U.S. DEPARTMENT OF THE TREASURY

As Russia Feels Effects of Multilateral Sanctions Campaign, Treasury Takes Further Action Against Russia's International Supply Chains

August 23, 2024

One day ahead of Ukrainian Independence Day, Treasury continues implementation of G7 sanctions commitments in support of Ukraine

WASHINGTON — Building on the sanctions already imposed on Russia in response to its continued war of aggression against Ukraine, today the U.S. Department of the Treasury and the Department of State targeted nearly 400 individuals and entities both in Russia and outside its borders—including in Asia, Europe, and the Middle East—whose products and services enable Russia to sustain its war effort and evade sanctions. The United States government will continue to support Ukraine as it defends its independence and hold Russia accountable for its aggression.

"Russia has turned its economy into a tool in service of the Kremlin's military industrial complex. Treasury's actions today continue to implement the commitments made by President Biden and his G7 counterparts to disrupt Russia's military-industrial base supply chains and payment channels," said Deputy Secretary of the Treasury Wally Adeyemo. "Companies, financial institutions, and governments around the world need to ensure they are not supporting Russia's military-industrial supply chains."

Treasury is targeting numerous transnational networks, including those involved in procuring ammunition and military materiel for Russia, facilitating sanctions evasion for Russian oligarchs through offshore trust and corporate formation services, evading sanctions imposed on Russia's cyber actors, laundering gold for a sanctioned Russian gold company, and supporting Russia's military-industrial base by procuring sensitive and critical items such as advanced machine tools and electronic components. Today's sanctions further limit Russia's future revenue from metals and mining. Treasury is also targeting Russian financial technology companies that provide necessary software and IT solutions for Russia's financial sector.

Treasury is aware of Russian efforts to facilitate sanctions evasion by opening new overseas branches and subsidiaries of Russian financial institutions. Foreign regulators and financial institutions should be cautious about any dealings with overseas branches or subsidiaries of Russian financial institutions, including efforts to open new branches or subsidiaries of Russian financial institutions that are not themselves sanctioned. Treasury has a range of tools available to respond to the establishment of new evasion channels.

The State Department is targeting entities and individuals involved in Russia's future energy, metals, and mining production and exports; sanctions evasion; Russia's military-industrial base, including armed unmanned aerial vehicle (UAV) production, Belarusian support for Russia's war effort, and air logistics entities; additional subsidiaries of State Atomic Energy Corporation Rosatom; and malign actors involved in the attempted, forcible "re-education" of Ukraine's children.

SANCTIONS EVASION, CIRCUMVENTION, AND BACKFILL

Consistent with commitments made by President Biden and G7 leaders, Treasury continues to target transnational networks that supply Russia with military materiel and sensitive dual-use goods like those included in the multilateral Common High Priority List, jointly developed by the United States, European Union, Japan, and the United Kingdom. Treasury is also targeting multiple networks that facilitate or enable illicit financial schemes and sanctions evasion on behalf of Russian revenue generators and oligarchs. Many of today's designations were enabled or informed by extensive coordination with Treasury's Financial Crimes Enforcement Network (FinCEN). Today's action targets almost a dozen distinct networks, designating more than 100 individuals and entities across 16 jurisdictions, including the People's Republic of China, Switzerland, Türkiye, and the United Arab Emirates.

For more information on these targets, please see Annex 1.

RUSSIA'S TECHNOLOGICAL BASE

Today, Treasury is targeting more than 60 Russia-based technology and defense companies that are critical for the sustainment and development of Russia's defense industry, including entities involved in weapons development and modernization, automation and robotics, development and acquisition of dual-use electronics, digital surveillance, Internet of Things, and artificial intelligence. These sanctions target Russia's defense industry while protecting the access by Russian citizens to crucial telecommunications and other digital technology.

For more information on these targets, please see Annex 2.

LIMITING RUSSIA'S STRATEGIC METALS AND MINING SECTOR

Guided by commitments made by President Biden and G7 leaders to reduce Russia's revenues from metals, today Treasury is targeting entities involved in Russia's metals and mining sector, including steel, iron, and coal mining firms and auxiliary firms that provide specialized services to Russian metals and mining companies.

For more information on these targets, please see Annex 3.

RUSSIAN FINANCIAL TECHNOLOGY

Today, OFAC is targeting Russian financial technology companies as a part of implementing G7 commitments to curtail Russia's use of and access to the international financial system to further its war against Ukraine.

Atol is a Russian technology developer involved in services related to payments.

Centre of Financial Technologies Group (CFT) is one of the largest software companies in the Russian market. CFT provides an array of software products for banking and payment solutions for the Russian financial market.

Diasoft Ltd (Diasoft) is one of Russia's largest developers and suppliers of information technology (IT) solutions for the financial sector.

Atol, CFT, and Diasoft were designated pursuant to E.O. 14024 for operating or having operated in the technology sector of the Russian Federation economy.

ANNEX 1: SANCTIONS EVASION, CIRCUMVENTION, AND BACKFILL

Ammunition Procurement Network

Italian national **Giulio Sfoglietti** (Sfoglietti) has been involved in a procurement network involving a Türkiye facilitator to purchase more than \$150 million worth of military equipment, ammunition, and ordnance for the Russian military from potential suppliers in Africa, Asia, the Caucasus, Central Asia, and Iran. Türkiye national **Hayri Tahirbeyoglu** (Tahirbeyoglu) is the

Chairman of the Board of Directors of Türkiye-based ammunition, weapons, and military materiel company **Taha Savunma Sanayi Ve Ticaret Anonim Sirketi** (Taha Savunma) and has worked with Sfoglietti on the procurement of ammunition and weapons for likely Russian enduse. Sfoglietti has also worked to procure microelectronics and chips for Russia-based endusers.

Sfoglietti associate Russian national **Marat Khanbalevich Gabitov** (Gabitov) has worked with an employee of U.S.-designated Russian defense conglomerate State Corporation Rostec to procure microelectronics related to radio frequency (RF) equipment. Gabitov has also worked to procure microelectronics, unmanned aerial vehicles (UAVs), and other machinery and equipment for Russia-based end-users.

