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LIMITE

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CFSP/PESC 924
RELEX 847
COEST 479
FIN 889

LEGISLATIVE ACTS AND OTHER INSTRUMENTS

Subject: COUNCIL IMPLEMENTING REGULATION implementing Regulation
(EU) 2024/1485 concerning restrictive measures in view of the situation in
Russia

COUNCIL IMPLEMENTING REGULATION (EU) 2026/...

of ...

**implementing Regulation (EU) 2024/1485 concerning restrictive measures
in view of the situation in Russia**

THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Council Regulation (EU) 2024/1485 of 27 May 2024 concerning restrictive measures in view of the situation in Russia¹, and in particular Article 17(1) thereof,

Having regard to the proposal from the High Representative of the Union for Foreign Affairs and Security Policy,

¹ OJ L, 2024/1485, 27.5.2024, ELI: <http://data.europa.eu/eli/reg/2024/1485/oj>.

Whereas:

- (1) On 27 May 2024, the Council adopted Regulation (EU) 2024/1485.
- (2) On 15 September 2025, the Special Rapporteur on the situation of human rights in the Russian Federation, who was appointed by the United Nations Human Rights Council, published a report entitled 'Situation of human rights in the Russian Federation'. The report underlined that the Russian authorities were continuing to use new technologies to restrict freedom of expression, access to information and freedom of association.
- (3) On 16 March 2026, the Deputy Permanent Representative of the European Union to the United Nations and other international organisations in Geneva delivered a statement on behalf of the Union in the framework of the 61st Session of the United Nations Human Rights Council. The statement condemned in the strongest possible terms Russia's continuing violations of international human rights law and international humanitarian law in Ukraine, such as summary executions of prisoners of war and civilian detainees, arbitrary detention, systematic and widespread use of torture and other forms of ill-treatment, including rape and other conflict-related sexual and gender-based violence.
- (4) The Union remains unwavering in its condemnation of the human rights violations and repressions in Russia.

- (5) In view of the gravity of the situation, the Council considers that 11 natural persons and 5 entities should be added to the list of natural and legal persons, entities and bodies set out in Annex IV to Regulation (EU) 2024/1485.
- (6) Regulation (EU) 2024/1485 should therefore be amended accordingly,

HAS ADOPTED THIS REGULATION:

Article 1

Annex IV to Regulation (EU) 2024/1485 is amended in accordance with the Annex to this Regulation.

Article 2

This Regulation shall enter into force on the date of its publication in the *Official Journal of the European Union*.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at ..., ...

For the Council

The President

ANNEX

Annex IV to Regulation (EU) 2024/1485 is amended as follows:

(1) the following entries are added under the heading ‘A. Natural persons’:

	Name	Identifying information	Statement of Reasons	Date of listing
‘88.	Elena Gennadyevna BAGUDINA (Russian: Елена Геннадьевна БАГУДИНА)	Position: General Director of Communication Platform LLC DOB: 11.3.1954 Nationality: Russian Gender: female	Elena Bagudina is the General Director of Communication Platform LLC, which is a subsidiary of VK (previously known as VKontakte) and the developer and manager of state-supported mobile phone application Max. In her position as General Director, she is responsible for the development and management of the Max application. The development of the Max application was supervised by the Federal Security Service (FSB), which established the requirements that the developers of the Max application had to meet. The Max application must be pre-installed on all mobile phones and tablets sold in Russia and is integrated with the Gosuslugi service.	+

+ OJ: please insert the date of entry into force of this implementing Regulation.

	Name	Identifying information	Statement of Reasons	Date of listing
			According to numerous experts, the Max application has extensive surveillance features and can monitor communications, including the use of virtual private networks (VPNs), gather data on other applications installed on phones, monitor address books, identify the location of users and install autonomous updates. The introduction and promotion of the Max application by the Russian state have been accompanied by a crackdown on and blocking of other independent applications, such as WhatsApp and Telegram, as well as by a campaign to limit the use of VPNs, which allowed users to access content blocked in Russia. Information gathered by Russian authorities through the Max application served as a basis to fine a Russian citizen for content posted on the application. Therefore, Elena Bagudina provides technical support for the repression of civil society and democratic opposition, including by assisting and facilitating such acts.	

