

25th Annual IBA Transnational
Crime Conference
The Westin Boston Seaport
District
Boston – USA



Sanctions: trends in
global sanctions
enforcement

the global voice of
the legal profession®

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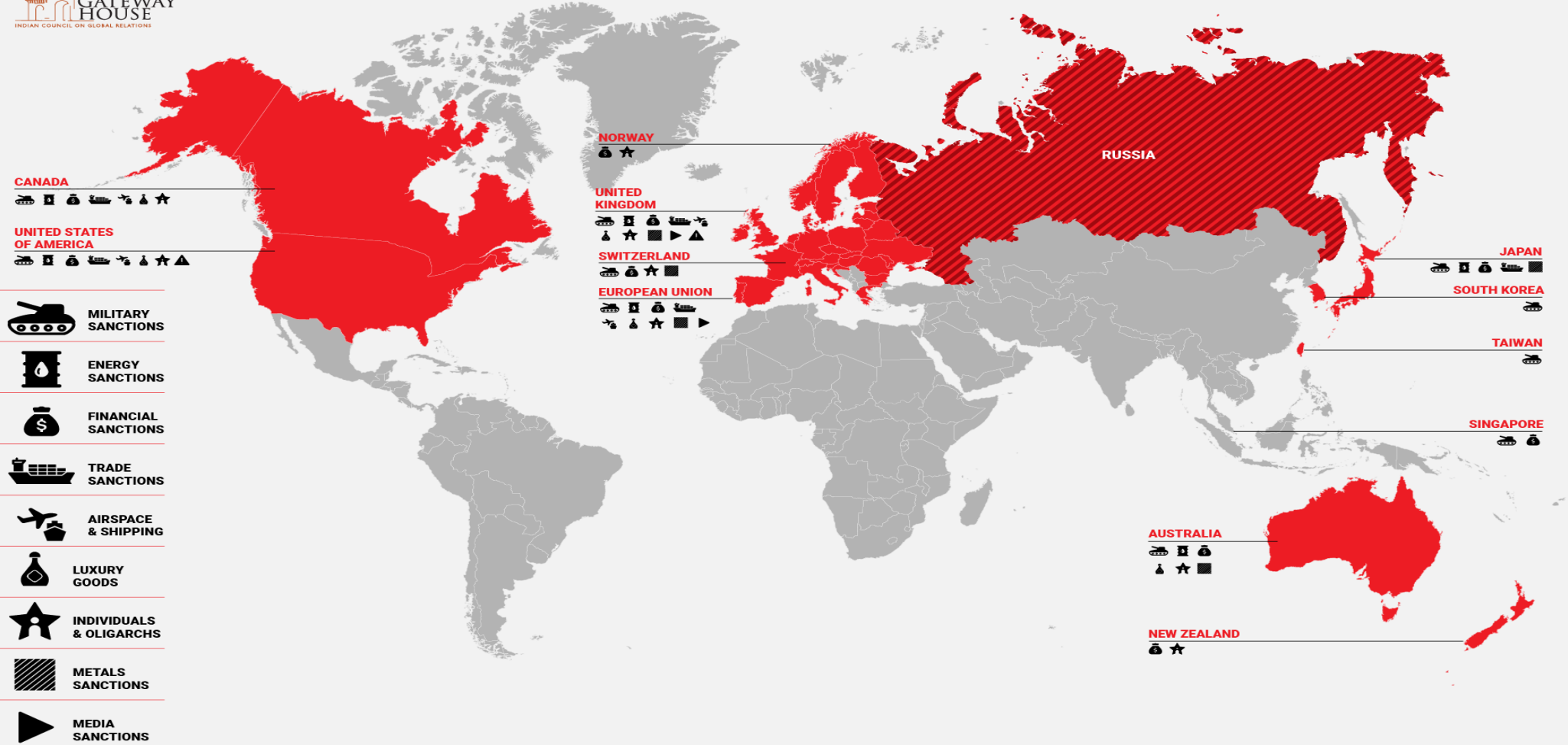


February 24th, 2022



Following Russia's invasion of Ukraine beginning on 24 February 2022, the United States, the European Union, and other Western countries introduced or significantly expanded sanctions covering Russian President Vladimir Putin and other government members, and banned "selected Russian banks" from using the SWIFT international payments system, triggering the 2022 Russian financial crisis and a massive international boycott of Russia and Belarus, which supports the invasion.



