | SUI | CAN | LIE | AUS |      | NOR |  |
| Vitalii Nikitich Ignatienko                      |    |    |     | CAN |     |     |      |     |  |
| Arkadii Viktorovich Bahkin                       |    |    |     | CAN |     |     |      |     |  |
| Vyaacheslav Volodin                              | US | EU | SUI | CAN | LIE |     | AUST | NOR |  |
| Dmitry Kozak                                     | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Aleksey Pushkov                                  | US |    |     | CAN |     |     | AUST |     |  |
| Alexander Babakov                                |    |    |     | CAN |     |     |      |     |  |
| Oleg Belaventsev                                 | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Yevgeniy Murov                                   | US |    |     | CAN |     |     |      |     |  |
| Oleg Savelyev                                    | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Ludmila Shvetsova                                |    | EU | SUI | CAN | LIE | AUS |      | NOR |  |
| Sergei Neverov                                   | US | EU | SUI | CAN | LIE | AUS |      | NOR |  |
| Vladimir Zhirinovskiy                            |    |    |     | CAN |     |     |      |     |  |
| Sergey Beseda                                    | US | EU | SUI | CAN |     | AUS |      | NOR |  |
| Igor Shchegolev                                  | US |    |     | CAN |     |     |      |     |  |
| Mikhail Efimovich Fradkov                        |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Nikolai Platonovich Patrushev                    |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Aleksandr Vailievich Bortnikov                   |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Rashid Gumarovich Nurgaliev                      |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Boris Vyacheslavovich Gryzlov                    |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Mikhail Vladimirovich Degtyarev                  |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Ramzan Akhmadovitch Kadyrov                      |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Alexander Nikolayevich Tkachyov                  |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Vladimir Georgyevich Kulishov                    |    |    |     | CAN |     |     |      |     |  |
| Valerii Yuriovych Travkin                        |    |    |     | CAN |     |     |      |     |  |
| Yuri Leonidovich Vorobiov                        |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Vladimir Volfovich Zhirinovskiy                  |    | EU | SUI |     |     | AUS |      | NOR |  |

|   |    |    |     |     |     |      |      |     |     |  |  |  |  |  |  |  |  |  |
|---|----|----|-----|-----|-----|------|------|-----|-----|--|--|--|--|--|--|--|--|--|
| Vladimir Abdualiyevich Vasilyev   |    | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Viktor Petrovich Vodolatsky   |    | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Leonid Ivanovich Kalashnikov  |    | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Vladimir Stepanovich Nikitin  |    | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Oleg Vladimirovich Lebedev  |    | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Ivan Ivanovich Melnikov   |    | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Igor Vladimirovich Lebedev  |    | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Nikolai Vladimirovich Levichev  |    | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Svetlana Sergeevna Zhurova  |    | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Aleksey Vasilevich Naumets  |    | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Anatoly Ivanovich Antonov   |    | EU |     | CAN |     | AUS  |      |     |     |  |  |  |  |  |  |  |  |  |
| Arkady Viktorovich Bakhin   |    | EU |     |     |     | AUS  |      |     |     |  |  |  |  |  |  |  |  |  |
| Iosif (Joseph) Davydovich Kobzon  |    | EU |     | CAN |     | AUS  |      |     |     |  |  |  |  |  |  |  |  |  |
| Valery Fedorovich Rashkin   |    | EU |     | CAN |     | AUS  |      |     |     |  |  |  |  |  |  |  |  |  |
| <b>Russian Cronies</b>  |    |    |     |     |     |      |      |     |     |  |  |  |  |  |  |  |  |  |
| Gennady Timchenko   | US |    |     | CAN |     | AUST |      |     |     |  |  |  |  |  |  |  |  |  |
| Arkady Rotenberg  | US | EU | SUI | CAN |     | AUS  | AUST | NOR |     |  |  |  |  |  |  |  |  |  |
| Boris Rotenberg   | US |    |     | CAN |     | AUST |      |     |     |  |  |  |  |  |  |  |  |  |
| Yuri Kovalchuk  | US | EU | SUI | CAN |     | AUS  | AUST | NOR |     |  |  |  |  |  |  |  |  |  |
| Igor Sechin   | US |    |     |     |     |      |      |     |     |  |  |  |  |  |  |  |  |  |
| Sergey Chemezov   | US | EU | SUI | CAN |     | AUS  |      |     |     |  |  |  |  |  |  |  |  |  |
| Konstantin Malofayev  | US | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Nikolay Shamalov  |    | EU | SUI | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Alexander Mikhailovich Babakov  |    | EU | SUI |     |     | AUS  |      |     |     |  |  |  |  |  |  |  |  |  |
| <b>Russian Military</b>   |    |    |     |     |     |      |      |     |     |  |  |  |  |  |  |  |  |  |
| Alexander Vitko   |    | EU | SUI |     | LIE | AUS  | AUST | NOR |     |  |  |  |  |  |  |  |  |  |
| Anatoly Alekseevich Sidorov   |    | EU | SUI |     | LIE | AUS  | AUST | NOR |     |  |  |  |  |  |  |  |  |  |
| Aleksandr Galkin  |    | EU | SUI |     | LIE | AUS  | AUST | NOR |     |  |  |  |  |  |  |  |  |  |
| Alexander Mihailovich Nosatov   |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Valery Vladimirovich Kulikov  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Lt. Gen. Igor Turchenyuk  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Valery Gerasimov  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Vladimir Shamanov   |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| General Dmitry Vitalievich Bulgakov   |    |    |     | CAN |     |      |      |     |     |  |  |  |  |  |  |  |  |  |
| Lieutenant-General Yuriy Eduardovich Sadovenko                                  |    |    |     | CAN |     |      |      |     |     |  |  |  |  |  |  |  |  |  |
| Colonel-General Oleg Leonidovich Salyukov                                       |    |    |     | CAN |     |      |      |     |     |  |  |  |  |  |  |  |  |  |
| Colonel-General Nikolay Bogdanovskiy  |    |    |     | CAN |     |      |      |     |     |  |  |  |  |  |  |  |  |  |
| Andrei Veleryevich Kartapolov   |    | EU |     | CAN |     | AUS  |      |     |     |  |  |  |  |  |  |  |  |  |
| <b>Former Ukrainian Government/ Ukrainian Separatists / Separatist Entities</b> |    |    |     |     |     |      |      |     |     |  |  |  |  |  |  |  |  |  |
| Igor Strelkov (Ihor Strielkov)  | US | EU | SUI | CAN | LIE | AUS  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Sergei Ivanovich Menyailo   | US | EU | SUI | CAN | LIE | AUS  |      | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Mikhail Malyshev  | US | EU | SUI | CAN | LIE | AUS  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Valery Medvedev   | US | EU | SUI | CAN | LIE | AUS  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Sergey Aksyonov   | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Vladimir Konsantinov  | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Viktor Medvechuck   | US |    |     |     |     |      | AUST |     |     |  |  |  |  |  |  |  |  |  |
| Rustam Illmirovich Ternigaliev  | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Deniz Valentinovich Berezovskiy   |    | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Aleksei Mikhailovich Chaily   | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Pyotr Anatoliyovych Zima  | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Yuriy Zherebtsov  | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Sergei Pavlovych Tsekov   | US | EU | SUI |     | LIE | AUS  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Viktor Fedorovych Yanukovych  | US | EU | SUI | CAN | LIE | AUS  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Vitalii Yuriyovych Zakharchenko   |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Viktor Pavlovych Pshonka  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Oleksandr Hryhorovych Yakymenko   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Andriy Volodymyrovych Portnov   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Olena Leonidivna Lukash   |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Andrii Petrovych Kliuiev  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Viktor Ivanovych Ratushniak   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Oleksandr Viktorovych Yanukovych  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Viktor Viktorovych Yanukovych   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Artem Viktorovych Pshonka   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Serhiy Petrovych Kliuiev  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Mykola Yanovych Azarov  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Oleksii Mykolayovych Azarov   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Serhiy Vitaliyovych Kurchenko   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Dmytro Volodymyrovych Tabachnyk   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Raisa Vasylivna Bohatryriova  |    | EU | SUI | CAN | LIE | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Ihor Oleksandrovych Kalinin   |    | EU |     | CAN |     | AUS  |      | NOR |     |  |  |  |  |  |  |  |  |  |
| Serhiy Abruzov  |    | EU |     |     |     | LIE  | AUS  | NOR |     |  |  |  |  |  |  |  |  |  |
| Mykhaylo (Mikhail) Markovych Dobkin   |    |    | SUI |     |     | LIE  | AUS  |     |     |  |  |  |  |  |  |  |  |  |
| Yuriy Ivanyushchenko  |    |    | SUI |     |     | LIE  | AUS  |     |     |  |  |  |  |  |  |  |  |  |
| Hennadiy Adolfovych Kernes  |    |    | SUI |     |     | LIE  | AUS  |     |     |  |  |  |  |  |  |  |  |  |
| Borys Viktorovych Kolesnikov  |    |    | SUI |     |     | LIE  |      |     |     |  |  |  |  |  |  |  |  |  |
| Yuriy Volodymyrovych Kolobov  |    |    | SUI |     |     | LIE  |      |     |     |  |  |  |  |  |  |  |  |  |
| Volodymyr Vasylovych Kozak  |    |    | SUI |     |     | LIE  |      |     |     |  |  |  |  |  |  |  |  |  |
| Mykola Volodymyrovych Prysyazhnyuk  |    |    | SUI |     |     | LIE  |      |     |     |  |  |  |  |  |  |  |  |  |
| Eduard Anatoliyovych Stavitsky  |    | EU | SUI |     |     | LIE  | AUS  |     | NOR |  |  |  |  |  |  |  |  |  |

