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PUBLICATION ON THE CONDITIONS FOR IDENTIFYING PERSONS SUBJECT TO INTERNATIONAL SANCTIONS

A person subject to international sanctions, i.e. Sanctioned Person means a natural person or legal entity or any other institution, or aggregation of assets or persons:

- (a) that is stated on the Sanctions List, is owned by such a person, is controlled by such a person or is a person acting on behalf of such a person;
- (b) that has its registered office or place of business in a sanctioned country, is organised or operates in a sanctioned country, i.e. in a country or territory subject to country-wide or territorial Sanctions, is established according to the rule of law of a sanctioned country, is owned by such a person, is controlled by such a person or is a person acting on behalf of such a person;
- (c) subject to Sanctions otherwise;
- (d) any natural or legal person owned or controlled by any of the natural person or legal entity mentioned above or acting on their behalf.

Sanction means any business, economic or financial sanction, embargo or other similar restrictive measure deriving from any legal regulation or other decision made by any Sanctions Authority.

Sanctions Authority means:

- (a) United Nations Security Council;
- (b) European Union;
- (c) United States of America;
- (d) the competent government institutions and agencies of any of the above mentioned authorities; or
- (e) any other competent government or regulatory authority, institution or agency that administers valid economic or financial sanctions, restrictive measures or embargo on trade including the Office of Foreign Assets Control of the US Department of Treasury ("OFAC") and the US Department of State.

Sanctions List means any publicly available list of specifically designated nationals and blocked persons or individuals or persons, entities or groups subject to Sanctions issued by the Sanctions Authority, as amended from time to time, for instance:

- (a) the Consolidated Financial Sanctions List maintained by the European Commission;
- (b) the Specifically Designated Nationals and Blocked Persons List maintained by the Office of Foreign Assets Control of the US Department of the Treasury (OFAC);
- (c) the Consolidated United Nations Security Council Sanctions List.