

The European Union has introduced a significant update to its sanctions framework concerning the provision of services to Russia. This development forms part of the EU's ongoing efforts to refine and expand its restrictive measures regime and may have implications for organisations engaged in activities that fall within the scope of the amended provisions.

On 22 January 2026, the European Commission updated its [FAQs](#) on restricted services under Article 5n of Council Regulation (EU) No 833/2014. The update substantially expands and clarifies the scope of prohibited services in four specific areas: commercial space-based services, artificial intelligence (AI) services, high-performance and quantum computing services, and services directly related to tourism activities in Russia.

## Commercial Space-based Services

The updated FAQs clarify that Article 5n now explicitly covers certain commercial space-based services. The prohibition includes the provision of Earth observation services, such as access to satellite imagery, satellite-derived data, geospatial analytics and tasking services, as well as certain satellite navigation services, including access to high-precision, augmented or encrypted positioning, navigation and timing data. The guidance confirms that these restrictions are intended to prevent access to space-based capabilities with potential military, intelligence or strategic applications.

## Artificial Intelligence Service

The FAQs introduce a new, standalone category of prohibited services covering AI. Article 5n is clarified to prohibit both (i) access to hosted AI models and (ii) access to platforms enabling the training, fine-tuning or inference of AI models. This includes, among others, large language models, image and video generation models, and other specialised AI models. The prohibition applies irrespective of whether the services are delivered via application programming interfaces (APIs), cloud-based platforms or similar technical means.

## High-performance and Quantum Computing Service

The commission has clarified that high-performance computing services fall within the scope of Article 5n. This includes access to graphics processing unit (GPU)-accelerated computing resources, high-performance computing clusters, supercomputing time-sharing arrangements and similar services. In addition, access to quantum computing services, including quantum hardware or quantum-emulation software, is explicitly covered. These clarifications confirm that the provision of large-scale computational capacity to Russian entities is prohibited.

## Services Directly Related to Tourism in Russia

The updated FAQs clarify and expand the scope of services considered to be directly related to tourism activities in Russia. The prohibition is confirmed to cover not only traditional travel agency and tour operator services, but also online platforms and applications enabling bookings, ticket sales, visa facilitation services when linked to tourism, and advertising services related to such activities. The guidance distinguishes these services from general travel information provided to the public.

## Recommended Actions

In light of these developments, we recommend that you consider the following steps:

- Identify whether your activities fall within any of the newly clarified service categories, including through a review of existing contracts and relationships with suppliers or third parties
- Review existing service delivery models, including digital, cloud-based or platform-based offerings, for potential exposure
- Update internal sanctions policies, procedures and contractual documentation as appropriate
- Ensure that relevant business and compliance teams are informed of the updated scope of Article 5n
- Document the assessments and decisions taken in response to this update

Organisations assessing the potential impact of these changes on their operations may need to consider whether adjustments to their existing compliance frameworks are required in light of the revised measures.

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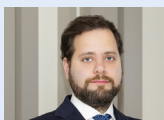
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