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| Oleksander Serhiyovych Yefremov                             |    |    | SUI |     | LIE |     |      |     |     |  |  |
| Oleksander Victorovych Klymenko                             |    | EU | SUI |     | LIE | AUS |      | NOR |     |  |  |
| Valeriy Koryak  |    |    |     |     |     | AUS |      |     |     |  |  |
| Oleksandr Popov   |    |    |     |     |     | AUS |      |     |     |  |  |
| Stanislav Schulyak  |    |    |     |     |     | AUS |      |     |     |  |  |
| Volodymyr Sivkovych   |    |    |     |     |     | AUS |      |     |     |  |  |
| Yuriy Ivanyushchenko  |    | EU | SUI |     | LIE | AUS |      | NOR |     |  |  |
| Olga Fedorovna Kovatidi                                     |    | EU | SUI | CAN | LIE | AUS | AUST | NOR | JPN |  |  |
| German Prokopiv   |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |
| Valeriy Bolotov   | US | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |
| Andriy Purgin   | US | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |
| Denys Pushylin  | US | EU | SUI | CAN | LIE | AUS | AUST | NOR | JPN |  |  |
| Sergey Gennadevich Tsyplakov                                |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |
| Petr Grigorievich Jarosh                                    |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |
| Oleg Grigorievich Kozuyura                                  |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |
| Viacheslav Ponomariv  | US | EU | SUI | CAN | LIE | AUS | AUST | NOR | JPN |  |  |
| Igor Mykolaiovych Bezler                                    | US | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |
| Igor Kakidzyanov  |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |
| Oleg Tsariov  |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |
| Roman Lyagin  |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |
| Aleksandr Malykhin  |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |
| Natalia Vladimirovna Poklonskaya                            | US | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |
| Igor Sergeievich Chetchenko (aka Shevchenko)                |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |  |  |
| Valery Vladimirovich Kaurov                                 | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Alexander Borodai   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Alexander Khodakovskiy                                      |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Alexandr Alexandrovich Kalyusky                             |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Alexandr Khryakov   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Marat Bashirov  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Vasyl Nikitin   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Aleksey Karyakin  | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Yuriy Ivakin  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Igor Plotnitsky   | US | EU | SUI |     |     | AUS |      | NOR | JPN |  |  |
| Nikolay (Mykola) Kozitsyn                                   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Oleksiy (Aleksey) Mozgovy                                   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Victor Yuriyovych Anosov                                    |    |    |     |     | CAN |     |      |     |     |  |  |
| Viacheslav Anatoliyovych Apraksimov                         |    |    |     |     | CAN |     |      |     |     |  |  |
| Fedir Dmytrovych Berezin                                    | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Ruslan Yunirovich Ilkaev                                    |    |    |     |     | CAN |     |      |     |     |  |  |
| Valerii Kostiantynovych Mussienko                           |    |    |     |     | CAN |     |      |     |     |  |  |
| Viacheslav Mykolaiovych Petrov                              |    |    |     |     | CAN |     |      |     |     |  |  |
| Ihor Venedyktovych Plotnytsky                               |    |    |     |     | CAN |     |      |     |     |  |  |
| Yuriy Oleksandrovych Protsenko                              |    |    |     |     | CAN |     |      |     |     |  |  |
| Oleh Anatoliyovych Vasin                                    |    |    |     |     | CAN |     |      |     |     |  |  |
| Serhii Anatoliyovych Zdriliuk                               |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Luhansk People's Republic                                   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Donetsk People's Republic                                   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Pavel Gubarev   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Ekaterina Gubareva  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Federal State of Novorossiya                                |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| International Union of Public Associations "Great Don Army" |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Sobol   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Lugansk Guard   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Army of the Southeast                                       |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Donbass People's Republic                                   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Vostok Battalion  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Vladimir Antyufeyev (aka Vladimir Shevtsov)                 | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Oksana Tchigrina  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Boris Litvinov  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Sergey Abisov   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Alexander Zakharchenko                                      | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Vladimir Kononov  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Miroslav Vladimirovich Rudenko                              | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Gennadiy Nikolaiovych Tsyplakov                             |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Andrey Yurevich Pinchuk                                     |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Oleg Bereza   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Andrei Nikolaevich Rodkin                                   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Aleksandr Karaman   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Georgiy L'vovich Muradov                                    |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Mikhail Sergeyevich Sheremet                                |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |  |  |
| Serhiy Kozyakov   |    | EU |     |     | CAN | AUS |      |     | JPN |  |  |
| Oleg Akimov   |    | EU |     |     |     | AUS |      |     | JPN |  |  |
| Larisa Airapetyan   |    | EU |     |     | CAN | AUS |      |     | JPN |  |  |
| Yuriy Sivokonenko   |    | EU |     |     | CAN | AUS |      |     | JPN |  |  |
| Aleksandr Kofman  |    | EU |     |     |     | AUS |      |     | JPN |  |  |
| Ravil Khalikov  |    | EU |     |     | CAN | AUS |      |     | JPN |  |  |
| Dmitry Semyonov   |    | EU |     |     | CAN | AUS |      |     | JPN |  |  |
| Oleg Bugrov   |    | EU |     |     | CAN | AUS |      |     | JPN |  |  |
| Lesya Lapteva   |    | EU |     |     | CAN | AUS |      |     | JPN |  |  |
| Yevgeniy Eduardovich Mikhaylov                              |    | EU |     |     | CAN | AUS |      |     | JPN |  |  |
| Ihor Vladymyrovych Kostenok                                 |    | EU |     |     | CAN | AUS |      |     | JPN |  |  |

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| Yevgeniy Vyasheslavovich Orlov   |    | EU |     | CAN |     | AUS |      |  |     | JPN |  |  |  |  |  |  |  |  |  |
| Vladyslav Nykolayevych Deynego   |    | EU |     | CAN |     | AUS |      |  |     | JPN |  |  |  |  |  |  |  |  |  |
| Donetsk Republic   |    | EU |     | CAN |     | AUS |      |  |     | JPN |  |  |  |  |  |  |  |  |  |
| Peace to Luhansk Region  |    | EU |     | CAN |     | AUS |      |  |     | JPN |  |  |  |  |  |  |  |  |  |
| Free Donbass   |    | EU |     | CAN |     | AUS |      |  |     | JPN |  |  |  |  |  |  |  |  |  |
| People's Union   |    | EU |     | CAN |     | AUS |      |  |     | JPN |  |  |  |  |  |  |  |  |  |
| Luhansk Economic Union   |    | EU |     | CAN |     | AUS |      |  |     | JPN |  |  |  |  |  |  |  |  |  |
| Donbass People's Militia   | US |    |     |     |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Marshall Capital Fund  | US |    |     |     |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Dmitry Neklyudov   | US |    |     | CAN |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Novorossiia Party  | US | EU |     | CAN |     | AUS |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Oplot  | US | EU |     | CAN |     | AUS |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Petr Savchenko   | US |    |     |     |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Profactor Tov  | US |    |     | CAN |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Oleh Tsaryov   | US |    |     |     |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| South-East Movement (Yugo-Vostok Movement)                                       | US |    |     | CAN |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Night Wolves   | US |    |     |     |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Aleksandr Zaldostanov  | US |    |     | CAN |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Pavel Dremov aka Batya   |    | EU |     | CAN |     | AUS |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Alexey Michakov aka Fritz, Serbian   |    | EU |     | CAN |     | AUS |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Arseny Pavlov aka Motorola   |    | EU |     | CAN |     | AUS |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Mikhail Tolstykh aka Givi  |    | EU |     | CAN |     | AUS |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Eduard Basurin   |    | EU |     | CAN |     | AUS |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Alexandr Shubin  |    | EU |     | CAN |     | AUS |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Sergey Litvin  |    | EU |     | CAN |     | AUS |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Sergey Ignatov   |    | EU |     | CAN |     | AUS |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Ekaterina Filippova  |    | EU |     | CAN |     | AUS |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Aleksandr Timofeev   |    | EU |     | CAN |     | AUS |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Evgeny Manuilov  |    | EU |     | CAN |     | AUS |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Viktor Yatsenko  |    | EU |     | CAN |     | AUS |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Olga Besedina  |    | EU |     | CAN |     | AUS |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Zaur Ismailov  |    | EU |     | CAN |     | AUS |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Cossack National Guard   |    | EU |     | CAN |     | AUS |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Sparta battalion   |    | EU |     | CAN |     | AUS |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Somali battalion   |    | EU |     | CAN |     | AUS |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Zarya battalion  |    | EU |     | CAN |     | AUS |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Prizrak brigade  |    | EU |     | CAN |     | AUS |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Kalmius battalion  |    | EU |     | CAN |     | AUS |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Death battalion  |    | EU |     | CAN |     | AUS |      |  |     |     |  |  |  |  |  |  |  |  |  |
| <b>Crimean Entities</b>  |    |    |     |     |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Chernomorneftegaz  | US | EU | SUI | CAN | LIE | AUS | AUST |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Feodosia (Feodosiya Enterprise)  | US | EU | SUI | CAN | LIE | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| State ferry enterprise "Kerch ferry"   |    | EU | SUI | CAN |     | AUS |      |  | NOR |     |  |  |  |  |  |  |  |  |  |
| State enterprise "Sevastopol commercial seaport"                                 |    | EU | SUI | CAN |     | AUS |      |  | NOR |     |  |  |  |  |  |  |  |  |  |
| State enterprise "Kerch commercial seaport"                                      |    | EU | SUI | CAN |     | AUS |      |  | NOR |     |  |  |  |  |  |  |  |  |  |
| State enterprise Universal - Avia  |    | EU | SUI | CAN |     | AUS |      |  | NOR |     |  |  |  |  |  |  |  |  |  |
| Resort Nizhnaya Oreanda  |    | EU | SUI | CAN |     | AUS |      |  | NOR |     |  |  |  |  |  |  |  |  |  |
| Crimean enterprise "Azov distillery plant"                                       |    | EU | SUI | CAN |     | AUS |      |  | NOR |     |  |  |  |  |  |  |  |  |  |
| State concern "National Association of producers Massandra"                      |    | EU | SUI | CAN |     | AUS |      |  | NOR |     |  |  |  |  |  |  |  |  |  |
| State enterprise Magarach of the national institute of wine                      |    | EU | SUI | CAN |     | AUS |      |  | NOR |     |  |  |  |  |  |  |  |  |  |
| State enterprise "Factory of sparkling wine Novy Svet"                           |    | EU | SUI | CAN |     | AUS |      |  | NOR |     |  |  |  |  |  |  |  |  |  |
| Russian National Commercial Bank   |    | EU | SUI | CAN |     | AUS |      |  | NOR |     |  |  |  |  |  |  |  |  |  |
| <b>Russian Entities (*Captured in EU sectoral measure, see below)</b>            |    |    |     |     |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Bank Rossiya   | US |    |     | CAN |     |     | AUST |  |     |     |  |  |  |  |  |  |  |  |  |
| SMP Bank   | US |    |     | CAN |     |     | AUST |  |     |     |  |  |  |  |  |  |  |  |  |
| InvestKapitalBank  | US |    |     | CAN |     |     | AUST |  |     |     |  |  |  |  |  |  |  |  |  |
| Volga Group  | US |    |     | CAN |     |     | AUST |  |     |     |  |  |  |  |  |  |  |  |  |
| Aquanika   | US |    |     | CAN |     |     | AUST |  |     |     |  |  |  |  |  |  |  |  |  |
| CJSC Zest  | US |    |     | CAN |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| JSB Sobin Bank   | US |    |     | CAN |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Avia Group LLC   | US |    |     | CAN |     |     | AUST |  |     |     |  |  |  |  |  |  |  |  |  |
| Avia Group Nord LLC  | US |    |     | CAN |     |     | AUST |  |     |     |  |  |  |  |  |  |  |  |  |
| Sakhatrans LLC   | US |    |     | CAN |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Stroytransgaz Group  | US |    |     | CAN |     |     | AUST |  |     |     |  |  |  |  |  |  |  |  |  |
| Stroytransgaz Holding  | US |    |     | CAN |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Stroytransgaz LLC  | US |    |     | CAN |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Stroytransgaz OJSC   | US |    |     | CAN |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Stroytransgaz-M LLC  | US |    |     | CAN |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Limited Liability Company Investment Company                                     | US |    |     | CAN |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Transoil   | US |    |     |     |     |     | AUST |  |     |     |  |  |  |  |  |  |  |  |  |
| Stroygazmontazh  | US |    |     | CAN |     |     | AUST |  |     |     |  |  |  |  |  |  |  |  |  |
| ExpoBank   |    |    |     | CAN |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| RosEnergobank  |    |    |     | CAN |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Almaz-Antey  | US | EU | SUI | CAN |     | AUS |      |  | NOR |     |  |  |  |  |  |  |  |  |  |
| Federal State Unitary Enterprise State Research and Production Enterprise Bazalt | US |    |     | CAN |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| JSC Concern Sozvezdie  | US |    |     | CAN |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| JSC MIC NPO Mashinostroyeniya  | US |    |     | CAN |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Kalishnikov Concern  | US | *  |     | CAN |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| KBP Instrument Design Bureau   | US |    |     | CAN |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Radio-Electronic Technologies  | US |    |     | CAN |     |     |      |  |     |     |  |  |  |  |  |  |  |  |  |



