

RUSSIA-RELATED SANCTIONS

Practitioner's Reference Guide

All Four OFAC Programs: Russian Harmful Foreign Activities Sanctions (E.O. 14024)
Ukraine-/Russia-Related Sanctions (E.O. 13660/13661/13662/13685) | CAATSA Title II |
Magnitsky Sanctions

Field	Value
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Disclaimer	Not legal advice. Verify against current OFAC publications before use in compliance decisions.

1. How to Use This Guide

HOW TO USE THIS GUIDE

This guide covers all four OFAC Russia-related sanctions programs. Navigate by compliance task:

- **Counterparty screening:** Section 7 (Sanctions Lists), Section 8 (Compliance Checklist)
- **Transaction review — sectoral/SSI:** Section 4 (Ukraine/Russia — Directives), Section 5 (CAATSA Title II — Sec. 228)
- **Transaction review — blocking/SDN:** Section 3 (E.O. 14024 Blocking Prohibitions), Section 4.1 (E.O. 13660–13685 Blocking)
- **Import/export prohibitions and services:** Section 3.3 (E.O. 14066/14068/14071 Determinations)
- **Secondary sanctions exposure:** Section 3.5 (E.O. 14024 Sec. 11), Section 4.4 (31 CFR § 589.201) — [FAQ #869](#)
- **CAATSA Section 231 (defense-intelligence transactions):** Section 5.1
- **Licensing and wind-down:** Section 9 (Licensing)
- **Magnitsky designation basis and coverage:** Section 6
- **FAQs and official document index:** Sections 11–12

CRITICAL: DO NOT REASON BY ANALOGY ACROSS PROGRAMS

These four programs use similar concepts (e.g., "financial services," "significant transaction") but assign them different legal meanings. Rules that apply under one program do not necessarily transfer to another. Always identify which program's authority is operative before applying any threshold, definition, or exception.

2. How These Programs Interact

Russia-related sanctions are administered under four distinct but overlapping OFAC programs. Each has its own CFR part, designation authorities, and list consequences. Understanding the hierarchy is essential because a transaction may implicate more than one program simultaneously — and different programs impose different requirements.

2.1 Program Map

Program	CFR Part	Primary List	Operative Since
Russian Harmful Foreign Activities (RuHFA)	31 CFR Part 587	SDN List [RUSSIA-EO14024]	April 2021
Ukraine-/Russia-Related (URSR)	31 CFR Part 589	SDN + SSI Lists	March 2014
CAATSA Title II (Russia)	No separate CFR part (uses 589)	SDN + SSI Lists	August 2017
Magnitsky Sanctions	31 CFR Part 584	SDN List [MAGNIT]	December 2012

2.2 Legal Hierarchy and Precedence

No single program supersedes another. They layer additively:

- E.O. 13660 (2014) established the national emergency regarding Ukraine. All subsequent Ukraine/Russia EOs are issued pursuant to that declared emergency.
- CAATSA (2017) codified existing Ukraine/Russia sanctions under statute, making them harder to revoke, and added new mandatory designation categories.
- E.O. 14024 (2021) established a separate but related national emergency — Russia's harmful foreign activities — with its own blocking authority, sectoral machinery, and secondary sanctions under Section 11/12.
- Magnitsky operates under a completely separate statutory basis (P.L. 112-208) targeting individuals responsible for the detention, abuse, or death of Sergei Magnitsky, or engaged in Russian human rights abuses.

2.3 Which Program Controls When

A practitioner encountering a Russia-related counterparty should work through this sequence:

1. **SDN check:** Is the party on the SDN List under any tag? Blocking applies regardless of which program tagged them (E.O. 14024, UKRAINE-EO13660 through 13685, or MAGNIT).
2. **SSI check:** Is the party on the SSI List? If yes, identify which Directive (1–4 under E.O. 13662) applies — each Directive restricts different transaction types with different thresholds.
3. **NS-MBS check:** Is the party on the Non-SDN Menu-Based Sanctions (NS-MBS) List? This list is populated under E.O. 14024 Directives 1A, 2, and 3.
4. **CAATSA Section 231 exposure:** Is the counterparty in the defense or intelligence sector of the Russian Federation? If so, there is potential secondary sanctions exposure for any 'significant transaction.' No SDN designation required.
5. **Magnitsky:** Separate inquiry — is this party designated specifically under P.L. 112-208 [MAGNIT]? Blocking applies independently.

SAME ENTITY, MULTIPLE TAGS

An entity can appear on the SDN List under both [UKRAINE-EO13662] and [RUSSIA-EO14024] simultaneously. When this occurs, the strictest applicable restrictions govern the transaction. Sectoral SSI restrictions (Directive-based thresholds) do not apply to a person who is also fully blocked on the SDN List — full blocking is absolute and contains no thresholds.

2.4 General License Interactions Across Programs

General licenses are program-specific unless they explicitly state otherwise:

- [Russia-related General Licenses](#) (issued under E.O. 14024) apply to transactions prohibited under E.O. 14024 and related authorities. They do not extend to Ukraine-/Russia-related prohibitions under Part 589 unless the GL text specifically references Part 589.
- Ukraine GLs (e.g., Ukraine GL 26A) may cross-reference Russia-related GLs. Always read the specific GL text to determine which program(s) it covers.
- Safe harbor provisions (e.g., 31 CFR § 589.413(i)) are specific to the regulations in which they appear and do not carry over to secondary sanctions provisions in other instruments.

GL SAFE HARBOR DOES NOT CROSS TO SECONDARY SANCTIONS

The safe harbor at 31 CFR § 589.413(i) — which protects certain transactions with non-U.S. persons operating in sectors subject to sectoral sanctions — applies to the primary prohibitions in Part 589. It does not protect against secondary sanctions exposure under E.O. 14024 Section 11/12 or CAATSA Section 231. These secondary sanctions authorities contain no safe harbor.

KEY COMPLIANCE TAKEAWAY

Russia-related sanctions operate in overlapping layers. Each program must be analyzed separately; an authorization under one program does not imply authorization under another.

