

CLIENT ALERT

NOVEMBER 4, 2025

EU adopts its 19th sanctions package against Russia and additional restrictive measures against Belarus

On **23 October 2025**, the EU adopted its 19th package of restrictive measures (sanctions) against the Russian Federation. Concurrently, the EU has also adopted further restrictive measures targeting the Republic of Belarus.

The measures were adopted through:

- Council Regulation (EU) 2025/2033 of 23 October 2025 amending Regulation (EU) No 833/2014;¹
- Council Regulation (EU) 2025/2037 of 23 October 2025 amending Regulation (EU) No 269/2014;²
- Council Implementing Regulation (EU) 2025/2035 of 23 October 2025 implementing Regulation (EU) No 269/2014;³
- Council Implementing Regulation (EU) 2025/2039 of 23 October 2025 implementing Article 8a (1) of Regulation (EC) No 765/2006;⁴ and
- Council Regulation (EU) 2025/2041 of 23 October 2025 amending Regulation (EC) No 765/2006.⁵

This package amends the EU's existing sanctions framework with a combination of (i) additional listings of persons and entities, (ii) expanded sectoral restrictions and export-

¹ Council Regulation (EU) 2025/2033 of 23 October 2025 *amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine*; full text accessible at the following link: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202502033.

² Council Regulation (EU) 2025/2037 of 23 October 2025 *amending Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine*; full text accessible at the following link: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202502037.

³ Council Implementing Regulation (EU) 2025/2035 of 23 October 2025 *implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine*; full text accessible at the following link: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202502035.

⁴ Council Implementing Regulation (EU) 2025/2039 of 23 October 2025 *implementing Article 8a(1) of Regulation (EC) No 765/2006 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine*; full text accessible at the following link: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202502039.

⁵ Council Regulation (EU) 2025/2041 of 23 October 2025 *amending Regulation (EC) No 765/2006 concerning restrictive measures in view of the situation in Belarus and the involvement of Belarus in the Russian aggression against Ukraine*; full text accessible at the following link: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202502041.

control measures, (iii) measures directed at specific revenue channels and modes of circumvention or frustration of the purpose of sanctions, and (iv) prior notification requirement and authorisations for travel and transit through EU Member States for diplomatic and consular personnel of Russia.

Outlined below are the main elements and principal legal changes effected by the adoption of the latest package.

New Designations

The EU has imposed asset freeze measures on a total of 64 persons under **Regulation (EU) No 269/2014**, consisting of 22 individuals and 42 entities, including entities established in third countries (United Kingdom, China, Hong Kong, United Arab Emirates and Kyrgyzstan).

The EU has also introduced a new listing criterion under **Regulation (EU) No 269/2014** providing for a legal basis to designate those *“responsible for, supporting or implementing actions or policies contributing to the deportation, forced transfer, forced assimilation, including indoctrination, or militarized education of Ukrainian minors.”*⁶

Among those that have been recently designated are Russia’s largest gold producer (PJSC Polyus); Russian conglomerate active in the oil sector established in Tatarstan (LLC Yadrant-Group); and various third-country operators accused of facilitating Russian revenue streams (including two Chinese refineries and a Chinese oil trader). Moreover, under the new listing criterion, the EU has designated businesspeople and entities within the Russian military-industrial complex, and non-Russian (UAE and China) operators producing or supplying military and dual-use goods to Russia, as well as individuals involved in the abduction, forced assimilation and militarized education of Ukrainian minors.

In order to align terminology across its legal acts, the EU has included in **Regulation (EU) No 269/2014** definitions of “**owning**”⁷ and “**controlling**”⁸ a legal person, entity

⁶ Article 3(1)(n), Council Regulation (EU) No 269/2014 (consolidated version); Article 1(3) of Council Regulation (EU) 2025/2037, of October 23, 2025, OJ 23.10.25.

⁷ Article 1 of Regulation (EU) No 269/2014 provides: “‘owning’ a legal person, entity or body means being in possession of 50 % or more of the proprietary rights of a legal person, entity or body, or having a majority interest therein.”

