

Restrictions on Russian Banks

Sanctioned Bank	US	UK	EU	EU SWIFT Ban
All Russian banks	<p>General License 6A authorizes transactions related to the exportation or reexportation of agricultural commodities, medicine, medical devices to, from, or transiting Russia and certain COVID-19-related transactions</p>	<p>General License INT/2022/1919908 allows retail banking services involving designated credit or financial institutions up to £50,000 until 10 September 2022</p> <p>General License INT/2022/1552576 allowing Designated Persons ("DPs"), companies controlled by DPs or their legal representatives to make payments to the London Court of International Arbitration ("LCIA") to cover their arbitration costs.</p>		
Alfa-Bank (Alfa-Bank)	<p>Prohibitions on new debt and equity</p> <p>Asset freeze</p> <p>General License 8B allows transactions "related to energy" until June 24, 2022.</p> <p>General License 9B allows dealings in debt or equity until June 30, 2022</p> <p>General License 10B allows certain derivative contracts until June 30, 2022</p>	<p>Asset freeze</p> <p>General License INT/2022/1424276 allows the wind down of transactions until 23 April</p>	<p>Restrictions on access to capital market</p>	No

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Bank Otkritie	Asset freeze	Asset freeze	Restrictions on access to capital market	Yes
Black Sea Bank for Development and Reconstruction		Asset freeze		No
Central Bank of Russia	Prohibition on transactions	Prohibition on financial services for the purpose of foreign exchange reserve and asset management General License INT/2022/1381276 allows the wind down of certain transactions until 2 May 2022 General License INT/2022/1495176 allows certain payments by the Central Bank of the Russian Federation until 30 June 2022	Prohibition on transactions related to the management of reserves and assets	No
Credit Bank of Moscow	Prohibitions on new debt and equity	Asset freeze General License INT/2022/1544176 allows the wind down of any transactions until 6 May 2022		Yes
Credit Ural Bank	Asset freeze			No
Gazprombank	Prohibitions on new debt and equity	Asset freeze General License INT/2022/1424276 allows the wind down of transactions until 23 April General License allowing for Gazprom Energy Payments	Prohibition on dealing with transferable securities and money-market instruments	No

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		valid until October 31, 2022		
IS Bank		Asset freeze		No
JSC Gen Bank	Asset freeze	Asset freeze		No
JSC Moscow Industrial Bank (MIB)	Asset freeze			No
Novikombank	Asset freeze			Yes
Promsvyazbank (PSB)	Asset freeze	Asset freeze	Restrictions on access to capital market	Yes
Rosbank		<p>Asset freeze against Rosbank owner Vladimir Potanin</p> <p>General licence INT/2022/1968500 allows for the wind-down of activities with Rosbank until 30 June 2022.</p> <p>General License INT/2022/1968500 allows for the wind-down of activities with Rosbank until 30 September 2022.</p>		
Rossiya Bank	Asset freeze	Asset freeze	Restrictions on access to capital market	Yes
Russia Direct Investment Fund	Asset freeze	Prohibition on providing financial services	Prohibition on investment, participation or other contribution	No
Russian Agricultural Bank (Rosselkhozbank)	Prohibitions on new debt and equity	<p>Prohibition on dealing with a transferable security or money-market instrument</p> <p>Asset freeze</p> <p>General License INT/2022/1424276 allows the wind down of transactions until 23 April</p>		Yes

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Sberbank	<p><u>Prohibitions on new debt and equity</u></p> <p><u>Prohibition on the opening or maintaining of a correspondent account or payable-through account and the processing of a transaction</u></p> <p><u>Asset freeze</u></p> <p><u>General License 22 authorizing wind down activities until April 13, 2022</u></p> <p><u>General License 26A, authorizing until 12 July 2022 the wind down of transactions involving JSC SB Sberbank Kazakhstan, Sberbank Europe AG or Sberbank (Switzerland) AG</u></p>	<p><u>Ban on dealing in transferable securities or money-market instruments of named Russian banks and companies to include their UK subsidiaries</u></p> <p><u>Sberbank CIB UK under Special Administration</u></p> <p><u>General License INT/2022/1277877 allows energy related payments with PJSC Sberbank until 24 June, 2022</u></p> <p><u>General License INT/2022/1298776 allows until 3 April 2022 to provide financial services to Sberbank or a subsidiary for the purpose of winding down that activity</u></p> <p><u>Asset freeze</u></p> <p><u>General License INT/2022/1277877 allows energy related payments until 24 June 2022</u></p> <p><u>General License INT/2022/1280876 allows for basic needs, routine holding and maintenance, the payment of legal fees and insolvency-</u></p>	<p><u>Prohibition on dealing with transferable securities and money-market instruments</u></p> <p><u>Asset freeze</u></p>	<p><u>Yes</u></p>

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		related payments until 3 April 2023		
SMP Bank	Asset freeze	Asset freeze General License INT/2022/1424276 allows the wind down of transactions until 23 April		No
Sovcombank	Asset freeze	Asset freeze		Yes
Transkapitalbank	Asset freeze			No
Ural Bank for Reconstruction and Development		Asset freeze General License INT/2022/1424276 allows the wind down of transactions until 23 April		No
Vnesheconombank (VEB)	Asset freeze	Asset freeze Prohibition on dealing with a transferable security or money-market instrument by a UK entity owned by VEB General License INT/2022/1295476 allows the wind down of transactions until 3 April 2022	Prohibition on dealing with transferable securities and money-market instruments	Yes
VTB Bank	Asset freeze	Asset freeze Prohibition on dealing with a transferable security or money-market instrument by a UK entity owned by VTB General License INT/2022/1280876 allows VTB Capital plc / any other VTB UK subsidiary to permit it	Prohibition on dealing with transferable securities and money-market instruments	Yes



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		<p><u>to make payments for basic needs until 3 April 2023</u></p> <p><u>General License INT/2022/1280976 puts VTB under prudential supervision or protecting, maintaining or enhancing the stability of the financial system of the UK until 1 March 2023</u></p> <p><u>General License INT/2022/1280876 allows for basic needs, routine holding and maintenance, the payment of legal fees and insolvency-related payments until 3 April 2023</u></p>		