Sfoglietti was designated pursuant to E.O. 14024 for operating or having operated in the defense and related materiel and technology sectors of the Russian Federation economy. Tahirbeyoglu and Taha Savunma were designated pursuant to E.O. 14024 for operating or having operated in the defense and related materiel sector of the Russian Federation economy. Gabitov was designated pursuant to E.O. 14024 for operating or having operated in the technology sector of the Russian Federation economy.

Promtekh Supply Chain

U.S.-designated Russia-based Aktsionernoe Obshchestvo Promyshlennye Tekhnologii (Promtekh) has used a network of companies located in Türkiye, France, and Hong Kong to send high priority goods to Promtekh's subsidiaries. Russia-based **Aspectriym Limited Trade Development** (Aspectriym) is a subsidiary of Promtekh and is a defense procurement firm involved in the wholesale of electronic equipment and parts.

Promtechcomplekt JSC, a subsidiary of Promtekh, and has worked with Aspectriym to procure foreign- and U.S.-made electronic components. Hong Kong-based Interasia Trading Group Limited (Interasia Trading) is the sole owner of ITGF. Russian national Igor Aleksandrovich Reutov (Reutov) is the Executive Director of ITGF. Reutov is also the owner of Estonia-based Free Sky Solutions OU (Free Sky) and the Managing Partner of France-based Aerialia. Aerialia was established in January 2024.

ITGF also created a Türkiye-based firm, **Enutek Makina Sanayi ve Ticaret Limited Sirketi** (Enutek). Enutek has made hundreds of shipments of technology, including high priority dual-

use technology such as electronic integrated circuits and ceramic capacitors, to U.S.-designated Promtekh subsidiaries, including Promtech Ulyanovsk, Dubna Switching Equipment Plant, and Promtech Irkutsk. Enutek was established in December 2022.

Other foreign suppliers to Promtekh subsidiaries include:

- Türkiye-based **Confienza Gida Pazarlama ve Ticaret Anonim Sirketi** (Confienza) has sent over 200 shipments to Aspectriym, with shipments including high priority dual-use technology.
- Hong Kong-based **Grun Group Co Limited** (Grun Group) has sent shipments totaling over \$3 million to U.S.-designated subsidiaries of Promtekh, including shipments with high priority dual-use technology.
- Hong Kong-based Hong Kong Yayang Trading Limited (Yayang Trading) has sent shipments totaling over \$9 million to U.S.-designated Promtekh subsidiaries Dubna Switching Equipment Plant and Aspectriym, with shipments including high priority dualuse technology.
- Hong Kong-based Kira International Trade Co Limited (Kira International) is a partner of Aspectriym. Kira International has sent shipments totaling over \$1.5 million to Aspectriym, with shipments including high priority dual-use technology.
- Hong Kong-based Most Development Limited (Most Development) has sent shipments totaling over \$1 million to Aspectriym, with shipments including high priority dual-use technology.
- Hong Kong-based **New Wally Target International Trade Co Limited** (New Wally Target) has sent over \$4 million worth of shipments to Aspectriym, with shipments including high priority dual-use technology.

Aspectriym, ITGF, Enutek, Interasia Trading, Reutov, Confienza, Grun Group, Yayang Trading, Kira International, Most Development, and New Wally Target were designated pursuant to E.O. 14024 for operating or having operated in the technology sector of the Russian Federation economy. Free Sky and Aerialia were designated pursuant to E.O. 14024 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Reutov.

Sanctions Evasion Through Switzerland and Liechtenstein Trust and Corporate Services Providers

Swiss national **Anton Daniel Wyss** (Wyss) is a major enabler of Russian cash flow in Switzerland and Liechtenstein and has used his Liechtenstein-based trust and corporate services provider (TCSP) **Audax Consulting Trust Establishment** (Audax) to obfuscate Russian beneficial ownership and investments into foreign ventures. Through their co-owned Liechtenstein-based company **One Asset Management AG** (One Asset), Wyss and his Austrian national associate **Alexander Franz Josef Lins** (Lins) provide asset management and reallocation services to sanctioned Russian nationals. Lins uses his own TCSP, Liechtenstein-based **LMG Lighthouse Trust Reg** (LMG), to facilitate sanctions evasion schemes for Russian clients. Audax, One Asset, and LMG are all located at the same address, and both Audax and LMG advertise their services in Russian-language brochures. Austrian national **Stefan Anton Wolf** (Wolf) is a director of Audax.

Wyss, Audax, LMG, and Lins were designated pursuant to E.O. 14024 for operating or having operated in the trust and corporate formation services sector of the Russian Federation economy. Wolf was designated pursuant to E.O. 14024 for being or having been a leader, official, senior executive officer, or member of the board of directors of Audax. One Asset was designated pursuant to E.O. 14024 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Wyss and Lins.

PRC-based Suppliers to Russia's Military-Industrial Base

The following entities were designated pursuant to E.O. 14024 for operating or having operated in the technology sector of the Russian Federation economy:

- Hong Kong-based machinery distributor Smart Kit Technology Limited (Smart Kit) has shipped high priority items, including chip-making machinery, to Russian companies including Inzhiniring Grupp OOO (Inzhiniring Grupp). Inzhiniring Grupp imports industrial machinery and equipment into Russia and has supplied manufacturing equipment to Russian government-owned labs.
- Hong Kong-based Siliborn Technology Limited (Siliborn) is an electronic component distributor that has shipped high priority items, including electronic integrated circuits, to Russian companies, including U.S.-designated electronics company Staut Company Limited.
- Hong Kong and PRC-based YLH Electronics HK Co Limited has supplied high-priority goods, including electronic integrated circuits, to Russian company Zakrytoe Aktsionernoe