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| Uralvagonzavod  | US | *  |     |     |     |  |     |     |     |  |  |  |  |  |  |  |  |  |  |
| United Shipbuilding Corporation   | US |    |     | CAN |     |  |     |     |     |  |  |  |  |  |  |  |  |  |  |
| Dobrolet (aka Dobrolyot)  |    | EU | SUI | CAN | AUS |  | NOR |     |     |  |  |  |  |  |  |  |  |  |  |
| OA0 Dolgoprudny Research Production Enterprise  | US |    |     | CAN |     |  |     |     |     |  |  |  |  |  |  |  |  |  |  |
| Mytishchinski Mashinostroitelny Zavod, OA0  | US |    |     | CAN |     |  |     |     |     |  |  |  |  |  |  |  |  |  |  |
| Kalinin Machine Plan JSC  | US |    |     | CAN |     |  |     |     |     |  |  |  |  |  |  |  |  |  |  |
| Almaz-Antey GSKB  | US |    |     | CAN |     |  |     |     |     |  |  |  |  |  |  |  |  |  |  |
| JSC NIIP  | US |    |     | CAN |     |  |     |     |     |  |  |  |  |  |  |  |  |  |  |
| Marine Scientific Research Institute of Radioelectronics Altair (MNIIRE "Altair")   |    |    |     | CAN |     |  |     |     |     |  |  |  |  |  |  |  |  |  |  |
| <b>Executive Order 13662 - Sectoral Sanctions</b>   |    |    |     |     |     |  |     |     |     |  |  |  |  |  |  |  |  |  |  |
| <b>Financial Institutions - New Debt and Equity Prohibition (*Not specifically listed but covered as 50%-owned subsidiary of a designated bank)</b>   |    |    |     |     |     |  |     |     |     |  |  |  |  |  |  |  |  |  |  |
| Sberbank  | US | EU | SUI | CAN |     |  |     | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| VTB Bank OA0  | US | EU | SUI | CAN |     |  |     | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| VEB   | US | EU | SUI | CAN |     |  |     | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Gazprombank OA0   | US | EU | SUI | CAN |     |  |     | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Bank of Moscow  | US | *  | *   | CAN |     |  |     | *   | *   |  |  |  |  |  |  |  |  |  |  |
| Russian Agricultural Bank (aka Rosselkhozbank)  | US | EU | SUI | CAN |     |  |     | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| <b>Energy Companies - Debt Prohibition</b>  |    |    |     |     |     |  |     |     |     |  |  |  |  |  |  |  |  |  |  |
| Rosneft   | US | EU | SUI | CAN | AUS |  | NOR |     |     |  |  |  |  |  |  |  |  |  |  |
| OA0 Novatek   | US |    |     | CAN |     |  |     |     |     |  |  |  |  |  |  |  |  |  |  |
| Gazprom Neft  | US | EU | SUI |     | AUS |  | NOR |     |     |  |  |  |  |  |  |  |  |  |  |
| AK Transneft OA0  | US | EU | SUI |     | AUS |  | NOR |     |     |  |  |  |  |  |  |  |  |  |  |
| <b>Energy Companies - Goods, Services and Technology in Oil Sector Activities (*EU, Norwegian and Canadian restrictions on provision of goods, services and technology apply are not applied to specific companies but cover their provision "in Russia")</b> |    |    |     |     |     |  |     |     |     |  |  |  |  |  |  |  |  |  |  |
| OA0 Gazprom   | US | *  |     | *   | *   |  | *   |     |     |  |  |  |  |  |  |  |  |  |  |
| Gazprom Neft  | US | *  |     | *   | *   |  | *   |     |     |  |  |  |  |  |  |  |  |  |  |
| Lukoil OA0  | US | *  |     | *   | *   |  | *   |     |     |  |  |  |  |  |  |  |  |  |  |
| Surgutneftegas  | US | *  |     | *   | *   |  | *   |     |     |  |  |  |  |  |  |  |  |  |  |
| <b>Defense and Related Material Companies - Debt Prohibition (*Captured as 50%-owned subsidiary of Rostec; **Designated as full asset freeze, noted above)</b>  |    |    |     |     |     |  |     |     |     |  |  |  |  |  |  |  |  |  |  |
| Rostec  | US |    |     |     |     |  |     |     |     |  |  |  |  |  |  |  |  |  |  |
| OPK Oboronprom  | *  | EU | SUI |     | AUS |  | NOR |     |     |  |  |  |  |  |  |  |  |  |  |
| United Aircraft Corporation   |    | EU | SUI |     | AUS |  | NOR |     |     |  |  |  |  |  |  |  |  |  |  |
| Uralvagonzavod  | ** | EU | SUI |     | AUS |  | NOR |     |     |  |  |  |  |  |  |  |  |  |  |
| <b>Defense and Related Material Companies - Prohibition on technical assistance, brokering services, financing, and financial assistance for dual-use goods and technology (*Designated as full asset freeze, noted above)</b>                                |    |    |     |     |     |  |     |     |     |  |  |  |  |  |  |  |  |  |  |
| JSC Sirius  |    | EU | SUI |     | AUS |  | NOR |     |     |  |  |  |  |  |  |  |  |  |  |
| OJSC Stankoinstrument   |    | EU | SUI |     | AUS |  | NOR |     |     |  |  |  |  |  |  |  |  |  |  |
| OA0 JSC Chemcomposite   |    | EU | SUI |     | AUS |  | NOR |     |     |  |  |  |  |  |  |  |  |  |  |
| JSC Kalashnikov   | *  | EU | SUI |     | AUS |  | NOR |     |     |  |  |  |  |  |  |  |  |  |  |
| JSC Tula Arms Plant   |    | EU | SUI |     | AUS |  | NOR |     |     |  |  |  |  |  |  |  |  |  |  |
| NPK Tchnologii Maschinostrojenija   |    | EU | SUI |     | AUS |  | NOR |     |     |  |  |  |  |  |  |  |  |  |  |
| OA0 Wysokototschnye Komplexi  |    | EU | SUI |     | AUS |  | NOR |     |     |  |  |  |  |  |  |  |  |  |  |
| OA0 Almaz Antey   |    | EU | SUI |     | AUS |  | NOR |     |     |  |  |  |  |  |  |  |  |  |  |
| OA0 NPO Bazalt  |    | EU | SUI |     | AUS |  | NOR |     |     |  |  |  |  |  |  |  |  |  |  |

## RE: quick question - RU

**From:** (b)(6)  
**To:** (b)(6) State (b)(6) (b)(6)  
**Cc:** (b)(6)  
**Date:** Mon, 09 Mar 2015 09:30:43 -0400  
**Attachments:** 20150226 Comparison of Country Sanctions\_Russia\_Ukraine.pdf (356.08 kB)

Hi State (b)(6)

I have attached the latest comparison chart which best illustrates where we have differences in sanctioned individuals and entities.

As far as the distinctions in our actual sanction tools, quickly off the top of my head (b)(6) and (b)(6) please chime in with anything I'm missing):

- Sanctions
  - o We have sanctioned more inner circle/cronies (in particular Timchenko and Boris Rotenberg)
  - o (b)(5)
- Debt and equity bans
  - o Across all sectors (energy, defense, and finance):
    - the EU has a carve out for trade finance supporting non-sanctioned trade by EU countries (not third countries)
    - the EU definition of equity is more narrow ((b)(6) or (b)(6) should have more information on this)
  - o Energy
    - Our allowable maturity threshold is set at 90 days, while EU is at 30 days.
    - We imposed the debt and equity ban on Novatek, which is a private company but owned by a sanctioned individuals, while the EU did not
  - o Defense
    - We imposed the financing ban on Rostec, which is a huge conglomerate, while the EU did a few smaller firms.
- Crimea ban
  - o We both have bans on trade now. U.S. is more expansive, including investment (I think this was the distinction (b)(6) and (b)(6) correct me if I'm wrong)

Here is our off the shelf background summary also:

Treasury has designated (e.g. imposed full blocking sanctions on) 74 individuals and 43 entities in Ukraine and Russia, including Russian government and legislative officials, separatist leaders, members of the Russian leadership's inner circle, and four banks. In addition, we have developed, in close cooperation with the EU, sanctions on a more narrow set of transactions for 14 companies. These measures include unique sanctions to raise costs of financing for Russian financial institutions and other companies by prohibiting dealing in new debt of various tenors and/or equity issued by Russia's six largest financial institutions, four energy firms, and one major defense conglomerate, focusing primarily on state-owned companies. We have also imposed a prohibition on the exploration and development of frontier oil projects in Russia that applies to a total of five energy companies, two of which are subject to the financing provision as well. Our G-7 partners and Australia have adopted similar measures across the same sectors. Finally, both the U.S. and EU have adopted bans on trade and investment in Crimea, with minor differences.

I do not know total for EU off the top of my head. Will see if I can find.

(b)(6)

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**From:** (b)(6)  
**Sent:** Monday, March 09, 2015 9:16 AM  
**To:** State (b)(6) (b)(6)  
**Cc:** (b)(6)  
**Subject:** Re: quick question - RU

+ (b)(6) in TFFC, who I believe has been tracking this

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**From:** State (b)(6)  
**Sent:** Monday, March 09, 2015 09:14 AM Eastern Standard Time  
**To:** (b)(6)  
**Subject:** quick question - RU

Hello,

I don't suppose either of you have a very quick summary of the gaps between US and EU sanctions on RU? What we've done that they have not, and vice-versa? I need to put something together quickly for our Ambassador and Country Team in the next two hours. I know there are gaps around oligarchs, that some of the debt financing time thresholds differ, and that we used to be behind on Crimea (but not anymore)?

Also, do you happen to have total numbers of persons and entities sanctioned, both US and EU?

2018-08-116: 000992

Thanks!

State (b)(6)

*First Secretary, Economics / U.S. Embassy, London /*

State (b)(6)

**Russia/Former Government of Ukraine-related Designations - Persons (as of February 26, 2015)**

US: United States  
 EU: European Union  
 SUI: Switzerland\*  
 CAN: Canada  
 LIE: Liechtenstein\*  
 AUS: Austria\*\*  
 AUST: Australia  
 JPN: Japan  
 NOR: Norway

\*Switzerland and Liechtenstein have issued "anti-circumvention" measures for many of the EU designated individuals and entities. These measures prohibit their financial institutions from entering into new business relationships with these individuals and entities (these measures short of asset freezes are denoted by black stripes). Likewise, in Switzerland, "new issue of long term financial instruments" for the five banks listed by the EU for debt and equity prohibitions will require authorization, only given if they are within the average financial engagement of the past three years.  
 \*\*Austria's original list was superceded by the shorter EU list; however, Austria has stated that it plans to add back those from original list (in gray)

| Executive Orders 13660 and 13661 - Asset Freezes |    |    |     |     |     |     |      |     |  |
|--|----|----|-----|-----|-----|-----|------|-----|--|
| Russian Officials                                |    |    |     |     |     |     |      |     |  |
| Viktor Alekseevich Ozerov                        | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Vladimir Michailovich Dzhubarov                  | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Andrei Aleksandrovich Klishas                    | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Nikolai Ivanovich Ryzhkov                        | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Evegni Viktorovich Bushmin                       | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Aleksandr Borisovich Totoonov                    | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Oleg Evgenefich Panteleev                        | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Sergei Mikhailovich Mironov                      | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Sergei Vladimirovich Zheleznyak                  | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Leonid Eduardovich Slutski                       | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Dmitry Olegovich Rogozin                         | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Sergey Yur'yevich Glazyev                        | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Vladislav Yuryevich Surkov                       | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Yelena Borisovna Mizulina                        | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Valentina Ivaonovna Matvienko                    | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Sergey Naryshkin                                 | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Victor Ivanov                                    | US |    |     | CAN |     |     |      |     |  |
| Igor Sergun                                      | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Sergei Ivanov                                    | US |    |     | CAN |     |     | AUST |     |  |
| Alexei Gromov                                    | US | EU | SUI | CAN |     | AUS | AUST | NOR |  |
| Andrei Fursenko                                  | US |    |     | CAN |     |     | AUST |     |  |
| Vladimir Yakunin                                 | US |    |     |     |     |     | AUST |     |  |
| Vladimir Kozhin                                  | US |    |     | CAN |     |     | AUST |     |  |
| Mikhail Vitalevich Margelov                      |    |    |     | CAN |     |     |      |     |  |
| Vladimir Pligin                                  |    | EU | SUI | CAN | LIE | AUS |      | NOR |  |
| Yury Viktorovich Ushakov                         |    |    |     | CAN |     |     |      |     |  |
| Dmitry Konstantinovich Kiselyov                  |    | EU | SUI | CAN | LIE | AUS |      | NOR |  |
| Vitalii Nikitich Ignatienko                      |    |    |     | CAN |     |     |      |     |  |
| Vyaacheslav Volodin                              | US | EU | SUI | CAN | LIE |     | AUST | NOR |  |
| Dmitry Kozak                                     | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Aleksey Pushkov                                  | US |    |     | CAN |     |     | AUST |     |  |
| Alexander Babakov                                |    |    |     | CAN |     |     |      |     |  |
| Oleg Belaventsev                                 | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Yevgeniy Murov                                   | US |    |     | CAN |     |     |      |     |  |
| Oleg Savelyev                                    | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Ludmila Shvetsova                                |    | EU | SUI | CAN | LIE | AUS |      | NOR |  |
| Sergei Neverov                                   | US | EU | SUI | CAN | LIE | AUS |      | NOR |  |
| Vladimir Volfovich Zhirinovskiy                  |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Sergey Beseda                                    | US | EU | SUI | CAN |     | AUS |      | NOR |  |
| Igor Shchegolev                                  | US |    |     | CAN |     |     |      |     |  |
| Mikhail Efimovich Fradkov                        |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Nikolai Platonovich Patrushev                    |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Aleksandr Valievich Bortnikov                    |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Rashid Gumarovich Nurgaliev                      |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Boris Vyacheslavovich Gryzlov                    |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Mikhail Vladimirovich Degtyarev                  |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Ramzan Akhmadovitch Kadyrov                      |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Alexander Nikolayevich Tkachyov                  |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Vladimir Georgyevich Kulishov                    |    |    |     | CAN |     |     |      |     |  |
| Valerii Yuriovych Travkin                        |    |    |     | CAN |     |     |      |     |  |
| Yuri Leonidovich Vorobiov                        |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Vladimir Abduallyevich Vasilyev                  |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Viktor Petrovich Vodolatsky                      |    | EU | SUI | CAN |     | AUS |      | NOR |  |