3. Chronological Timeline of Key Instruments

Listed in reverse chronological order. This table covers the instruments that built the current legal framework across all four Russia-related programs.

Date	Instrument	What It Added or Changed
Jan. 2025	E.O. 14024 Determination (Energy Sector)	Energy sector of Russian economy designated under Sec. 1(a)(i) of E.O. 14024; expanded SDN designation basis; coordinated with Gazprom Neft/Surgutneftegas SDN designations
Dec. 2023	E.O. 14114	Amended E.O. 14024; redesignated prior Section 11 as Section 12; added new Section 11 creating separate secondary sanctions basis for transactions involving Russia's military-industrial complex and designated items
Apr. 2022	E.O. 14071	Prohibited new investment in the Russian Federation; authorized OFAC to prohibit categories of services to Russia by Determination; foundation for IT, accounting, engineering, and petroleum services prohibitions
Mar. 2022	E.O. 14068	Prohibited certain imports (energy, seafood, diamonds, metals) and new investment in Russian energy sector; basis for G7 price cap implementation
Mar. 2022	E.O. 14066	Prohibited certain imports and new investments related to Russian efforts to undermine Ukrainian sovereignty; initial import ban package
Feb. 2022	E.O. 14065	Blocked property of certain persons; prohibited certain transactions with Donetsk and Luhansk regions; expanded Crimea-like treatment
Feb. 2022	E.O. 14024 Directives 1A, 2, 3, 4	Four directives issued under E.O. 14024 creating NS-MBS List restrictions (sovereign debt prohibition, correspondent account cut-off, new debt/equity restrictions, CBR/NWF/MoF transaction prohibition)
Aug. 2021	E.O. 14039	Authorized blocking property with respect to Russian energy export pipelines; basis for PEESA/Nord Stream 2 sanctions implementation

Date	Instrument	What It Added or Changed
Apr. 2021	E.O. 14024	Established new national emergency on Russian harmful foreign activities; created broad SDN blocking authority; predecessor to 31 CFR Part 587
Sep. 2018	E.O. 13849	Delegated CAATSA implementation authority to Treasury/State/DNI; enabled OFAC to impose menu-based sanctions under CAATSA Sections 224-235
Aug. 2017	CAATSA (P.L. 115-44)	Codified Ukraine/Russia sanctions under statute; added CAATSA Sec. 228 (financial system prohibitions); mandatory designation under Sec. 231 (defense/intelligence sector); Sec. 233 (privatization); Sec. 235 (pipeline sanctions); amended SSIDES and UFSA
Sep.–Oct. 2017	Directives 1, 2, 4 (as amended)	CAATSA amended E.O. 13662 Directives 1 and 2 to tighten debt maturity thresholds; created Directive 4 for defense sector
Dec. 2014	E.O. 13685	Blocked property of persons operating in Crimea; prohibited new investment, import, export in/from Crimea; near-comprehensive Crimea embargo
Sep. 2014	Directive 3 (E.O. 13662)	Applied sectoral restrictions to defense and related materiel sector; 30-day new debt threshold
Jul. 2014	E.O. 13662 Determinations	Made financial services and energy sectors of the Russian economy subject to E.O. 13662; populated Directives 1 and 2
Mar. 2014	E.O. 13662	Created sectoral sanctions architecture (SSI List); authorized designation of persons in key sectors of Russian economy (no blocking — transaction-type restrictions only)
Mar. 2014	E.O. 13661	Expanded blocking authority; blocked senior Russian officials and entities; expanded criteria from E.O. 13660
Mar. 2014	E.O. 13660	Declared national emergency with respect to Ukraine; established initial blocking authority for persons threatening peace, security, and sovereignty of Ukraine
Jan. 2014	SSIDES (P.L. 113-95)	Support for the Sovereignty, Integrity, Democracy, and Economic Stability of Ukraine Act; authorized sanctions on persons responsible for situation in Ukraine; authorized SSI sectoral sanctions
Dec. 2014	UFSA (P.L. 113-272)	Ukraine Freedom Support Act; expanded sanctions authorities; authorized OFAC to impose sanctions on persons providing materiel support to Russian defense sector
Dec. 2012	Magnitsky Act (P.L. 112-208)	Sergei Magnitsky Rule of Law Accountability Act; created authority to block persons responsible for Magnitsky's detention/abuse and those engaged in Russian human rights abuses

KEY COMPLIANCE TAKEAWAY

The Russia sanctions framework accumulated in layers over 12 years. The operative authority for any given counterparty or transaction will depend on which layer(s) it falls within — not just the most recent instrument.

4. Russian Harmful Foreign Activities Sanctions (E.O. 14024)

The Russian Harmful Foreign Activities Sanctions program — administered under [31 CFR Part 587](#) — is the broadest and most actively used of the four Russia programs. It is based on a separate national emergency from the Ukraine/Russia program and has its own blocking authority, four directives, and the Section 11/12 secondary sanctions framework.

4.1 Blocking Prohibitions — Section 1 of E.O. 14024

Section 1 of [E.O. 14024](#) blocks the property and interests in property of persons determined by the Secretary of the Treasury, in consultation with the Secretary of State, to meet specified criteria. The 50% Rule applies: entities owned 50% or more (individually or in aggregate) by blocked persons are themselves blocked, even if not listed.

4.1.1 Designation Criteria (Section 1(a))

- **Section 1(a)(i):** Persons who operate or have operated in a "technology," "defense and related materiel," "construction," "aerospace," "electronics," "marine," "quantum computing," "accounting," "trust and corporate formation," "management consulting," "metals and mining," "financial services," "transportation," "architecture," "engineering," "manufacturing," or "energy" sector of the Russian Federation economy. OFAC activates each sector by Determination.
- **Section 1(a)(ii):** Persons who operate or have operated in any sector of the Russian Federation economy identified by the Secretary of the Treasury pursuant to a published Determination.
- **Section 1(a)(iii):** Leaders, officials, senior executive officers, or board members of any person blocked under this section or of the Russian government; persons who have materially assisted or supported blocked persons; persons owned or controlled by blocked persons.
- **Section 1(a)(iv):** Persons responsible for or complicit in deceptive or structured transactions intended to evade U.S. sanctions with respect to the Russian Federation.

