FINANCIAL REPORTING AUTHORITY

(CAYFIN)

Delivery Address:
133 Elgin Ave, 4th Floor
Government Administrative Building
Grand Cayman
CAYMAN ISLANDS
Direct Tel No. (345) 244-2394
Tel No. (345) 945-6267
Fax No. (345) 945-6268
Email: financialsanctions@gov.ky

Mailing Address:
P.O. Box 1054
Grand Cayman KY1-1102
CAYMAN ISLANDS

Financial Sanctions Notice **09/12/2025**

Russia

Introduction

1. The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) ("the Russia Regulations") were made under the Sanctions and Anti-Money Laundering Act 2018 (the Sanctions Act) and provide for the imposition of financial sanctions, including asset freezes and other financial and investment restrictions, on persons who are or have been involved in destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine; or obtaining a benefit from or supporting the Government of Russia.

2. On 9 December 2025 the Foreign, Commonwealth and Development Office updated the UK Sanctions List on GOV.UK. This list provides details of those designated under regulations made under the Sanctions Act. A link to the UK Sanctions List can be found below. Following the publication of the UK Sanctions List, information on the Consolidated List has been updated.

3. Following the publication of the UK Sanctions List, information on the Consolidated List has been updated.

Notice summary

4. The following entries have been added to the Consolidated List and are now subject to an asset freeze and trust service sanctions:

- Aleksandr Geljevitj DUGIN (Group ID: 17243)
- Mikhail Sergeevich ZVINCHUK (Group ID: 17242)
- CENTER FOR GEOPOLITICAL EXPERTISE (Group ID: 17245)
- EUROMORE (Group ID: 17241)
- FOUNDATION FOR THE SUPPORT AND PROTECTION OF THE RIGHTS OF COMPATRIOTS LIVING ABROAD (Group ID: 17239)
- GOLOS (Group ID: 17240)
- RYBAR LLC (Group ID: 17244)

What <u>you</u> must do

5. You must:

i. check whether you maintain any accounts or hold any funds or economic resources for the persons set out in the Annex to this Notice and any entities owned or controlled by them;

ii. freeze such accounts, and other funds or economic resources;

iii. refrain from dealing with the funds or economic resources or making them available directly or indirectly to or for the benefit of designated persons unless licensed by the Governor or if an exception applies;

iv. refrain from providing trust services to or for the benefit of the persons set out to the Annex in this Notice;

v. report any findings to the FRA at financialsanctions@gov.ky, together with the information or other matter on which the knowledge or suspicion is based by completing and submitting a Compliance Reporting Form (CRF). Where the information relates to funds or economic resources, the nature and quantity should also be reported.

6. Information received by the FRA may be disclosed to third parties in accordance with provisions set out in the Information and Records part of the regulations and in compliance with applicable data protection laws.

7. Information regarding a suspected designated person, and funds or economic resources belonging to them, does not need to be disclosed to the FRA where it has previously been reported.

8. Failure to comply with financial sanctions legislation or to seek to circumvent its provisions may be a criminal offence.

Further Information

9. Copies of recent notices, UK legislation and relevant guidance can be obtained from the Russia financial sanctions page on the GOV.UK website:

   https://www.gov.uk/government/collections/financial-sanctions-regime-specific-consolidated-lists-and-releases

10. The Consolidated List can be found here:

    https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets

11. The UK Sanctions List can be found here:

    https://www.gov.uk/government/publications/the-uk-sanctions-list

12. The Compliance Reporting Form can be found here:

    https://fra.gov.ky/forms-documents/#74-91-wpfd-financial-sanctions-forms

13. For more information please see OFSI's guide to financial sanctions:

    https://www.gov.uk/government/publications/uk-financial-sanctions-guidance

14. For general information on financial sanctions please see our Financial Sanctions Guidance:

    https://fra.gov.ky/guides-to-financial-sanctions/

Enquiries

15. Enquiries regarding this Financial Sanctions Notice should be addressed to:

    The Sanctions Coordinator
    Financial Reporting Authority
    P.O. BOX 1054
    Grand Cayman KY1-1102
    Cayman Islands
    financialsanctions@gov.ky