	Name	Identifying information	Statement of Reasons	Date of listing
89.	Dmitry Valerianovich GACHKO (Russian: Дмитрий Валерьянович ГАЧКО)	Position: General Director and ultimate owner of VAS Experts DOB: 16.8.1976 Nationality: Russian Gender: male	Dmitry Gachko is the General Director and ultimate owner of the limited liability company VAS Experts, which manufactures, develops and sells hardware and software related to the so-called System of Operative Investigative Measures (SORM). In his position as General Director and ultimate owner, he is responsible for VAS Experts' activities relating to the manufacture and supply of SORM-related hardware and software. SORM is a surveillance system used since the mid-1990s to control internet and mobile communications in Russia, namely the monitoring of phone calls, emails, internet use, text messages and social networks. Mobile phones and internet providers are legally required to install SORM. It is installed in all Russian data centres and at all internet exchange points and within major search engines. User traffic is copied to a separate server or to a data centre available to the Federal Security Service (FSB). SORM gathers information about users' physical location, activity patterns, time of device use, users' behaviour and the use of different SIM cards in one or more devices. It can be used retroactively and without the provider's knowledge.	+

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	Name	Identifying information	Statement of Reasons	Date of listing
			SORM has been used to target journalists, opposition figures, minority groups and ordinary citizens. It has also been used to prosecute supporters of the Russian opposition, leaders such as Alexei Navalny, organisers of protests, individuals who ran internet accounts critical of the Russian authorities or produced reports on the political situations and activists who opposed the war of aggression against Ukraine. SORM has also been used to pre-emptively detain individuals suspected of anti-government activities. SORM has had a profound impact on the ability of Russian citizens to access unbiased information about the war of aggression against Ukraine. It was also used to block traffic from, and access to, thousands of Western websites and services.	

	Name	Identifying information	Statement of Reasons	Date of listing
			VAS Experts is involved in the development, supply and maintenance of SORM, including hardware and software integrated into telecoms networks, therefore allowing intelligence agencies to directly access all traffic. VAS Experts is a key supplier of SORM that complies with interception requirements mandated by the FSB and supports the operation of Russia's communications surveillance infrastructure. VAS Experts operates within a framework established and supervised by the Russian authorities. These authorities approve technical requirements for SORM deployment, require operators to coordinate implementation plans, oversee compliance and use the equipment for direct interception activities. Consequently, VAS Experts develops and supplies equipment specifically designed to satisfy surveillance requirements established by the FSB. Therefore, Dmitry Gachko provides material support for serious violations and abuses of human rights and for the repression of civil society and democratic opposition.	

	Name	Identifying information	Statement of Reasons	Date of listing
90.	Sergey Anatolevich OVCHINNIKOV (Russian: Сергей Анатольевич ОВЧИННИКОВ)	Position: Executive Director and ultimate owner of Closed Joint-Stock Company “Norsi-Trans” DOB: 5.5.1955 Nationality: Russian Gender: male	Sergey Ovchinnikov is the Executive Director and ultimate owner of Closed Joint-Stock Company “Norsi-Trans”, which manufactures, develops and sells hardware and software related to the so-called System of Operative Investigative Measures (SORM). In his position as Executive Director and ultimate owner, he is responsible for Norsi-Trans’ activities relating to the manufacture and supply of SORM-related hardware and software. SORM is a surveillance system used since the mid-1990s to control internet and mobile communications in Russia, namely the monitoring of phone calls, emails, internet use, text messages and social networks. Mobile phone and internet providers are legally required to install SORM. It is installed in all Russian data centres and at all internet exchange points and within major search engines. User traffic is copied to a separate server or to a data centre available to the Federal Security Service (FSB). SORM gathers information about users’ physical location, activity patterns, time of device use, users’ behaviour and the use of different SIM cards in one or more devices. It can be used retroactively and without the provider’s knowledge.	+

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	Name	Identifying information	Statement of Reasons	Date of listing
			SORM has been used to target journalists, opposition figures, minority groups and ordinary citizens. It has also been used to prosecute supporters of the Russian opposition, leaders such as Alexei Navalny, organisers of protests, individuals who ran internet accounts critical of the Russian authorities or produced reports on the political situations and activists who opposed the war of aggression against Ukraine. SORM has also been used to pre-emptively detain individuals suspected of anti-government activities. SORM has had a profound impact on Russians' ability to access unbiased information about the war of aggression against Ukraine. It was used to block traffic from, and access to, thousands of Western websites and services.	