|   |    |    |     |     |     |     |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |
|---|----|----|-----|-----|-----|-----|--|------|-----|-----|--|--|--|--|--|--|--|--|--|--|--|
| Leonid Ivanovich Kalashnikov  |    | EU | SUI | CAN |     | AUS |  | NOR  |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Vladimir Stepanovich Nikitin  |    | EU | SUI | CAN |     | AUS |  | NOR  |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Oleg Vladimirovich Lebedev  |    | EU | SUI | CAN |     | AUS |  | NOR  |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Ivan Ivanovich Melnikov   |    | EU | SUI | CAN |     | AUS |  | NOR  |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Igor Vladimirovich Lebedev  |    | EU | SUI | CAN |     | AUS |  | NOR  |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Nikolai Vladimirovich Levichev  |    | EU | SUI | CAN |     | AUS |  | NOR  |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Svetlana Sergeevna Zhurova  |    | EU | SUI | CAN |     | AUS |  | NOR  |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Aleksey Vasilevich Naumets  |    | EU | SUI | CAN |     | AUS |  | NOR  |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Anatoly Ivanovich Antonov   |    | EU |     | CAN |     | AUS |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Arkady Viktorovich Bakhin   |    | EU |     | CAN |     | AUS |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Iosif (Joseph) Davydovich Kobzon  |    | EU |     | CAN |     | AUS |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Valery Fedorovich Rashkin   |    | EU |     | CAN |     | AUS |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |
| <b>Russian Cronies</b>  |    |    |     |     |     |     |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Gennady Timchenko   | US |    |     | CAN |     |     |  | AUST |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Arkady Rotenberg  | US | EU | SUI | CAN |     | AUS |  | AUST | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Boris Rotenberg   | US |    |     | CAN |     |     |  | AUST |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Yuri Kovalchuk  | US | EU | SUI | CAN |     | AUS |  | AUST | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Igor Sechin   | US |    |     |     |     |     |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Sergey Chemezov   | US | EU | SUI | CAN |     | AUS |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Konstantin Malofayev  | US | EU | SUI | CAN |     | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Nikolay Shamalov  |    | EU | SUI | CAN |     | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Alexander Mikhailovich Babakov  |    | EU | SUI |     |     | AUS |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |
| <b>Russian Military</b>   |    |    |     |     |     |     |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Alexander Vitko   |    | EU | SUI |     | LIE | AUS |  | AUST | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Anatoly Alekseevich Sidorov   |    | EU | SUI |     | LIE | AUS |  | AUST | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Aleksandr Galkin  |    | EU | SUI |     | LIE | AUS |  | AUST | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Alexander Mihalovich Nosatov  |    | EU | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Valery Vladimirovich Kulikov  |    | EU | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Lt. Gen. Igor Turchenyuk  |    | EU | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Valery Gerasimov  |    | EU | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Vladimir Shamanov   |    | EU | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| General Dmitry Vitalievich Bulgakov   |    |    |     | CAN |     |     |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Lieutenant-General Yuriy Eduardovich Sadovenko                                  |    |    |     | CAN |     |     |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Colonel-General Oleg Leonidovich Salyukov                                       |    |    |     | CAN |     |     |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Colonel-General Nikolay Bogdanovskiy  |    |    |     | CAN |     |     |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Andrei Veleryevich Kartapolov   |    | EU |     | CAN |     | AUS |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |
| <b>Former Ukrainian Government/ Ukrainian Separatists / Separatist Entities</b> |    |    |     |     |     |     |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Igor Strelkov (Ihor Strielkov)  | US | EU | SUI | CAN | LIE | AUS |  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |  |
| Sergei Ivanovich Menyailo   | US | EU | SUI | CAN | LIE | AUS |  |      | NOR | JPN |  |  |  |  |  |  |  |  |  |  |  |
| Mikhail Malyshev  | US | EU | SUI | CAN | LIE | AUS |  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |  |
| Valery Medvedev   | US | EU | SUI | CAN | LIE | AUS |  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |  |
| Sergey Aksyonov   | US | EU | SUI |     | LIE | AUS |  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |  |
| Vladimir Konsantinov  | US | EU | SUI |     | LIE | AUS |  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |  |
| Viktor Medvechuck   | US |    |     |     |     |     |  | AUST |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Rustam Illmirovich Ternigaliev  | US | EU | SUI |     | LIE | AUS |  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |  |
| Deniz Valentinovich Berezovskiy   |    | EU | SUI |     | LIE | AUS |  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |  |
| Aleksei Mikhailovich Chaily   | US | EU | SUI |     | LIE | AUS |  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |  |
| Pyotr Anatolyovych Zima   | US | EU | SUI |     | LIE | AUS |  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |  |
| Yuriy Zherebtsov  | US | EU | SUI |     | LIE | AUS |  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |  |
| Sergei Pavlovych Tsekov   | US | EU | SUI |     | LIE | AUS |  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |  |
| Viktor Fedorovich Yanukovich  | US | EU | SUI | CAN | LIE | AUS |  | AUST | NOR | JPN |  |  |  |  |  |  |  |  |  |  |  |
| Vitalii Yuriyovych Zakharchenko   |    | EU | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Viktor Pavlovych Pshonka  |    | EU | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Oleksandr Hryhorovych Yakymenko   |    | EU |     | CAN |     | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Andriy Volodymyrovych Portnov   |    | EU |     | CAN |     | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Olena Leonidivna Lukash   |    | EU | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Andrii Petrovych Kliuiev  |    | EU | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Viktor Ivanovych Ratushniak   |    | EU |     | CAN |     | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Oleksandr Viktorovych Yanukovich  |    | EU | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Viktor Viktorovych Yanukovich   |    | EU |     | CAN |     | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Artem Viktorovych Pshonka   |    | EU |     | CAN |     | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Serhii Petrovych Kliuiev  |    | EU | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Mykola Yanovych Azarov  |    | EU | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Oleksii Mykolayovych Azarov   |    | EU |     | CAN |     | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Serhiy Vitaliyovych Kurchenko   |    | EU |     | CAN |     | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Dmytro Volodymyrovych Tabachnyk   |    | EU |     | CAN |     | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Raisa Vasyivna Bohatyrivna  |    | EU | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Ihor Oleksandrovych Kalinin   |    | EU |     | CAN |     | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Serhiy Abruzov  |    | EU | SUI |     | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Mykhaylo (Mikhail) Markovych Dobkin   |    |    | SUI |     | LIE | AUS |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Yuriy Ivanyushchenko  |    |    | SUI |     | LIE | AUS |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Hennadiy Adolfovyh Kernes   |    |    | SUI |     | LIE | AUS |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Borys Viktorovych Kolesnikov  |    |    | SUI |     | LIE |     |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Yuriy Volodymyrovych Kolobov  |    |    | SUI |     | LIE |     |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Volodymyr Vasylovych Kozak  |    |    | SUI |     | LIE |     |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Mykola Volodymyrovych Prysyazhnyuk  |    |    | SUI |     | LIE |     |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Eduard Anatolyovych Stavitsky   |    | EU | SUI |     | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Oleksander Serhiyovych Yefremov   |    |    | SUI |     | LIE |     |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |
| Oleksander Viktorovych Klymenko   |    | EU | SUI |     | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |  |  |  |  |  |
| Valeriy Koryak  |    |    |     |     |     | AUS |  |      |     |     |  |  |  |  |  |  |  |  |  |  |  |