ACTIVE SECTOR DETERMINATIONS (as of May 2026)

Sectors currently subject to OFAC Determinations under E.O. 14024 include: financial services, defense and related materiel, aerospace, electronics, marine, quantum computing, accounting, trust and corporate formation, management consulting, metals and mining, transportation, architecture, engineering, construction, manufacturing, and energy. Each Determination activates the corresponding sector for Section 1(a)(i) designations.

4.2 E.O. 14024 Directives (NS-MBS List)

OFAC has issued four Directives under E.O. 14024. Persons subject to these Directives are placed on the Non-SDN Menu-Based Sanctions (NS-MBS) List, not the SDN List. They are not fully blocked — specific transaction types are prohibited.

Directive	Subject	Key Prohibition
Directive 1A	(Feb. 22, 2022) Sovereign Debt	U.S. persons may not participate in the primary or secondary market for new sovereign debt issued on/after Feb. 1, 2022 by the Russian Central Bank, National Wealth Fund, or Ministry of Finance. "New" sovereign debt means issuances on/after Feb. 1, 2022.
Directive 2	(Feb. 24, 2022) Correspondent/Payable-Through Accounts	U.S. financial institutions may not open or maintain correspondent or payable-through accounts for, or process transactions involving, certain Russian financial institutions (Gazprombank, VTB, Sberbank, and others). See FAQ #869.
Directive 3	(Feb. 24, 2022) New Debt/Equity	U.S. persons may not engage in transactions involving new debt (maturity > 14 days) or new equity of listed entities, or any debt or equity issued on/after Feb. 24, 2022 by the Central Bank of Russia, National Wealth Fund, or Ministry of Finance.
Directive 4	(as amended May 2023) CBR/NWF/MoF Transactions	U.S. persons may not engage in any transaction involving the Central Bank of the Russian Federation, National Wealth Fund of the Russian Federation, or Ministry of Finance of the Russian Federation (the "Sovereign Transactions Directive"). See FAQ #1118.

DIRECTIVE 4: NEAR-COMPREHENSIVE CBR/NWF/MOF PROHIBITION

Directive 4 is not limited to financial transactions. It prohibits **any transaction** involving the three covered institutions, including transactions that are merely facilitated by, or pass through, those institutions. General License 13 (and its successors, now GL 13P) provides narrow authorizations for administrative transactions. ([FAQ #1118](#)) is the primary FAQ explaining its scope.

4.3 Import and Services Prohibitions (E.O.s 14066, 14068, 14071)

Three executive orders issued in 2022 layered import bans and services prohibitions onto the E.O. 14024 framework. These are categorical prohibitions — they do not require the counterparty to be listed on any sanctions list.

4.3.1 E.O. 14066 — Import Prohibition (March 8, 2022)

- [E.O. 14066](#) prohibited: (a) importation into the U.S. of Russian-origin crude oil, petroleum, petroleum fuels, oils, liquefied natural gas, coal, and coal products; (b) new investment in the Russian energy sector by U.S. persons.
- This EO is a **categorical prohibition** — it applies regardless of whether any party in the transaction is listed on the SDN List.

4.3.2 E.O. 14068 — Broader Import and Investment Prohibition (March 11, 2022)

- [E.O. 14068](#) authorized OFAC to prohibit, by Determination: (a)(i)(A) importation of categories of goods; (a)(i)(B) importation of categories of goods from Russia via third countries; (a)(i)(C) new investment in the Russian Federation; (a)(i)(D) export of categories of goods.
- Active import prohibitions under E.O. 14068 Determinations include: Russian-origin crude oil and petroleum products (Dec. 2022 Determination — price cap implementation); gold (June 2022); fish, seafood, and preparations (Dec. 2023); diamonds and diamond jewelry (March 2024, with thresholds); aluminum, copper, and nickel (April 2024).

4.3.3 E.O. 14071 — New Investment and Services Prohibition (April 6, 2022)

- [E.O. 14071](#) prohibited: (a) new investment in the Russian Federation by U.S. persons; (b) the export, reexport, sale, or supply — directly or indirectly — of services to any person located in the Russian Federation, subject to Determinations.
- Active services prohibitions (via Determinations) include: accounting, trust and corporate formation, management consulting (May 2022); architecture and engineering (June 2023); quantum computing (September 2022); IT and software services (September 2024); petroleum services (February 2025, effective February 27, 2025).

PETROLEUM SERVICES PROHIBITION — FEBRUARY 2025

Effective February 27, 2025, U.S. persons are prohibited from providing services — including oil field services, technical assistance, and management services — related to the production of oil or gas anywhere in Russia or on behalf of any Russian-origin producer. This prohibition applies to services provided to non-blocked third parties (e.g., joint-venture operators). It is a **categorical services prohibition**, not limited to SDN-listed parties. Review any existing petroleum-sector service agreements for compliance.

4.4 Oil Price Cap (E.O. 14068 / E.O. 14071)

The G7/Australia oil price cap — administered by OFAC under the authority of E.O. 14068 and E.O. 14071 — permits U.S.-person maritime service providers (shipping, insurance, finance, flagging, customs brokerage) to provide services related to crude oil of Russian Federation origin only if the oil is sold at or below the price cap (\$60/barrel for crude oil, separate caps for petroleum products).

- **Price cap on crude oil:** \$60 per barrel. Effective December 5, 2022.
- **Price cap on petroleum products:** \$100/barrel (premium) and \$45/barrel (discount) products. Effective February 5, 2023.
- Maritime service providers relying on the price cap must maintain records establishing that the oil was purchased at or below the cap, including price attestations from sellers and buyers along the supply chain. [Price Cap Guidance \(Dec. 2023\)](#)

4.5 Secondary Sanctions — Sections 11 and 12 of E.O. 14024 (as amended)

Section 11 (as redesignated and amended by E.O. 14114) and Section 12 of E.O. 14024 authorize the Secretary of the Treasury to impose blocking sanctions on non-U.S. persons who engage in **significant transactions** with listed parties or in specified sectors. These secondary sanctions provisions expose non-U.S. financial institutions to SDN designation.