⁸ Article 1 of Regulation (EU) No 269/2014 provides: “‘controlling’ a legal person, entity or body means, but is not limited to:

(i) having the right or exercising the power to appoint or remove a majority of the members of the administrative, management or supervisory body of a legal person, entity or body;

(ii) having appointed solely as a result of the exercise of one’s voting rights a majority of the members of the administrative, management or supervisory bodies of a legal person, entity or body who have held office during the present and previous financial year;

or body by applying the definition already provided in both the EU Best Practices (as updated in July 2024) for the effective implementation of EU restrictive measures, and in Council Regulation (EC) No 2580/2001.⁹

Lastly, the asset freeze provision under article 2 of **Regulation (EU) No 269/2014** has been amended as follows:

- 1. All funds and economic resources belonging to, owned, held or controlled by any natural or legal persons, entities or bodies listed in Annex I shall be frozen.*
- 2. No funds or economic resources shall be made available, directly or indirectly, to or for the benefit of natural or legal persons, entities or bodies listed in Annex I.*

Therefore, the reference to “*natural or legal persons, entities or bodies associated with*” designated persons and/or entities listed in Annex I was deleted, maintaining the wording “*owned or controlled*” by a designated person.

Furthermore, the EU has designated five persons (two individuals and three entities) under **Regulation (EC) No 765/2006** under the Belarus program.

Energy-related measures

With the 19th package, the scope of sectoral measures targeting the energy sector of the Russian Federation economy has been expanded.

In particular, the EU has imposed a ban on the import of Russian liquefied natural gas (LNG) into the EU. Under the adopted timetable, long-term LNG contracts become

(iii) controlling alone, pursuant to an agreement with other shareholders in or members of a legal person, entity or body, a majority of shareholders’ or members’ voting rights in that legal person, entity or body;

(iv) having the right to exercise a dominant influence over a legal person, entity or body, pursuant to an agreement entered into with that legal person, entity or body or to a provision in its Memorandum or Articles of Association, where the law governing that legal person, entity or body permits its being subject to such agreement or provision;

(v) having the power to, de facto, exercise the right to exercise a dominant influence referred to in point (iv), without being the holder of that right;

(vi) having the right to use all or part of the assets of a legal person, entity or body;

(vii) managing the business of a legal person, entity or body on a unified basis, while publishing consolidated accounts; or

(viii) sharing jointly and severally the financial liabilities of a legal person, entity or body, or guaranteeing them.”

⁹ Council Regulation (EC) No 2580/2001 of 27 December 2001 on specific restrictive measures directed against certain persons and entities with a view to combating terrorism; full text accessible at the following link: <https://eur-lex.europa.eu/eli/reg/2001/2580/oj/eng>.

subject to the ban as of 1 January 2027, while short-term contracts are to be phased out within six months and by 25 April 2026.¹⁰

The package simultaneously tightens transactional restrictions applicable to certain major Russian state-owned oil producers and adds targeted listings of corporate actors active within the Russian oil sector. In particular, the existing transaction ban¹¹ in **Regulation (EU) No 833/2014** on two major Russian state-owned oil producers (**Rosneft PJSC** and **Gazprom Neft PJSC**) was amended.¹²

In order to counter identified marine circumvention, the EU (i) has designated 117 additional vessels subject to port-access and service prohibitions as set out in Annex XLII to **Regulation (EU) No 833/2014**, bringing the total number of designated vessels in the context of the so-called “*shadow fleet*” to 557; and (ii) has prohibited the re-insurance of those designated vessels.¹³

Military and industrial complex, trade measures and export control

Export bans have been introduced under Annex XXIII to **Regulation (EU) No 833/2014**, listing goods which generate significant revenues for Russia. This now covers products such as salts and ores, articles of rubber, tubes, tyres, millstones, and construction materials.¹⁴

These inclusions have also been mirrored for Belarus with additional listings in Annex XVIII of **Regulation (EC) No 765/2006**.¹⁵

Moreover, the list of advanced goods and technologies subject to export prohibition set out in Annex VII to **Regulation (EU) No 833/2014** has been expanded and now includes electronic components, rangefinders, additional chemicals used in the

¹⁰ Article 3ra of Regulation (EU) No 833/2014.

¹¹ Article 5aa of Regulation (EU) No 833/2014.