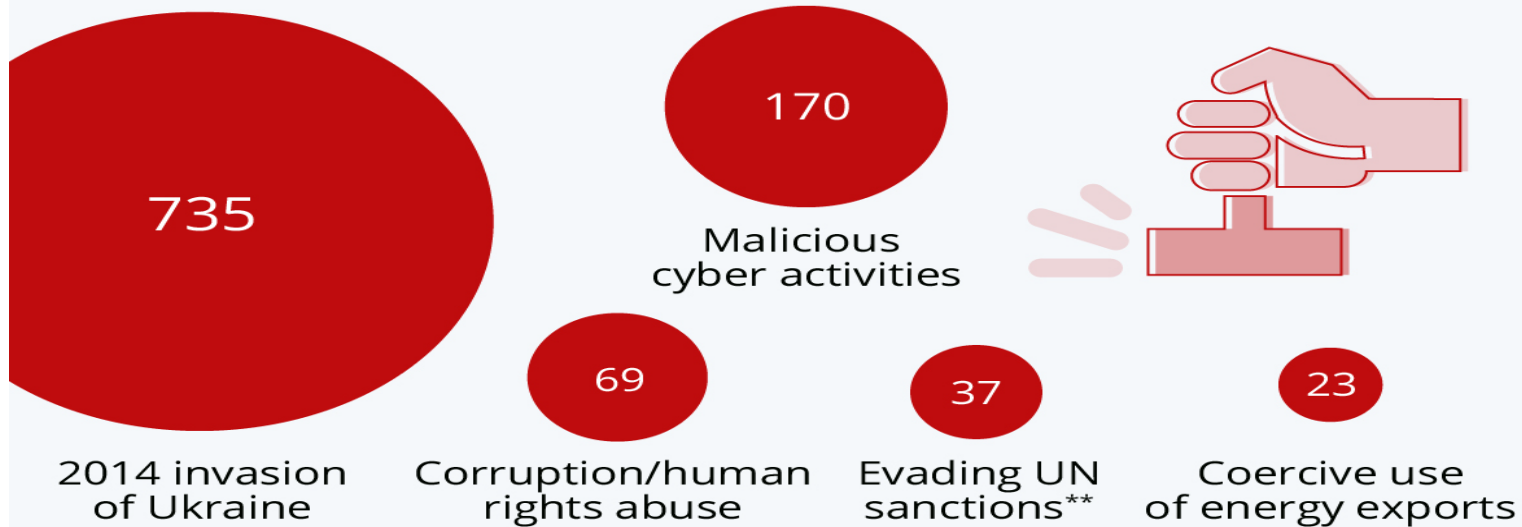


- MILITARY SANCTIONS**
- ENERGY SANCTIONS**
- FINANCIAL SANCTIONS**
- TRADE SANCTIONS**
- AIRSPACE & SHIPPING**
- LUXURY GOODS**
- INDIVIDUALS & OLIGARCHS**
- METALS SANCTIONS**
- MEDIA SANCTIONS**
- MISCELLANEOUS**

PUBLIC SANCTIONS AGAINST RUSSIA

Why Has the U.S. Sanctioned Russia in the Past?

Approximate number of Russian entities subject to U.S. sanctions for the following reasons (as of Sept 1, 2021)*



