

CLIENT ALERT

OCTOBER 16, 2026

EU lists almost 1,600 additional individuals and entities in its latest sanctions against Russia

On October 12, 2026, the Council of the European Union announced a new wave of restrictive measures against Russia, centered on what the Council describes as its largest-ever package of individual listings. The measures add 1,569 new listings of individuals and entities which, according to the Council, are involved in Russia's military and industrial complex.

The Council also added 74 persons who were candidates in the recent Russian legislative elections held in the territories disputed between Russia and Ukraine and 3 members of the Central Election Commission of the Russian Federation organizing such elections.

The newly-added listings bring the total number of active listings under the sanction's framework supporting Ukraine's territorial integrity close to 4,600¹.

The new measures were adopted through:

- Council Decision (CFSP) 2026/2279 of 12 October 2026 adding 826 entities and 737 individuals to Annex I to Decision 2014/145/CFSP;²
- Council Implementing Regulation (EU) 2026/2281 of 12 October 2026 adding 826 entities and 737 individuals to Annex I to Regulation (EU) No 269/2014;³
- Council Decision (CFSP) 2026/2291 of 12 October 2026 adding 77 individuals involved in the Russian elections in occupied territories to Annex I to Decision 2014/145/CFSP;⁴ and

² Council Decision (CFSP) 2026/2279 of 12 October 2026 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 2026/2279, 12.10.2026, ELI: <http://data.europa.eu/eli/dec/2026/2279/oj>

³ Council Implementing Regulation (EU) 2026/2281 of 12 October 2026 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 2026/2281, 12.10.2026, ELI: http://data.europa.eu/eli/reg_impl/2026/2281/oj

⁴ Council Decision (CFSP) 2026/2291 of 12 October 2026 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 2026/2291, 12.10.2026, ELI: <http://data.europa.eu/eli/dec/2026/2291/oj>

- Council Implementing Regulation (EU) 2026/2292 of 12 October 2026 adding 77 individuals involved in the Russian elections in occupied territories to Annex I to Regulation (EU) No 269/2014.⁵

Asset freezes and prohibition to make funds available

Individuals and entities listed in Annex I to Regulation (EU) No 269/2014 are subject to a comprehensive asset freeze, which covers all funds and economic resources belonging to, owned, held or controlled by the listed persons.⁶ It is also prohibited to make funds and economic resources available to such listed persons.⁷ The terms ‘funds’ and ‘economic resources’ are construed broadly to include assets of any kind.⁸ In practice, listed persons cannot access, use, transfer, or otherwise dispose of, any existing or new funds.

In addition, natural persons listed in Annex I to Regulation (EU) No 269/2014 are subject to a travel ban within the Union.

Entities and persons required to comply with EU sanctions

EU sanctions apply, in principle, within the territory of the Union and aboard any aircraft or vessel registered in the Union. Foreign nationals and entities incorporated outside the EU shall comply with EU sanctions in respect of any business done in the EU.⁹

EU nationals and entities incorporated in the EU are required to comply with EU sanctions in all their activities, whether inside or outside the EU.¹⁰ Notably, EU persons and entities are under a best efforts obligation to ensure that any entity incorporated outside the EU that they own or control does not undermine EU sanctions.¹¹

Reporting obligations

Persons and entities listed in Annex I to Regulation (EU) No 269/2014 shall report to the national competent authorities any funds or economic resources within the relevant jurisdiction. The reporting shall take place within 6 weeks from the day of listing.¹²

⁵ Council Implementing Regulation (EU) 2026/2292 of 12 October 2026 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L, 2026/2292, 12.10.2026, ELI: http://data.europa.eu/eli/reg_impl/2026/2292/oj

⁶ Article 2(1) of Regulation (EU) No 269/2014.

⁷ Article 2(2) of Regulation (EU) No 269/2014.

⁸ See Article 1(d) and (g) of Regulation (EU) No 269/2014.

⁹ Article 17 of Regulation (EU) No 269/2014.

¹⁰ *Id.*

¹¹ Article 13a of Regulation (EU) No 269/2014.

¹² Article 9(2) of Regulation (EU) No 269/2014.

Persons and entities holding funds and economic resources of listed persons within the Union shall likewise provide information to the national competent authorities.¹³

Remedies

Newly-added persons and entities to Annex I to Regulation (EU) No 269/2014 may contest their listing by submitting an application for reconsideration to the Council. They can also seek judicial review by filing an application for annulment before the General Court.

Strict deadlines apply in each case, which should be assessed promptly and on an individualized basis.

About Curtis

Curtis, Mallet-Prevost, Colt & Mosle LLP is a leading international law firm. Headquartered in New York, Curtis has 19 offices in the United States, Latin America, Europe, the Middle East and Asia. Curtis represents a wide range of clients, including multinational corporations and financial institutions, governments and state-owned companies, money managers, sovereign wealth funds, family-owned businesses, individuals and entrepreneurs.

Curtis' multijurisdictional [economic sanctions and export control](#) has deep knowledge of EU sanctions and can provide full-spectrum legal services, including representation before the Courts of the EU, Member State Courts and National Competent Authorities.

For more information about Curtis, please visit www.curtis.com.

Attorney advertising. The material contained in this Client Alert is only a general review of the subjects covered and does not constitute legal advice. Clients should seek specific legal advice in relation to their individual circumstances.

¹³ Article 8 of Regulation (EU) No 269/2014.

Please feel free to contact any of the persons listed below if you have any questions on this important development:



Gianluca Cattani

Partner
gcattani@curtis.com
Rome: +39 06 6758 2228



Elena Klonitskaya

Partner
eklonitskaya@curtis.com
Brussels: +32 474 42 75 77



Edoardo Zucchelli

Partner
ezucchelli@curtis.com
Milan: +39 02 7623 2001



Mikhail Bychikhin

Counsel
mbychikhin@curtis.com
Dubai: +971 4 382 6100



Alice Venturini

Counsel
aventurini@curtis.com
Milan: +39 02 7623 2001



Sofia Forestiere

Associate
sforestiere@curtis.com
Rome: +39 06 6758 2201



**Tatiana
Gordievskaya**

Associate
tgordievskaya@curtis.com
Dubai: +971 4 382 6100



Anastasios Lafaras

Associate
alafaras@curtis.com
Paris: +33 1 42 68 72 92