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High-level overview of newly imposed sanctions related to the Russian attack on Ukraine

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Annex to Sanctions Briefing: Update on sanctions against Russia and Belarus

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High-level overview of newly imposed sanctions related to the Russian attack on Ukraine

The US, UK, and EU coordinate their sanctions to a large extent. President Biden has stated that the coalition consisting of the US and allies including the EU, UK, and Australia, together make up over 50% of the world's GDP which amplifies the joint impact of their response. Some differences in sanctions regimes are however to be expected.

The sanctions now imposed against Russia and Belarus come in addition to the restrictive measures imposed since 2014 for the annexation of Crimea and destabilizing of the situation in Ukraine which were far less far-reaching.

The following overview is meant to give the reader a high-level introduction to the type of measures currently in place in some key jurisdictions. It is not exhaustive and the sanctions regimes in countries around the world are being amended on a continuous basis.

Norway

Norway will align its sanctions regime with the measures imposed by the EU. Norway will not implement separate national sanctions. This has in the recent days been communicated by various representatives of the Norwegian government and is in line with the Norwegian approach in the past where EU sanctions, as a general rule, were adopted in Norway.

EU

The EU sanctions pack¹ currently consists of amongst others:

Extensive asset freeze and travel restrictions:²

Asset freeze measures prohibit making funds or economic resources available to or for the benefit of any person on the list, directly or indirectly:

- A total of 680 individuals and 53 entities related to Russia and the aggression against Ukraine as of 28 February 2022.³ This includes high profile individuals and entities undermining or threatening the sovereignty of Ukraine, individuals and entities conducting transactions with separatist groups in the Donbas region, and leading businesspersons or entities involved in economic sectors providing a substantial source of revenue to the Government of Russia.⁴
- All 351 members of the Russian State Duma who voted in favour of the resolution to recognize the Donetsk People's Republic and the Luhansk People's Republic.⁵
- Members of the Russian elite, government, leading businesspersons, and oligarchs, such as President Vladimir Putin and Minister of Foreign Affairs Sergey Lavrov, Igor Sechin (CEO of Rosneft), Alisher Usmanov (pro-Kremlin oligarch), Petr Aven (oligarch, shareholder of Alfa

¹ [EUR-Lex - 32014R0269 - EN - EUR-Lex \(europa.eu\)](#)

² [EUR-Lex - 32022D0265 - EN - EUR-Lex \(europa.eu\)](#) og [EUR-Lex - 32022R0236 - EN - EUR-Lex \(europa.eu\)](#)

³ [Russia's military aggression against Ukraine: Council imposes sanctions on 26 persons and one entity - Consilium \(europa.eu\)](#)

⁴ [EUR-Lex - 32022R0261 - EN - EUR-Lex \(europa.eu\)](#)

⁵ [EUR-Lex - 32022R0261 - EN - EUR-Lex \(europa.eu\)](#)

Group) Mikhail Fridman (founder and main shareholder of Alfa Group), Petr Fradkov (chairman and the sole executive body of PJSC Promsvyazbank), Joint stock company «Gas Industry Insurance Company SOGAZ» insured the construction of the railway infrastructure.⁶

- 27 individuals and seven entities related to Belarus are listed for the involvement in Ukraine.

Financial measures:

- Prohibition to purchase, sell, provide investment services for, or deal with transferable securities issued after 9 March 2022 by Russia and its Government or the Russian Central Bank, or legal person, entity or body acting on behalf of the entities.⁷
- Prohibition to provide or be part of an agreement to provide loans or credit to Russia and its Government, the Russian Central Bank, or be part of any arrangement involving those entities or legal persons or entities acting on behalf of the entities (with some exceptions).⁸
- Russia, the Russian Government, and the Russian Central Bank are prohibited from purchasing and selling securities issued after 9 March 2022, including prohibition of purchasing, selling, providing investment services to those entities.
- Restrictions of providing loans or credit to Russia, the Russian Government, and the Russian Central Bank after 23 February 2022.
- All transactions related to the management of reserves as well as of assets of the Russian Central Bank, including transactions with any individual or entity on behalf of the bank are prohibited.⁹
- Prohibition to sell, supply, transfer or export euro denominated banknotes to Russia or to any natural or legal person, entity or body in Russia, including the government and the Central Bank of Russia, or for use in Russia.¹⁰