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|---|----|----|-----|-----|-----|-----|------|--|-----|-----|--|--|--|--|--|--|--|--|--|
| Oleksandr Popov   |    |    |     |     |     |     | AUS  |  |     |     |  |  |  |  |  |  |  |  |  |
| Stanislav Schulyak  |    |    |     |     |     |     | AUS  |  |     |     |  |  |  |  |  |  |  |  |  |
| Volodymyr Sivkovych   |    |    |     |     |     |     | AUS  |  |     |     |  |  |  |  |  |  |  |  |  |
| Yuriy Ivanyushchenko  |    | EU | SUI |     | LIE | AUS |      |  | NOR |     |  |  |  |  |  |  |  |  |  |
| Olga Fedorovna Kovatidi                                     |    | EU | SUI | CAN | LIE | AUS | AUST |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| German Prokopiv   |    | EU | SUI | CAN | LIE | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Valeriy Bolotov   | US | EU | SUI | CAN | LIE | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Andriy Purgin   | US | EU | SUI | CAN | LIE | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Denys Pushylin  | US | EU | SUI | CAN | LIE | AUS | AUST |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Sergey Gennadevich Tsyplakov                                |    | EU | SUI | CAN | LIE | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Petr Grigorievich Jarosh                                    |    | EU | SUI | CAN | LIE | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Oleg Grigorievich Kozyura                                   |    | EU | SUI | CAN | LIE | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Viacheslav Ponomariov                                       | US | EU | SUI | CAN | LIE | AUS | AUST |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Igor Mykolaiovych Bezler                                    | US | EU | SUI | CAN | LIE | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Igor Kakidzyanov  |    | EU | SUI | CAN | LIE | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Oleg Tsariov  |    | EU | SUI | CAN | LIE | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Roman Lyagin  |    | EU | SUI | CAN | LIE | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Aleksandr Malyykhin   |    | EU | SUI | CAN | LIE | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Natalia Vladimirovna Poklonskaya                            | US | EU | SUI | CAN | LIE | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Igor Sergeievich Chetchenko (aka Shevchenko)                |    | EU | SUI | CAN | LIE | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Valery Vladimirovich Kaurov                                 | US | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Alexander Borodai   | US | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Alexander Khodakovskiy                                      |    | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Alexandr Alessandrovich Kalyusky                            |    | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Alexandr Khryakov   | US | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Marat Bashirov  |    | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Vasyl Nikitin   |    | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Aleksey Karyakin  | US | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Yuriy Ivakin  |    | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Igor Plotnitsky (aka Ihor Venedyktovych Plotnitsky)         | US | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Nikolay (Mykola) Kozitsyn                                   | US | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Oleksiy (Aleksey) Mozgovy                                   | US | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Victor Yuriiovych Anosov                                    |    |    |     |     | CAN |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Viacheslav Anatoliiovych Apraksimov                         |    |    |     |     | CAN |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Fedir Dmytrovych Berezin                                    | US | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Ruslan Yunirovish Ilkaev                                    |    |    |     |     | CAN |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Valerii Kostiantynovych Mussienko                           |    |    |     |     | CAN |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Viacheslav Mykolaiovych Petrov                              |    |    |     |     | CAN |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Yuriy Oleksandrovych Protsenko                              |    |    |     |     | CAN |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Oleh Anatoliiovych Vasin                                    |    |    |     |     | CAN |     |      |  |     |     |  |  |  |  |  |  |  |  |  |
| Serhii Anatoliiovych Zdriliuk                               |    | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Luhansk People's Republic                                   | US | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Donetsk People's Republic                                   | US | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Pavel Gubarev   | US | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Ekaterina Gubareva  |    | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Federal State of Novorossiya                                |    | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| International Union of Public Associations "Great Don Army" |    | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Sobol   |    | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Lugansk Guard   |    | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Army of the Southeast                                       |    | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Donbass People's Republic                                   |    | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Vostok Battalion  |    | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Vladimir Antyufeyev (aka Vladimir Shevtsov)                 | US | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Oksana Tchigrina  |    | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Boris Litvinov  |    | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Sergey Abisov   |    | EU | SUI | CAN |     | AUS |      |  | NOR |     |  |  |  |  |  |  |  |  |  |
| Alexander Zakharchenko                                      | US | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Vladimir Kononov  |    | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Miroslav Vladimirovich Rudenko                              | US | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Gennadiy Nikolaiovych Tsyplakov                             |    | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Andrey Yurevich Pinchuk                                     |    | EU | SUI | CAN |     | AUS |      |  | NOR |     |  |  |  |  |  |  |  |  |  |
| Oleg Bereza   |    | EU | SUI | CAN |     | AUS |      |  | NOR |     |  |  |  |  |  |  |  |  |  |
| Andrei Nikolaevich Rodkin                                   |    | EU | SUI | CAN |     | AUS |      |  | NOR |     |  |  |  |  |  |  |  |  |  |
| Aleksandr Karaman   |    | EU | SUI | CAN |     | AUS |      |  | NOR | JPN |  |  |  |  |  |  |  |  |  |
| Georgiy L'vovich Muradov                                    |    | EU | SUI | CAN |     | AUS |      |  | NOR |     |  |  |  |  |  |  |  |  |  |
| Mikhail Sergeyevich Sheremet                                |    | EU | SUI | CAN |     | AUS |      |  | NOR |     |  |  |  |  |  |  |  |  |  |
| Serhiy Kozyakov   |    | EU |     |     | CAN |     | AUS  |  |     | JPN |  |  |  |  |  |  |  |  |  |
| Oleg Akimov   |    | EU |     |     |     |     | AUS  |  |     | JPN |  |  |  |  |  |  |  |  |  |
| Larisa Airapetyan   |    | EU |     |     | CAN |     | AUS  |  |     | JPN |  |  |  |  |  |  |  |  |  |
| Yuriy Sivokononko   |    | EU |     |     | CAN |     | AUS  |  |     | JPN |  |  |  |  |  |  |  |  |  |
| Aleksandr Kofman  |    | EU |     |     |     |     | AUS  |  |     | JPN |  |  |  |  |  |  |  |  |  |
| Ravil Khalikov  |    | EU |     |     | CAN |     | AUS  |  |     | JPN |  |  |  |  |  |  |  |  |  |
| Dmitry Semyonov   |    | EU |     |     | CAN |     | AUS  |  |     | JPN |  |  |  |  |  |  |  |  |  |
| Oleg Bugrov   |    | EU |     |     | CAN |     | AUS  |  |     | JPN |  |  |  |  |  |  |  |  |  |
| Lesya Lapteva   |    | EU |     |     | CAN |     | AUS  |  |     | JPN |  |  |  |  |  |  |  |  |  |
| Yevgeniy Eduardovich Mikhaylov                              |    | EU |     |     | CAN |     | AUS  |  |     | JPN |  |  |  |  |  |  |  |  |  |
| Ihor Vladmyrovych Kostenok                                  |    | EU |     |     | CAN |     | AUS  |  |     | JPN |  |  |  |  |  |  |  |  |  |
| Yevgeniy Vyasheslavovich Orlov                              |    | EU |     |     | CAN |     | AUS  |  |     | JPN |  |  |  |  |  |  |  |  |  |
| Vladyslav Nykolayevych Deynego                              |    | EU |     |     | CAN |     | AUS  |  |     | JPN |  |  |  |  |  |  |  |  |  |
| Donetsk Republic  |    | EU |     |     | CAN |     | AUS  |  |     | JPN |  |  |  |  |  |  |  |  |  |
| Peace to Luhansk Region                                     |    | EU |     |     | CAN |     | AUS  |  |     | JPN |  |  |  |  |  |  |  |  |  |
| Free Donbass  |    | EU |     |     | CAN |     | AUS  |  |     | JPN |  |  |  |  |  |  |  |  |  |

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| People's Union   |    | EU |     | CAN |     | AUS |      |     |     | JPN |  |  |  |  |
| Luhansk Economic Union   |    | EU |     | CAN |     | AUS |      |     |     | JPN |  |  |  |  |
| Donbass People's Militia   | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Marshall Capital Fund  | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Dmitry Neklyudov   | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Novorossiia Party  | US | EU |     | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Oplot  | US | EU |     | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Petr Savchenko   | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Profactor Tov  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Oleh Tsaryov   | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| South-East Movement (Yugo-Vostok Movement)                                       | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Night Wolves   | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Aleksandr Zaldostanov  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Pavel Dremov aka Batya   |    | EU |     | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Alexey Milchakov aka Fritz, Serbian  |    | EU |     | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Arseny Pavlov aka Motorola   |    | EU |     | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Mikhail Tolstykh aka Givi  |    | EU |     | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Eduard Basurin   |    | EU |     | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Alexandr Shubin  |    | EU |     | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Sergey Litvin  |    | EU |     | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Sergey Ignatov   |    | EU |     | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Ekaterina Filippova  |    | EU |     | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Aleksandr Timofeev   |    | EU |     | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Evgeny Manuilov  |    | EU |     | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Viktor Yatsenko  |    | EU |     | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Olga Besedina  |    | EU |     | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Zaur Ismailov  |    | EU |     | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Cossack National Guard   |    | EU |     | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Sparta battalion   |    | EU |     | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Somali battalion   |    | EU |     | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Zarya battalion  |    | EU |     | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Prizrak brigade  |    | EU |     | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Kalmius battalion  |    | EU |     | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Death battalion  |    | EU |     | CAN |     | AUS |      |     |     |     |  |  |  |  |
| <b>Crimean Entities</b>  |    |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Chernomorneftegaz  | US | EU | SUI | CAN | LIB | AUS | AUST | NOR | JPN |     |  |  |  |  |
| Feodosia (Feodosiya Enterprise)  | US | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |     |  |  |  |  |
| State ferry enterprise "Kerch ferry"   |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| State enterprise "Sevastopol commercial seaport"                                 |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| State enterprise "Kerch commercial seaport"                                      |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| State enterprise Universal - Avia  |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| Resort Nizhnaya Oreanda  |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| Crimean enterprise "Azov distillery plant"                                       |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| State concern "National Association of producers Massandra"                      |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| State enterprise Magarach of the national institute of wine                      |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| State enterprise "Factory of sparkling wine Novy Svet"                           |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| Russian National Commercial Bank   |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| <b>Russian Entities (*Captured in EU sectoral measure, see below)</b>            |    |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Bank Rossiya   | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| SMP Bank   | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| InvestKapitalBank  | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| Volga Group  | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| Aquanika   | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| CJSC Zest  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| JSB Sobin Bank   | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Avia Group LLC   | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| Avia Group Nord LLC  | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| Sakhatrans LLC   | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Stroytransgaz Group  | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| Stroytransgaz Holding  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Stroytransgaz LLC  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Stroytransgaz OJSC   | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Stroytransgaz-M LLC  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Limited Liability Company Investment Company                                     | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Transoil   | US |    |     |     |     |     | AUST |     |     |     |  |  |  |  |
| Stroygazmontazh  | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| ExpoBank   |    |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| RosEnergoBank  |    |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Almaz-Antey  | US | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| Federal State Unitary Enterprise State Research and Production Enterprise Bazalt | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| JSC Concern Sozvezdie  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| JSC MIC NPO Mashinostroyeniya  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Kalishnikov Concern  | US | *  |     | CAN |     |     |      |     |     |     |  |  |  |  |
| KBP Instrument Design Bureau   | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Radio-Electronic Technologies  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Uralvagonzavod   | US | *  |     |     |     |     |      |     |     |     |  |  |  |  |
| United Shipbuilding Corporation  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Dobrolet (aka Dobrolyot)   |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| QAO Dolgoprudny Research Production Enterprise                                   | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Mytishchinski Mashinostrotelny Zavod, OAO  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Kalinin Machine Plan JSC   | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |

|   |    |    |     |     |  |     |  |  |  |     |     |  |  |  |  |  |  |  |  |  |  |
|---|----|----|-----|-----|--|-----|--|--|--|-----|-----|--|--|--|--|--|--|--|--|--|--|
| Almaz-Antey GSKB  | US |    |     |     |  |     |  |  |  |     |     |  |  |  |  |  |  |  |  |  |  |
| JSC NIIP  | US |    |     | CAN |  |     |  |  |  |     |     |  |  |  |  |  |  |  |  |  |  |
| Marine Scientific Research Institute of Radioelectronics Altair (MNIIRE "Altair")   |    |    |     | CAN |  |     |  |  |  |     |     |  |  |  |  |  |  |  |  |  |  |
| <b>Executive Order 13662 - Sectoral Sanctions</b>   |    |    |     |     |  |     |  |  |  |     |     |  |  |  |  |  |  |  |  |  |  |
| <b>Financial Institutions - New Debt and Equity Prohibition (*Not specifically listed but covered as 50%-owned subsidiary of a designated bank)</b>   |    |    |     |     |  |     |  |  |  |     |     |  |  |  |  |  |  |  |  |  |  |
| Sberbank  | US | EU | SUI | CAN |  |     |  |  |  | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| VTB Bank OAO  | US | EU | SUI | CAN |  |     |  |  |  | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| VEB   | US | EU | SUI | CAN |  |     |  |  |  | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Gazprombank OAO   | US | EU | SUI | CAN |  |     |  |  |  | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| Bank of Moscow  | US | *  | *   | CAN |  |     |  |  |  | *   | *   |  |  |  |  |  |  |  |  |  |  |
| Russian Agricultural Bank (aka Rosselkhozbank)  | US | EU | SUI | CAN |  |     |  |  |  | NOR | JPN |  |  |  |  |  |  |  |  |  |  |
| <b>Energy Companies - Debt Prohibition</b>  |    |    |     |     |  |     |  |  |  |     |     |  |  |  |  |  |  |  |  |  |  |
| Rosneft   | US | EU | SUI | CAN |  | AUS |  |  |  | NOR |     |  |  |  |  |  |  |  |  |  |  |
| OAO Novatek   | US |    |     | CAN |  |     |  |  |  |     |     |  |  |  |  |  |  |  |  |  |  |
| Gazprom Neft  | US | EU | SUI |     |  | AUS |  |  |  | NOR |     |  |  |  |  |  |  |  |  |  |  |
| AK Transneft OAO  | US | EU | SUI |     |  | AUS |  |  |  | NOR |     |  |  |  |  |  |  |  |  |  |  |
| <b>Energy Companies - Goods, Services and Technology in Oil Sector Activities (*EU, Norwegian and Canadian restrictions on provision of goods, services and technology apply are not applied to specific companies but cover their provision "in Russia")</b> |    |    |     |     |  |     |  |  |  |     |     |  |  |  |  |  |  |  |  |  |  |
| Rosneft   | US | *  |     | *   |  | *   |  |  |  | *   |     |  |  |  |  |  |  |  |  |  |  |
| OAO Gazprom   | US | *  |     | *   |  | *   |  |  |  | *   |     |  |  |  |  |  |  |  |  |  |  |
| Gazprom Neft  | US | *  |     | *   |  | *   |  |  |  | *   |     |  |  |  |  |  |  |  |  |  |  |
| Lukoil OAO  | US | *  |     | *   |  | *   |  |  |  | *   |     |  |  |  |  |  |  |  |  |  |  |
| Surgutneftegas  | US | *  |     | *   |  | *   |  |  |  | *   |     |  |  |  |  |  |  |  |  |  |  |
| <b>Defense and Related Material Companies - Debt Prohibition (*Captured as 50%-owned subsidiary of Rostec; **Designated as full asset freeze, noted above)</b>  |    |    |     |     |  |     |  |  |  |     |     |  |  |  |  |  |  |  |  |  |  |
| Rostec  | US |    |     |     |  |     |  |  |  |     |     |  |  |  |  |  |  |  |  |  |  |
| OPK Oboronprom  | *  | EU | SUI |     |  | AUS |  |  |  | NOR |     |  |  |  |  |  |  |  |  |  |  |
| United Aircraft Corporation   |    | EU | SUI |     |  | AUS |  |  |  | NOR |     |  |  |  |  |  |  |  |  |  |  |
| Uralvagonzavod  | ** | EU | SUI |     |  | AUS |  |  |  | NOR |     |  |  |  |  |  |  |  |  |  |  |
| <b>Defense and Related Material Companies - Prohibition on technical assistance, brokering services, financing, and financial assistance for dual-use goods and technology (*Designated as full asset freeze, noted above)</b>                                |    |    |     |     |  |     |  |  |  |     |     |  |  |  |  |  |  |  |  |  |  |
| JSC Sirius  |    | EU | SUI |     |  | AUS |  |  |  | NOR |     |  |  |  |  |  |  |  |  |  |  |
| OJSC Stankoinstrument   |    | EU | SUI |     |  | AUS |  |  |  | NOR |     |  |  |  |  |  |  |  |  |  |  |
| OAO JSC Chemcomposite   |    | EU | SUI |     |  | AUS |  |  |  | NOR |     |  |  |  |  |  |  |  |  |  |  |
| JSC Kalashnikov   | *  | EU | SUI |     |  | AUS |  |  |  | NOR |     |  |  |  |  |  |  |  |  |  |  |
| JSC Tula Arms Plant   |    | EU | SUI |     |  | AUS |  |  |  | NOR |     |  |  |  |  |  |  |  |  |  |  |
| NPK Tchnologii Maschinostrojenija   |    | EU | SUI |     |  | AUS |  |  |  | NOR |     |  |  |  |  |  |  |  |  |  |  |
| OAO Wysokototschnye Kompleksi   |    | EU | SUI |     |  | AUS |  |  |  | NOR |     |  |  |  |  |  |  |  |  |  |  |
| OAO Almaz Antey   |    | EU | SUI |     |  | AUS |  |  |  | NOR |     |  |  |  |  |  |  |  |  |  |  |
| OAO NPO Bazalt  |    | EU | SUI |     |  | AUS |  |  |  | NOR |     |  |  |  |  |  |  |  |  |  |  |



