

























Newsletter

Appendix 1:

A Sanctions' Matrix: What is Forbidden

	EU company* or ▪ its foreign branch ▪ its foreign representative office or an EU citizen or resident**		US company* or ▪ its foreign branch ▪ its foreign representative office or a US citizen or resident		Non-EU and Non-US company		Non-EU and Non US-citizen, who resides neither in the US nor in EU***	
and acts in the EU		EU list applies		EU list applies		EU list applies		EU list applies
		US list does not apply		US list applies		US list does not apply		US list does not apply
and acts in the US		EU list applies		EU list does not apply		EU list does not apply		EU list does not apply
		US list applies		US list applies		US list applies		US list applies
and acts in a third country (for example, in Russia)		EU list applies		EU list does not apply		EU list does not apply		EU list does not apply
		US list does not apply		US list applies		US list does not apply		US list does not apply

* Subsidiaries of EU or US companies registered outside of the EU or US, respectively, are not regarded as EU or US companies, but as non-EU and non-US companies.

** A foreign citizen who is a EU resident must comply with the EU sanctions as long as he or she acts from the EU or within the EU territory. Sanctions regime does not apply as soon as this person acts on a territory of a third country.

*** For example: a Russian national residing in Russia wants to sell his house that is located in the US or EU to a listed person.

Aktau	Almaty	Frankfurt	Kiev	Minsk	Moscow	St. Petersburg	Warsaw					
Berlin	Beijing	Bruges	Dusseldorf	Gothenburg	Hamburg	London	Milan	New York	Paris	Tokyo	Vienna	Zurich

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