* can be individuals, organizations or transporting vessels

** against North Korea, Syria, Venezuela

Source: Congressional Research Service

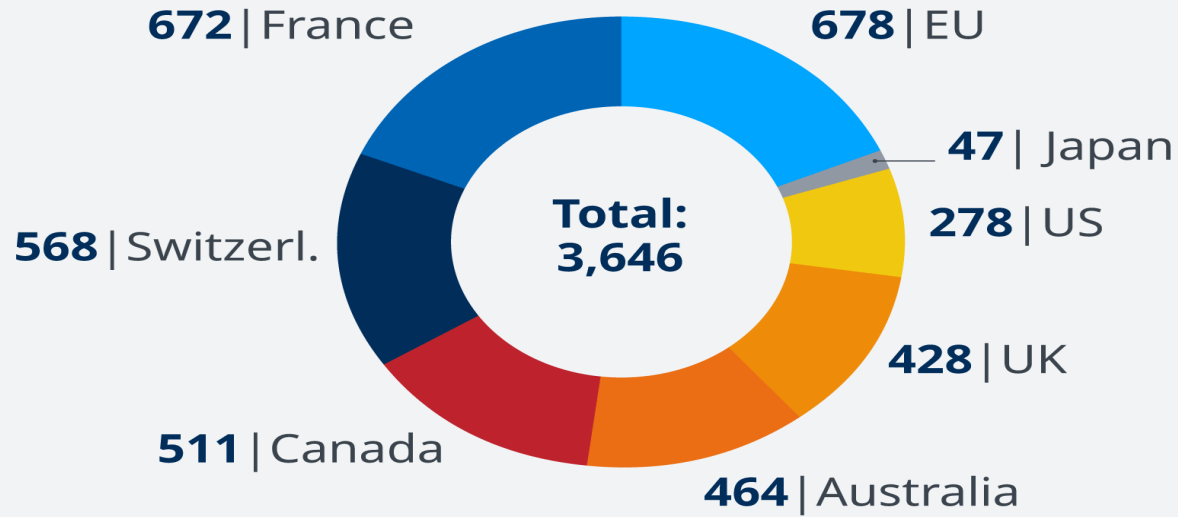


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Who sanctioned Russia

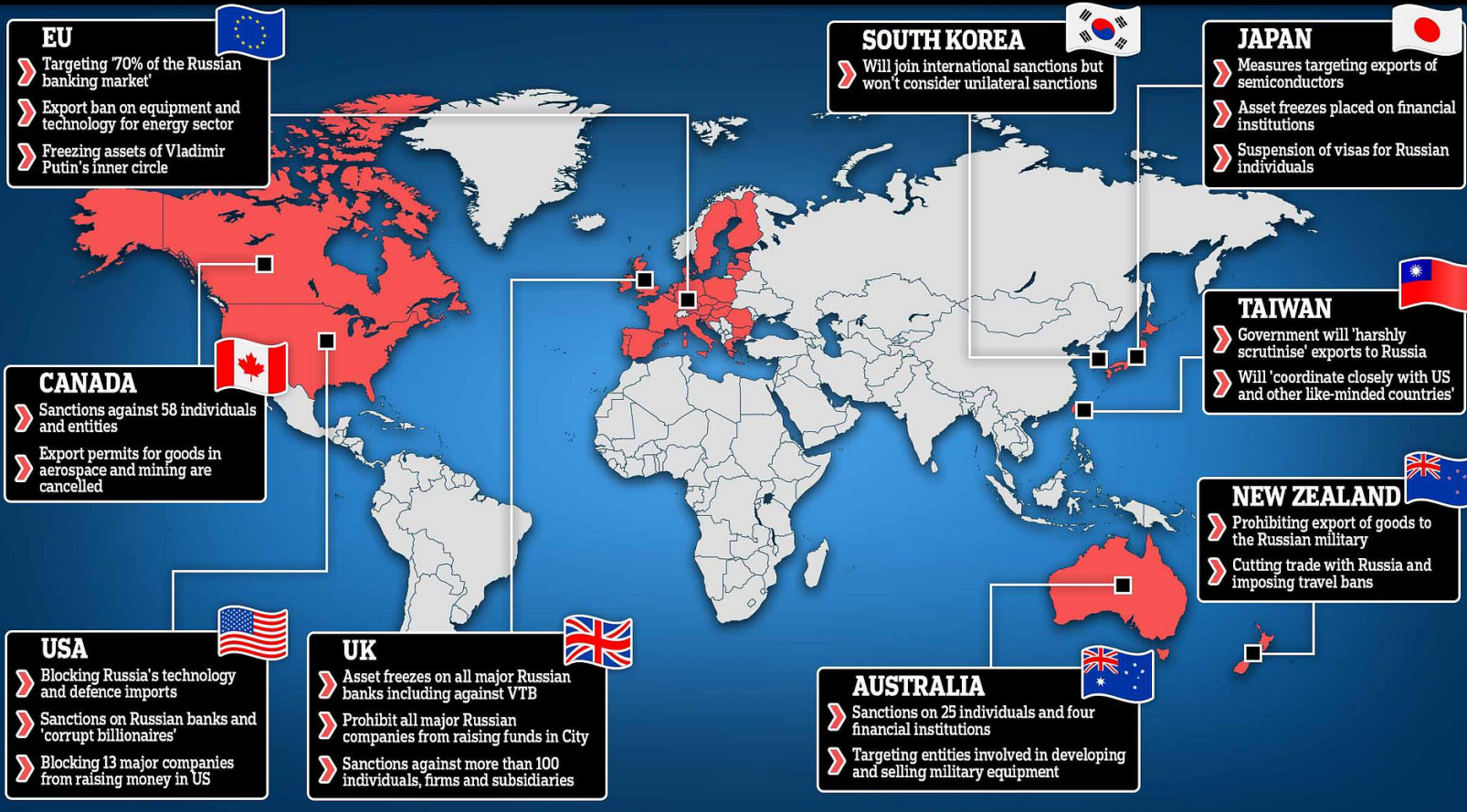
Since February 22



Source: Castellum.AI | March 15

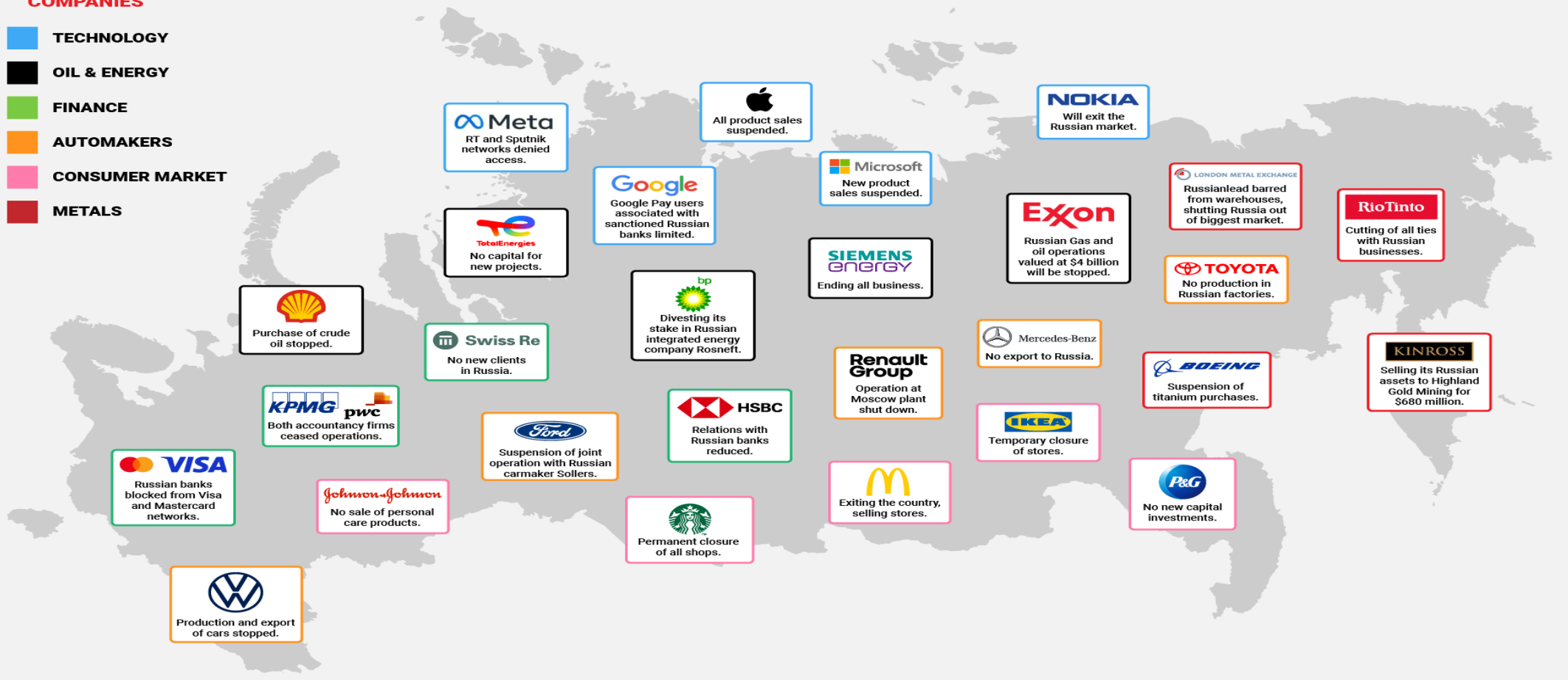


SANCTIONS PLACED ON RUSSIA BY GOVERNMENTS AROUND THE WORLD



1. MULTINATIONAL COMPANIES

- TECHNOLOGY
- OIL & ENERGY
- FINANCE
- AUTOMAKERS
- CONSUMER MARKET
- METALS



PRIVATE SANCTIONS AGAINST RUSSIA

2. INTERNATIONAL SPORTING ORGANISATIONS

FIFA, UEFA	All Russian national representative and club teams, suspended from participation in FIFA and UEFA competitions until further notice.
International Skating Union	Russia banned weeks before skaters to compete at the World Championships in Montpellier, France.
Champions League Final	Saint Petersburg stripped of hosting rights for the 2022 Champions League final.
Formula 1 Grand Prix	Race scheduled in Sochi for September scrapped. Russian Grand Prix permanently removed from F1 calendar.
International Judo Federation	Russia's leader Vladimir Putin, a keen judoka, suspended as honorary president.
International Chess Federation (FIDE)	Russia and Belarus banned from official competitions. World class player Sergey Karjakin, not allowed to play for six months, because of his support of Russia's Ukraine invasion.
International Paralympic Committee	Russia and Belarus must participate as neutrals in the Beijing 2022 Paralympic Winter Games and will not receive medals.
World Rugby	
International Tennis Federation (including Wimbledon)	No Russian or Belarusian athletes or groups to participate in events.
International Badminton Federation	
EA Sports	Russian national team and clubs removed from popular FIFA video games. Sales of games and content in Russia and Belarus paused.

5. MISCELLANEOUS

Cat owners living in Russia banned from competitions held by the International Cat Federation (FIFe) until May 2023. No FIFe pedigree registration of Russian bred cats, prohibition of shows in Russia.

U.S. liquor stores and bars have removed Russian vodka and changed the name of the popular cocktail Moscow Mule to Kyiv Mule, Snake Island Mule, American Stallion, Freedom Mule or Texas Mule.