- **Obshchestvo Nauchno Vnedrencheskoe Predpriyatie Bolid**, a Russian manufacturer of sensors and security equipment.
- Hong Kong-based Hongkong Chip Line International Co has supplied high priority goods, including electronic integrated circuits, to U.S.-designated Russian microelectronics manufacturer Matriks Elektronika and Russian technology company Maveriks, another importer of high priority goods.
- Hong Kong-based Hengye Tech Limited has supplied high priority goods, including electronic integrated circuits, to Russian electronic components manufacturer Elektroradiokomponenty Severo Zapad.
- Hong Kong-based LL Electronic Limited has shipped electronic integrated circuits and multilayer ceramic capacitors to U.S.-designated Russian electronic component importer Limited Liability Company Kvazar.
- Hong Kong-based Allchips Limited has supplied high priority goods, including electronic integrated circuits, to Limited Liability Company Micropribor, a Russian wholesaler of electronic equipment.
- Hong Kong-based Fepood Electronics HK Co Limited has shipped electronic integrated circuits and multilayer ceramic capacitors to U.S.-designated Russian electronic components supplier LLC Spetselservis.
- Hong Kong-based Xin Quan Electronics Co Limited has made thousands of shipments of high priority goods, including electronic integrated circuits, to Russian company Snabinter, a Russian wholesaler of electronic equipment.
- PRC-based Jinhua Hairun Power Technology Co Ltd produces cutting machines, carburetors, and pistons and has made hundreds of shipments to Russia, including engine parts, transmissions, and gear components.
- Hong Kong-based Ace Era Co Limited (Ace Era) has shipped electronic integrated circuits, multilayer ceramic capacitors, and tantalum capacitors to U.S.-designated Russian electronic equipment wholesaler Streloi Ekommerts. Ace Era has sent over \$3 million worth of shipments to Streloi Ekommerts.
- Hong Kong-based Shenzhen Royo Technology Co Limited and PRC-based Qingdao
 Hehuixin International Trade Co Ltd have shipped technologies to U.S.-designated
 Russian defense company Limited Liability Company Drake, which is contracted to receive
 UAV parts, components, and materials from Iran for use in Iranian-designed, Russian-manufactured UAVs.

- Hong Kong-based **HK Cinty Co Limited** (HK Cinty) has shipped electronic integrated circuits, multilayer ceramic capacitors, and electrical parts of machinery to Russia-based end-users. HK Cinty has sent over \$2 million worth of goods to Russia-based end-users, with shipments including high priority goods. HK Cinty was established in July 2022.
- PRC-based Foshan Golden Age Motor Technology Co., Ltd. supplies technology, including
 electric drives and servo motors, to Russia-based Limited Liability Company
 Mekhatronika, a computer numerical control technology developer and importer of
 integrated circuits.
- Hong Kong-based **Asia Material Solutions Company Limited** (Asia Material) has shipped electronic integrated circuits to Russia-based end-users. Asia Material has sent shipments worth just under \$1,000,000 to Russia-based end users. Asia Material has been identified as a cover company for Russian intelligence.

Fighter Jet Supply Network

Russia-based **Exiton** has imported foreign electronic components into Russia and supplies U.S.-designated Russian company Joint Stock Company Experimental Design Bureau named after A.S. Yakovlev, a manufacturer involved in the production of Sukhoi fighter jets. Russia-based **Limited Liability Company Eksiton** (Eksiton) imports high priority goods, including electronic integrated circuits. Hungary-based **Matrix Metal Group Korlatolt Felelossegu Tarsasag Felszamolas Alatt** (Matrix Metal) has supplied high priority goods, including electronic integrated circuits, to Eksiton. Additionally, Russia-based military contractor and developer of anti-aircraft systems **Aktsionernoe Obshchestvo Displei Komponent** (Displei Komponent) has received regular shipments of electronic components from both Matrix Metal and Cyprus-based **Noratec Holdings Ltd**.

Exiton, Eksiton, Matrix Metal, Displei Komponent, and Noratec Holdings Ltd were designated pursuant to E.O. 14024 for operating or having operated in the technology sector of the Russian Federation economy.

Alexandre Orloff

Swiss-Russian national **Alexandre Orloff** (Orloff) has been working with a Russian government covert procurement network for years to acquire high-value, foreign-made semiconductor-related equipment and technology for Russian military end-users. Orloff has also been part of a scheme to acquire specialized thermal cameras for a Russian end-user.

Orloff owns and is the director and secretary of an eponymous United Kingdom-based company, **Alexandre Orloff Ltd** (AO Ltd). AO Ltd, in turn, owns Hong Kong-based **Zvigeni Technological Systems Limited** (Zvigeni) and **Dougong Trading Hong Kong Limited** (Dougong) and Canada-based **9105 2829 Quebec Inc**. Orloff is also the founder and CEO of UAE-based **Digital Marketing Awards FZ LLC** (DMA).

PRC-based **Shanghai Techinital Materials Co Ltd** (Shanghai Techinital), a producer of components for semiconductor manufacturing equipment, has made dozens of shipments to U.S.-designated Joint Stock Company Scan (JSC Scan), including of high priority dual-use technology such as signal generators and oscilloscopes. JSC Scan designs microelectronics and has its own center for designing integrated circuits. Shanghai Techinital has open contracts to provide JSC Scan with technology, despite the latter's designation. In 2023 alone, Zvigeni transmitted more than \$1.5 million to Shanghai Techinital.

Orloff and Shanghai Techinital were designated pursuant to E.O. 14024 for operating or having operated in the technology sector of the Russian Federation economy. AO Ltd, Zvigeni, Dougong, 9105 2829 Quebec Inc, and DMA were designated pursuant to E.O. 14024 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Orloff.

Russian Evasion of Cyber Sanctions

In June 2018, the Department of the Treasury sanctioned a network of entities working at the behest of the Russian Federation and its military and intelligence units to increase Russia's malicious cyber capabilities. Since that time, individuals associated with those entities, including Ilya Medvedovsky (Medvedovsky), Dmitriy Evdokimov (Evdokimov), Yevgeniya Klimina (Klimina), Dmitriy Chastuhin (Chastuhin), Taranjeet Kambo (Kambo), and Gleb Cherbov (Cherbov) have established, developed, and supported a complex network of technology companies to continue their work unimpeded. The front companies set up by these individuals, at times registered in the names of family members, operate primarily in the technology sector of the Russian Federation economy, with efforts being taken by individuals such as Chastuhin and Klimina, to establish a technology presence outside of Russia. Included in these companies is OOO Soft Plyus, a Russia-based firm that sells cyber security software and is formerly known as OOO Hexway, for whom Chastuhin has claimed to be the founder and CEO; Cloudrun LLC, a Russia-based company founded by Evdokimov that develops computer software; Didzhital Komplaens, OOO and Kiber Servis, OOO, both of which offer cyber

security services and were founded by an individual believed to be related to Medvedovksy; **Didzhital Sekyuriti Servisis, OOO**; and **Machine Learning Labs S.R.O.**, founded and owned by Klimina. Medvedovsky, alongside Chastuhin, Cherbov, and Klimina, have been involved in decision making related to the operation of Soft Plyus and other related companies, whereas Kambo and Cherbov have worked together to service customers of Soft Plyus.