4.5.1 Section 11 — Military-Industrial Complex Secondary Sanctions

- Section 11(a) authorizes blocking non-U.S. persons who have, on or after December 22, 2023, engaged in or attempted to engage in a significant transaction involving items used by Russia's military-industrial complex or designated entities.
- No safe harbor. No bright-line threshold. OFAC applies facts-and-circumstances analysis to determine whether a transaction is "significant."
- The SDN entry for persons subject to Section 11 secondary sanctions risk will include: "Secondary sanctions risk: See Section 11 of Executive Order 14024."

4.5.2 Section 12 — General Secondary Sanctions

- Section 12 authorizes blocking non-U.S. persons determined to have materially assisted, sponsored, or provided financial, material, or technological support to designated persons.
- This authority has been used extensively for foreign financial institutions that facilitated transactions with SDN-listed entities, including third-country banks in Central Asia, the Middle East, and China.

ENFORCEMENT TRACK RECORD — E.O. 14024 SECONDARY SANCTIONS

Since 2022, OFAC has designated foreign financial institutions under the secondary sanctions authorities of E.O. 14024 for providing financial services to SDN-listed Russian entities. Key patterns: (a) banks in UAE, Turkey, China, and Central Asian states that processed Russia-related payments have received OFAC designations or warnings; (b) the September 2024 IT/software Determination and the February 2025 petroleum services Determination expanded the universe of transactions that can trigger secondary sanctions scrutiny.

The [June 2024 Advisory for Foreign Financial Institutions](#) explicitly warns that foreign financial institutions providing financial services that support Russia's military-industrial base — even without a direct SDN nexus — risk designation.

NO SAFE HARBOR FOR SECTION 11/12 SECONDARY SANCTIONS

Neither Section 11 nor Section 12 of E.O. 14024 contains a safe harbor or a bright-line dollar threshold. OFAC evaluates significance based on the totality of the circumstances, including dollar value, nature of the transaction, number of occurrences, and degree of nexus to Russia's military-industrial capacity. Non-U.S. persons (including non-U.S. financial institutions) should not assume that any threshold protects against exposure.

KEY COMPLIANCE TAKEAWAY

E.O. 14024 is the most expansive Russia program, covering SDN blocking, NS-MBS List sectoral restrictions, categorical import/investment/services prohibitions, and a secondary sanctions framework with no safe harbor or bright-line threshold.

5. Ukraine-/Russia-Related Sanctions (31 CFR Part 589)

The Ukraine-/Russia-Related Sanctions Regulations, [31 CFR Part 589](#), implement four executive orders ([E.O. 13660](#), [E.O. 13661](#), [E.O. 13662](#), [E.O. 13685](#)) and two statutes (SSIDES and UFSA). This program encompasses both full blocking sanctions and the sectoral sanctions (SSI List) framework.

5.1 Blocking Prohibitions (E.O. 13660, 13661)

Executive Orders 13660 and 13661 authorize the blocking of property and interests in property of persons determined to have contributed to the situation in Ukraine through:

- Asserting governmental authority over any territory of Ukraine inconsistently with its laws (E.O. 13660 § 1(a))
- Actions or policies that undermine democratic processes or institutions in Ukraine (E.O. 13660 § 1(b))
- Threatening peace, security, stability, or sovereignty of Ukraine (E.O. 13660 § 1(c))
- Misappropriation of state assets of Ukraine or private assets from individuals in Ukraine (E.O. 13660 § 1(d))
- Senior Russian government officials, arms dealers, oligarchs, and their family members (E.O. 13661)

SDN LIST TAGS

Persons designated under these EOs receive the tags [UKRAINE-EO13660] or [UKRAINE-EO13661]. Full blocking applies — all property and interests in property within U.S. jurisdiction are blocked, and U.S. persons may not engage in any transactions with these persons without a license.

5.2 Sectoral Sanctions — E.O. 13662 and the SSI List

E.O. 13662 created a different type of sanction: not blocking, but **transaction-type restrictions** on persons identified in specific sectors of the Russian economy. These persons appear on the Sectoral Sanctions Identifications (SSI) List and receive a "Directive Determination" tag specifying which Directive (1, 2, 3, or 4) applies.

Directive	Sector	Debt Threshold	Equity Threshold
Dir. 1 (as amended)	Financial Services	14 days maturity (new debt)	All new equity
Dir. 2 (as amended)	Energy	60 days maturity (new debt)	All new equity
Dir. 3	Defense & Related Materiel	30 days maturity (new debt)	All new equity
Dir. 4 (as amended)	Defense (specific entities)	All goods/services/technology	N/A (goods/services/tech ban)

5.2.1 Key SSI Prohibitions (31 CFR § 589.201)

- **§ 589.201(a):** U.S. persons may not engage in transactions — or dealings in — new debt (exceeding the applicable maturity threshold) or new equity issued by persons subject to Directive 1, 2, or 3. Also prohibits transactions with entities that are 50% or more owned by SSI-listed persons where the transaction would violate the applicable Directive.
- **§ 589.201(b):** Same prohibition extended to persons 50% or more owned by SSI-listed persons, even if not themselves listed. The 50% Rule applies to SSI-listed persons — aggregation across multiple SSI-listed owners counts.

- **§ 589.201(c) — Directive 3 goods/services/tech:** Prohibits providing goods, services, or technology in support of exploration or production for deepwater, Arctic offshore, or shale projects in Russia, where the project involves a Directive 3 SSI-listed person.

DIRECTIVE 1 THRESHOLD: 14 DAYS — NOT 90

CAATSA Section 223 amended Directive 1 to tighten the debt maturity threshold for the financial services sector from 90 days to 14 days (effective October 31, 2017) and for the energy sector (Directive 2) from 90 days to 60 days. Practitioners from other programs may be accustomed to 90-day thresholds. The current operative thresholds under these Directives are 14 days (Directive 1) and 60 days (Directive 2). (FAQ #539)

5.3 Crimea Comprehensive Prohibition (E.O. 13685)

E.O. 13685 created a near-comprehensive embargo on the Crimea region of Ukraine:

- New investment in Crimea by U.S. persons is prohibited.
- Importation of goods, services, or technology from Crimea into the U.S. is prohibited.
- Exportation, reexportation, sale, or supply of goods, services, or technology to Crimea is prohibited.
- Approval, financing, facilitation, or guarantee of any of the above by U.S. persons is prohibited.