	Name	Identifying information	Statement of Reasons	Date of listing
			Norsi-Trans is involved in the development, supply and maintenance of SORM, including hardware and software integrated into telecoms networks, therefore allowing intelligence agencies to directly access all traffic. SORM includes monitoring equipment installed in facilities of telecommunications providers. Such monitoring equipment provides information to the Russian government's intelligence agency, including on phone calls, text messages, emails and internet traffic. SORM also facilitates access to communications data associated with messaging application, metadata, mobile numbers, phone identifiers, geolocation, names, email addresses and IP addresses.	

	Name	Identifying information	Statement of Reasons	Date of listing
			Norsi-Trans is a key supplier of SORM that complies with interception requirements mandated by the FSB and supports the operation of Russia's communications surveillance infrastructure. Norsi-Trans operates within a framework established and supervised by the Russian authorities. These authorities approve technical requirements for SORM deployment, require operators to coordinate implementation plans, oversee compliance and use the equipment for direct interception activities. Consequently, Norsi-Trans develops and supplies equipment specifically designed to satisfy surveillance requirements established by the FSB. Therefore, Sergey Ovchinnikov provides material support for serious violations and abuses of human rights and for the repression of civil society and democratic opposition.	

	Name	Identifying information	Statement of Reasons	Date of listing
91.	Mikhail Mikhailovich FOMIN (Russian: Михаил Михайлович ФОМИН)	Position: Executive Director of LLC Citadel DOB: 22.3.1981 Nationality: Russian Gender: male	Mikhail Fomin is the Executive Director of LLC Citadel. LLC Citadel operates in Moscow and Nizhny Novgorod and develops, implements and provides support for software and hardware of the so-called System of Operative Investigative Measures (SORM). LLC Citadel is the largest manufacturer and reportedly the most important supplier of SORM hardware and software in Russia. In his position as Executive Director, Mikhail Fomin is responsible for LLC Citadel's activities relating to the manufacture and supply of SORM-related hardware and software.	+

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	Name	Identifying information	Statement of Reasons	Date of listing
			SORM is a surveillance system used since the mid-1990s to control internet and mobile communications in Russia, namely the monitoring of phone calls, emails, internet use, text messages and social networks. Mobile phone and internet providers are legally required to install SORM. It is installed in all Russian data centres and at all internet exchange points and within major search engines. The user traffic is copied to a separate server or to a data centre available to the Federal Security Service (FSB). SORM gathers information about users' physical location, activity patterns, time of device use, users' behaviour and the use of different SIM cards in one or more devices. It can be used retroactively and without the provider's knowledge.	

	Name	Identifying information	Statement of Reasons	Date of listing
			SORM has been used to target journalists, opposition figures, minority groups and ordinary citizens. It has also been used to prosecute supporters of the Russian opposition, leaders such as Alexei Navalny, organisers of protests, individuals who ran internet accounts critical of the Russian authorities or produced reports on the political situations and activists who opposed the war of aggression against Ukraine. SORM has also been used to pre-emptively detain individuals suspected of anti-government activities. SORM has had a profound impact on the ability of Russian citizens to access unbiased information about the war of aggression against Ukraine. It was also used to block traffic from, and access to, thousands of Western websites and services. LLC Citadel is involved in the development, supply and maintenance of SORM, including hardware and software integrated into telecoms networks, therefore allowing intelligence agencies to directly access all traffic. SORM includes monitoring equipment installed in facilities of telecommunications providers. Such monitoring equipment provides information to the Russian government's intelligence agency, including on phone calls, text messages, emails and internet traffic. SORM also facilitates access to communications data associated with messaging application, metadata, mobile numbers, phone identifiers, geolocation, names and email addresses and IP addresses.	

	Name	Identifying information	Statement of Reasons	Date of listing
			LLC Citadel is a key supplier of SORM that complies with interception requirements mandated by the FSB and supports the operation of Russia's communications surveillance infrastructure. LLC Citadel operates within a framework established and supervised by the Russian authorities. These authorities approve technical requirements for SORM deployment, require operators to coordinate implementation plans, oversee compliance and use the equipment for direct interception activities. Consequently, LLC Citadel develops and supplies equipment specifically designed to satisfy surveillance requirements established by the FSB. Therefore, Mikhail Fomin provides material support for serious violations and abuses of human rights and for the repression of civil society and democratic opposition.	

