

3 March 2023

## TO ALL MEMBERS

Dear Sir or Madam

### US impose further sanctions against Russia

On 24 February 2023, the one year anniversary of Russia's invasion of Ukraine, the US Department of State and the US Department of Treasury's Office of Foreign Assets Control (OFAC) imposed sanctions on numerous additional individuals, entities and vessels that the US has determined are engaged in sanctions evasion. Full details can be found [here](#).

### Financial Services Sanctions

OFAC has designated over a dozen Russian banks and financial institutions which include:

- Credit Bank of Moscow Public Joint Stock Company
- Joint Stock Company Commercial Bank Lanta Bank
- Public Joint Stock Company Commercial Bank Metallurgical Investment Bank (Metallinvestbank)
- Public Joint Stock Company MTS Bank
- Novosibirsk Social Commercial Bank Levoberezhny Public Joint Company
- Bank Saint-Petersburg Public Joint Stock Company
- Joint Stock Commercial Bank Primorye
- SDM-Bank Public Joint Stock Company
- Public Joint Stock Company Ural Bank for Reconstruction and Development (UBRD)
- Public Joint Stock Company Bank Uralsib
- Bank Zenit Public Joint Stock Company

OFAC also issued a number of general licenses permitting certain transactions in connection with these entities:

- [General License 8F](#) was amended to authorise certain energy-related transactions relating to certain of the above-listed financial institutions.
- [General License 13D](#) authorises US persons or entities owned or controlled by US persons to carry out certain transactions including paying taxes, fees or import duties and to purchase or receive permits, licenses, registrations or certificates, that would otherwise be prohibited by Directive 4 under Executive Order 14024, until 12:01 am eastern daylight time on 6 June 2023.
- [General License 60](#) authorises transactions "ordinarily incident and necessary" to wind down transactions involving the above listed financial institutions until 12:01 am eastern daylight time on 25 May 2023.

- [General License 61](#) authorises transactions “ordinarily incident and necessary” to the divestment or transfer of debt or equity of the above entities until 12:01 am eastern daylight time on 25 May 2023.

### **Metals and Mining Sanctions**

OFAC also issued a [determination](#) pursuant to Section 1(a)(i) of Executive Order [14024](#) “Blocking Property With Respect To Specified Harmful Foreign Activities of the Government of the Russian Federation” (E.O.14024), which enables the imposition of sanctions on individuals and entities who operate or have operated in the metals and mining sector of the Russian economy.

Pursuant to this determination, OFAC designated the following four entities:

- Joint Stock Company Burevestnik Central Scientific Research Institute
- OOO Metallurg-Tulamash
- TPZ-Rondol OOO
- Mtsenskprokat

OFAC has also issued [FAQs](#) which provide that:

- the metals and mining sector includes any act or process of extracting, at the surface or underground, ores, coal, precious stones, or any other minerals or geological materials in the Russian Federation, or any act of procuring, processing, manufacturing, or refining such geological materials, or transporting them to, from, or within the Russian Federation (see FAQ 1115).
- It does not mean that all persons who operate or have operated in the Russian metals and mining sector are sanctioned. The Determination authorises OFAC to impose sanctions on persons and entities operating or who have operated in the sector (see FAQ 1116).
- non-US persons may be exposed to sanctions if they continue to do business with persons or entities which are blocked (i.e. designated to the SDN list) under E.O. 14024 (see FAQ 1117).

*If members have any queries about the above, please get in touch with your usual club contact.*

Yours faithfully  
A BILBROUGH & CO LTD  
(MANAGERS)