Medvedovsky, Klimina, OOO Soft Plyus, Cloudrun LLC, Didzhital Komplaens, OOO, Didzhital Sekyuriti Servisis, OOO, and Kiber Servis, OOO, were designated pursuant to E.O. 14024 for operating or having operated in the technology sector of the Russian Federation economy. Chastuhin was designated pursuant to E.O. 14024 for being or having been a leader, official, senior executive officer, or member of the board of directors of OOO Soft Plyus. Evdokimov was designated pursuant to E.O. 14024 for being or having been a leader, official, senior executive officer, or member of the board of directors of Cloudrun LLC. Cherbov and Kambo were designated pursuant to E.O. 14024 for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, OOO Soft Plyus. Machine Learning Labs S.R.O. was designated pursuant to E.O. 14024 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Klimina.

Alikhanov Machine Tool Procurement

Italy-based machine tool manufacturer **Fagima Fresatrici SPA** (Fagima) has worked closely with U.S.-designated Russian procurement agent Dmitrii Vladimirovich Alikhanov (Alikhanov) to facilitate the shipment of Fagima-produced machines through various third-country intermediary companies for Russian defense end-users. Fagima's owner and CEO **Massimo Falchini** (Falchini) and Fagima marketing executive **Fulvio Salvadori** (Salvadori) have helped fulfill orders for Alikhanov's network and evade sanctions, including after Alikhanov's designation in June 2024.

Fagima, Falchini, and Salvadori were designated pursuant to E.O. 14024 for operating or having operated in the manufacturing sector of the Russian Federation economy.

Illicit Russian Gold Trade

UAE-based, UK-sanctioned **Paloma Precious DMCC** (Paloma Precious) is a precious metals trading firm that has helped move Russian gold abroad. Paloma Precious and U.S.-designated

Taube Precious HK Limited played a key role in numerous illicit Russian gold trading and laundering schemes, including with U.S.-designated Andrey Dmitriyevich Sudakov (Sudakov). Sudakov, an employee of U.S.-designated Russian gold producer Public Joint Stock Company Polyus, and his Hong Kong-based associate Mu Xiaolu (Mu), engaged in a complex, multilayered laundering scheme whereby payments from the sale of Russian-origin gold were converted into fiat currency and cryptocurrencies through numerous UAE and Hong Kong-based front companies.

UAE-based Russian national **Vladislav Faridovich Guzey** (Guzey) has worked closely with Sudakov and Mu to launder proceeds of Russian-origin gold through UAE- and Hong-Kong based entities. As part of their effort to move Russia-origin gold, Sudakov and Mu utilized UAE-based front companies **Shams Gold Trading FZE** (Shams) and **Swiss Luxury FZE** (Swiss Luxury), and Hong Kong-based front companies **Universal Gold Hong Kong Limited** (Universal Gold) and **Bright Universe International Limited** (Bright Universe).

UAE-based **Trio Jewells LLC** (Trio) has made dozens of shipments of precious metal ingots to and from a Russia-based precious metals producer and processor.

Paloma Precious, Guzey, Shams, Swiss Luxury, Universal Gold, Bright Universe, and Trio were designated pursuant to E.O. 14024 for operating or having operated in the metals and mining sector of the Russian Federation economy.

Petrov Covert Procurement

Türkiye-based **Whitestone Bilism Tic Ve Sanayi Ltd Sti** (Whitestone) is owned by U.S.-designated Evgenii Stanislavich Petrov (Petrov) and has been used by Petrov to process payments for Petrov's procurement activity for Russian end-users linked to Russia's intelligence services. Petrov has acted as a covert procurement intermediary and has worked to obtain export-controlled foreign-made products on behalf of Russian-end-users. Whitestone was established in October 2023. Treasury also previously designated Türkiye-based MSO Lojistik Tic Ve Sanayi Ltd Sti for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Petrov.

Whitestone was designated for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Petrov, a person whose property and interest in property are blocked pursuant to E.O. 14024.

Dalkos

Russia-based machinery and spare parts provider **Dalkos Co Ltd** (Dalkos) has orchestrated a transnational sanctions evasion scheme to deceive foreign machinery manufacturers into inadvertently sending machine tools into Russia via third countries. Dalkos customers include Russian companies that produce drones, tanks, and air defense units. Dalkos co-owners **Konstantin Svyatoslavovich Kalinov** (Kalinov) and **Aleksandr Aleksandrovich Pushkov** (Pushkov) also own Estonia-based **SPE OU**, which Dalkos has used to acquire millions of dollars of goods.

Dalkos, Kalinov, and Pushkov were designated pursuant to E.O. 14024 for operating or having operated in the manufacturing sector of the Russian Federation economy. SPE OU was designated pursuant to E.O. 14024 for being owned or controlled by, or having acted or purported to act for or on behalf of, directly or indirectly, Kalinov and Pushkov.

Türkiye-based Manufacturing Equipment Suppliers

Türkiye-based **Hidropark Hidrolik Pnomatik San Ve Tic Ltd Sti** (Hidropark) sells hydraulic and pneumatic equipment and has supplied computer numerical control (CNC) machine tools and machining centers to Russian end-users. Hidropark has sent shipments totaling over \$800,000 to Russia-based end-users, which is more than its reported annual revenue.

Turkiye-based **Feva Dis Ticaret Limited Sirketi** (Feva) has supplied CNC machine tools to Russian end-users. Feva has sent over 500 shipments to Russia-based end-users, with shipments including manufacturing equipment. U.S.-designated Russian firm Limited Liability Company AK Microtech sought to evade sanctions by purchasing goods through Feva. Feva was established in April 2022.

Hidropark and Feva were designated pursuant to E.O. 14024 for operating or having operated in the manufacturing sector of the Russian Federation economy.