	Name	Identifying information	Statement of Reasons	Date of listing
92.	Alexander Vladimirovich GNUTOV (Russian: Александр Владимирович ГНУТОВ)	Position: Head of Penal Colony No 10 (since 2024) Former Deputy Head of Penal Colony No 10 (from 2022 to 2024) DOB: 9.8.1980 Nationality: Russian Gender: male Passport number: 6100202615	Alexander Gnutov is the Head of Penal Colony No 10, which is located in the village of Udarny in the Zubovo-Polyansky District of the Republic of Mordovia. In that position, he directly oversees and is responsible for actions carried out in the Penal Colony No 10, and has failed to ensure the protection of detainees' rights and safety and the maintenance of law and order. Alexander Gnutov therefore bears responsibility for the abuse of prisoners committed by the staff of Penal Colony 10.	+

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	Name	Identifying information	Statement of Reasons	Date of listing
			Hundreds of Ukrainian prisoners of war as well as Ukrainian civilians captured in the occupied Ukrainian territories have been held in Penal Colony No 10. Former detainees report inhuman and degrading treatment and torture, including electric shocks, beating, stress positions causing trophic ulcers, sexual violence, mock executions and the denial of medical care. Civilians are subjected to the same treatment as prisoners of war and are held without trial or status. Human rights defenders have reported about inhuman conditions and torture in Penal Colony No 10 since 2012, including towards Russian prisoners. Therefore, Alexander Gnutov is responsible for serious violations or abuses of human rights, including torture and other cruel, inhuman or degrading treatment.	

	Name	Identifying information	Statement of Reasons	Date of listing
93.	Alexei Vladimirovich ANASHKIN (Russian: Алексей Владимирович АНАШКИН)	Position: Deputy Head of Penal Colony No 10 DOB: 9.6.1978 Nationality: Russian Gender: male Passport number: 8902524698	Alexei Anashkin is the Deputy Head of Penal Colony No 10, which is located in the village of Udarny in the Zubovo-Polyansky District of the Republic of Mordovia. In that position, he directly oversees and is responsible for actions carried out in Penal Colony No 10, and has failed to ensure the protection of detainees' rights and safety and the maintenance of law and order. Alexei Anashkin therefore bears responsibility for the abuse of prisoners committed by the staff of Penal Colony No 10.	+

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	Name	Identifying information	Statement of Reasons	Date of listing
			Hundreds of Ukrainian prisoners of war as well as Ukrainian civilians captured in the occupied Ukrainian territories have been held in the Penal Colony No 10. Former detainees report inhuman and degrading treatment and torture, including electric shocks, beating, stress positions causing trophic ulcers, sexual violence, mock executions and the denial of medical care. Civilians are subjected to the same treatment as prisoners of war and are held without trial or status. Human rights defenders have reported about inhuman conditions and torture in this facility since 2012, including towards Russian prisoners. Therefore, Alexei Anashkin is responsible for serious violations or abuses of human rights, including torture and other cruel, inhuman or degrading treatment.	

	Name	Identifying information	Statement of Reasons	Date of listing
94.	Egor Viktorovich AVERKIN (Russian: Егор Викторович АВЕРКИН)	Position: Deputy Head of Penal Colony No 10 DOB: 8.10.1992 Nationality: Russian Gender: male Passport number: 8912267789	Egor Averkin is the Deputy Head of Penal Colony No 10, which is located in the village of Udarny in the Zubovo-Polyansky District of the Republic of Mordovia. In that position, he directly oversees and is responsible for actions carried out in Penal Colony No 10, and has failed to ensure the protection of detainees' rights and safety and the maintenance of law and order. Egor Averkin therefore bears responsibility for the abuse of prisoners committed by the staff of Penal Colony No 10.	+

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	Name	Identifying information	Statement of Reasons	Date of listing
			Hundreds of Ukrainian prisoners of war as well as Ukrainian civilians captured in the occupied Ukrainian territories have been held in Penal Colony No 10. Former detainees report inhuman and degrading treatment and torture, including electric shocks, beating, stress positions causing trophic ulcers, sexual violence, mock executions and the denial of medical care. Civilians are subjected to the same treatment as prisoners of war and are held without trial or status. Human rights defenders have reported about inhuman conditions and torture in this facility since 2012, including towards Russian prisoners. Therefore, Egor Averkin is responsible for serious violations or abuses of human rights, including torture and other cruel, inhuman or degrading treatment.	

