

On September 30, 2025, President Vladimir Putin signed Decree No. 693 “On Certain Particularities of the Sale of Property in Federal Ownership” ([here](#)).

The measure took effect the moment it was published. The decree is expressly framed as a response to “unfriendly” actions by the United States and its allies. It is adopted “to protect the national interests of the Russian Federation,” citing Federal Laws No. 390 FZ (On Security) and No. 127 FZ on counter measures.

Decree No. 693 creates an accelerated pathway for disposing of federal property “in cases determined by a decision of the President of the Russian Federation,” where the goal is to ensure Russia’s defense capability and security. In this fast track channel, the market valuation of federal property and the appraisal report must be completed within 10 business days of signing the appraisal contract. The Government of the Russian Federation will appoint the individuals and entities authorized to conduct these valuations. It puts in place a special procedure which will apply to state registration, accounting, and transfer of rights to federal property, including shortened time limits for those steps.

Having said this, the Russian Federation is not literally contemplating selling off its own government property; rather the decree needs to be read against renewed EU and G7 discussions over deploying Euroclear-held Russian sovereign assets to finance Ukraine, including proposals for a €140 billion “reparations loan.” In such a scenario, Moscow would retaliate by nationalizing assets in Russia owned by EU and US nationals and entities, which it would then proceed to auction-off in order to compensate the damages suffered.

Bank PSB (ex. PromSvyazBank) is charged with organizing the auction of the nationalized property and empowered to act as the seller on behalf of the state. Bank PSB has been subject to U.S. and EU sanctions, further complicating any attempts by foreign nationals attempting to buy back their nationalized assets. Although Decree 693 does not itself assign different rules to foreign versus domestic buyers, its counter measures framing and concentration of roles in a sanctioned financial institution heighten exposure for entities from jurisdictions Russia deems “unfriendly,” as well as corporate groups with foreign ownership structures.

The decree compresses the window for anyone on the outside hoping to negotiate for their assets inside the Russian Federation; it gives the Russian Government access to quick liquidity if it should need it, and finally, gives it a mechanism to brandish should foreign actors make a move against its frozen funds.

The decree specifies that President Putin wields considerable discretion when it comes to applying any other elements of Russian law relevant to these transactions, including any which touch upon privatization rules, joint stock and LLC laws, securities market regulation, banking law, and competition/antitrust law. In practical terms, current decree empowers Russia to avoid these formalities when it feels sufficiently threatened.

Potentially affected parties should monitor official publications and developments related to this possible escalation between the EU and the Russian Federation. Our team is widely experienced in sanctions advice and cross-border transactions, being available to provide any assistance clients may need.

Contacts



José María Viñals

Partner, Madrid/Brussels
T +34 91 426 4840
T +34 649 133 822
E josemaria.viñals@squirepb.com



Patrick J. Brooks

Partner, Washington DC/ Astana
T +1 202 457 5328
E patrick.brooks@squirepb.com



Darina Kogan Bellamy

Partner, New York, London, Astana
T +7 495 258 5052
M +44 754 551 3722
E darina.koganbellamy@squirepb.com



Tigran Piruzyan

Senior Associate, Madrid
T +34 618 017 354
E tigran.piruzyan@squirepb.com