

LALIVE THE DISPUTES POWERHOUSE

Swiss sanctions against Russia

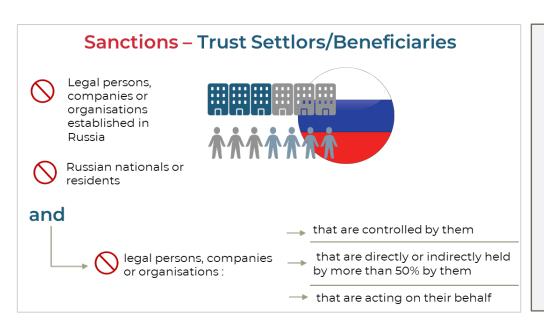
Dr. Simone Nadelhofer, Partner

Overview of Swiss sanctions

| Economic sanctions | Targeted sanctions | Financial sanctions |
|--|--|---|
| Export bans, e.g. on: military and dual-use goods goods from specific sectors (e.g. oil, energy and luxury sectors) | Asset freezes Entry and travel bans against approx. 1000 individuals | Including prohibitions on: • granting loans • accepting deposits • sale of marketable securities • transactions with certain |
| Import bans, e.g. on: coal and solid fossil fuels iron and steel products goods generating significant income (e.g. wood, cement, fertilizers, seafood, liquor) | and 80 entities | state-owned entities investments in energy sector trust serviceswhere Russian individuals or entities are involved + exclusion of certain Russian banks from SWIFT |

- Certain **exceptions** apply (e.g. for dual nationals/residents, humanitarian purposes)
- Violations punishable by prison sentence or fine
- Largely coincide with EU sanctions (subject to some deviations)

Prohibition concerning trusts



It is **prohibited** to:

- register or provide administrative or management services; and
- to act as, or arrange for another person to act as, a trustee in a similar position
- for a trust or similar legal arrangement
- where a Russian settlor and/or beneficiary is involved



Dr Simone Nadelhofer Partner, Zurich

snadelhofer@lalive.law