ANNEX TO NOTICE

FINANCIAL SANCTIONS: RUSSIA

THE RUSSIA (SANCTIONS) (EU EXIT) REGULATIONS 2019 (S.I. 2019/855)

ADDITIONS

Individuals

1. **DUGIN, Aleksandr Geljevitj**
   DOB: 07/01/1962. **POB:** Moscow, Russia **Nationality:** Russia **Other Information:** (UK Sanctions List Ref): RUS3157. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 09/12/2025. (UK Statement of Reasons):Aleksandr Geljevitj DUGIN is an "involved person" under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following ground: DUGIN is or has been involved in destabilising Ukraine by being responsible for, engaging in, providing support for, or promoting any policy or action which destabilises Ukraine or undermines or threatens the territorial integrity, sovereignty or independence of Ukraine. (Gender): Male **Listed on:** 09/12/2025 **UK Sanctions List Date Designated:** 09/12/2025 **Last Updated:** 09/12/2025 **Group ID**: 17243.

2. **ZVINCHUK, Mikhail Sergeevich**
   DOB: 19/07/1991. **POB:** Vladivostok, Russia **Nationality:** Russia **National Identification Number**: INN: 253716334825 **Address:** Block B, 86 Nizhegorodskaya Street, Nizhegorodsky Municipal District, Moscow, Russia, 109052.**Position:** Director General of RYBAR LLC **Other Information:** (UK Sanctions List Ref): RUS3156. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 09/12/2025. (UK Statement of Reasons):Mikhail Sergeevich ZVINCHUK is an "involved person" under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following ground: ZVINCHUK is or has been involved in destabilising Ukraine by working as a director or equivalent of an entity, RYBAR LLC, which is or has been involved in destabilising Ukraine by being responsible for, engaging in, providing support for, or promoting any policy or action which destabilises Ukraine or undermines or threatens the territorial integrity, sovereignty or independence of Ukraine. (Gender): Male **Listed on:** 09/12/2025 **UK Sanctions List Date Designated:** 09/12/2025 **Last Updated:** 09/12/2025 **Group ID:** 17242.

Entities

1. **CENTER FOR GEOPOLITICAL EXPERTISE**
   a.k.a: CGE **Address:** Dinamovskaya Ulitsa, 1A, Moscow, Russia, 109044.**Other Information:** (UK Sanctions List Ref): RUS3159. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 09/12/2025. (UK Statement of Reasons):CENTER FOR GEOPOLITICAL EXPERTISE (CGE) is an "involved person" under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following ground: CGE is or has been involved in destabilising Ukraine by being responsible for, engaging in, providing support for, or promoting any policy or action which destabilises Ukraine or undermines or threatens the territorial integrity, sovereignty or independence of Ukraine. (Business Reg No): INN: 7703259850 **Listed on:**

09/12/2025 **UK Sanctions List Date Designated:** 09/12/2025 **Last Updated:** 09/12/2025 **Group ID:** 17245.

2. **EUROMORE**
   Address: Avenue Ariane 5, Brussels, Belgium, 1200.**Other Information:** (UK Sanctions List Ref): RUS3155. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 09/12/2025. (UK Statement of Reasons):The Secretary of State considers there are reasonable grounds to suspect that EUROMORE is an "involved person" under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following grounds: 1) EUROMORE is or has been involved in destabilising Ukraine by being responsible for, engaging in, providing support for, or promoting any policy or action which destabilises Ukraine or undermines or threatens the territorial integrity, sovereignty or independence of Ukraine; and 2) EUROMORE is or has been involved in obtaining a benefit from or supporting the Government of Russia by carrying on business as a Government of Russia-affiliated entity which otherwise obtains a financial benefit or other material benefit from the Government of Russia. (Phone number): +32 (2) 781-03-01 (Website): Euromore.eu (Email address): News@euromore.eu **Listed on:** 09/12/2025 **UK Sanctions List Date Designated:** 09/12/2025 **Last Updated:** 09/12/2025 **Group ID:** 17241.