Technopole Procurement Network

On December 22, 2022, the U.S. Department of State designated Technopole Company (Technopole) and the P.P. Shirshov Institute of Oceanology of the Russian Academy of Sciences (Shirshov Institute) pursuant to E.O. 14024 for operating or having operated in the marine sector of the Russian Federation economy. Technopole produces a navigation system for the use of

Russian military vessels and provides equipment for a variety of ocean exploration, oceanology, oceanography, and hydrography activities, among others. The Shirshov Institute is the largest Russian oceanology research center. The Shirshov Institute also develops remotely operated and autonomous robotic tools that support the surface and submarine forces of the Russian navy and other Russian government agencies. Russian national **Alexander Petrovich Voronkov** (Voronkov) has been the Director of Technopole since 2007 and is the 100 percent owner of the company. Russian national **Viktor Georgiyevich Spiridonov** (Spiridonov) is the Deputy Director of Technopole and is actively involved in Russian procurement of western-origin equipment.

Idronaut S.R.L. (Idronaut) is one of Technopole's foreign partners and facilitates the procurement and sale of equipment, on behalf of Technopole and other Russian military end users, including the Shirshov Institute. **Flavio Graziottin** (Graziottin) owns Idronaut and has worked to circumvent U.S. and European Union sanctions through Idronaut to acquire equipment for Technopole.

Technology Co. (Shanghai Oceanen) have worked to circumvent sanctions on Technopole and have procured equipment on Technopole's behalf. Shanghai Oceanen is the distributor for Idronaut in the PRC and has acted as a middleman to ship Idronaut's equipment to Technopole and the Shirshov Institute. Shanghai Oceanen has historically assisted Technopole in procuring dual-use equipment for Russian end users. In early 2023, Shanghai Oceanen sent a shipment to Technopole containing surveying equipment, including hydrographic, oceanographic, hydrological, meteorological, or geophysical instruments and appliances. PRC national Liu Yang is the Technical Director for Shanghai Oceanen and uses the company to facilitate the procurement of foreign equipment.

Russia-based **Technomar** offers advanced measurement oceanographic and hydrographic equipment in the fields of oceanography and hydrology from the world's leading manufacturers.

Voronkov and Spiridonov were designated pursuant to E.O. 14024 for having acted or purported to act for or on behalf of, directly or indirectly, Technopole. Idronaut was designated pursuant to E.O.14024 for having materially assisted, sponsored, or provided financial, material, technological or other support for, or goods or services in support of, Technopole and the Shirshov Institute. Graziottin was designated pursuant to E.O. 14024 for having acted or purported to act for or on behalf of, directly or indirectly, Idronaut. Shanghai Oceanen was designated pursuant to E.O. 14024 for having materially assisted, sponsored, or provided

financial, material, technological or other support for, or goods or services in support of, Technopole. Liu Yang was designated pursuant to E.O.14024 for having acted or purported to act for or on behalf of, directly or indirectly, Shanghai Oceanen. Technomar was designated pursuant to E.O. 14024 for operating or having operated in the marine sector of the Russian Federation economy.

ANNEX 2: RUSSIA'S DOMESTIC WAR ECONOMY

The following Russia-based persons were designated pursuant to E.O. 14024 for operating or having operated in the defense and related materiel sector of the Russian Federation economy:

- 46th Central Research and Development Institute of the Ministry of Defense (46th CRDI) is a Russian Ministry of Defense (MoD) research organization that develops systems to modernize Russia's weapons. The 46th CRDI also studies electronic warfare and military applications of artificial intelligence.
- Federal State Governmental Institution 4 Central Research Institute of the Ministry of Defense of the Russian Federation (4CRI) is a Russian entity involved in the development and implementation of dual-use technologies in the creation of new types of weapons. 4CRI provides scientific and technical support for missile systems.
- Federal State Governmental Institution 27 Central Research Institute of the Ministry of
 Defense of the Russian Federation is a Russian MoD scientific research institute that
 conducts military scientific research, provides military scientific support for the creation of
 automated systems and complexes, and creates samples of military equipment.
- **Joint Stock Company KT Unmanned Systems** (KT Unmanned Systems) cooperates with the Russian MoD and U.S.-designated Federal Security Service (FSB). KT Unmanned Systems supports software used for Russian weapons development.
- Joint Stock Company Special Design Bureau of the Russian Ministry of Defense develops unmanned robotic combat vehicles.
- Obshchestvo S Ogranichennoi Otvetstvennostyu Konstruktorskoe Byuro Vostok is the developer of the Scalpel UAV, which is used by Russian forces in Ukraine such as the Vostok Battalion. The Scalpel UAV is a one-way-attack platform that can be equipped with a payload weighing up to five kilograms.
- **Prikladnye Tekhnologii** has indicated a willingness to procure Chinese-origin engines with cruise missile applications for the Russian weapons sector.

- **Tekhekspertiza AO** has worked with the Russian weapons sector to arrange the purchase of engines with cruise missile applications.
- TRV Engineering JSC is the official authorized procurement agent for Russia's U.S.designated Tactical Missiles Corporation (KTRV) and its subordinate companies. TRV
 Engineering JSC receives a commission for goods supplied, work performed, and services
 provided to KTRV, its subordinates, and other members of Russia's defense industrial base.
 TRV Engineering JSC has been directly involved with supplying products and services in
 support of Russian state defense orders, including providing machine tools to KTRV
 subordinates such as U.S.-designated State Machine-Building Design Bureau Raduga. TRV
 Engineering JSC's General Director Mikhail Vladimirovich Kolesnikov was directly
 involved with fulfilling TRV Engineering JSC's state defense orders and other procurements
 in the interest of companies in the Russian defense industrial base.

Russia-based electronic parts wholesaler **LLC Semicor** is a subsidiary of U.S.-designated LLC **Laser Components** (Laser Components). LLC Semicor has offered to supply engines on behalf of LLC Laser Components in support of Russian cruise missile development. LLC Semicor was designated pursuant to E.O. 14024 for having materially assisted, sponsored, or provided material, financial, or technological support for, or goods or services to or in support of, Laser Components.