	Name	Identifying information	Statement of Reasons	Date of listing
95.	Alexander Anatolevich GRISHANIN (Russian: Александр Анатольевич ГРИШАНИН)	Position: Deputy Head of Penal Colony No 10 DOB: 6.10.1991 Nationality: Russian Gender: male Passport number: 8911222216	Alexander Grishanin is the Deputy Head of Penal Colony No 10, which is located in the village of Udarny in the Zubovo-Polyansky District of the Republic of Mordovia. In that position, he directly oversees and is responsible for actions carried out in Penal Colony No 10, and has failed to ensure the protection of detainees' rights and safety and the maintenance of law and order. Alexander Grishanin therefore bears responsibility for the abuse of prisoners committed by the staff of Penal Colony No 10.	+

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	Name	Identifying information	Statement of Reasons	Date of listing
			Hundreds of Ukrainian prisoners of war as well as Ukrainian civilians captured in the occupied Ukrainian territories have been held in Penal Colony No 10. Former detainees report inhuman and degrading treatment and torture, including electric shocks, beating, stress positions causing trophic ulcers, sexual violence, mock executions and the denial of medical care. Civilians are subjected to the same treatment as prisoners of war and are held without trial or status. Human rights defenders have reported about inhuman conditions and torture in this facility since 2012, including towards Russian prisoners. Therefore, Alexander Grishanin is responsible for serious violations or abuses of human rights, including torture and other cruel, inhuman or degrading treatment.	

	Name	Identifying information	Statement of Reasons	Date of listing
96.	Semyon Viktorovich KUZNETSOV (Russian: Семен Викторович КУЗНЕЦОВ)	Position: Deputy Head of Penal Colony No 10 DOB: 18.11.1982 Nationality: Russian Gender: male Passport number: 79271857062	Semyon Kuznetsov is the Deputy Head of Penal Colony No 10, which is located in the village of Udarny in the Zubovo-Polyansky District of the Republic of Mordovia. In that position, he directly oversees and is responsible for actions carried out in Penal Colony No 10, and has failed to ensure the protection of detainees' rights and safety and the maintenance of law and order. Semyon Kuznetsov therefore bears responsibility for the abuse of prisoners committed by the staff of Penal Colony No 10.	+

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	Name	Identifying information	Statement of Reasons	Date of listing
			Hundreds of Ukrainian prisoners of war as well as Ukrainian civilians captured in the occupied Ukrainian territories have been held in Penal Colony No 10. Former detainees report inhuman and degrading treatment and torture, including electric shocks, beating, stress positions causing trophic ulcers, sexual violence, mock executions and the denial of medical care. Civilians are subjected to the same treatment as prisoners of war and are held without trial or status. Human rights defenders have reported about inhuman conditions and torture in this facility since 2012, including towards Russian prisoners. Therefore, Semyon Kuznetsov is responsible for serious violations or abuses of human rights, including torture and other cruel, inhuman or degrading treatment.	

	Name	Identifying information	Statement of Reasons	Date of listing
97.	Ivan Vasilyevich VESHKIN (Russian: Иван Васильевич ВЕШКИН)	Position: Deputy Head of Penal Colony No 10 DOB: 22.12.1991 Nationality: Russian Gender: male Passport number: 8903739994	Ivan Veshkin is the Deputy Head of Penal Colony No 10, which is located in the village of Udarny in the Zubovo-Polyansky District of the Republic of Mordovia. In that position, he directly oversees and is responsible for actions carried out in Penal Colony No 10, and has failed to ensure the protection of detainees' rights and safety and the maintenance of law and order. Ivan Veshkin therefore bears responsibility for the abuse of prisoners committed by the staff of Penal Colony No 10.	+

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	Name	Identifying information	Statement of Reasons	Date of listing
			Hundreds of Ukrainian prisoners of war as well as Ukrainian civilians captured in the occupied Ukrainian territories have been held in the Penal Colony No 10. Former detainees report inhuman and degrading treatment and torture, including electric shocks, beating, stress positions causing trophic ulcers, sexual violence, mock executions and the denial of medical care. Civilians are subjected to the same treatment as prisoners of war and are held without trial or status. Human rights defenders have reported about inhuman conditions and torture in this facility since 2012, including towards Russian prisoners. Therefore, Ivan Veshkin is responsible for violations or abuses of human rights, including torture and other cruel, inhuman or degrading treatment.	