Sectorial sanctions:

- Aviation and space industry: Prohibition to sell, supply, transfer or export goods and technology, as well as provision of related technical or financial assistance, suited for use in aviation or space industry, to any natural or legal person, entity or body in Russia or for use in Russia (execution of contracts until 28 March 2022 of contracts concluded before 26 February 2022 may be allowed under certain circumstances).¹¹ The purpose of a total ban on sale of aircrafts, aircraft components and equipment to Russian airlines is to degrade a key sector of Russia's economy. Three quarters of Russia's current commercial air fleet were built in the EU, the US and Canada.¹²
- Energy sector: Prohibition to sell, supply, transfer or export of specific goods, equipment and technologies in oil refining, as well as provision of related technical or financial assistance, to any natural or legal person, entity or body in Russia or for use in Russia (execution of contracts until 27 May 2022 of contracts concluded before 26 February 2022 may be allowed under

⁶ [EUR-Lex - 32022R0336 - EN - EUR-Lex \(europa.eu\)](#)

⁷ [EUR-Lex - 32022D0264 - EN - EUR-Lex \(europa.eu\)](#)

⁸ COUNCIL DECISION (CFSP) 2022/264

⁹ [EUR-Lex - 32022D0335 - EN - EUR-Lex \(europa.eu\)](#)

¹⁰ [Russia's military aggression against Ukraine: EU bans certain Russian banks from SWIFT system and introduces further restrictions - Consilium \(europa.eu\)](#)

¹¹ Regulation (EU) 833/2014

¹² [Russia's military aggression against Ukraine: EU imposes sanctions against President Putin and Foreign Minister Lavrov and adopts wide ranging individual and economic sanctions - Consilium \(europa.eu\)](#)

certain circumstances).¹³ The purpose is to hit the Russian oil sector and make it impossible to upgrade Russian oil refineries.¹⁴

- **High technology sector:** Prohibition to sell, supply, transfer or export specific goods, equipment and high technologies, as well as provision of related technical or financial assistance, to any natural or legal person, entity or body in Russia or for use in Russia, which may be used in defence and military sector, for instance telecommunications, information technology, sensors, lasers, maritime applications.¹⁵
- **Dual use goods:** Prohibition to sell, supply, transfer or export specific dual-use goods and technologies, as well as provision of related technical or financial assistance, to any natural or legal person, entity or body in Russia or for use in Russia.

Sanctions against the regions Donetsk and Luhansk: ¹⁶

- Prohibition to acquire real estate, entities, or shares, and to provide financing of entities in the areas of Donetsk and Luhansk.
- Restrictions on trade and financing related to certain economic sectors, including transport, telecommunications, energy, production of oil and gas.
- Prohibition of technical assistance, engineering services relating to infrastructure in the areas.
- Prohibition to provide services directly related to tourism activities in the areas.

Import bans:

- Prohibited to import goods originating in the areas of Donetsk and Luhansk (execution of contracts until 24 May 2022 for contracts concluded before 23 February 2022 may be allowed under certain circumstances).
- Prohibited to provide financing related to the import of goods originating in Donetsk and Luhansk (execution of contracts until 24 May 2022 for contracts concluded before 23 February 2022 may be allowed under certain circumstances).

Export control in relation to Donetsk and Luhansk:

- Prohibition to trade with certain goods and technologies to individuals or entities in the areas within the transport, telecommunications, energy and production of oil and gas sectors.