The following Russia-based persons were designated pursuant to E.O. 14024 for operating or having operated in the technology sector of the Russian Federation economy:

- **Aktsionernoe Obshchestvo Korporatsiya Galaktika** develops digitalization platforms, including for U.S.-designated Russian defense giants Rostec and Uralvagonzavod.
- Aktsionernoe Obshchestvo Opytnoe Konstruktorskoe Byuro Eksiton is involved in experimental design work and research with the Russian MoD, including related to the assembly of microcircuits.
- Aktsionernoe Obshchestvo Zavod Rekond specializes in the production of electronic components, microcircuits, and semiconductor devices, particularly sensitive dual-use devices such as ceramic and tantalum capacitors.
- AO NPP SAIT (Sait), a producer of technology such as memory units, has received Russian state funding and is involved in the manufacture of computers and peripheral equipment. Sait works with U.S.-designated Russian defense entity Federal State Institution of Higher Vocational Education Moscow Institute of Physics and Technology, which has been

recognized by the Russian MoD for developing technologies in the interest of Russia's military.

- Autonomous Non Profit Organization Artificial Intelligence Research Institute conducts research in the field of artificial intelligence and has developed neural networks related to unmanned vehicles.
- **Elprom Limited Liability Company** supplies microcircuits and other electronic components, including to a Russian UAV producer.
- Federal State Budgetary Institution Technological Institution for Superhard and Novel
 Carbon Materials develops advanced manufacturing technologies and high-tech
 components used by several U.S.-designated Russian defense entities.
- Federal State Institution Federal Research Center Informatics and Management of the Russian Academy of Sciences (FRC CSC RAS) conducts research and development in the fields of computer science, informational technology, and systems analysis. A FRC CSC RAS researcher has developed mathematical modeling technology for analyzing financial flows for Russia's military-industrial base.
- **FGUP PO Oktyabr**, one of the largest radio-electronics companies in Russia, produces radar systems.
- Joint Stock Company 31 State Design Institute for Special Construction (31 State Design Institute) designs complex antenna systems, radio equipment, radio electronic equipment, and facilities with network computer control systems, information security systems, and intrusion protection and detection systems. 31 State Design Institute has built central and command posts for the Russian MoD.
- **Joint Stock Company Akmetron** (Akmetron) develops and produces electronics and specialized software. Akmetron has procured dual-use technology for a Russian UAV producer.
- **Joint Stock Company Aerocon** develops manufacturing, design, and engineering software and aeronautic systems for fighter aircraft and designs UAVs.
- Joint Stock Company Research and Production Center NII Microdevices, a resident of
 U.S.-designated Joint Stock Company Special Economic Zone Technopolis Moscow,
 specializes in the development and production of light-technology products based on lightemitting diodes for nautical technology.
- **Joint Stock Company Research Institute of Polymeric Material** develops technologies and equipment for processing polymer materials.

- Katod manufactures electronic components and optical instruments, including night vision devices.
- **Kribrum JSC** develops hardware and software for monitoring social media and has signed a contract with the Russian Government's main censorship body to automate internet monitoring.
- Kugel Limited Liability Company develops robotic solutions for welding.
- **Limited Liability Company 4Test** has imported high-priority items, including high-value electronics and manufacturing, production, and quality testing equipment for electronics components, circuit boards, and modules.
- **Limited Liability Company Afinor** supplies control-measurement equipment and software and has contracted with the Government of the Russian Federation for missile-related activities.
- **Limited Liability Company Alfa Instruments** imports and wholesales high priority goods, such as oscillographs and signals generators, including to the U.S.- designated Institute of Laser Physics of the Siberian Branch of the Russian Academy of Sciences.
- Limited Liability Company Eksikyushn Er Di Si (Execution RDC) operates in the field of enterprise automation. Execution RDC works with Russia's main censor on a neural network that uses artificial intelligence to scan the Internet.
- **Limited Liability Company ETM Photonics** imports high priority goods, including integrated circuits, and a wholesaler of technology, including through Russian state procurement contracts.
- **Limited Liability Company Khaverim** wholesales electronic equipment and has imported high priority electronics, such as electronic integrated circuits, into Russia.
- **Limited Liability Company Head Point** provides an Internet of Things (IoT) platform that can be used by law enforcement and supports Russian government surveillance systems.
- **Limited Liability Company Palitrumlab** (Palitrumlab) develops machine-learning and linguistics algorithms and software that can be used to monitor social networks and social media. Palitrumlab is involved in Russian censorship activities.
- **Limited Liability Company Vektor Iks** (Vektor Iks) develops neural networks and algorithms that are used in Russian censorship activities.
- **Limited Liability Company Intem Lab** (InTheme) specializes in the digitalization of logistics processes. InTheme provides business process automation services to several U.S.-designated Russian entities.

- **Limited Liability Company Green Chip** supplies radio-electronic components for the development, production, and repair of industrial, special-purpose, and energy enterprises.
- Limited Liability Company Umnyi Sklad (IQSklad) provides logistics and warehouse automation solutions and develops its own technologies, including a hardware and software system for production and logistics processes. IQSklad has completed a project for U.S.-designated Russian defense company Concern Morinformsystem Agat Joint Stock Company, which specializes in the design and production of missile systems.
- **Limited Liability Company Tsifra** (Zyfra) develops and implements industrial digital solutions. The Zyfra Industrial IoT platform has been used by U.S.-designated military engine producer Joint Stock Company United Engine Corporation to monitor production and simulate testing for turbo jets for a combat-capable trainer aircraft.
- **Limited Liability Company Dronoport**, using the trade name "HIVE," develops autonomous drone solutions for monitoring and has developed a neural network to analyze input data, including thermal imagery and special indicators.
- **Limited Liability Company PT Elektronik** is an electronics distributor that has supplied a Russian UAV producer.
- Limited Liability Company Simbirskoe Konstruktorskoe Byuro Piranya is a computer programming company that develops drones used by Russia's military.
- Limited Liability Company Amitron Elektroniks produces military-certified coaxial radio components.
- **Limited Liability Company Uraldronzavod** is involved in computer programming activities and has developed a UAV used by the Russian MoD.
- **Limited Liability Company KB Rus** manufactures electronic components and has created a drone helicopter that is planned for use by Russia's military.
- **Limited Liability Company NPK Tesart** develops and manufactures technology, including radio-measurement systems, and its products are advertised on the website of U.S.-designated Scientific Equipment Group of Companies, a Russian company that provides high-tech equipment to industrial enterprises.
- **Limited Liability Company Company Scan** is a wholesaler of machinery and electronic equipment, including to the U.S.-designated Russian technology research institute Federal State Financed Institution of Science Physics and Technology Institute Named after A. F. loffe of the Russian Federation Academy of Sciences.

