

US sanctions against Russia

Coordinated by

OFAC

The Office of Foreign Assets Control

Specially Designated Nationals List (SDN)

Executive Orders 13660/13661/13685

SDN Directives:

- U.S. persons are prohibited to deal with them.
- Asset freezes

160 persons
129 entities

The effect of contagion

Starting from end of January 2018 any (not only American) counterparties face restrictions when engaging in “**significant transactions**” with sanctioned companies from **defense** and **intelligence sector**. Counterparties whose transactions with sanctioned companies are considered significant risk to face considerable restrictions with regard to obtaining financing in US and executing transactions in USD.

Sectoral Sanctions Identifications List (SSI)

Banking

- SBERBANK
- VTB GROUP
- VNESHECONOMBANK
- GAZPROMBANK
- RUS AGRICULTURAL BANK

*and their subsidiaries from SSI list

Energy

- GAZPROM NEFT
- TRANSNEFT
- ROSNEFT
- NOVATEK

*and their subsidiaries from SSI list

Defense

- GAZPROM
- ROSNEFT
- GAZPROM NEFT
- LUKOIL
- SURGUTNEFTEGAZ

*and their subsidiaries from SSI list

- ROSTEC

Executive Order 13662

SSI Directives:

Financial restrictions

All transactions and financing or other dealing in **new debt** longer than **14 days maturity** are prohibited

(Amendments timeline: July 16, 2014 – 90 days; September 12, 2014 – 30 days; November 28, 2017 – 14 days)

Financial restrictions

Same as for **Banking** but the maturity limit is 60 days.

(July 16, 2014 – 90 days; November 28, 2017 – 60 days)

Technological restrictions

Prohibition to provide sanctioned companies **with goods, services and technology in support of exploration or production for deepwater, Arctic offshore, or shale projects**. These restrictions expand to the projects initiated after Jan 29, 2018, where the interest of sanctioned companies is above 33%.

Financial restrictions

Same as for **Banking** but the maturity limit is 30 days.

Directive 1

Directive 2

Directive 4

Directive 3

CAATSA*

Very mild tone of the two reports published in January:

- The “**Kremlin Report**” (list of senior foreign political figures and oligarchs close to Putin)
- Sovereign Debt Report** (effect of expanding sanctions on sovereign debt)

Links: [Executive orders](#); [Directives \(OFAC\)](#); [SDN list](#); [SSI list](#); [CAATSA](#)

*Countering America's Adversaries Through Sanctions Act

Nordea