

SANCTIONS: TWO WEEKS OVERVIEW

UK

[UK Expands Sanctions List](#)

On 15.10.2025, the UK sanctions list was expanded to include 39 Russian and foreign companies and individuals, including Rosneft, Lukoil, NSPK, as well as companies from Singapore, China, the UAE, and Turkey. Sanctions have also been imposed on 44 tankers, citing their involvement in the transportation of Russian oil.

OFSI has issued 2 [general licenses](#) allowing for the cessation of operations with Rosneft, Lukoil, non-Russian energy companies, and their subsidiaries and controlled entities until 28.11.2025, inclusive.

As a reminder, I. Sechin and V. Alekperov were previously sanctioned by the UK on 10.03.2022 and 13.04.2022, respectively.

Furthermore, following the EU's 18th package, the import of petroleum products manufactured from Russian oil by third countries has been prohibited.

EU

[ECJ Deems Extension of Sanctions Against G. Pumpyanskaya Unjustified](#)

On 09.03.2022, sanctions were initially imposed on G. Pumpyanskaya. Subsequently, the sanctions were repeatedly extended but successfully challenged in the ECJ: the decision to impose sanctions was overturned on 26.06.2024 (see [digest](#) of 01.07.2024), and the decision to extend the sanctions from March 2024 was overturned on 02.04.2025 (see [digest](#) of 17.04.2025).

On 15.10.2025, the ECJ, among other things, stated that in the case of D. Pumpyanskiy (see [digest](#) of 22.09.2025), the EU Council failed to prove his status as a "leading businessperson." Consequently, the application of restrictive measures to G. Pumpyanskaya is no longer justified, and the Court overturned the decision to extend the sanctions from 14.03.2025.

The case took 6 months to be reviewed.

[ECJ: Obligation to Report Assets in the EU Does Not Constitute a Restrictive Measure](#)

On 14.10.2022, G. and E. Timchenko appealed to the ECJ, challenging amendments to Regulation 269 that required sanctioned persons to declare all European assets and accounts within 6 weeks. On 11.09.2024, the lawsuit was dismissed. An appeal was filed on 21.11.2024.

On 16.10.2025, the ECJ (appellate court) rejected the appeal, stating, among other things:

- the obligation for sanctioned persons to declare assets is not a separate sanction in itself, but rather serves to enforce the asset freeze and prevent circumvention of the prohibition;

- the EU Council has the right to adopt any such measures within the framework of EU Regulations.

The review of the appeal took 11 months.

[Sanctions – 1, Benfica – 0: Portugal Investigates Sanctions-Related Payments for Footballer Transfer](#)

In 2023, Argentine footballer German Conti transferred from Portuguese club Benfica to Lokomotiv Moscow. In January 2024, Lokomotiv sold the player and transferred a percentage of the sale (EUR 76,000) to Benfica from its account at Raiffeisenbank.

BCP, Benfica's bank, deemed the transfer suspicious and notified the Public Prosecutor's Office (MP). On their instruction, the transfer of funds was returned to the sender. The Public Prosecutor's Office (DCIAP) has also launched an investigation against Benfica's president and financial director. The president of Benfica was questioned on 15.07.2025. News of this investigation was published in Portuguese media on 06.10.2025.

The prosecution argues that Lokomotiv is controlled by sanctioned entities: TransTeleCom and VTB Bank. The DCIAP cites that VTB Bank's shareholder is Marathon Group, owned by Vinokurov, and that TransTeleCom is controlled by Russian Railways (RZD). In turn, Vinokurov, VTB Bank, and RZD are subject to EU sanctions.

Money laundering is also included in the charges, despite the direct transfer of funds between the clubs.

In Portugal, violating international sanctions carries a penalty of 1 to 5 years of imprisonment or a fine in cases of negligence. According to media reports, the Public Prosecutor's Office intends to drop the case provided a fine is paid.

USA

[OFAC Removes Turkish Company Linked to Rosatom from SDN List](#)

On 15.01.2025, sanctions were imposed on a Turkish shipyard company for conducting business with FSUE Atomflot – a subsidiary of Rosatom (construction of a floating dock for servicing and repairing nuclear icebreakers).

On 09.10.2025, the Turkish company was removed from the SDN list. No reasons were provided for the removal of the sanctions.

WHAT TO EXPECT IN THE NEXT TWO WEEKS:

- Preparation of the 19th sanctions package.
- ECJ decisions in the M. Gutseriev case.