SWIFT ban:

- The EU Council has on 2 March 2022 decided that the following banks shall be excluded from SWIFT from 12 March 2022: Bank Otkritie, Novikombank, Promsvyazbank, Bank Rossiya, Sovcombank, VNESHECONOMBANK (VEB), VTB BANK. The regulation prohibits from providing specialised financial messaging services to the listed banks. The ban will also apply to any individual or entity established in Russia whose proprietary rights are owned

¹³ (EU) 2022/328 amending Regulation (EU) No 833/2014

¹⁴ [Russia's military aggression against Ukraine: EU imposes sanctions against President Putin and Foreign Minister Lavrov and adopts wide ranging individual and economic sanctions - Consilium \(europa.eu\)](#)

¹⁵ [Russia's military aggression against Ukraine: EU imposes sanctions against President Putin and Foreign Minister Lavrov and adopts wide ranging individual and economic sanctions - Consilium \(europa.eu\)](#)

¹⁶ [EUR-Lex - 32022R0263 - EN - EUR-Lex \(europa.eu\)](#)

for more than 50% by the banks. Banks that are important for the trade of Russian gas to European markets, Sberbank and Gazprombank, have currently not been listed.¹⁷

- A decision to exclude Russia or specific Russian banks from SWIFT has been heavily discussed. Several major countries have supported a ban, where France, Germany, Italy, the United Kingdom, Canada, and the United States on 1 March 2022 [committed](#) to ensuring that selected banks are removed from the system in a joint statement. In addition, the Netherlands, Austria, Czech Republic, Estonia, Latvia and Lithuania have expressed their support to this measure. Further development involving SWIFT exclusions may be expected.
- The international payment system SWIFT is member-owned by more than 3500 banks and financial institutions, and overseen by central banks of Belgium, Canada, France, Germany, Italy, Japan, the Netherlands, United Kingdom, United States, Switzerland, and Sweden as well as the European Central Bank. SWIFT has taken the stand that it is uninfluenced by politics as an [independent](#) cooperative company, but has on 1 March 2022 published a message about the joint statement where it confirms to comply with applicable sanctions laws and regulations and to disconnect targeted banks upon legal instruction. SWIFT has earlier disconnected banks due to sanctions imposed by EU in a case where [the regulation](#) explicitly targeted financial messaging providers from providing services to EU-sanctioned Iranian banks.

US

The US sanctions pack currently consists of amongst others:

Extensive asset freeze and travel restrictions:¹⁸

Asset freeze measures prohibit to give or receive funds, goods, or services to any listed person:

- Members of the Russian elite and government, including President Vladimir Putin and Minister of Foreign Affairs Sergey Lavrov.¹⁹
- Major Russian banks such as VTB Bank Public Joint Stock Company, Public Joint Stock Company Sberbank of Russia and 25 subsidiaries, State Corporation Bank for Development and Foreign Economic Affairs Vnesheconombank and 25 subsidiaries, Public Joint Stock Company Bank Financial Corporation Otkritie, Sovcombank OJSC, Sovcombank Technologies Limited Liability Company, and Joint Stock Commercial Bank Novikombank are listed.
- 24 Belarusian entities and individuals, including state-owned banks and defence companies, such as Minsk Wheeled Tractor Plant (MZKT), and senior executives of MZKT Aliaksei Ivanavich Rymasheuski and Aliaksandr Piatrovich Vetsianevich. Defence officials are also sanctioned, such as the Belarusian Minister of Defense Viktor Gennadievich Khrenin.
- Belarusian state-owned banks such as Belarussian Bank of Development and Reconstruction Belinvestbank Joint Stock Company, Bank Dabrabyt Joint-Stock Company.

¹⁷ Russia's military aggression against Ukraine: EU bans certain Russian banks from SWIFT system and introduces further restrictions - Consilium (europa.eu)

¹⁸ Executive order 14065 of February 21, 2022 and directive 4 Russia-related Designations; Issuance of Russia-related Directive 4 and Russia-related General License 8A | U.S. Department of the Treasury

¹⁹ Executive order 14024

- Belarusian Limited Liability Company Belinvest-Engineering and financial leasing company CJSC Belbizneslizing.