## Updated Sanctions Comparison Chart

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**From:** (b)(6)  
**To:** \_DL\_TFI\_Ukraine\_Russia <dl\_tfi\_ukraine\_russia@do.treas.gov>  
**Cc:** (b)(6)  
**Date:** Wed, 11 Mar 2015 10:23:26 -0400  
**Attachments:** 20150311 Comparison of Country Sanctions\_Russia\_Ukraine.pdf (360.41 kB)

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Hi everyone,

Please find attached an updated sanctions comparison chart with today's designations, as well as Switzerland's addition of 28 EU-designated individuals to their "anti-circumvention measures". I also noted where the EU's re-listing of former Yanukovich regime members omitted four of the original names. (<http://www.reuters.com/article/2015/03/06/us-ukraine-crisis-eu-sanctions-idUSKBN0M21BB20150306>).

As usual, please do not forward the chart outside of Treasury without consulting our office.

Thanks,

(b)(6)

(b)(6)

Policy Advisor  
U.S. Department of the Treasury  
Office of Terrorist Financing and Financial Crimes  
Office: (b)(6) | Blackberry: (b)(6)

(b)(6)

### Russia/Former Government of Ukraine-related Designations - Persons (as of March 11, 2015)

US: United States  
 EU: European Union  
 SUI: Switzerland\*  
 CAN: Canada  
 LIE: Liechtenstein\*  
 AUS: Austria\*\*  
 AUST: Austarlia  
 JPN: Japan  
 NOR: Norway

\*Switzerland and Liechtenstein have issued "anti-circumvention" measures for many of the EU designated individuals and entities. These measures prohibit their financial institutions from entering into new business relationships with these individuals and entities (these measures short of asset freezes are denoted by black stripes). Likewise, in Switzerland, "new issue of long term financial instruments" for the five banks listed by the EU for debt and equity prohibitions will require authorization, only given if they are within the average financial engagement of the past three years.  
 \*\*Austria's original list was superceded by the shorter EU list; however, Austria has stated that it plans to add back those from original list (in gray)

| Executive Orders 13660 and 13661 - Asset Freezes |    |    |     |     |     |     |      |     |  |
|--|----|----|-----|-----|-----|-----|------|-----|--|
| Russian Officials                                |    |    |     |     |     |     |      |     |  |
| Viktor Alekseevich Ozerov                        | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Vladimir Michailovich Dzhubarov                  | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Andrei Aleksandrovich Kliskas                    | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Nikolai Ivanovich Ryzhkov                        | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Evegni Viktorovich Bushmin                       | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Aleksandr Borisovich Totoonov                    | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Oleg Evgenefich Panteleev                        | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Sergei Mikhailovich Mironov                      | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Sergei Vladimirovich Zheleznyak                  | US | EU | SUI |     | LIE | AUS | AUST | NOR |  |
| Leonid Eduardovich Slutski                       | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Dmitry Olegovich Rogozin                         | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Sergey Yur'yevich Glazyev                        | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Vladislav Yuryevich Surkov                       | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Yelena Borisovna Mizulina                        | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Valentina Ivaonovna Matvienko                    | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Sergey Naryshkin                                 | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Victor Ivanov                                    | US |    |     | CAN |     |     |      |     |  |
| Igor Sergun                                      | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Sergei Ivanov                                    | US |    |     | CAN |     |     | AUST |     |  |
| Alexei Gromov                                    | US | EU | SUI | CAN |     | AUS | AUST | NOR |  |
| Andrei Fursenko                                  | US |    |     | CAN |     |     | AUST |     |  |
| Vladimir Yakunin                                 | US |    |     |     |     |     | AUST |     |  |
| Vladimir Kozhin                                  | US |    |     | CAN |     |     | AUST |     |  |
| Mikhail Vitalevich Margelov                      |    |    |     | CAN |     |     |      |     |  |
| Vladimir Pligin                                  |    | EU | SUI | CAN | LIE | AUS |      | NOR |  |
| Yury Viktorovich Ushakov                         |    |    |     | CAN |     |     |      |     |  |
| Dmitry Konstantinovich Kiselyov                  |    | EU | SUI | CAN | LIE | AUS |      | NOR |  |
| Vitalii Nikitich Ignatienko                      |    |    |     | CAN |     |     |      |     |  |
| Vyaacheslav Volodin                              | US | EU | SUI | CAN | LIE |     | AUST | NOR |  |
| Dmitry Kozak                                     | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Aleksey Pushkov                                  | US |    |     | CAN |     |     | AUST |     |  |
| Alexander Babakov                                |    |    |     | CAN |     |     |      |     |  |
| Oleg Belaventsev                                 | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Yevgeniy Murov                                   | US |    |     | CAN |     |     |      |     |  |
| Oleg Savelyev                                    | US | EU | SUI | CAN | LIE | AUS | AUST | NOR |  |
| Ludmila Shvetsova                                |    | EU | SUI | CAN | LIE | AUS |      | NOR |  |
| Sergei Neverov                                   | US | EU | SUI | CAN | LIE | AUS |      | NOR |  |
| Vladimir Volfovich Zhirinovskiy                  |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Sergey Beseda                                    | US | EU | SUI | CAN |     | AUS |      | NOR |  |
| Igor Shchegolev                                  | US |    |     | CAN |     |     |      |     |  |
| Mikhail Efimovich Fradkov                        |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Nikolai Platonovich Patrushev                    |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Aleksandr Valievich Bortnikov                    |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Rashid Gumarovich Nurgaliev                      |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Boris Vyacheslavovich Gryzlov                    |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Mikhail Vladimirovich Degtyarev                  |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Ramzan Akhmadovitch Kadyrov                      |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Alexander Nikolayevich Tkachyov                  |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Vladimir Georgyevich Kulishov                    |    |    |     | CAN |     |     |      |     |  |
| Valerii Yuriovych Travkin                        |    |    |     | CAN |     |     |      |     |  |
| Yuri Leonidovich Vorobiov                        |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Vladimir Abdualiyevich Vasilyev                  |    | EU | SUI | CAN |     | AUS |      | NOR |  |
| Viktor Petrovich Vodolatsky                      |    | EU | SUI | CAN |     | AUS |      | NOR |  |