CRIMEA vs. OTHER OCCUPIED TERRITORIES

E.O. 13685 specifically covers the "Crimea region of Ukraine." E.O. 14065 (February 2022) expanded similar restrictions to the Donetsk and Luhansk Peoples' Republics. The operative regulations for Donetsk and Luhansk restrictions appear in Part 589 as extended by E.O. 14065 and related GLs rather than in a separate comprehensive embargo regulation. Check the current status of applicable GLs when transacting with any currently or formerly contested Ukrainian territory.

5.4 Secondary Sanctions Under 31 CFR § 589.201 (SSIDES/UFGA)

Certain persons on the SSI List carry a secondary sanctions risk notation on their entry. This notation indicates that non-U.S. persons who engage in significant transactions with that SSI-listed person may be subject to U.S. sanctions — even though the non-U.S. person is not itself a U.S. person subject to primary sanctions.

- The secondary sanctions risk under Part 589 is found at 31 CFR § 589.201(a)(6)(vii)(B) (incorporating SSIDES Sec. 10(a)(2)(A) as amended by CAATSA Sec. 228).
- Non-U.S. financial institutions that engage in **significant financial transactions** with persons on the SDN List, SSI List, or NS-MBS List pursuant to the authorities in § 589.305 are subject to menu-based sanctions under CAATSA Section 228. (FAQ #546)

KEY COMPLIANCE TAKEAWAY

The URSR program contains both full blocking (SDN) and transaction-type restrictions (SSI List). The SSI List thresholds changed in 2017 and are now 14 days (financial sector) and 60 days (energy sector) — not the commonly assumed 90 days.

6. CAATSA Title II — Countering Russian Influence in Europe and Eurasia

Title II of the [Countering America's Adversaries Through Sanctions Act \(P.L. 115-44\)](#) (enacted August 2, 2017) is codified primarily at 22 U.S.C. §§ 9501–9551. It did three things: (1) codified existing Ukraine/Russia sanctions under statute; (2) imposed new mandatory designation requirements; and (3) created new penalty frameworks. Implementation was delegated to Treasury and State by [E.O. 13849](#).

6.1 Section 224 — Mandatory Sanctions (Cyber)

Section 224 directs the President to impose sanctions on any person that the President determines knowingly engages in significant malicious cyber-enabled activities directed against the U.S. or its allies. This section works in conjunction with the Cyber-related Sanctions program (E.O. 13694/13757) and does not create a standalone Russia sanctions list.

6.2 Section 225 — Mandatory Sanctions (Undermining Cybersecurity)

Section 225 mandates sanctions on persons who engage in or facilitate activities to undermine cybersecurity on behalf of the Russian government.

6.3 Section 226 — Mandatory Sanctions (Intelligence Sharing)

Section 226 mandates sanctions on persons who knowingly provide material support for acts intended to undermine the peace, security, stability, sovereignty, or territorial integrity of a country in Europe or Eurasia, including through political manipulation, misinformation campaigns, or assassination.

6.4 Section 228 — Mandatory Financial System Prohibitions

Section 228 amends SSIDES (Sec. 10) to add mandatory menu-based sanctions on non-U.S. persons that engage in a **significant financial transaction** with a person that is subject to sanctions under Title II of CAATSA, SSIDES, UFSA, or any "covered Executive Order." ([FAQ #546](#))([FAQ #539](#))

- The menu of sanctions available under Section 228 includes: export/import prohibitions, loan restrictions, prohibitions on investment, correspondent account restrictions, prohibitions on U.S. bank accounts, and prohibition on dealings in U.S. government debt instruments.
- "Covered Executive Orders" for this purpose are E.O. 13660, 13661, 13662, 13685, 13694 (relating to Russia), and 13757 (relating to Russia). ([FAQ #546](#))
- There is no statutory definition of "significant financial transaction." OFAC applies a facts-and-circumstances analysis.

6.5 Section 231 — Defense and Intelligence Sector

Section 231 of CAATSA requires the President to impose five or more sanctions from a specified menu on any person that the President determines, on or after August 2, 2017, knowingly, on behalf of the Russian Federation, engages or has engaged in a **significant transaction** with a person that is part of, or operates for or on behalf of, the defense or intelligence sector of the Russian Federation.

- The [State Department administers Section 231](#) in coordination with Treasury and Commerce.

- Designation under Section 231 does not require the counterparty to be on any existing OFAC list. The transaction must be with a person who is part of the Russian defense or intelligence sector — this is determined by the President based on facts and circumstances.
- Five or more sanctions from the CAATSA Section 235 menu must be imposed, including possible: prohibition on U.S. Export-Import Bank assistance, denial of U.S. export licenses, prohibition on U.S. government contracts, and full blocking sanctions.

SECTION 231: NO BRIGHT-LINE THRESHOLD, NO SAFE HARBOR

Section 231 provides no definition of "significant transaction" and no safe harbor. The State Department has imposed Section 231 sanctions on third-country entities, including in India and China, for defense procurement from Russia. Any entity transacting with the Russian defense or intelligence sector — regardless of whether that sector entity is separately SDN-listed — must evaluate Section 231 exposure. (FAQ #627)

6.6 Section 233 — Privatization Prohibition

Section 233 prohibits the provision of loans, credits, or other financing to any Russian person for the purpose of privatizing assets of the Russian Federation, if it would result in a benefit to senior Russian officials or their close associates or family members.

6.7 Section 235 — Menu of Sanctions

Section 235 specifies the full menu of sanctions available for imposition under Sections 224–234. Relevant options include full blocking (SDN) designation, prohibitions on U.S. financial institution loans, prohibitions on U.S. government contracts, denial of visas, and prohibition on U.S. Export-Import Bank assistance.