	Name	Identifying information	Statement of Reasons	Date of listing
98.	Galina Vasilievna MOKSHANOVA (Russian: Галина Васильевна МОКШАНОВА)	Position: Head of Medical Unit No 13, Penal Colony No 10 DOB: 16.1.1966 Nationality: Russian Gender: female Passport number: 8910200628	Galina Mokshanova is the Head of Medical Unit No 13 of Penal Colony No 10, which is located in the village of Udarny in the Zubovo-Polyansky District of the Republic of Mordovia. In that position, she plans, directs, orders and facilitates activities carried out in medical services of Penal Colony No 10. Galina Mokshanova therefore bears responsibility for the abuse of prisoners committed by the staff of Penal Colony No 10.	+

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	Name	Identifying information	Statement of Reasons	Date of listing
			Hundreds of Ukrainian prisoners of war as well as Ukrainian civilians captured in the occupied Ukrainian territories have been held in the Penal Colony No 10. Former detainees report inhuman and degrading treatment and torture, including electric shocks, beating, stress positions causing trophic ulcers, sexual violence, mock executions and the denial of medical care. Civilians are subjected to the same treatment as prisoners of war and are held without trial or status. Human rights defenders have reported about inhuman conditions and torture in this facility since 2012, including towards Russian prisoners. Therefore, Galina Mokshanova is responsible for serious violations or abuses of human rights, including torture and other cruel, inhuman or degrading treatment.	

(2) the following entries are added under the heading ‘B. Legal persons, entities and bodies’:

	Name	Identifying information	Statement of Reasons	Date of listing
‘3.	VK (previously known as Mail.ru group, VK Company Limited) (Russian: VK)	Address: Moscow, 125167, Leningradsky prospekt 39, bld. 79 Vk.com Vk.company INN (Russian tax ID): 3900015862 TIN (TIN): 3900015862 OGRN (Trade register number): 1233900010585	VK is one of the main technological companies in Russia. It provides email and chat services and runs applications and the social media website VKontakte. VK is the parent company of Communication Platform LLC, the developer and manager of state-supported mobile phone application Max. The development of the Max application was supervised by the Federal Security Service (FSB), which established requirements that the developers of the Max application had to meet. The Max application must be pre-installed on all mobile phones and tablets sold in Russia and is integrated with the Gosuslugi service.	+

+ OJ: please insert the date of entry into force of this implementing Regulation.

	Name	Identifying information	Statement of Reasons	Date of listing
			According to numerous experts, the Max application has extensive surveillance features and can monitor communications, including the use of virtual private networks (VPNs), gather data on other applications installed on phones, monitor address books, identify the location of users and install autonomous updates. The introduction and promotion of the Max application by the Russian state have been accompanied by a crackdown on and blocking of other independent applications, such as WhatsApp and Telegram, as well as by a campaign to limit the use of VPNs, which allowed users to access content blocked in Russia. Information gathered by Russian authorities through the Max application served as a basis to fine a Russian citizen for content posted on the application.	

	Name	Identifying information	Statement of Reasons	Date of listing
			The Max application has benefitted from government-imposed blocks on access to Western and independent competitors, such as Instagram, Facebook, Telegram and WhatsApp, enabling it to increase its revenue and market share. VK has cooperated with Russian authorities in their repressive actions, including by providing them with data concerning users of its services who posted content criticising Russia's war of aggression against Ukraine, or other content banned by the authorities. VK has also participated in the government-ordered ban on the use of VPNs, through which Russian internet users could previously access independent content on the internet. Therefore, VK provides technical support for the repression of civil society and democratic opposition, including by assisting and facilitating such acts.	

	Name	Identifying information	Statement of Reasons	Date of listing
4.	Communication Platform LLC (Russian: Акционерное Общество Инвестиционная Компания Коммуникационная Платформа)	Address: PR-KT Leningradskii D. 39, Str. 79, 125167 Moscow, Russian Federation www.complatform.ru mail@complatform.ru INN (Russian tax ID): 9714058267 TIN (TIN): 9714058267	Communication Platform LLC is a subsidiary company of VK (previously known as VKontakte) and is the developer and manager of state-supported mobile phone application Max. The development of the Max application was supervised by the Federal Security Service (FSB), which established the requirements that the developers of the Max application had to meet. The Max application must be pre-installed on all mobile phones and tablets sold in Russia and is integrated with the Gosuslugi service. According to numerous experts, the Max application has extensive surveillance features and can monitor communications, including the use of virtual private networks (VPNs), gather data on other applications installed on phones, monitor the address books, identify the location of the users and install autonomous updates. The introduction and promotion of the Max application by the Russian state have been accompanied by a crackdown on and blocking of other independent applications, such as WhatsApp and Telegram, as well as by a campaign to limit the use of VPNs, which allowed users to access content blocked in Russia.	+

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	Name	Identifying information	Statement of Reasons	Date of listing
			Information gathered by Russian authorities through the Max application served as a basis to fine a Russian citizen for content posted on the application. Therefore, Communication Platform LLC provides technical support for the repression of civil society and democratic opposition, including by assisting and facilitating such acts.	