- **Limited Liability Company TC Element** is a wholesaler and technical services provider for machinery, computers, and analytical equipment, including spectrometers.
- **Limited Liability Company Vector** is a manufacturer of electronic components that imported millions of dollars' worth of high priority electronics, including electronic integrated circuits.
- Nauchno Issledovatelskaya Laboratoriya Aerokosmicheskoi Tekhniki DOSAAF (DOSAAF)
 has a research laboratory for aerospace technology, and manufactures radar equipment,
 radio navigation devices, and remote-control radio apparatuses. DOSAAF has also
 contributed to a project led by U.S.-designated Russian defense entity JSC Academic M.F.
 Reshetnev Information Satellite Systems.
- Nauchno Proizvodstvennoe Predpriyatie Tomilinskii Elektronnyi Zavod manufactures microchips allegedly used in missile production.
- **Nauchno Proizvodstvennoe Obyedinenie Gran** manufactures robots and other robotized vehicles used by Russian assault teams in Ukraine and for remote-controlled minelaying.
- **OJSC Vladimir Radio Communications Design Bureau** develops software and hardware systems, as well as radio communication systems for the Russian MoD.
- **Open Joint Stock Company MStator** produces high-tech electromagnetic components, including inductors for the Russian MoD.
- Proteh Co Ltd (Proteh) modernizes production facilities in the radio-electronic and instrument-making industries. Proteh works with U.S.-designated Russian defense conglomerate Rostec and has helped the U.S.-designated Russian UAV producer Special Technology Center acquire foreign-made components.
- **Radioline Ltd** (Radioline) designs, develops, and produces positioning systems for industrial robots. Radioline has also made agreements to procure technology for U.S.-designated Russian UAV producer Special Technology Center.
- Research and Production Association Lepton manufactures remote sensing cameras and high-resolution telescope cameras that can provide military and intelligence collection capabilities.
- Russian Artificial Intelligence Research Institute of the Russian Academy of Sciences (RAIRI) develops systems related to artificial intelligence. A leading RAIRI researcher has presented on robotic systems at a Russian military forum.
- Scientific and Production Association State Institute of Applied Optics, a subsidiary of U.S.-designated Russian defense entity Joint Stock Company Shvabe, develops and

produces advanced optoelectronic systems.

- **Scientific Production Association Computing Systems** manages IT infrastructure for the Russian MoD and the Russian Ministry of Internal Affairs.
- Scientific Research Institute for Optoelectronic Instrument Engineering (OIE) develops, creates, tests, and calibrates optoelectronic and laser devices. OIE has filed a patent related to defense technology.
- Scientific Research Center Resonance Joint Stock Company develops radar systems for the Russian MoD.
- **Speech Technology Center Limited** (STC) develops facial, voice, and biometric recognition software and systems. STC works with the FSB and Russian Ministry of Internal Affairs.
- **STC Innovations Limited** is an STC subsidiary that develops biometric and person-identifying technologies, including for government agencies.
- **STC Soft Limited** is an STC subsidiary that provides biometric search capabilities to Russian authorities.
- **Sfera JSC** (Sfera) develops software and facial recognition surveillance systems. The Russian Government has used Sfera surveillance systems to detain protestors.
- **ZAO Svetlana EP** develops microwave radiation-resistant semiconductor devices and technology for next-generation radar systems.

ANNEX 3: RUSSIA'S STRATEGIC METALS AND MINING SECTOR

The following Russia-based companies are involved in or provide services to Russia's metals industry.

Russian metals and mining companies

The following Russia-based companies were designated pursuant to E.O. 14024 for operating or having operated in the metals and mining sector of the Russian Federation economy.

- Aktsionernoe Obshchestvo Evraz Kachkanarski Gorno Obogatitelny Kombinat mines iron and metal ores and non-metallic minerals.
- Aktsionernoe Obshchestvo Evraz Nizhnetagilski Metallurgicheski Kombinat (NTMK) is one of the largest integrated steel production plants in Russia. NTMK's production and

processing cycle includes coke production facilities, blast furnaces, steelmaking units, and seven rolling mills.

- Aktsionernoe Obshchestvo Evraz Obedinenny Zapadno Sibirski Metallurgicheski Kombinat is the largest steel producer in Siberia.
- **Aktsionernoe Obshchestvo Evraz Vanadi Tula** produces vanadium pentoxide that includes specific additive alloys for the manufacture of high-strength steel.
- Aktsionernoe Obshchestvo Obyedinennaya Ugolnaya Kompaniya Yuzhkuzbassugol is a bituminous coal and lignite surface mining company.
- **AO Evraz Market** is a leading provider of steel for infrastructure projects, and a trading company involved in the supply of rebar, and flat, tubular, and rolled steel.
- Limited Liability Company GRK Bystrinskoe is an ore mining and processing plant.
- Obshchestvo S Ogranichennol Otvetstvennostyu Raspadskaya Ugolnaya Kompaniya's
 activities include coal mining services, surface and underground coal mining, and the
 wholesale of coal, ores, and other minerals.
- **Obshchestvo S Ogranichennoi Otvetstvennostyu Shakhta Alardinskaya** develops coal mining sites and prepares, cleans, washes, screens, and sizes coal.
- Obshchestvo S Ogranichennoi Otvetstvennostyu Shakhta Esaulskaya's activities include coal mining services and the wholesale of coal, ore, and other minerals.
- **Publichnoe Aktsionernoe Obshchestvo Raspadskaya** (Raspadskaya) specializes in the production and sale of coking coal.

Russian metals and mining support services companies

Russia-based **Aktsionernoe Obshchestvo Norilsk Avia** (Norilsk Avia) provides helicopter transportation services. Norilsk Avia was designated pursuant to E.O. 14024 for operating or having operated in the aerospace sector of the Russian Federation economy.