3. **FOUNDATION FOR THE SUPPORT AND PROTECTION OF THE RIGHTS OF COMPATRIOTS LIVING ABROAD**
   Name (non-Latin script): Фонд поддержки и защиты прав соотечественников, проживающих за рубежом
   a.k.a: (1) FUND FOR THE LEGAL PROTECTION AND SUPPORT OF RUSSIAN FEDERATION COMPATRIOTS (2) PRAVFOND **Address:** Arbat Street, 55/32, Moscow, Russia, 119200.**Other Information:** (UK Sanctions List Ref): **RUS3153**. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 09/12/2025. (UK Statement of Reasons):The Secretary of State considers there are reasonable grounds to suspect that the FOUNDATION FOR THE SUPPORT AND PROTECTION OF THE RIGHTS OF COMPATRIOTS LIVING ABROAD (hereafter PRAVFOND) is an "involved person" under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following grounds: 1) PRAVFOND is or has been involved in obtaining a benefit from or supporting the Government of Russia by carrying on business as a Government of Russia-affiliated entity by being owned or controlled by the Government of Russia; and 2) PRAVFOND is or has been involved in destabilising Ukraine by making available funds that could contribute to destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine through funding the media outlets Euromore and Golos. (Phone number): +7 499 244-44-10 (Website): https://www.pravfond.ru/ (Business Reg No): INN: 7704278982 **Listed on:** 09/12/2025 **UK Sanctions List Date Designated:** 09/12/2025 **Last Updated:** 09/12/2025 **Group ID:** 17239.

4. **GOLOS**
   Address: Avenue Ariane 5, Brussels, Belgium, 1200. **Other Information:** (UK Sanctions List Ref): RUS3154. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 09/12/2025. (UK Statement of Reasons):The Secretary of State considers there are reasonable grounds to suspect that GOLOS is an "involved person" under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following grounds: 1) GOLOS is or has been involved in destabilising Ukraine by being responsible for, engaging in, providing support for, or promoting any policy or action which destabilises Ukraine or undermines or threatens the territorial

integrity, sovereignty or independence of Ukraine; and 2) GOLOS is or has been involved in obtaining a benefit from or supporting the Government of Russia by carrying on business as a Government of Russia-affiliated entity which otherwise obtains a financial benefit or other material benefit from the Government of Russia. (Phone number): +32 (2) 781-03-01 (Website): golos.eu **Listed on:** 09/12/2025 **UK Sanctions List Date Designated:** 09/12/2025 **Last Updated**: 09/12/2025 **Group ID:** 17240.

5. **RYBAR LLC**
   Address: Block B, 86 Nizhegorodskaya Street, Nizhegorodsky Municipal District, Moscow, Russia, 109052.**Other Information:** (UK Sanctions List Ref): RUS3158. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 09/12/2025. (UK Statement of Reasons):RYBAR LLC is an "involved person" under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following ground: RYBAR LLC is or has been involved in destabilising Ukraine by being responsible for, engaging in, providing support for, or promoting any policy or action which destabilises Ukraine or undermines or threatens the territorial integrity, sovereignty or independence of Ukraine. (Website): rybar.ru; restmedia.io (Email address): Info@rybar.ru (Business Reg No) :(1) INN: 7720891730 (2) KPP: 772201001 **Listed on:** 09/12/2025 **UK Sanctions List Date Designated**: 09/12/2025 **Last Updated:** 09/12/2025 **Group ID:** 17244.

Financial Reporting Authority

Portfolio of Legal Affairs

09/12/2025