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## RUSSIA, BELARUS AND SPECIFIC REGIONS OF UKRAINE

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### SUMMARY

As of February 21, 2022, the United States and its allies released sanctions and export controls in response to Russia's invasion of Ukraine. These sanctions are changing rapidly and result in new restrictions on **exports and imports of items, technology and services to/from any of these countries and covered regions** and designation of new restricted parties and otherwise designated entities.

#### What does this mean for you?

You will need to be aware that the new sanctions may affect your interactions with parties in the sanctioned regions, including financial dealings, physical imports and exports, and provision or receipt of services. Please contact your Export Control office if you have any questions, or anticipate engaging in any of the following activities with Russia, Belarus or Ukraine:

- Exporting or importing any items, technology or services;
- Engaging in financial or other transactions or entering into agreements with parties in any of these regions;
- Traveling to any of these regions.

To assist your location in addressing these changes, we recommend locations:

- Continue to conduct restricted party screening;
- Identify shipments for review by export control offices;
- And identify any agreements or transactions with parties in any of these countries, including procurement of items or services or exports of items or services, for review by export control offices in light of these changing restrictions/sanctions.

#### Background

The U.S. Department of Commerce (DOC) significantly increased the license requirements on hardware, software or technology exported, reexported or transferred in-country to Russia<sup>1</sup> and Belarus<sup>2</sup>.

The U.S. Office of Foreign Assets Control (OFAC) has imposed export, reexport and transfer restrictions on the Luhansk People's Republic (LNR) and Donetsk People's Republic (DNR) regions of the Ukraine and Crimea<sup>3</sup>.

Both DOC and OFAC have added numerous individuals and organizations (including banks) to Entity and Designated Nationals lists, which means most or all transactions with these individuals and organizations are prohibited.

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<sup>1</sup> Implementation of Sanctions Against Russia Under the Export Administration Regulations (EAR), [87 FR 12226](#)

<sup>2</sup> [White House Fact Sheet](#) on Russia and Belarus

<sup>3</sup> Executive Order - *Blocking Property of Certain Persons and Prohibiting Certain Transactions With Respect to Continued Russian Efforts To Undermine the Sovereignty and Territorial Integrity of Ukraine*, [87 FR 10293](#)