

## Introduction

In response to the ongoing situation in Ukraine, the European Union (EU) has imposed a number of sanctions regimes. All sanctions regarding Crimea, Sevastopol, Russia and in respect of actions compromising Ukraine's territorial integrity are time limited and were shortly due to expire. Last week, the EU Council agreed to extend the expiry dates for the sanctions regimes in force in Crimea<sup>1</sup> and Russia<sup>2</sup>. These decisions have now all been published in the EU Journal.

## Russia

The Council of the EU has extended the duration of the sanctions targeting Russia, imposed due to the situation in Ukraine. The Council's Decision of 22 June 2015 extends the sanctions for a further six months, until 31 January 2016.

The scope of these sanctions remains the same as already in force (set out in [Council Decision 2014/512](#) and [Regulation 2014/833](#)), which includes prohibitions and restrictions, including on:

- The supply of military and dual use items and technology from or to Russia, or where the end-users are the Russian military.
- Exports of certain energy-related equipment and technology to Russia – subject to prior authorisation by competent authorities of Member States. Export licenses are denied if products are destined for deep water oil exploration and production, arctic oil exploration or production and shale oil projects in Russia.
- Services necessary for deep water oil exploration and production, arctic oil exploration or production and shale oil projects in Russia cannot be supplied, for instance drilling, well testing or logging services.
- Access to EU capital markets (for specified companies) including a prohibition on dealing in trade securities and money market instruments and prohibiting new loans and credit.

## Crimea and Sevastopol

On Friday 19 June 2015, the Council of the EU also voted to extend the EU sanctions in place with respect to Crimea and Sevastopol until 23 June 2016.

By way of reminder, these sanctions, initially adopted in June 2014 ([Council Decision 2014/386](#) and [Regulation 2014/692](#)), target the following:

- Imports into the EU products that have originated in Crimea or Sevastopol.
- Investment in Crimea or Sevastopol. This means that, generally, no Europeans or EU-based companies may buy real estate or entities in Crimea, finance Crimean companies or supply services in connection with these actions.
- Tourism services in Crimea and Sevastopol. In particular EU cruise ships may not stop at ports in the Crimean peninsula, except in an emergency.
- Exporting certain goods and technologies to Crimean companies or for use in Crimea. This applies to the transport, telecommunications and energy sectors and also to goods and technologies for the purpose of prospecting, exploring or producing oil, gas and mineral resources.

Here again, the scope of the sanctions has not been amended as part of this decision.

## Previous Extensions

The restrictive measures imposed by the EU in respect of actions compromising Ukraine's territorial integrity, and imposing asset freezes on certain individuals were extended earlier this year:

- Asset freezing sanctions extended by [Council Decision 2015/364](#) to 6 June 2015 in respect of four designated persons and until 6 March 2016 in respect of the remaining 14.
- Sanctions in respect of actions undermining the Ukraine's territorial integrity extended by [Council Decision 2015/432](#) to 15 September 2015.

The chronology on page three provides an overview of the timeline that applies with respect to sanctions regimes on Russia, Crimea and Sevastopol and in respect of actions compromising Ukraine's territorial integrity.

<sup>1</sup> [Council Decision 2015/959](#)

<sup>2</sup> [Council Decision 2015/971](#)

## Where EU Sanctions Apply

As a general rule, EU sanctions laws apply to:

- EU nationals, wherever located;
- Entities incorporated in the EU including non-EU branches of such entities;
- Any individuals located in the EU including non-EU nationals; and
- Any entities in respect of business done in whole or in part in the EU, including non-EU entities.

## What Does This Mean for You?

Further to the adoption of these decisions, companies will need to continue to ensure that they comply with the sanctions regime in force with respect to Russia, Crimea and Sevastopol and in respect of actions undermining the Ukraine's territorial integrity. The measures in force are likely to remain as they are until the end of this year and potentially beyond, with any changes being dependent on the situation on the ground in Ukraine and the implementation of the Minsk agreement.

## About Our Sanctions Team

Our sanctions team is built on the ability to advise on the shifting regulatory framework on both sides of the Atlantic. We have extensive experience in advising and representing a wide range of companies and financial institutions in European, the US and other jurisdictions on export control and sanctions from a multijurisdictional perspective. Our sanctions team is part of our overall International Trade Practice, providing a "one-stop" solution to global trade compliance through rapid, professional and tailored advice and compliance tools to fit your business needs and processes. If you have any question relating to sanctions please contact a member of our EU or US sanctions team listed herein. You can also email [sanctions-europe@squirepb.com](mailto:sanctions-europe@squirepb.com) for assistance.

## Contacts

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The contents of this update are not intended to serve as legal advice related to individual situations or as legal opinions concerning such situations nor should they be considered a substitute for taking legal advice.

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**Russia** | **Ukraine – Misappropriation and human rights** | **Ukraine – Territorial integrity, sovereignty and independence** | **Crimea – Illegal annexation**

Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15	Jan-16	Feb-16	Mar-16	Apr-16	May-16	Jun-16
									Council <b>Decision 2014/512</b> (31/07/2014 – 31/07/2015)							Extended by Council <b>Decision 2015/971</b> to 31/01/2016											
									<b>Regulation 833/2014</b>																		
Council <b>Decision 2014/119</b> (05/03/2014 – 06/03/2015)												Extended by <b>Council Decision 2015/364</b> to 06/03/2016 in respect of 14 designated persons, and until 06/06/2015 in respect of the remaining four designated persons; further extended by Council <b>Decision 2015/876</b> to 06/10/2015 in respect of one of those four designated persons, and until 6 March 2016 in respect of two of those four designated persons.															
<b>Regulation 208/2014</b> (as amended)																											
Council <b>Decision 2014/145</b> (17/03/2014 – 17/09/2014)							Extended by Council <b>Decision 2014/658</b> to 15/03/2015							Extended by Council <b>Decision 2015/432</b> to 15/09/2015													
<b>Regulation 269/2014</b> (as amended)																											
									Council <b>Decision 2014/386</b> (25/06/2014 – 23/06/2015)							Extended by Council <b>Decision 2015/959</b> to 23 June 2016											
									<b>Regulation 692/2014</b> (as amended)																		