

27 February 2024

Russia: EU sanctions

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The European Union's Regulation no. 833/2014 imposes a ban on European operators from directly or indirectly providing certain services to the Russian Government or any legal entity established in Russia.

The prohibited services are specified in the art. 5n of the Regulation and include accounting, auditing, tax consultancy, architecture and engineering services, legal and IT consultancy, market research and opinion polls as well as lastly access to specific management software.

As of today (**February 27, 2024**), the aforementioned prohibition does not apply to the provision of services provided for the exclusive use of legal persons, entities or bodies established in Russia which are owned or under the control, including joint control, of European companies. This exemption does not apply, however, in the case of Russian entities owned or controlled by natural persons, European citizens.

With the adoption of the twelfth package of sanctions, the aforementioned exception was limited in time until **20 June 2024**. After that date, the provision of the prohibited services to Russian subsidiaries of European companies must be authorized in advance by the relevant national authority.

The Russian subsidiaries and/or joint ventures of Italian economic operators will therefore be able to continue to benefit from the services referred to in the art. 5n requiring a prior authorisation from the relevant national authority - UAMA (Unit for the authorization of armaments materials).

This request must be made through the appropriate E-licensing portal after creating an EU LOGIN digital identity (ECAS identity).

The UAMA is already operational, and requests for exemption can be submitted immediately.

Desk Russia and CIS Countries