6.8 CAATSA Provisions Codifying Existing Sanctions

CAATSA Sections 216 and 222 require Congressional review before the President can terminate or waive sanctions imposed pursuant to E.O. 13662 or E.O. 13685 (or any covered Executive Order). This means the President cannot unilaterally end the sectoral sanctions program without providing advance notice to and obtaining approval from Congress. (FAQ #539)

KEY COMPLIANCE TAKEAWAY

CAATSA Title II elevated Russia sanctions to statutory law, making them substantially harder to revoke, and added the Section 231 defense/intelligence secondary sanctions framework — which applies with no list requirement and no safe harbor.

7. Magnitsky Sanctions (31 CFR Part 584)

The Magnitsky Sanctions are based on the [Sergei Magnitsky Rule of Law Accountability Act of 2012 \(P.L. 112-208\)](#), enacted December 14, 2012. They operate under [31 CFR Part 584](#). This program is **distinct from the Global Magnitsky program** (which is based on E.O. 13818 and 31 CFR Part 583 and applies globally). The Magnitsky Act program is Russia-specific.

MAGNITSKY vs. GLOBAL MAGNITSKY — CRITICAL DISTINCTION

Magnitsky Sanctions (Part 584): Based on P.L. 112-208; Russia-specific; SDN tag is [MAGNIT]; designation criteria tied to the Magnitsky case and Russian human rights violations.

Global Magnitsky Sanctions (Part 583): Based on E.O. 13818; applies worldwide; SDN tag is [GLOMAG]; authorizes designation of serious human rights abusers and corrupt officials anywhere in the world. NOT covered in this guide.

7.1 Designation Criteria (31 CFR § 584.201)

OFAC may block persons determined to be responsible for or complicit in:

- **Detention, abuse, or death of Sergei Magnitsky:** Section 1 of P.L. 112-208 targets persons responsible for the extrajudicial killing, torture, or other gross violation of internationally recognized human rights committed against Sergei Magnitsky in a Russian detention facility.
- **Russian human rights abuses:** Persons responsible for extrajudicial killings, torture, or other gross violations of internationally recognized human rights against individuals seeking to expose illegal activity carried out by Russian government officials, or seeking to obtain, exercise, defend, or promote internationally recognized human rights and freedoms.
- **Complicit officials:** Russian government officials or senior foreign political figures who committed or facilitated the above, or who materially assisted persons designated for the above.

7.2 Blocking Consequences

A Magnitsky designation results in full blocking — all property and interests in property of the designated person within U.S. jurisdiction are blocked. U.S. persons may not engage in any transaction with a [MAGNIT]-designated person without an OFAC license. The 50% Rule applies.

7.3 Relationship to Other Russia Programs

- A person designated under the Magnitsky Act may also be designated under E.O. 14024 (Russian Harmful Foreign Activities) or E.O. 13661 (Ukraine/Russia). All applicable SDN tags will appear on the SDN List entry.
- There are no SSI List consequences under the Magnitsky program — it creates only SDN blocking, not sectoral sanctions.
- The Magnitsky Act contains no secondary sanctions provisions. It does not expose non-U.S. persons to designation merely for transacting with a [MAGNIT]-designated person (though secondary sanctions under other programs may apply depending on facts).

7.4 No Comprehensive Embargo

The Magnitsky Sanctions program does not impose a country-wide or sector-wide prohibition. It is a list-based program: only designated persons (and entities 50%+ owned by them) are subject to blocking. Transactions with Russia or Russian parties not on the [MAGNIT] SDN List do not create Magnitsky exposure.

KEY COMPLIANCE TAKEAWAY

The Magnitsky program blocks persons designated for Russian human rights abuses or involvement

in Magnitsky's death. It is Russia-specific, list-based, and has no secondary sanctions or sector-based prohibitions — unlike E.O. 14024.

8. Sanctions Lists Comparison

Multiple lists are relevant to Russia-related compliance. The following table compares the lists, the programs that populate them, and 50% Rule applicability.

List	Who Populates It	50% Rule?	Compliance Implication
SDN List	OFAC (all programs)	Yes — entities 50%+ owned by blocked persons are blocked	Full blocking: all property in U.S. jurisdiction blocked; U.S. persons may not deal
SSI List	OFAC under E.O. 13662 (Part 589)	Yes — 50% Rule applies for transaction-type restrictions	No blocking; Directive-specific transaction type restrictions with maturity/equity thresholds
NS-MBS List	OFAC under E.O. 14024 Directives 1A, 2, 3, 4	Check Directive text — varies by Directive	Directive-specific prohibitions (sovereign debt, correspondent accounts, new debt/equity, CBR transactions)
CMIC List (Non-SDN)	Treasury (CMEA/NDAA)	Limited — check list-specific rule	Prohibits U.S. persons from engaging in public securities trading of designated Chinese military-industrial companies — not Russia-specific but may overlap

50% RULE — AGGREGATION

Under the 50% Rule, if two or more blocked or restricted persons together own 50% or more of an entity (e.g., each owns 30%), that entity is itself treated as blocked or restricted — even if no single owner reaches 50%. This aggregation rule applies to SDN and SSI-listed persons. Check ownership structures carefully.

8.1 Searching the Lists

Use [OFAC's Sanctions List Search tool](#) to search the SDN List, SSI List, NS-MBS List, and other OFAC lists simultaneously. The search tool returns results across all lists in a single query.

- Search by name, address, vessel, aircraft, ID number, or other identifiers.
- Use broad searches and review the full results — a "no results" response from a narrow search is not a complete clearance.
- The search tool does not screen for 50% Rule exposure — that requires separate ownership analysis.

KEY COMPLIANCE TAKEAWAY

Russia-related sanctions employ three separate list categories (SDN, SSI, NS-MBS), each with different legal consequences. The 50% Rule applies across all three but operates differently for each list type — the SSI List applies transaction-type restrictions rather than blocking, and the 50% Rule extends those restrictions to unlisted subsidiaries.

9. Licensing

OFAC issues general licenses (GLs) and specific licenses authorizing transactions that would otherwise be prohibited. Russia-related GLs are issued under E.O. 14024/Part 587 or under the Ukraine/Russia program/Part 589. Always read the GL text to determine which program it covers.