3. MUSIC AND DANCE

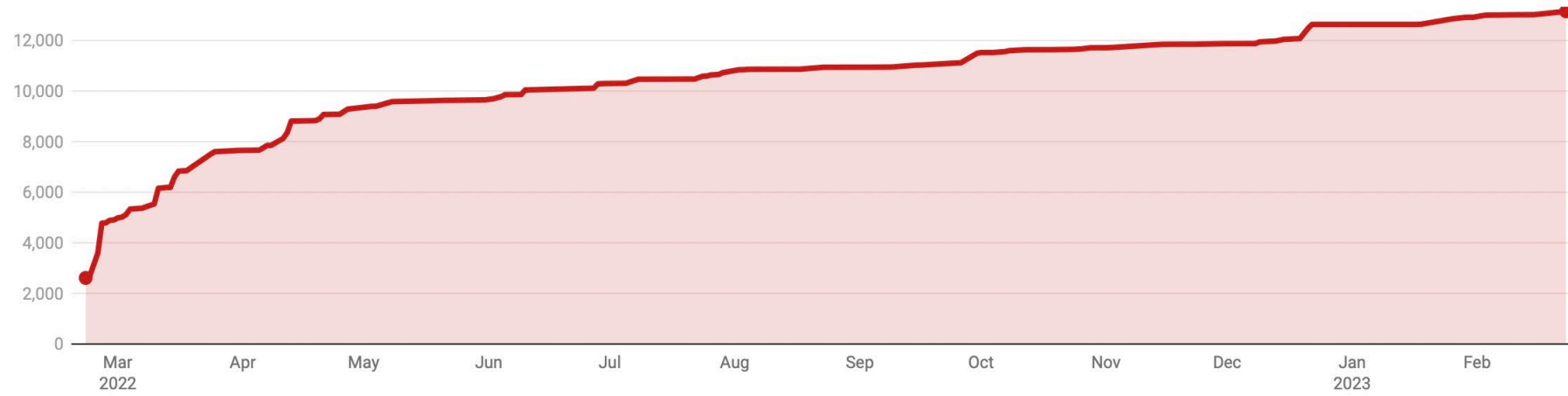
Metropolitan Opera, NYC	Severed ties with Russian artists who refused to condemn Putin, among them superstar Anna Netrebko. The Russian soprano condemned the invasion, but in the eyes of the Metropolitan Opera, did not go far enough.
Munich Philharmonic Orchestra	Fired famed composer and conductor Valery Gergiev for refusing to take a stance on the invasion. (He previously expressed support for the annexation of Crimea in 2014.)
Eurovision Song Contest	Russia not invited to participate.
Ballet shows cancelled	Royal Moscow Ballet in Ireland, the Russian State Ballet of Siberia and the Bolshoi Ballet in Britain.

4. FILM, TV AND MEDIA

Stockholm International Film Festival	Any film with Russian state backing to be taken out of 2022 lineup. The boycott will remain in place as long as the war is ongoing.
Glasgow Film Festival	Withdrew two Russian titles from its 2022 program — Kirill Sokolov's No Looking Back and Lado Kvataniya's The Execution.
Cannes Film Festival	Russian delegates banned. Dissident Kirill Serebrennikov's film screened despite financing from oligarch Roman Abramovich.
Netflix	Withdrew services from Russia, driven by its refusal to carry state-backed propaganda.
Cannes Lions Advertising Festival	No submissions from Russia.
Spanish Screenings XXL	Russian buyers and acquisition executives barred from attending March meeting of Spain's biggest movie export platform.

Total Sanctions Against Russia

22 February 2022 - 24 February 2023



Includes Australia, Canada, EU, France, Switzerland, UK, and US sanctions.

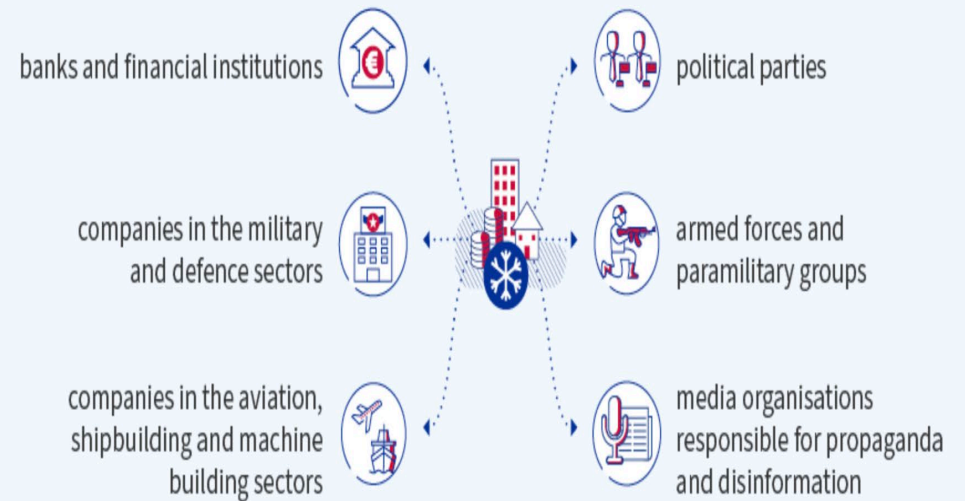
Source: [Castellum.AI](#) • [Get the data](#) • [Embed](#) • [Download image](#) • Created with [Datawrapper](#)



