

## SANCTIONS: TWO WEEKS OVERVIEW

### EU

#### ECJ upholds sanctions against SBK Art

On 16.12.2022, sanctions were imposed on SBK Art LLC, a Sberbank subsidiary. On 26.02.2023, the company appealed to the ECJ, arguing that at the time the sanctions were introduced due to its connection with Sberbank, it had already been sold to a third party and was no longer under Sberbank's control.

On 30.04.2025, the ECJ dismissed the action, stating that the sale of shares had been carried out without the authorization of sanctions regulators (see [digest](#) of 13.05.2025).

Prior to this ruling, another action had been filed, challenging the renewal of sanctions in September 2024 and March 2025. On 26.11.2025, the ECJ [dismissed](#) the second action with the same reasoning. Specifically, the ECJ noted:

- SBK Art LLC is a Sberbank SPV, whose sole purpose is to hold depositary receipts and bonds of the Dutch company Fortenova Group TopCo;
- The transaction in Russia involving the sale of shares in the Russian LLC between Russian companies and a UAE investor falls under EU Regulation 269. This is because the applicant's sole asset is located in the EU, has been frozen since July 2022, and any change in its status is only possible with the consent of the Dutch sanctions regulator;
- SBK Art LLC and the UAE investor had the opportunity to obtain a license (under Article 6b(2b) of Regulation 269) permitting the partial unfreezing of Sberbank's assets, but did not utilize it.

#### ECJ does not lift sanctions against M. Bazhaev

On 8.04.2022, sanctions were imposed on M. Bazhaev as a leading businessman (criterion (g)). An action challenging these sanctions was filed on 18.06.2022 and dismissed on 11.09.2024 (see [digest](#) of 17.09.2024).

A second action was filed on 24.11.2024. On 26.11.2025 it was also [dismissed](#).

Among other points, the ECJ considered the applicant's connection with VEB.RF (associated), stating that the applicant's and VEB.RF's shared interest in developing Russian Platinum is evidenced by a long-term loan agreement for approximately €7.3 billion, designated for the implementation of a large infrastructure project. The ECJ further noted that the economic significance, scale, and duration of this project prevent it from being considered an ordinary commercial transaction.

### USA

#### OFAC authorizes transactions related to Hungarian Paks-2 nuclear power plant

On 21.11.2025, OFAC [published](#) General License No. 132, authorizing a number of Russian banks and their subsidiaries, including Gazprombank, Sberbank, VTB, and Alfa-Bank, to conduct transactions related to the Paks-2 nuclear power plant – a Rosatom project in Hungary.

Previously, on 27.06.2025, OFAC also [issued](#) General License No. 115B, authorizing payments to Russian banks for operations in the nuclear energy sector.

#### Third US cyber sanctions this year

On 19.11.2025, the United States, Australia, and the United Kingdom [imposed sanctions](#) on Media Land, a Russian software provider that enables cybercrime and evades detection (The UK also sanctioned Aeza Group LLC, which was previously added to OFAC's list earlier this year for similar activities).

These are the third US cyber sanctions against Russian entities in 2025. Previous ones were imposed in February and July. Additionally, in August, sanctions were imposed against a payment system linked to the Russian cryptocurrency A7A5.

#### Maneuvers around Lukoil

On 22.10.2025, sanctions were imposed against Lukoil and Rosneft (see [digest](#) of 03.11.2025). On 14.11.2025, General License No. 131 was issued, authorizing transactions necessary for negotiations regarding the sale of Austrian company Lukoil International GmbH until 13.12.2025 (see [digest](#) of 17.11.2025).

On 19.11.2025, OFAC published a [clarification](#) stating that the US Treasury Department will evaluate the terms of the potential sale of the aforementioned Austrian company and may revoke the said License No. 131 in the event of bad-faith negotiations.

Concurrently, the UK's OFSI:

- On 20.11.2025, expanded the list of Lukoil's Bulgarian subsidiaries in its [general license](#), synchronizing it in this part with US License No. 130. However, OFSI maintained a discrepancy in validity periods: the OFSI license is valid until 14.02.2026, while the earlier OFAC license is valid until 29.04.2026;
- On 26.11.2025, issued a [general license](#) for payments to and from Lukoil International GmbH. This license is valid until 26.02.2026.

#### WHAT TO EXPECT IN THE NEXT TWO WEEKS:

- ECJ decisions in the Timchenko spouses' cases.