

## **Alert** | Export Controls & Economic Sanctions



May 2026

### **EU's 20th Russia Sanctions Package: Key Changes and Compliance Implications**

On 23 April 2026, the EU Council adopted its 20th package of restrictive measures against Russia, amending the core EU sanctions regulations that have been in place since 2014. The package expands existing restrictions across energy, finance, trade, and media, and introduces several new legal instruments, including the first use of the EU's anti-circumvention mechanism against a third country and strengthened legal protections for EU operators. Companies with exposure to Russia, Belarus, or related supply chains should review the changes as summarized in this GT Alert.

#### **Key Changes**

##### *1. Anti-Circumvention Mechanism: First Use Against a Third Country*

The Kyrgyz Republic has been formally designated as a jurisdiction where circumvention of EU export controls is systematic and persistent. Imports of controlled EU goods into Kyrgyzstan rose by approximately 800% compared to pre-war levels; re-exports to Russia rose by approximately 1,200%. The goods concerned, primarily machining centres and data transmission equipment, have been identified in Russian drone and missile production.

EU exporters are now required to apply enhanced due diligence when selling to Kyrgyz counterparties. In addition, 60 entities in Russia, China, Hong Kong, Turkey, the UAE, and Thailand have been newly listed

under Annex IV to Regulation (EU) No 833/2014 as supporters of Russia’s military-industrial complex or as circumvention actors, subjecting them to tightened export restrictions.

## *2. New Legal Protections for EU Operators*

Three new instruments are available to EU companies with Russia exposure:

- Anti-suit injunctions: Member State courts may now order Russian parties to refrain from initiating or continuing proceedings in Russian courts in breach of agreed jurisdiction or arbitration clauses, with financial penalties for non-compliance payable to the EU company.
- Third-country enforcement: EU companies may seek damages before Member State courts where Russian parties attempt to enforce Russian judgments in third countries outside Russia, closing a previously existing gap.
- Transaction bans: Russian entities that have benefited from Russia’s “temporary management” (i.e., compulsory transfer) of EU-owned assets, or that use intellectual property or trade secrets of EU rights holders without their consent under Russian forced-licensing legislation, are now subject to a transaction ban, prohibiting EU persons from making funds or economic resources available to them, directly or indirectly.

## *3. Energy: Shipping and LNG*

Three changes introduce new compliance obligations beyond the extension of the Russian shadow fleet list to 632 vessels:

- Mandatory “no Russia” clause: EU sellers of oil tankers must include a contractual prohibition on resale or transfer to Russia and conduct proportionate due diligence. Liability for a subsequent breach by a good-faith seller’s buyer rests with the third-country purchaser.
- LNG terminal services ban: From 1 January 2027, EU operators may not provide LNG terminal services to Russian entities. Existing contracts must terminate by that date.
- Maintenance ban: Technical and financial assistance for Russian-flagged or Russian-managed LNG tankers and icebreakers is prohibited with immediate effect.

## *4. Financial Sector: Crypto Ban and Additional Bank Restrictions*

The most significant change is the shift from listing individual crypto entities to a categorical sectoral ban. As of 24 May 2026, EU persons are prohibited from engaging in any transaction with crypto-asset service providers and decentralized trading platforms established in Russia – regardless of whether the individual platform has been specifically listed.

Additional measures include:

- The digital rouble and the RUBx stablecoin are prohibited instruments.
- Twenty additional Russian banks are excluded from the EU internal market, bringing the total to 70. Four banks in Kyrgyzstan, Laos, and Azerbaijan have been added for facilitating circumvention.
- Non-bank operators offering netting, set-off, or reconciliation services to route Russian transactions around sanctions are also newly restricted.

### *5. Export and Import Restrictions*

New export prohibitions cover goods worth over EUR 365 million, including chemicals, rubber and vulcanized rubber products, steel articles, tools for metal production, industrial tractors, laboratory glassware, and high-performance lubricants. New import prohibitions apply to metals, chemicals, minerals, and other revenue-generating goods worth over EUR 530 million, with an additional quota on ammonia. Companies should verify their product portfolios against the updated CN code listings in the EU sanctions legislation.

### *6. Managed Security Services*

As of 25 May 2026, the provision of managed security services to the Russian government and to entities established in Russia is prohibited. The prohibition covers services relating to cybersecurity risk management, including incident handling, penetration testing, security audits, and related consulting or expert advice, and extends to Russian subsidiaries of EU-incorporated companies, unless a licence is obtained from the competent national authority.

### *7. State Media and Research Funding*

Online platforms replicating content of already-banned Russian state media outlets are now subject to the same broadcasting prohibition as the original outlets. EU research institutions, universities, and associated individuals are prohibited from accepting Russian government funding in connection with research and innovation activities.

### *8. Belarus*

Key parallel measures introduced in the Belarus sanctions regime include a categorical ban on transactions with Belarusian crypto asset service providers (effective 24 May 2026), a prohibition on the Belarusian digital rouble, new import bans on metals and chemicals, and equivalent legal protections against abusive Belarusian court proceedings.

### **What This Means for Businesses**

The new measures affect companies across a wide range of sectors and geographies, not only those directly trading with Russia. Companies should assess whether the new restrictions affect their current business activities, contractual arrangements, or compliance frameworks, in particular if they:

- Operate in the energy, shipping, cybersecurity, financial services, or trade sectors.
- Have supply chains involving Kyrgyzstan, China, Hong Kong, Turkey, the UAE, or Thailand.
- Hold intellectual property or trade secrets that may be subject to unauthorized use under Russian forced-licensing legislation.
- Face ongoing or anticipated disputes with Russian counterparties.
- Receive Russian government funding for research or academic cooperation.

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