|   |    |   |     |     |     |     |  |      |     |     |  |  |  |  |  |  |
|---|----|---|-----|-----|-----|-----|--|------|-----|-----|--|--|--|--|--|--|
| Leonid Ivanovich Kalashnikov  |    | EU  | SUI | CAN |     | AUS |  | NOR  |     |     |  |  |  |  |  |  |
| Vladimir Stepanovich Nikitin  |    | EU  | SUI | CAN |     | AUS |  | NOR  |     |     |  |  |  |  |  |  |
| Oleg Vladimirovich Lebedev  |    | EU  | SUI | CAN |     | AUS |  | NOR  |     |     |  |  |  |  |  |  |
| Ivan Ivanovich Melnikov   |    | EU  | SUI | CAN |     | AUS |  | NOR  |     |     |  |  |  |  |  |  |
| Igor Vladimirovich Lebedev  |    | EU  | SUI | CAN |     | AUS |  | NOR  |     |     |  |  |  |  |  |  |
| Nikolai Vladimirovich Levichev  |    | EU  | SUI | CAN |     | AUS |  | NOR  |     |     |  |  |  |  |  |  |
| Svetlana Sergeevna Zhurova  |    | EU  | SUI | CAN |     | AUS |  | NOR  |     |     |  |  |  |  |  |  |
| Aleksey Vasilevich Naumets  |    | EU  | SUI | CAN |     | AUS |  | NOR  |     |     |  |  |  |  |  |  |
| Anatoly Ivanovich Antonov   |    | EU  | SUI | CAN |     | AUS |  |      |     |     |  |  |  |  |  |  |
| Arkady Viktorovich Bakhin   |    | EU  | SUI | CAN |     | AUS |  |      |     |     |  |  |  |  |  |  |
| Iosif (Joseph) Davydovich Kobzon  |    | EU  | SUI | CAN |     | AUS |  |      |     |     |  |  |  |  |  |  |
| Valery Fedorovich Rashkin   |    | EU  | SUI | CAN |     | AUS |  |      |     |     |  |  |  |  |  |  |
| <b>Russian Cronies</b>  |    |   |     |     |     |     |  |      |     |     |  |  |  |  |  |  |
| Gennady Timchenko   | US |   |     | CAN |     |     |  | AUST |     |     |  |  |  |  |  |  |
| Arkady Rotenberg  | US | EU  | SUI | CAN |     | AUS |  | AUST | NOR |     |  |  |  |  |  |  |
| Boris Rotenberg   | US |   |     | CAN |     |     |  | AUST |     |     |  |  |  |  |  |  |
| Yuri Kovalchuk  | US | EU  | SUI | CAN |     | AUS |  | AUST | NOR |     |  |  |  |  |  |  |
| Igor Sechin   | US |   |     |     |     |     |  |      |     |     |  |  |  |  |  |  |
| Sergey Chemezov   | US | EU  | SUI | CAN |     | AUS |  |      |     |     |  |  |  |  |  |  |
| Konstantin Malofayev  | US | EU  | SUI | CAN |     | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Nikolay Shamalov  |    | EU  | SUI | CAN |     | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Alexander Mikhailovich Babakov  |    | EU  | SUI |     |     | AUS |  |      |     |     |  |  |  |  |  |  |
| <b>Russian Military</b>   |    |   |     |     |     |     |  |      |     |     |  |  |  |  |  |  |
| Alexander Vitko   |    | EU  | SUI |     | LIE | AUS |  | AUST | NOR |     |  |  |  |  |  |  |
| Anatoly Alekseevich Sidorov   |    | EU  | SUI |     | LIE | AUS |  | AUST | NOR |     |  |  |  |  |  |  |
| Aleksandr Galkin  |    | EU  | SUI |     | LIE | AUS |  | AUST | NOR |     |  |  |  |  |  |  |
| Alexander Mihalovich Nosatov  |    | EU  | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Valery Vladimirovich Kulikov  |    | EU  | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Lt. Gen. Igor Turchenyuk  |    | EU  | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Valery Gerasimov  |    | EU  | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Vladimir Shamanov   |    | EU  | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |
| General Dmitry Vitalievich Bulgakov   |    |   |     | CAN |     |     |  |      |     |     |  |  |  |  |  |  |
| Lieutenant-General Yuriy Eduardovich Sadovenko                                  |    |   |     | CAN |     |     |  |      |     |     |  |  |  |  |  |  |
| Colonel-General Oleg Leonidovich Salyukov                                       |    |   |     | CAN |     |     |  |      |     |     |  |  |  |  |  |  |
| Colonel-General Nikolay Bogdanovskiy  |    |   |     | CAN |     |     |  |      |     |     |  |  |  |  |  |  |
| Andrei Veleryevich Kartapolov   |    | EU  | SUI | CAN |     | AUS |  |      |     |     |  |  |  |  |  |  |
| <b>Former Ukrainian Government/ Ukrainian Separatists / Separatist Entities</b> |    | *Indicates former Yanukovich officials not contained on March 5, 2015 EU re-listing |     |     |     |     |  |      |     |     |  |  |  |  |  |  |
| Igor Strelkov (Ihor Strielkov)  | US | EU  | SUI | CAN | LIE | AUS |  | AUST | NOR | JPN |  |  |  |  |  |  |
| Sergei Ivanovich Menyailo   | US | EU  | SUI | CAN | LIE | AUS |  |      | NOR | JPN |  |  |  |  |  |  |
| Mikhail Malyshev  | US | EU  | SUI | CAN | LIE | AUS |  | AUST | NOR | JPN |  |  |  |  |  |  |
| Valery Medvedev   | US | EU  | SUI | CAN | LIE | AUS |  | AUST | NOR | JPN |  |  |  |  |  |  |
| Sergey Aksyonov   | US | EU  | SUI |     | LIE | AUS |  | AUST | NOR | JPN |  |  |  |  |  |  |
| Vladimir Konsantinov  | US | EU  | SUI |     | LIE | AUS |  | AUST | NOR | JPN |  |  |  |  |  |  |
| Viktor Medvechuck   | US |   |     |     |     |     |  | AUST |     |     |  |  |  |  |  |  |
| Rustam Illmirovich Ternigaliev  | US | EU  | SUI |     | LIE | AUS |  | AUST | NOR | JPN |  |  |  |  |  |  |
| Deniz Valentinovich Berezovskiy   |    | EU  | SUI |     | LIE | AUS |  | AUST | NOR | JPN |  |  |  |  |  |  |
| Aleksei Mikhailovich Chaily   | US | EU  | SUI |     | LIE | AUS |  | AUST | NOR | JPN |  |  |  |  |  |  |
| Pyotr Anatolyiovych Zima  | US | EU  | SUI |     | LIE | AUS |  | AUST | NOR | JPN |  |  |  |  |  |  |
| Yuriy Zherebtsov  | US | EU  | SUI |     | LIE | AUS |  | AUST | NOR | JPN |  |  |  |  |  |  |
| Sergei Pavlovych Tsekov   | US | EU  | SUI |     | LIE | AUS |  | AUST | NOR | JPN |  |  |  |  |  |  |
| Viktor Fedorovich Yanukovich  | US | EU  | SUI | CAN | LIE | AUS |  | AUST | NOR | JPN |  |  |  |  |  |  |
| Vitalii Yuriyovich Zakharchenko   |    | EU  | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Viktor Pavlovych Pshonka  |    | EU  | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Oleksandr Hryhorovych Yakymenko   |    | EU*   |     | CAN |     | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Andriy Volodymyrovych Portnov   |    | EU*   |     | CAN |     | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Olena Leonidivna Lukash   |    | EU  | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Andrii Petrovych Kliuiev  |    | EU  | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Viktor Ivanovych Ratushniak   |    | EU  |     | CAN |     | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Oleksandr Viktorovych Yanukovich  |    | EU  | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Viktor Viktorovych Yanukovich   |    | EU  |     | CAN |     | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Artem Viktorovych Pshonka   |    | EU  |     | CAN |     | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Serhii Petrovych Kliuiev  |    | EU  | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Mykola Yanovych Azarov  | US | EU  | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Oleksii Mykolayovych Azarov   |    | EU*   |     | CAN |     | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Serhiy Vitaliyovych Kurchenko   |    | EU  |     | CAN |     | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Dmytro Volodymyrovych Tabachnyk   |    | EU  |     | CAN |     | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Raisa Vasyivna Bohatyriova  | US | EU  | SUI | CAN | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Ihor Oleksandrovych Kalinin   |    | EU*   |     | CAN |     | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Serhiy Abruzov  | US | EU  | SUI |     | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Mykhaylo (Mikhail) Markovych Dobkin   |    |   | SUI |     | LIE | AUS |  |      |     |     |  |  |  |  |  |  |
| Yuriy Ivanyushchenko  |    |   | SUI |     | LIE | AUS |  |      |     |     |  |  |  |  |  |  |
| Hennadiy Adolfovyh Kernes   |    |   | SUI |     | LIE | AUS |  |      |     |     |  |  |  |  |  |  |
| Borys Viktorovych Kolesnikov  |    |   | SUI |     | LIE |     |  |      |     |     |  |  |  |  |  |  |
| Yuriy Volodymyrovych Kolobov  |    |   | SUI |     | LIE |     |  |      |     |     |  |  |  |  |  |  |
| Volodymyr Vasylovych Kozak  |    |   | SUI |     | LIE |     |  |      |     |     |  |  |  |  |  |  |
| Mykola Volodymyrovych Prysyazhnyuk  |    |   | SUI |     | LIE |     |  |      |     |     |  |  |  |  |  |  |
| Eduard Anatolyiovych Stavitsky  |    | EU  | SUI |     | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Oleksander Serhiyovych Yefremov   |    |   | SUI |     | LIE |     |  |      |     |     |  |  |  |  |  |  |
| Oleksander Viktorovych Klymenko   |    | EU  | SUI |     | LIE | AUS |  |      | NOR |     |  |  |  |  |  |  |
| Valeriy Koryak  |    |   |     |     |     | AUS |  |      |     |     |  |  |  |  |  |  |

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|---|----|----|-----|-----|-----|-----|------|-----|-----|-----|--|--|
| Oleksandr Popov   |    |    |     |     |     | AUS |      |     |     |     |  |  |
| Stanislav Schulyak  |    |    |     |     |     | AUS |      |     |     |     |  |  |
| Volodymyr Sivkovich   |    |    |     |     |     | AUS |      |     |     |     |  |  |
| Yuriy Ivanyushchenko  |    | EU | SUI |     | LIE | AUS |      | NOR |     |     |  |  |
| Olga Fedorovna Kovatidi                                     |    | EU | SUI | CAN | LIE | AUS | AUST | NOR | JPN |     |  |  |
| German Prokopiv   |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |     |  |  |
| Valeriy Bolotov   | US | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |     |  |  |
| Andriy Purgin   | US | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |     |  |  |
| Denys Pushylin  | US | EU | SUI | CAN | LIE | AUS | AUST | NOR | JPN |     |  |  |
| Sergey Gennadevich Tsyplakov                                |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |     |  |  |
| Petr Grigorievich Jarosh                                    |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |     |  |  |
| Oleg Grigorievich Kozyura                                   |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |     |  |  |
| Viacheslav Ponomariov                                       | US | EU | SUI | CAN | LIE | AUS | AUST | NOR | JPN |     |  |  |
| Igor Mykolaiovych Bezler                                    | US | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |     |  |  |
| Igor Kakidzyanov  |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |     |  |  |
| Oleg Tsariov  |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |     |  |  |
| Roman Lyagin  | US | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |     |  |  |
| Aleksandr Malykhin  |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |     |  |  |
| Natalia Vladimirovna Poklonskaya                            | US | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |     |  |  |
| Igor Sergeievich Chetchenko (aka Shevchenko)                |    | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |     |  |  |
| Valery Vladimirovich Kaurov                                 | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Alexander Borodai   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Alexander Khodakovskiy                                      | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Aleksandr Alexandrovich Kalyusky                            |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Alexandr Khryakov   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Marat Bashirov  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Vasyl Nikitin   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Aleksey Karyakin  | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Yuriy Ivakin  | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Igor Plotnitsky (aka Ihor Venedyktovych Plotnitsky)         | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Nikolay (Mykola) Kozitsyn                                   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Oleksiy (Aleksey) Mozgovy                                   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Victor Yuriirovich Anosov                                   |    |    |     |     | CAN |     |      |     |     |     |  |  |
| Viacheslav Anatoliiovych Apraksimov                         |    |    |     |     | CAN |     |      |     |     |     |  |  |
| Fedir Dmytrovych Berezin                                    | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Ruslan Yunirovish Ilkaev                                    |    |    |     |     | CAN |     |      |     |     |     |  |  |
| Valeriy Kostiantynovych Mussienko                           |    |    |     |     | CAN |     |      |     |     |     |  |  |
| Viacheslav Mykolaiovych Petrov                              |    |    |     |     | CAN |     |      |     |     |     |  |  |
| Yuriy Oleksandrovych Protsenko                              |    |    |     |     | CAN |     |      |     |     |     |  |  |
| Oleh Anatoliiovych Vasin                                    |    |    |     |     | CAN |     |      |     |     |     |  |  |
| Serhii Anatoliiovych Zdriliuk                               | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Luhansk People's Republic                                   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Donetsk People's Republic                                   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Pavel Gubarev   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Ekaterina Gubareva  | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Federal State of Novorossiia                                |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| International Union of Public Associations "Great Don Army" |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Sobol   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Lugansk Guard   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Army of the Southeast                                       |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Donbass People's Republic                                   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Vostok Battalion  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Vladimir Antyufeyev (aka Vladimir Shevtsov)                 | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Oksana Tchigrina  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Boris Litvinov  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Sergey Abisov   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Alexander Zakharchenko                                      | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Vladimir Kononov  |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Miroslav Vladimirovich Rudenko                              | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Gennadiy Nikolaiovych Tsyplakov                             |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Andrey Yurevich Pinchuk                                     |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Oleg Bereza   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Andrei Nikolaevich Rodkin                                   |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Aleksandr Karaman   | US | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Georgiy L'vovich Muradov                                    |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Mikhail Sergeyevich Sheremet                                |    | EU | SUI | CAN |     | AUS |      | NOR | JPN |     |  |  |
| Serhiy Kozyakov   |    | EU |     |     | CAN |     | AUS  |     |     | JPN |  |  |
| Oleg Akimov   |    | EU |     |     |     |     | AUS  |     |     | JPN |  |  |
| Larisa Airapetyan   |    | EU |     |     | CAN |     | AUS  |     |     | JPN |  |  |
| Yuriy Sivokonenko   |    | EU |     |     | CAN |     | AUS  |     |     | JPN |  |  |
| Aleksandr Kofman  |    | EU |     |     |     |     | AUS  |     |     | JPN |  |  |
| Ravil Khalikov  |    | EU |     |     | CAN |     | AUS  |     |     | JPN |  |  |
| Dmitry Semyonov   |    | EU |     |     | CAN |     | AUS  |     |     | JPN |  |  |
| Oleg Bugrov   |    | EU |     |     | CAN |     | AUS  |     |     | JPN |  |  |
| Lesya Lapteva   |    | EU |     |     | CAN |     | AUS  |     |     | JPN |  |  |
| Yevgeniy Eduardovich Mikhaylov                              |    | EU |     |     | CAN |     | AUS  |     |     | JPN |  |  |
| Ihor Vladymyrovych Kostenok                                 |    | EU |     |     | CAN |     | AUS  |     |     | JPN |  |  |
| Yevgeniy Vyasheslavovich Orlov                              |    | EU |     |     | CAN |     | AUS  |     |     | JPN |  |  |
| Vladyslav Nykolayevych Deynego                              |    | EU |     |     | CAN |     | AUS  |     |     | JPN |  |  |
| Donetsk Republic  |    | EU |     |     | CAN |     | AUS  |     |     | JPN |  |  |
| Peace to Luhansk Region                                     |    | EU |     |     | CAN |     | AUS  |     |     | JPN |  |  |
| Free Donbass  |    | EU |     |     | CAN |     | AUS  |     |     | JPN |  |  |