→ Assets freeze / travel ban against



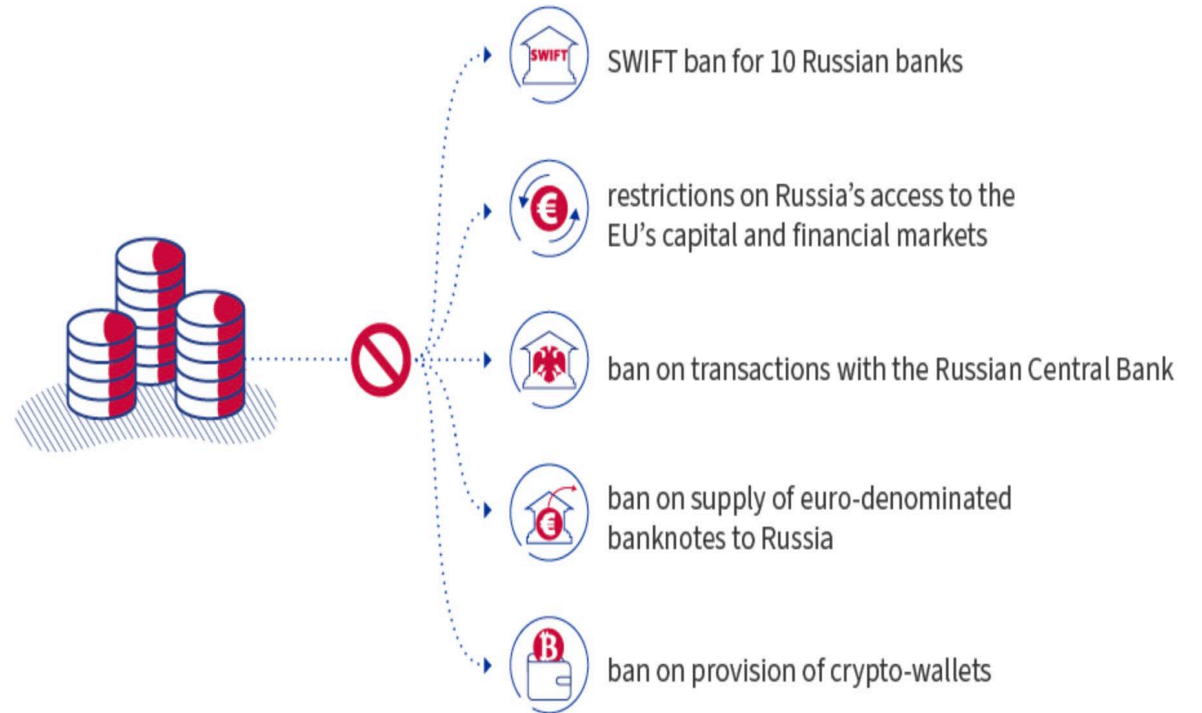
→ Assets freeze against



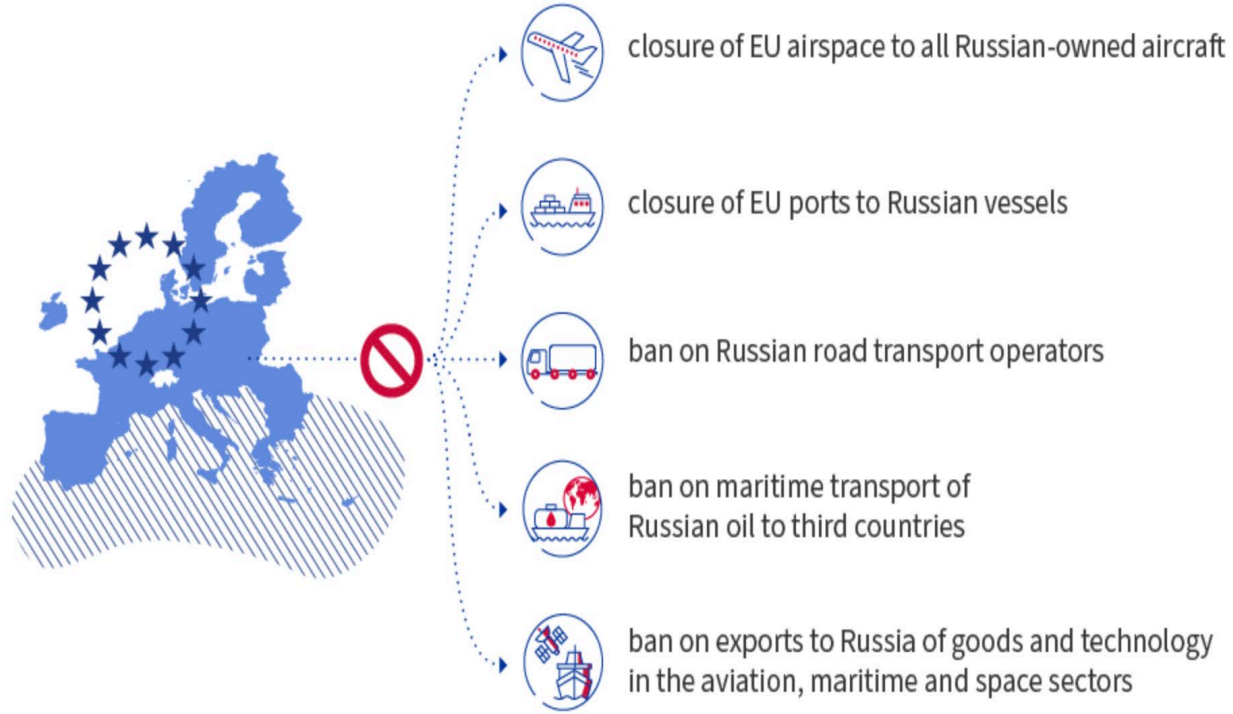
→ Services



→ Finance



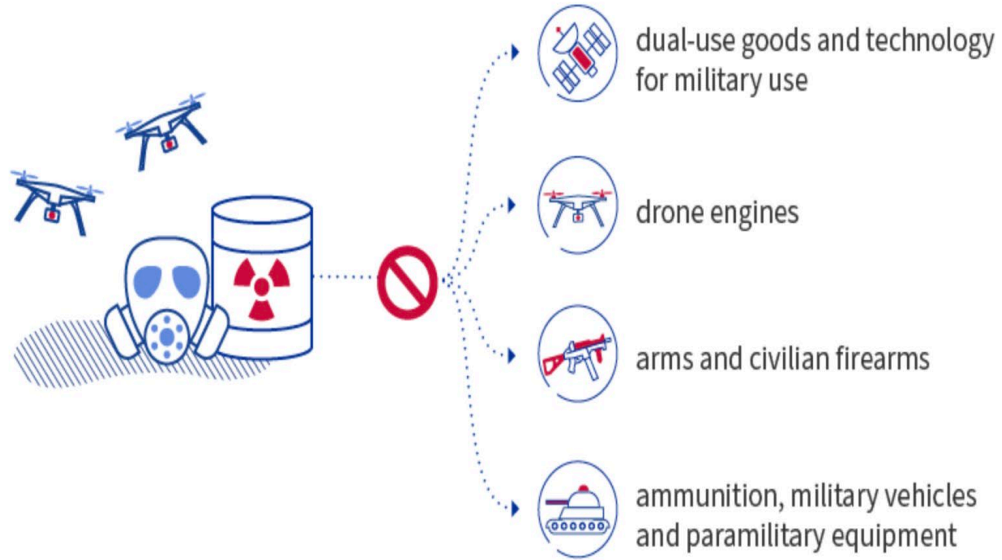
→ Transport



→ Energy



→ Defence



→ Raw materials and other goods

Ban on exports to Russia of:



Ban on imports from Russia of:



steel, iron, cement and asphalt



wood, paper, synthetic rubber and plastics



seafood, spirits, cigarettes and cosmetics



gold, including jewellery

Restrictions on media



Suspension of **broadcasting activities** in the EU of some Russian media outlets:

- Sputnik and subsidiaries
- Rossiya 1
- Russia Today and subsidiaries
- TV Centre International
- Rossiya RTR / RTR Planeta
- NTV / NTV Mir
- Rossiya 24 / Russia 24
- REN TV
- Pervyi Kanal

Visa measures

- Suspension of visa facilitation agreement between the EU and Russia
- Suspension of visa facilitation provisions for Russian diplomats and businesspeople



What measures has the EU taken against Russia?

Individual and economic sanctions

The EU has adopted a **number of sanctions** in response to Russia's war of aggression against Ukraine and the illegal annexation of Ukraine's Donetsk, Luhansk, Zaporizhzhia and Kherson regions.

The measures are designed to **weaken Russia's economic base**, depriving it of critical technologies and markets and significantly curtailing its ability to wage war.