Financial measures:

- Sanctions against Russia's central bank, the Central Bank of the Russian Federation, prohibiting any transaction, including transfer of assets or foreign exchange transactions, involving the Russian Central Bank, the National Wealth Fund of the Russian Federation and the Ministry of Finance of the Russian Federation.²⁰
- Prohibition of making transactions, financing, and dealings in new debt under specified conditions of listed entities such as Credit Bank of Moscow Public Joint Stock Company, Gazprombank Joint Stock Company, Joint Stock Company Alfa-Bank, Public Joint Stock Company Sberbank of Russia, Public Joint Stock Company Transneft.²¹
- U.S. financial institutions are prohibited from maintaining correspondent accounts and processing transactions involving foreign financial institutions determined to be subject to the prohibitions of the Russia-related CAPTA Directive, or their property, or interests in property. Financial institutions subject to the prohibitions of the CAPTA Directive are, for instance, Arimero Holding Limited, Joint Stock Company Sberbank and subsidiaries, and IKS Joint Stock Company.²²

Sectorial sanctions against Russia:

- Technology, targeting Russian military forces, aviation, and maritime sector.

Export control:

- Restrictions on goods produced in America such as technology and software to Russia.
- Total export ban to Luhansk and Donetsk regarding any goods, services or technology from the US or by an US person.

UK

The UK sanctions pack²³ currently consists of amongst others:

Extensive asset freeze and travel restrictions:

- More than 100 Russian individuals and entities, including the largest company in the Russian defence sector, Rostec, Tactical Missile Corporation, Uralvagonzavod. It has been confirmed that further listings will be made in the coming days.
- Members of the Russian elite, government, leading businesspersons, and oligarchs, including five members of Vladimir Putin's close associates, Kirill Shamalov, Gennadij Timtsjenko, Boris Rotenberg and Igor Rotenberg.

²⁰ [Treasury Prohibits Transactions with Central Bank of Russia and Imposes Sanctions on Key Sources of Russia's Wealth | U.S. Department of the Treasury](#), under directive 3 and directive 4 of the under executive order 14024

²¹ Directive 3 under executive order 14024

²² https://home.treasury.gov/system/files/126/correspondent_accounts_directive_2.pdf under executive order 14024 (Russian Harmful Foreign Activities Sanctions at [Russian Harmful Foreign Activities Sanctions | U.S. Department of the Treasury](#))

²³ [UK Statement on Further Economic Sanctions Targeted at the Central Bank of the Russian Federation - GOV.UK \(www.gov.uk\)](#)

- Major Russian banks such as VTB Bank, PJSC Sberbank, VEB.RF, PJSC SovComBank, Bank Otkritie Financial Corporation PJSC, PJSC Promsvyazbank, IS Bank, Black Sea Bank, Bank Rossija, Promsvyazbank.

Financial measures:

- Financial sanctions against major Russian banks such as VTB Bank, Gazprom bank and VEB.RF restricting dealing in instruments issued by them.
- Prohibition of providing financial for the purpose of foreign exchange reserve and asset management services to the Central Bank of Russia, the National Wealth Fund of the Russian Federation and the Ministry of Finance of the Russian Federation.²⁴
- Major Russian companies are prohibited from obtaining financing in the British markets. State-owned entities are also prohibited from taking up government debt in British markets.
- Russian and Belarus citizens are prohibited from deposits over 50,000 pounds in British banks.

Sectorial sanctions:

- Goods, dual-use goods and technology to and for use in Russia, including technical or financial services, which may be used in defence and military sector, for instance telecommunications, sensors and lasers to.²⁵
- Measures targeting the shipping sector, ports and vessels.

Ongoing discussions about additional measures

Authorities globally are assessing and discussing on an ongoing basis whether additional measures should be imposed in light of the war in Ukraine. It is thus crucial that companies follow the developments and make sure that their sanctions risk assessments are continuously adjusted in light of newly imposed measures.

Disclaimer: This newsletter comprises only general information on selected trade sanctions and export control laws and regulations in Norway, the EU, UK and US and is not exhaustive and may be updated from time to time. This overview is prepared for information purposes only and shall neither be considered nor constructed as legal advice in any respect. No liability or responsibility is accepted as a result of the newsletter.

²⁴ [The Russia \(Sanctions\) \(EU Exit\) \(Amendment\) \(No. 5\) Regulations 2022 \(legislation.gov.uk\)](#)

²⁵ [The Russia \(Sanctions\) \(EU Exit\) \(Amendment\) \(No. 3\) Regulations 2022 \(legislation.gov.uk\)](#)

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