	Name	Identifying information	Statement of Reasons	Date of listing
5.	VAS Experts (Russian: Общество с ограниченной ответственностью Вас Эксперте)	Address: Saint Petersburg, Avenue Liteyny 26, building a, office 5-13 OGRN: 1137847014337 INN (Russian tax ID) 7841476577	VAS Experts manufactures, develops, and sells hardware and software related to the so-called System of Operative Investigative Measures (SORM). SORM is a surveillance system used since the mid-1990s to control internet and mobile communications in Russia, namely the monitoring of phone calls, emails, internet use, text messages and social networks. Mobile phone and internet providers are legally required to install SORM. It is installed in all Russian data centres and at all internet exchange points and within major search engines. User traffic is copied to a separate server or to a data centre available to the Federal Security Service (FSB). SORM gathers information about users' physical location, activity patterns, time of device use, users' behaviour and the use of different SIM cards in one or more devices. It can be used retroactively and without the provider's knowledge.	+

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	Name	Identifying information	Statement of Reasons	Date of listing
			SORM has been used to target journalists, opposition figures, minority groups and ordinary citizens. It has also been used to prosecute supporters of the Russian opposition, leaders such as Alexei Navalny, organisers of protests, individuals who ran internet accounts critical of the Russian authorities or produced reports on the political situations and activists who opposed the war of aggression against Ukraine. SORM has also been used to pre-emptively detain individuals suspected of anti-government activities. SORM has had a profound impact on the ability of Russian citizens to access unbiased information about the war of aggression against Ukraine. It was also used to block traffic from, and access to, thousands of Western websites and services. VAS Experts is involved in the development, supply and maintenance of SORM, including hardware and software integrated into telecoms networks, therefore allowing intelligence agencies to directly access all traffic. VAS Experts is a key supplier of SORM that complies with interception requirements mandated by the FSB and supports the operation of Russia's communications surveillance infrastructure.	

	Name	Identifying information	Statement of Reasons	Date of listing
			VAS Experts operates within a framework established and supervised by the Russian authorities. These authorities approve technical requirements for SORM deployment, require operators to coordinate implementation plans, oversee compliance and use the equipment for direct interception activities. Consequently, VAS Experts develops and supplies equipment specifically designed to satisfy surveillance requirements established by the FSB. Therefore, VAS Experts provides material support for serious violations and abuses of human rights and for the repression of civil society and democratic opposition.	

	Name	Identifying information	Statement of Reasons	Date of listing
6.	Norsi-Trans a.k.a. Closed Joint-Stock Company “Norsi-Trans” (Russian: Закрытое Акционерное Общество “Норси-Транс”)	Address: 127015 Moscow, Bolshaya Novodmitrovskaya Street 12, building 15, floor 2, room 36) Date of registration: 16.1.2003 OGRN: 1037700030477 INN (Russian tax ID): 7705051215	Closed Joint-Stock Company “Norsi-Trans” manufactures, develops, and sells hardware and software related to the so-called System of Operative Investigative Measures (SORM). SORM is a surveillance system used since the mid-1990s to control internet and mobile communications in Russia, namely the monitoring of phone calls, emails, internet use, text messages and social networks. Mobile phone and internet providers are legally required to install SORM. It is installed in all Russian data centres and at all internet exchange points and within major search engines. User traffic is copied to a separate server or to a data centre available to the Federal Security Service (FSB). SORM gathers information about users’ physical location, activity patterns, time of device use, users’ behaviour and the use of different SIM cards in one or more devices. It can be used retroactively and without the provider’s knowledge.	+

+ OJ: please insert the date of entry into force of this implementing Regulation.

	Name	Identifying information	Statement of Reasons	Date of listing
			SORM has been used to target journalists, opposition figures, minority groups and ordinary citizens. It has also been used to prosecute supporters of the Russian opposition, leaders such as Alexei Navalny, organisers of protests, individuals who ran internet accounts critical of the Russian authorities or produced reports on the political situations and activists who opposed the war of aggression against Ukraine. It was also used to pre-emptively detain individuals suspected of anti-government activities. SORM has had a profound impact on Russians' ability to access unbiased information about the war of aggression against Ukraine. It was also used to block traffic from, and access to, thousands of Western websites and services.	