The following Russia-based entities were designated pursuant to E.O. 14024 for operating or having operated in the financial services sector of the Russian Federation economy:

- Aktsionernoe Obshchestvo Norilski Gorno Metallurgicheski Kombinat Im AP
 Zavenyagina is involved in holding company and securities management.
- **Obshchestvo S Ogranichennoi Otvetstvennostyu AP Invest** (AP Invest) specializes in real estate transactions, particularly in secured lending and mortgage services. AP Invest has partnered with more than 20 banks.

• **Obshchestvo S Ogranichennoi Otvetstvennostyu Evrazkholding Finans** is engaged in financial intermediation, deposit banking, business credit, and financial transactions processing.

The following Russia-based entities were designated pursuant to E.O. 14024 for operating or having operated in the transportation sector of the Russian Federation economy:

- Aktsionernoe Obshchestvo Taimyrskaya Toplivnaya Kompaniya is engaged in the retail, sale, wholesale, storage, and transshipment of chemical products.
- Obshchestvo S Ogranichennoi Otvetstvennostyu Norilski Promyshlenny Transport is engaged in freight transport services, including general and specialized freight trucking.

The following Russia-based entities were designated pursuant to E.O. 14024 for operating or having operated in the technology sector of the Russian Federation economy:

- **Limited Liability Company BaseAlt** is involved in custom computer programing services, software development, and the creation of operating systems. BaseAlt entered into a technology agreement with a Russian metals and mining conglomerate to develop and promote domestic digital products, including the development of an operating system with built-in information security tools.
- **Limited Liability Company Nornickel Sfera** is engaged in critical information infrastructure security and software product publishing.
- **Limited Liability Company Nornickel Sputnik** is involved in IT design and operational activities that support digital transformation efforts.
- Serenity Cyber Security Limited Liability Company (MTS Red) is involved in computer
 programming, computer consultancy, and information security. MTS Red and a Russian
 metals and mining conglomerate signed a 2024 cooperation agreement on information
 security for the development of cybersecurity products and services for the industrial
 sector.

The following Russia-based entities were designated pursuant to E.O. 14024 for operating or having operated in the construction sector of the Russian Federation economy:

- **Limited Liability Company Nornikel Technical Services** constructs buildings, roads and highways, and engineering structures in Russia.
- Obshchestvo S Ogranichennoi Otvetstvennostyu Pechengskoe Stroitelnoe Obedinenie is involved in building construction and civil engineering works.

- **Obshchestvo S Ogranichennoi Otvetstvennostyu Vostokgeologiya** constructs, reconstructs, repairs, and maintains roads, railways, and road structures. It is also engaged in the construction, operation, and repair of limestone mining facilities.
- Obshchestvo S Ogranichennoi Otvetstvennostyu Zapolyarnaya Stroitelnaya
 Kompaniya specializes in the construction and reconstruction of underground facilities and surface mine infrastructure.

The following Russia-based entities were designated pursuant to E.O. 14024 for operating or having operated in the engineering sector of the Russian Federation economy:

- **Obshchestvo S Ogranichennoi Otvetstvennostyu Institut Gipronikel** provides general design services, customer engineering services, and field engineering services.
- **Obshchestvo S Ogranichennoi Otvetstvennostyu NN** conducts engineering surveys and engineering and technical design and provides construction project management, construction control and supervision, and technical advice.

The following Russia-based entities were designated pursuant to E.O. 14024 for operating or having operated in the manufacturing sector of the Russian Federation economy:

- Obshchestvo S Ogranichennoi Otvetstvennostyu Norilski Obespechivayushchi
 Kompleks manufactures metal structures and provides spare sparts and other equipment
 and products to enterprises engaged in mining, processing, metallurgy, construction, and
 maintenance.
- Obshchestvo S Ogranichennoi Otvetstvennostyu Norilsknikelremont provides repair and maintenance services for metallurgical and concentration plant equipment; mining equipment; automotive vehicles and rolling stock; self-propelled diesel equipment; and instrumentation and automation systems.

MMK

Russia-based **Publichnoe Aktsionernoe Obschestvo Magnitogorskiy Metallurgicheskiy Kombinat** (MMK) was designated pursuant to E.O. 14024 for operating or having operated in the metals and mining sector of the Russian Federation economy. MMK is the largest iron and steel works company in Russia and a leading steelmaker globally. OFAC previously designated MMK pursuant to E.O. 14024 for operating or having operated in the financial services sector of the Russian Federation economy.

SANCTIONS IMPLICATIONS

As a result of today's action, all property and interests in property of the persons above that are in the United States or in the possession or control of U.S. persons are blocked and must be reported to OFAC. In addition, any entities that are owned, directly or indirectly, 50 percent or more by one or more blocked persons are also blocked. All transactions by U.S. persons or within (or transiting) the United States that involve any property or interests in property of designated or blocked persons are prohibited unless authorized by a general or specific license issued by OFAC, or exempt. These prohibitions include the making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any blocked person and the receipt of any contribution or provision of funds, goods, or services from any such person. Non-U.S. persons are also prohibited from causing or conspiring to cause U.S. persons to wittingly or unwittingly violate U.S. sanctions, as well as from engaging in conduct that evades U.S. sanctions. OFAC's Economic Sanctions Enforcement Guidelines provide more information regarding OFAC's enforcement of U.S. sanctions, including the factors that OFAC generally considers when determining an appropriate response to an apparent violation.

In addition, foreign financial institutions that conduct or facilitate significant transactions or provide any service involving Russia's military-industrial base run the risk of being sanctioned by OFAC. For additional guidance, please see the updated OFAC advisory, "Updated Guidance for Foreign Financial Institutions on OFAC Sanctions Authorities Targeting Support to Russia's Military-Industrial Base," as well as OFAC Frequently Asked Questions (FAQs) 1146-1157.

The power and integrity of OFAC sanctions derive not only from OFAC's ability to designate and add persons to the SDN List, but also from its willingness to remove persons from the SDN List consistent with the law. The ultimate goal of sanctions is not to punish, but to bring about a positive change in behavior. For information concerning the process for seeking removal from an OFAC list, including the SDN List, please refer to OFAC's FAQ 897 here. For detailed information on the process to submit a request for removal from an OFAC sanctions list, please click here.

Any persons included on the SDN List pursuant to E.O. 14024 may be subject to additional export restrictions administered by the Department of Commerce, Bureau of Industry and Security (BIS).

For identifying information on the individuals and entities sanctioned today, click here.