¹² More specifically, the new measures eliminate the applicability of the prior exemption for Rosneft and Gazprom Neft's oil and gas imports from or through Russia into the EU and provide for a limited exemption for Rosneft in connection to transactions related to the transit of oil or refined petroleum products originating in a third country that are only being loaded in, departing from or transiting through Russia, provided that both the origin and the owner of those goods are non-Russian. Moreover, without prejudice to the prohibition in Article 3m of Regulation (EU) No 833/2014, the EU has included exemptions to the transactions ban for transactions necessary for the trading, brokering, transport, including through ship-to-ship transfers to third countries, and the related technical assistance, brokering services or financing or financial assistance of, crude oil and petroleum products, originated in or exported from Russia as long as the purchase price per barrel of such products does not exceed the Oil price cap established by the EU. On the other hand, the divestment exemption and derogation have been extended until 31 December 2026, as mentioned in the below dedicated sections of this document.

¹³ Article 3s of Council Regulation (EU) No 833/2014.

¹⁴ Article 3k of Regulation (EU) No 833/2014.

¹⁵ Article 1bb of Regulation (EC) No 765/2006.

preparation of propellants, and additional metals, oxides and alloys used in the manufacturing of military systems.¹⁶

These inclusions have also been mirrored for Belarus with additional listings in Annex Va of **Regulation (EC) No 765/2006**.¹⁷

Annex IV to **Regulation (EU) No 833/2014** has been updated to include **45** additional entities now subject to stricter export restrictions on dual-use goods and technologies capable of contributing to the technological advancement of Russia's defense and security sector, including export and circumvention of CNC machine tools,¹⁸ micro-electronics, unmanned aerial vehicles and other advanced technology goods, 17 of which are based in third countries (12 in China, including Hong Kong, three in India, two in Thailand).

The package further establishes a prohibition on the provision by EU operators of services directly related to tourism activities within the Russian Federation.

The prohibition of purchase, import and transfer into the EU under Article 3i has been extended to include all acyclic hydrocarbons originating in Russia or exported from Russia as listed in Annex XXI of **Regulation (EU) No 833/2014**.¹⁹ The same EU import ban has been provided for goods originating in or exported from Belarus and listed in Annex XXVII of **Regulation (EC) No 765/2006**.²⁰

Financial and crypto asset measures

In respect of the financial and crypto assets sector, this package extends the prohibitions against instruments, persons and platforms used to circumvent existing restrictions.

In particular, the package establishes a prohibition for EU operators, as from January 2026, to connect to any systems of the Central Bank of Russia or to systems provided by any person, entity or body incorporated or constituted under Russian law that include a financial messaging functionality, including the Russian National Payment Card System ("**Mir**") and the Fast Payments System ("**SBP**").²¹

Furthermore, due to Russia's increased use of crypto assets, notably the stablecoin "A7A5," starting from 25 November 2025 the EU has prohibited transactions involving A7A5 in the EU.²²

¹⁶ Article 2a of Regulation (EU) No 833/2014.

¹⁷ Article 1f of Regulation (EC) No 765/2006.

¹⁸ Computer Numerical Control (CNC) machines are automated manufacturing tools that are controlled by a computer executing preprogrammed sequences of machine control commands.

¹⁹ Article 3i of Regulation (EU) No 833/2014.

²⁰ Article 1ra of Regulation (EC) No 765/2006.

²¹ Article 5ac of Regulation (EU) No 833/2014.

²² Article 5ba of Regulation (EU) No 833/2014.

The already existing prohibition on the provision of crypto asset services to Russian nationals or natural persons residing in Russia, or to entities established in Russia, has been extended by including among the restricted services the issuing of payment instruments, acquiring of payment transactions, or payment initiation services and the issuing of electronic money.²³ The same prohibition went into effect under the Belarus sanctions framework.²⁴

The list of third-country credit and financial institutions and crypto asset service providers in Annex XLV to Regulation (UE) No 833/2014 subject to a transaction ban has been extended to include entities from Tajikistan, Kyrgyzstan, the United Arab Emirates and Hong Kong that allegedly frustrate the purpose of sanctions. In order to fight against the proliferation of new entities succeeding to listed ones, the EU has extended the transaction ban to also target those mirror/successor entities that satisfy at least two of the following criteria: (a) substantially identical content, feeds or transaction flows; (b) continuity of branding, design or user interface; (c) overlapping ownership, control or management; (d) redirection or migration of users from a listed entity; and (e) continuity of technical infrastructure, including use of the same code base, domains or applications.²⁵

Furthermore, five additional Russian banks ('NPO' "Istina" (JSC), LLC "Zemsky Bank," Commercial Bank Absolut Bank (PAO), PJSC "MTS Bank" and JSC "ALFA-BANK") have been targeted with a transaction ban.²⁶

Moreover, significant restrictions have been introduced on economic relations with entities operating in 9 Russian special economic zones²⁷ listed in Annex LII of Regulation (EU) No 833/2014.²⁸

These measures ban acquiring or extending ownership or control of entities in these zones, creating new joint ventures or branches, entering into new supply contracts, and providing financing or investment services connected to such entities. As of 25 January 2026, the restrictions extend to maintaining existing ownership, joint ventures, branches, contracts, or financing arrangements with entities listed in Part A of Annex LII of Regulation (EU) No 833/2014.