9.1 Key General Licenses Under E.O. 14024 (Russia-Related GLs)

The following are among the most operationally significant currently active Russia-related general licenses (as of May 2026). This is not an exhaustive list — OFAC has issued over 130 Russia-related GLs.

GL	Key Authorization
GL 6D	Agricultural commodities, medicine, medical devices, replacement parts, software updates, COVID-19 related transactions, clinical trials — broadly authorized for all Russia-related programs
GL 13P	Certain administrative transactions prohibited by Directive 4 under E.O. 14024 (e.g., payment of taxes, regulatory fees, entry fees); narrow scope — read carefully
GL 25G	Telecommunications services and certain internet-based communications; broadly authorizes provision of personal communications tools to persons in Russia
GL 27	Certain transactions in support of nongovernmental organizations' activities in Russia
GL 42	Certain transactions with the Federal Security Service (FSB) for import/export compliance purposes; narrow scope
GL 55E	Certain services related to Sakhalin-2 (LNG project)
GL 115C	Certain transactions related to civil nuclear energy
GL 124B	Petroleum services and transactions related to Caspian Pipeline Consortium, Tengizchevroil, and Karachaganak projects
GL 128B	Certain transactions involving Lukoil retail service stations outside of Russia
GL 131C	Certain transactions for negotiating and entering contingent contracts for the sale of Lukoil International GmbH

9.2 Key General Licenses Under Ukraine-/Russia-Related Program

GL	Key Authorization
Ukraine GL 18	Exportation or reexportation of agricultural commodities, medicine, medical devices to certain Ukraine regions

GL	Key Authorization
Ukraine GL 19	Telecommunications and mail transactions
Ukraine GL 26A	Transactions authorized pursuant to Russian Harmful Foreign Activities Sanctions Regulations — cross-program GL
GL 133	Delivery and sale of crude oil of Russian Federation origin loaded on vessels as of March 5, 2026, to India
GL 134A	Delivery and sale of crude oil of Russian Federation origin loaded on vessels as of March 12, 2026

9.3 Specific License Policy

OFAC accepts applications for specific licenses authorizing transactions not covered by general licenses. Applications are submitted through the [OFAC Online License Application Portal](#). Key considerations:

- OFAC will consider specific license applications for transactions serving humanitarian purposes, supporting personal maintenance of U.S. persons in Russia, legal services in challenging OFAC actions, and other compelling cases.
- Specific licenses are granted at OFAC's discretion — there is no entitlement to a specific license even if the application appears compelling.
- Processing times vary; urgent applications may include a request for expedited review.

KEY COMPLIANCE TAKEAWAY

General licenses are the primary authorization mechanism for otherwise prohibited Russia-related transactions. Read each GL's text carefully — scope is often narrower than the short title suggests, and many GLs are program-specific (E.O. 14024 only) rather than cross-program.

10. Compliance Quick-Reference Checklist

This checklist applies to any transaction involving Russia-related parties, sectors, goods, or services. Work through each step sequentially — stopping if a screen is positive.

#	Step	What to Do
1	SDN Screen	Search the OFAC Sanctions List Search tool (sanctionssearch.ofac.treas.gov) for all parties (counterparties, beneficial owners, intermediaries, vessels, aircraft). A [UKRAINE-EO13660], [UKRAINE-EO13661], [UKRAINE-EO13685], [RUSSIA-EO14024], or [MAGNIT] tag = full blocking applies.
2	50% Rule Analysis	If any party's ultimate beneficial ownership is not fully transparent, conduct ownership investigation. Block if any SDN-listed person owns 50%+ (individually or in aggregate).
3	SSI Screen	Check for SSI List entries (Directive 1, 2, 3, or 4 under E.O. 13662). If yes, determine whether the transaction involves "new debt" or "new equity" within the applicable maturity threshold. Tightened thresholds: Directive 1 = 14 days; Directive 2 = 60 days; Directive 3 = 30 days.

#	Step	What to Do
4	NS-MBS Screen	Check for NS-MBS List entries (Directives 1A, 2, 3, 4 under E.O. 14024). Apply the applicable Directive's prohibition.
5	Import/Export Check	Is the transaction an import of Russian-origin goods (crude oil, petroleum products, gold, seafood, diamonds, aluminum, copper, nickel)? Apply categorical prohibitions under E.O. 14066 and E.O. 14068 Determinations.
6	Services Check	Is the transaction the provision of services to Russia? Check whether OFAC has issued a Determination activating the relevant services category under E.O. 14071 (accounting, IT, petroleum services, architecture, engineering, quantum computing, etc.).
7	CAATSA § 231 Check	Does the counterparty operate in the Russian defense or intelligence sector (whether SDN-listed or not)? If yes, the transaction may be a "significant transaction" triggering Section 231 exposure for the transacting party.
8	Secondary Sanctions	For non-U.S. party analysis: Does any party face secondary sanctions exposure under E.O. 14024 Sec. 11/12 or CAATSA § 228? No safe harbor or bright-line threshold applies.
9	GL Review	If any prohibition applies, identify applicable general licenses. Check Russia-related GLs (under E.O. 14024) and Ukraine GLs (under Part 589). Verify GL covers the specific transaction type and program.
10	Specific License	If no GL covers the transaction: file for specific license if there is a compelling basis via ofac.treasury.gov/ofac-license-application-page . Do not proceed without authorization.
11	Document & Report	Blocked transactions must be reported to OFAC via the OFAC Reporting System within 10 business days. Rejected transactions must also be reported. Retain records per 31 CFR Part 501.

11. Key FAQs — Operative Answers

The following FAQs address the most common Russia sanctions compliance questions. All cross-referenced inline in the relevant sections above.

FAQ #373 — Ukraine-/Russia-Related Directive 4 Applicability

Directive 4 under E.O. 13662 prohibits U.S. persons from engaging in transactions involving the provision, exportation, or reexportation of goods, services, or technology (except for financial services) to deepwater, Arctic offshore, or shale projects in Russia that have the potential to produce oil, or on behalf of, certain Russian energy companies. See [FAQ #373](#) for OFAC's full operative interpretation of Directive 4's scope.