In this context, the EU has also adopted sanctions against:

- **Belarus** in response to its involvement in the invasion of Ukraine
- **Iran** in relation to the use of Iranian drones in the Russian aggression against Ukraine

(23 February 2022)

- individual sanctions against members of the **Russian State Duma** who voted in favour of the recognition of the non-government controlled areas of the **Donetsk and Luhansk** oblasts
- restrictions on economic relations with the non-government controlled areas of the Donetsk and Luhansk oblasts
- restrictions on Russia's access to the EU's **capital and financial markets** and services

•Second package (25 February 2022)

- individual sanctions against **Vladimir Putin, Sergey Lavrov** and members of the Russian State Duma and National Security Council, among others
- economic sanctions covering the finance, energy, transport and technology sectors
- suspension of **visa facilitation provisions** for Russian diplomats and other Russian officials and businesspeople

•Third package (28 February and 2 March 2022)

- closure of **EU airspace** to all Russian aircraft
- prohibition on **transactions** with the Russian Central Bank
- **SWIFT** ban for seven Russian banks
- prohibition on the provision of **euro-denominated banknotes** to Russia
- suspension of broadcasting in the EU of state-owned outlets **Russia Today and Sputnik**
- individual sanctions against Belarusians in response to Belarus' involvement in Russia's military invasion

What measures has the EU taken against Russia?

Sanctions against Belarus (9 March 2022)

- **SWIFT** ban for three Belarusian banks
- prohibition on **transactions** with the Central Bank of Belarus
- limits on **financial inflows** from Belarus to the EU
- prohibition on the provision of **euro-denominated banknotes** to Belarus

Fourth package of sanctions (15 March 2022)

- individual sanctions against **Roman Abramovich** and German Khan, among others
- prohibition on all **transactions** with certain state-owned enterprises
- prohibition on the provision of **credit-rating services** to any Russian person or entity
- prohibition on new investments in the Russian **energy sector**
- prohibition on exports to Russia of **luxury goods**
- prohibition on imports from Russia to the EU of **iron** and **steel**

Fifth package of sanctions (8 April 2022)

- prohibition on imports from Russia of **coal** and other solid fossil fuels
- closure of **EU ports** to all Russian vessels
- prohibition on Russian and Belarusian **road transport** operators from entering the EU
- prohibition on **imports** from Russia of wood, cement, seafood and liquor
- prohibition on **exports** to Russia of jet fuel and other goods
- a series of targeted economic measures
- sanctions against 217 individuals and 18 entities

Sixth package of sanctions (3 June 2022)

- prohibition on imports from Russia of **crude oil and refined petroleum products** (with limited exceptions)
- **SWIFT ban** for an additional three Russian banks and one Belarusian bank
- **suspension of broadcasting** in the EU for Rossiya RTR / RTR Planeta, Rossiya 24 / Russia 24 and TV Centre International
- sanctions against **18 entities and 65 individuals**, including individuals responsible for the atrocities committed in Bucha and Mariupol

What measures has the EU taken against Russia?

“Maintenance and alignment” package (21 July 2022)

- prohibition on imports of **Russian-origin gold**
- reinforcement of **export controls of dual-use goods**
- extension of the **port access ban to locks**
- clarification of existing measures, for instance in the field of public procurement, aviation and justice
- sanctions against **54 individuals and 10 entities**, including the mayor of Moscow and Sberbank, a major financial institution

Eighth package of sanctions (6 October 2022)

- a **price cap** related to the maritime transport of **Russian oil** for third countries
- restrictions on exports of dual-use goods and technology
- prohibition on provision of **crypto-wallets** to Russian persons
- prohibition on trade in arms, civilian firearms, ammunition, military vehicles and paramilitary equipment
- prohibition on imports from Russia of **steel products**
- prohibition to provide **architectural and engineering services, IT consultancy services and legal advisory services** to Russia
- sanctions against 30 persons and 7 entities

Ninth package of sanctions (16 December 2022)

- prohibition on exports of **drone engines**
- restrictions on exports of dual-use goods and technology
- prohibition on investments in the **mining sector**
- prohibition on transactions with the Russian Regional Development Bank
- prohibition on the provision of advertising, market research and public opinion polling services
- suspension of the **broadcasting licenses** of four additional Russian media outlets
- sanctions against an additional 141 individuals and 49 entities

Tenth package of sanctions (25 February 2023)

- prohibition on exports of critical technology and industrial goods
- prohibition on imports of **asphalt and synthetic rubber**
- prohibition on provision of **gas storage** capacity to Russians
- suspension of broadcasting licenses of RT Arabic and Sputnik Arabic
- restrictions for Russian nationals to hold any position in the governing bodies of EU critical infrastructures and entities
- **reporting obligations** to ensure the effectiveness of sanctions
- additional sanctions against 87 individuals and 34 entities



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