	Name	Identifying information	Statement of Reasons	Date of listing
			Norsi-Trans is involved in the development, supply and maintenance of SORM, including hardware and software that is integrated into telecoms networks, therefore allowing intelligence agencies to directly access all traffic. SORM includes monitoring equipment installed in facilities of telecommunications providers. Such monitoring equipment provides information to the Russian government's intelligence agency, including on phone calls, text messages, emails and internet traffic. SORM also facilitates access to communications data associated with messaging application, metadata, mobile numbers, phone identifiers, geolocation, names, email addresses and IP addresses. Norsi-Trans is a key supplier of SORM that complies with interception requirements mandated by the FSB and supports the operation of Russia's communications surveillance infrastructure.	

	Name	Identifying information	Statement of Reasons	Date of listing
			Norsi-Trans operates within a framework established and supervised by the Russian authorities. These authorities approve technical requirements for SORM deployment, require operators to coordinate implementation plans, oversee compliance and use the equipment for direct interception activities. Consequently, Norsi-Trans develops and supplies equipment specifically designed to satisfy surveillance requirements established by the FSB. Therefore, Norsi-Trans provides material support for serious violations and abuses of human rights and for the repression of civil society and democratic opposition.	

	Name	Identifying information	Statement of Reasons	Date of listing
7.	LLC Citadel (Russian: Общество с ограниченной ответственностью “Цитадель”)	Address: 127015 Moscow, Intra-city municipal territory municipal district Butyrsky, Novodmitrovskaya Street 2B OGRN: 1157746895690 INN(Russian tax ID): 9701012339 Address: 603098, Nizhny Novgorod, pr. Gagarina, 50 (Korpus 9), BTS “Chiornaya Zhemchuzhina” OGRN: 1055238018098 INN (Russian tax ID): 5260146265	LLC Citadel operates in Moscow and Nizhny Novgorod and develops, implements and provides support for software and hardware of the so-called System of Operative Investigative Measures (SORM). LLC Citadel is the largest manufacturer and reportedly the most important supplier of SORM hardware and software in Russia. SORM is a surveillance system used since the mid-1990s to control internet and mobile communications in Russia, namely the monitoring of phone calls, emails, internet use, text messages and social networks. Mobile phone and internet providers are legally required to install SORM. It is installed in all Russian data centres and at all internet exchange points and within major search engines. The user traffic is copied to a separate server or to a data centre available to the Federal Security Service (FSB). SORM gathers information about users’ physical location, activity patterns, time of device use, users’ behaviour and the use of different SIM cards in one or more devices. It can be used retroactively and without the provider’s knowledge.	+

+ OJ: please insert the date of entry into force of this implementing Regulation.

	Name	Identifying information	Statement of Reasons	Date of listing
			SORM has been used to target journalists, opposition figures, minority groups and ordinary citizens. It has also been used to prosecute supporters of the Russian opposition, leaders such as Alexei Navalny, organisers of protests, individuals who ran internet accounts critical of the Russian authorities or produced reports on the political situations and activists who opposed the war of aggression against Ukraine. SORM has also been used to pre-emptively detain individuals suspected of anti-government activities. It has had a profound impact on Russians' ability to access unbiased information about the war of aggression against Ukraine and was used to block traffic from, and access to, thousands of Western websites and services.	

	Name	Identifying information	Statement of Reasons	Date of listing
			LLC Citadel is involved in the development, supply and maintenance of SORM, including hardware and software integrated into telecoms networks, therefore allowing intelligence agencies to directly access all traffic. SORM includes monitoring equipment installed in facilities of telecommunications providers. Such monitoring equipment provides information to the Russian government's intelligence agency, including on phone calls, text messages, emails and internet traffic. SORM also facilitates access to communications data associated with messaging application, metadata, mobile numbers, phone identifiers, geolocation, names, email addresses and IP addresses. LLC Citadel is a key supplier of SORM that complies with interception requirements mandated by the FSB and supports the operation of Russia's communications surveillance infrastructure.	

	Name	Identifying information	Statement of Reasons	Date of listing
			LLC Citadel operates within a framework established and supervised by the Russian authorities. The authorities approve technical requirements for SORM deployment, require operators to coordinate implementation plans, oversee compliance and use the equipment for direct interception activities. Consequently, LLC Citadel develops and supplies equipment specifically designed to satisfy surveillance requirements. Therefore, LLC Citadel provides material support for serious violations and abuses of human rights and for the repression of civil society and democratic opposition.	