FAQ #539 — CAATSA Section 223: Tightened Debt Thresholds

CAATSA Section 223 amended E.O. 13662 Directive 1 to reduce the maturity threshold for new debt in the financial sector from 90 to 14 days, and Directive 2 to reduce the energy sector threshold from 90 to 60 days (effective September 29, 2017). [FAQ #539](#) confirms that the amendments apply to new debt with a maturity exceeding 14 days (Directive 1) or 60 days (Directive 2) issued on or after the effective date.

FAQ #540 — CAATSA Section 233 Scope

CAATSA Section 233 prohibits extending loans, credits, or other financial assistance to any Russian person in connection with the privatization of state-owned assets, if doing so would benefit senior Russian officials or their close associates. [FAQ #540](#) addresses the scope of this prohibition.

FAQ #546 — "Subject to Sanctions" Definition for CAATSA § 228

For purposes of CAATSA Section 228 (mandatory menu-based sanctions on significant financial transactions), "subject to sanctions imposed by the United States with respect to the Russian Federation" includes persons on the SDN List, SSI List, or NS-MBS List pursuant to covered authorities, and their 50% Rule subsidiaries. [FAQ #546](#)

FAQ #552 — CAATSA Oligarch Report Sanctions Implications

The Treasury Department's January 2018 report on oligarchs and parastatal entities (required by CAATSA Section 241) does not by itself constitute a sanctions designation. Being listed in the report does not make a person a Specially Designated National. [FAQ #552](#)

FAQ #627 — E.O. 13849 Purpose and CAATSA Implementation

E.O. 13849 (September 20, 2018) delegated authority to the Secretaries of Treasury and State, and the Director of National Intelligence, to implement the sanctions measures in Titles I, II, and III of CAATSA that require Presidential action. [FAQ #627](#)

FAQ #869 — CAATSA Section 235 Menu-Based Sanctions

FAQ #869 addresses the menu of sanctions available under CAATSA Section 235, the process for imposing them, and the relationship between those sanctions and OFAC's standard designation procedures. [FAQ #869](#)

FAQ #1118 — Directive 4 Under E.O. 14024 (CBR/NWF/MoF)

Directive 4 under E.O. 14024 prohibits U.S. persons from engaging in any transaction — including transactions that are only facilitated by the CBR, NWF, or MoF — with those three entities. This prohibition is comprehensive and not limited to financial transfers. [FAQ #1118](#)

12. Official Document Index

Statutes

Instrument	URL
Sergei Magnitsky Rule of Law Accountability Act (P.L. 112-208)	https://ofac.treasury.gov/media/5801/download

Instrument	URL
SSIDES (P.L. 113-95)	https://ofac.treasury.gov/media/5806/download
UFSA (P.L. 113-272)	https://ofac.treasury.gov/media/5811/download
CAATSA (P.L. 115-44)	https://congress.gov/115/plaws/publ44/PLAW-115publ44.pdf
PEESA (2019)	https://ofac.treasury.gov/media/43256/download
IEEPA (50 U.S.C. §§ 1701-1706)	https://ofac.treasury.gov/media/5736/download
NEA (50 U.S.C. §§ 1601-1651)	https://ofac.treasury.gov/media/5766/download

Executive Orders

Instrument	URL
E.O. 13660 (Mar. 2014)	https://ofac.treasury.gov/media/5946/download
E.O. 13661 (Mar. 2014)	https://ofac.treasury.gov/media/5956/download
E.O. 13662 (Mar. 2014)	https://ofac.treasury.gov/media/5961/download
E.O. 13685 (Dec. 2014)	https://ofac.treasury.gov/media/5966/download
E.O. 13849 (Sep. 2018)	https://ofac.treasury.gov/media/8671/download
E.O. 14024 (Apr. 2021)	https://www.federalregister.gov/documents/2021/04/19/2021-08098/blocking-property-with-respect-to-specified-harmful-foreign-activities-of-the-government-of-the
E.O. 14039 (Aug. 2021)	https://ofac.treasury.gov/media/912496/download
E.O. 14065 (Feb. 2022)	https://ofac.treasury.gov/media/918791/download
E.O. 14066 (Mar. 2022)	https://ofac.treasury.gov/media/919111/download
E.O. 14068 (Mar. 2022)	https://ofac.treasury.gov/media/919281/download
E.O. 14071 (Apr. 2022)	https://ofac.treasury.gov/media/922081/download
E.O. 14114 (Dec. 2023)	https://ofac.treasury.gov/media/932441/download

CFR Parts

Part	URL
31 CFR Part 584 — Magnitsky Act Sanctions Regulations	https://www.ecfr.gov/current/title-31/subtitle-B/chapter-V/part-584
31 CFR Part 587 — Russian Harmful Foreign Activities Sanctions Regulations	https://www.ecfr.gov/current/title-31/subtitle-B/chapter-V/part-587
31 CFR Part 589 — Ukraine-/Russia-Related Sanctions Regulations	https://www.ecfr.gov/current/title-31/subtitle-B/chapter-V/part-589

OFAC Program Pages

Program	URL
Russia-related Sanctions (main page)	https://ofac.treasury.gov/sanctions-programs-and-country-information/russia-related-sanctions
Russian Harmful Foreign Activities Sanctions	https://ofac.treasury.gov/sanctions-programs-and-country-information/russian-harmful-foreign-activities-sanctions
Ukraine-/Russia-related Sanctions	https://ofac.treasury.gov/sanctions-programs-and-country-information/ukraine-russia-related-sanctions
CAATSA-related Sanctions	https://ofac.treasury.gov/sanctions-programs-and-country-information/countering-americas-adversaries-through-sanctions-act-related-sanctions
Magnitsky Sanctions	https://ofac.treasury.gov/sanctions-programs-and-country-information/the-magnitsky-sanctions
Sanctions List Search	https://sanctionssearch.ofac.treas.gov
OFAC License Application Page	https://ofac.treasury.gov/ofac-license-application-page
OFAC FAQs	https://ofac.treasury.gov/faqs/all-faqs