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| People's Union   |    | EU |     | CAN |     | AUS |      |     |     | JPN |  |  |  |  |
| Luhansk Economic Union   |    | EU |     | CAN |     | AUS |      |     |     | JPN |  |  |  |  |
| Donbass People's Militia   | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Marshall Capital Fund  | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Dmitry Neklyudov   | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Novorossiia Party  | US | EU | SUI | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Oplot  | US | EU | SUI | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Petr Savchenko   | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Profactor Tov  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Oleh Tsaryov   | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| South-East Movement (Yugo-Vostok Movement)                                       | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Night Wolves   | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Aleksandr Zaldostanov  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Pavel Dremov aka Batya   |    | EU | SUI | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Alexey Milchakov aka Fritz, Serbian  |    | EU | SUI | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Arseny Pavlov aka Motorola   |    | EU | SUI | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Mikhail Tolstykh aka Givi  |    | EU | SUI | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Eduard Basurin   |    | EU | SUI | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Alexandr Shubin  |    | EU | SUI | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Sergey Litvin  |    | EU | SUI | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Sergey Ignatov   |    | EU | SUI | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Ekaterina Filippova  |    | EU | SUI | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Aleksandr Timofeev   |    | EU | SUI | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Evgeny Manuilov  |    | EU | SUI | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Viktor Yatsenko  |    | EU | SUI | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Olga Besedina  |    | EU | SUI | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Zaur Ismailov  |    | EU | SUI | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Cossack National Guard   |    | EU | SUI | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Sparta battalion   |    | EU | SUI | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Somali battalion   |    | EU | SUI | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Zarya battalion  |    | EU | SUI | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Prizrak brigade  |    | EU | SUI | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Kalmius battalion  |    | EU | SUI | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Death battalion  |    | EU | SUI | CAN |     | AUS |      |     |     |     |  |  |  |  |
| Eurasian Youth Union   | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Aleksandr Dugin  | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Andrey Kovalenko   | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Pavel Kanishchev   | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Sergei Abisov  | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Oleg Kozyura   | US |    |     |     |     |     |      |     |     |     |  |  |  |  |
| <b>Crimean Entities</b>  |    |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Chernomorneftegaz  | US | EU | SUI | CAN | LIE | AUS | AUST | NOR | JPN |     |  |  |  |  |
| Feodosia (Feodosiya Enterprise)  | US | EU | SUI | CAN | LIE | AUS |      | NOR | JPN |     |  |  |  |  |
| State ferry enterprise "Kerch ferry"   |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| State enterprise "Sevastopol commercial seaport"                                 |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| State enterprise "Kerch commercial seaport"                                      |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| State enterprise Universal - Avia  |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| Resort Nizhnaya Oreanda  |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| Crimean enterprise "Azov distillery plant"                                       |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| State concern "National Association of producers Massandra"                      |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| State enterprise Magarach of the national institute of wine                      |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| State enterprise "Factory of sparkling wine Novy Svet"                           |    | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| Russian National Commercial Bank   | US | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| <b>Russian Entities (*Captured in EU sectoral measure, see below)</b>            |    |    |     |     |     |     |      |     |     |     |  |  |  |  |
| Bank Rossiya   | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| SMP Bank   | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| InvestKapitalBank  | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| Volga Group  | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| Aquanika   | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| CJSC Zest  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| JSB Sobin Bank   | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Avia Group LLC   | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| Avia Group Nord LLC  | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| Sakhatrans LLC   | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Stroytransgaz Group  | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| Stroytransgaz Holding  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Stroytransgaz LLC  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Stroytransgaz OJSC   | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Stroytransgaz-M LLC  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Limited Liability Company Investment Company                                     | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Transoil   | US |    |     |     |     |     | AUST |     |     |     |  |  |  |  |
| Stroygazmontazh  | US |    |     | CAN |     |     | AUST |     |     |     |  |  |  |  |
| ExpoBank   |    |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| RosEnergoBank  |    |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Almaz-Antey  | US | EU | SUI | CAN |     | AUS |      | NOR |     |     |  |  |  |  |
| Federal State Unitary Enterprise State Research and Production Enterprise Bazalt | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| JSC Concern Sozvezdie  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| JSC MIC NPO Mashinostroyeniya  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Kalishnikov Concern  | US |    | *   | CAN |     |     |      |     |     |     |  |  |  |  |
| KBP Instrument Design Bureau   | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |
| Radio-Electronic Technologies  | US |    |     | CAN |     |     |      |     |     |     |  |  |  |  |

|   |    |    |     |     |  |     |  |     |     |  |  |  |  |  |  |  |  |  |  |  |  |
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| Uralvagonzavod  | US | *  |     |     |  |     |  |     |     |  |  |  |  |  |  |  |  |  |  |  |  |
| United Shipbuilding Corporation   | US |    |     | CAN |  |     |  |     |     |  |  |  |  |  |  |  |  |  |  |  |  |
| Dobrolet (aka Dobrolyot)  |    | EU | SUI | CAN |  | AUS |  | NOR |     |  |  |  |  |  |  |  |  |  |  |  |  |
| OAO Dolgoprudny Research Production Enterprise  | US |    |     | CAN |  |     |  |     |     |  |  |  |  |  |  |  |  |  |  |  |  |
| Mytishchinski Mashinostroitelny Zavod, OAO  | US |    |     | CAN |  |     |  |     |     |  |  |  |  |  |  |  |  |  |  |  |  |
| Kalinin Machine Plan JSC  | US |    |     | CAN |  |     |  |     |     |  |  |  |  |  |  |  |  |  |  |  |  |
| Almaz-Antey GSKB  | US |    |     |     |  |     |  |     |     |  |  |  |  |  |  |  |  |  |  |  |  |
| JSC NIIP  | US |    |     | CAN |  |     |  |     |     |  |  |  |  |  |  |  |  |  |  |  |  |
| Marine Scientific Research Institute of Radioelectronics Altair (MNIIRE "Altair")   |    |    |     | CAN |  |     |  |     |     |  |  |  |  |  |  |  |  |  |  |  |  |
| <b>Executive Order 13662 - Sectoral Sanctions</b>   |    |    |     |     |  |     |  |     |     |  |  |  |  |  |  |  |  |  |  |  |  |
| <b>Financial Institutions - New Debt and Equity Prohibition (*Not specifically listed but covered as 50%-owned subsidiary of a designated bank)</b>   |    |    |     |     |  |     |  |     |     |  |  |  |  |  |  |  |  |  |  |  |  |
| Sberbank  | US | EU | SUI | CAN |  |     |  | NOR | JPN |  |  |  |  |  |  |  |  |  |  |  |  |
| VTB Bank OAO  | US | EU | SUI | CAN |  |     |  | NOR | JPN |  |  |  |  |  |  |  |  |  |  |  |  |
| VEB   | US | EU | SUI | CAN |  |     |  | NOR | JPN |  |  |  |  |  |  |  |  |  |  |  |  |
| Gazprombank OAO   | US | EU | SUI | CAN |  |     |  | NOR | JPN |  |  |  |  |  |  |  |  |  |  |  |  |
| Bank of Moscow  | US | *  | *   | CAN |  |     |  | *   | *   |  |  |  |  |  |  |  |  |  |  |  |  |
| Russian Agricultural Bank (aka Rosselkhozbank)  | US | EU | SUI | CAN |  |     |  | NOR | JPN |  |  |  |  |  |  |  |  |  |  |  |  |
| <b>Energy Companies - Debt Prohibition</b>  |    |    |     |     |  |     |  |     |     |  |  |  |  |  |  |  |  |  |  |  |  |
| Rosneft   | US | EU | SUI | CAN |  | AUS |  | NOR |     |  |  |  |  |  |  |  |  |  |  |  |  |
| OAO Novatek   | US |    |     | CAN |  |     |  |     |     |  |  |  |  |  |  |  |  |  |  |  |  |
| Gazprom Neft  | US | EU | SUI |     |  | AUS |  | NOR |     |  |  |  |  |  |  |  |  |  |  |  |  |
| AK Transneft OAO  | US | EU | SUI |     |  | AUS |  | NOR |     |  |  |  |  |  |  |  |  |  |  |  |  |
| <b>Energy Companies - Goods, Services and Technology in Oil Sector Activities (*EU, Norwegian and Canadian restrictions on provision of goods, services and technology apply are not applied to specific companies but cover their provision "in Russia")</b> |    |    |     |     |  |     |  |     |     |  |  |  |  |  |  |  |  |  |  |  |  |
| Rosneft   | US | *  |     | *   |  | *   |  | *   |     |  |  |  |  |  |  |  |  |  |  |  |  |
| OAO Gazprom   | US | *  |     | *   |  | *   |  | *   |     |  |  |  |  |  |  |  |  |  |  |  |  |
| Gazprom Neft  | US | *  |     | *   |  | *   |  | *   |     |  |  |  |  |  |  |  |  |  |  |  |  |
| Lukoil OAO  | US | *  |     | *   |  | *   |  | *   |     |  |  |  |  |  |  |  |  |  |  |  |  |
| Surgutneftegas  | US | *  |     | *   |  | *   |  | *   |     |  |  |  |  |  |  |  |  |  |  |  |  |
| <b>Defense and Related Material Companies - Debt Prohibition (*Captured as 50%-owned subsidiary of Rostec; **Designated as full asset freeze, noted above)</b>  |    |    |     |     |  |     |  |     |     |  |  |  |  |  |  |  |  |  |  |  |  |
| Rostec  | US |    |     |     |  |     |  |     |     |  |  |  |  |  |  |  |  |  |  |  |  |
| OPK Oboronprom  | *  | EU | SUI |     |  | AUS |  | NOR |     |  |  |  |  |  |  |  |  |  |  |  |  |
| United Aircraft Corporation   |    | EU | SUI |     |  | AUS |  | NOR |     |  |  |  |  |  |  |  |  |  |  |  |  |
| Uralvagonzavod  | ** | EU | SUI |     |  | AUS |  | NOR |     |  |  |  |  |  |  |  |  |  |  |  |  |
| <b>Defense and Related Material Companies - Prohibition on technical assistance, brokering services, financing, and financial assistance for dual-use goods and technology (*Designated as full asset freeze, noted above)</b>                                |    |    |     |     |  |     |  |     |     |  |  |  |  |  |  |  |  |  |  |  |  |
| JSC Sirius  |    | EU | SUI |     |  | AUS |  | NOR |     |  |  |  |  |  |  |  |  |  |  |  |  |
| OJSC Stankoinstrument   |    | EU | SUI |     |  | AUS |  | NOR |     |  |  |  |  |  |  |  |  |  |  |  |  |
| OAO JSC Chemcomposite   |    | EU | SUI |     |  | AUS |  | NOR |     |  |  |  |  |  |  |  |  |  |  |  |  |
| JSC Kalashnikov   | *  | EU | SUI |     |  | AUS |  | NOR |     |  |  |  |  |  |  |  |  |  |  |  |  |
| JSC Tula Arms Plant   |    | EU | SUI |     |  | AUS |  | NOR |     |  |  |  |  |  |  |  |  |  |  |  |  |
| NPK Tchnologii Maschinostrojenija   |    | EU | SUI |     |  | AUS |  | NOR |     |  |  |  |  |  |  |  |  |  |  |  |  |
| OAO Wysokototschnye Kompleksi   |    | EU | SUI |     |  | AUS |  | NOR |     |  |  |  |  |  |  |  |  |  |  |  |  |
| OAO Almaz Antey   |    | EU | SUI |     |  | AUS |  | NOR |     |  |  |  |  |  |  |  |  |  |  |  |  |
| OAO NPO Bazalt  |    | EU | SUI |     |  | AUS |  | NOR |     |  |  |  |  |  |  |  |  |  |  |  |  |