²³ Article 5b of Regulation (EC) No 765/2006.

²⁴ Article 1u of 1ra of Regulation (EC) No 765/2006.

²⁵ Article 5ad of Regulation (EU) No 833/2014.

²⁶ Article 5h of Regulation (EU) No 833/2014.

²⁷ The "*special economic, innovation and preferential zones*" referenced in Annex LII of Regulation (EU) No 833/2014 are designated territories within the Russian Federation that enjoy particular legal, fiscal, or operational advantages intended to promote economic development, technological innovation, or preferential trade. These zones may provide reduced taxation, streamlined administrative procedures, or other benefits to resident companies.

²⁸ Article 5ah of Regulation (EU) No 833/2014.

Limited exceptions apply for public health or environmental emergencies, certain energy or raw material imports, humanitarian activities, research and production of medical or agricultural goods, contract execution prior to 24 October 2025, divestment or wind-down of operations, and essential telecommunications and data services.

Provision of services

The measures governing the prohibition on the provision of services has been restated and amended.²⁹

The following have been added to the list of restricted services as of 25 November 2025:

- commercial space services consisting of Earth observation or satellite navigation;
- artificial intelligence services consisting of access to models or platforms for training, fine-tuning, and inference thereof; and
- high-performance computing services, including access to accelerated computing services with graphics processing units, or quantum computing services.

A ban on the provision of “*services directly related to tourism in Russia*” has been introduced. This prohibition is different from the prohibition of other services restricted under the same Article 5n which targets the provision of services to the Russian government, or entities incorporated in Russia.

Moreover, prior authorization is now required for the direct or indirect provision to the Russian government of any services other than those already prohibited under Article 5n, paragraphs 1 and 2 of Regulation (EU) No 833/2014. National competent authorities will be entitled to issue such licenses on the basis of a specific, case-by-case assessment.

For these last two restrictions, a temporary derogation has been provided for until 1 January 2026 for the performance of contracts concluded before 24 October 2025.

With respect to **Belarus**, mirroring the measures already adopted for Russia, the EU has prohibited, as of 25 November 2025, the supply of commercial space-based, artificial intelligence (AI) and high-performance computing services to the Belarus government, to entities established in Belarus and to any natural person and entity acting on behalf or at the direction of the Republic of Belarus, its government, its public bodies, corporations or agencies. Transitional arrangements are provided for contracts concluded before 24 October 2025, allowing limited continuation until 1 January 2026.

Moreover, the list of software with certain uses in the banking and financial sector under Annex XXVI of Regulation (EC) No 765/2006 whose provision is prohibited to the abovementioned subjects has been extended.

²⁹ Article 5n of Regulation (EU) No 833/2014.

An equivalent **authorization mechanism for services** not already restricted has been provided when in favor of the Republic of Belarus, its government, its public bodies, corporations or agencies.³⁰

Divestment Derogations

A certain number of derogations linked to divestment from Russia or involving certain Russia persons and/or entities have been extended until 31 December 2026.³¹

Movement of Russian diplomats

The package also introduced a prior notification requirement for all diplomatic or consular personnel who intend to travel to or transit through the territory of any Member State, except when entering or transiting the Member State that has issued a residence permit or visa. Such travel must be notified at least 24 hours in advance to the Member State(s) concerned. Furthermore, a Member State may impose an authorization requirement for travel or transit, even where a visa or residence permit has been issued by another Member State.³²

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³⁰ Article 1jc of Regulation (EC) No 765/2006.

³¹ Derogation applicable to prohibition provided in Articles 2, 2a, 3, 3b, 3c, 3f, 3h, 3k, 3g, 3i, 5aa, 5n and 11 of Regulation (EU) No 833/2014.

³² Article 5v and Article 5w of Regulation (EU) No 833/2014.

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