



## **COMPLIANCE CIRCULAR**

**15/2026 [CC 15\_2026]**

**To:**

**ALL MEMBERS, FIRMS AND ALL COMPLIANCE OFFICERS OF THE INSTITUTE**

**Date:**

**24 April 2026**

**Subject:**

**Twentieth package of sanctions imposed by the EU against Russia**

The Institute of Certified Public Accountants (ICPAC) with the present circular draws the attention of its Members, Firms and Compliance Officers to the twentieth package of sanctions imposed on 23 April 2026 by the European Union against Russia. For the official announcement please follow the [link](#).

The twentieth package of sanctions imposed provides, inter alia, for a further 120 listings of persons.

Furthermore, the twentieth package introduced sectoral measures on the following industries:

### **Energy measures**

The package includes the basis for a future maritime services ban on Russian crude oil and petroleum products.

The package targets 36 new designations operating in the exploration, extraction, refining, and transportation of oil. Also, it includes further listings focusing on the shadow fleet ecosystem, including entities operating in third countries. An additional 46 vessels are subject to a port access ban and a ban on the provision of a broad range of services related to maritime transport.

Mandatory due diligence checks for the sale of tankers has also been introduced and the provision of maintenance and other services for Russian liquified natural gas (LNG) tankers and ice-breakers has been banned. In addition, as of January 2027, the provision of LNG terminal services to Russian entities or entities owned or controlled by Russian nationals or operators will be illegal.

Lastly, the package introduces a ban on transactions with two Russian ports, namely Murmansk and Tuapse and with the oil terminal at the port of Karimun in Indonesia, which are used to circumvent the oil price cap.

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## **Financial services and crypto**

The package introduces a transaction ban with 20 Russian banks. Furthermore, it imposed a transaction ban on four financial institutions in third countries for circumventing EU sanctions or connecting to the Russian System for Transfer of Financial Messages.

In addition, a Kyrgyz entity is designated for operating a platform where significant amounts of the government-backed stablecoin in A7A5 are traded. Moreover, the package introduces a total sectoral ban on providers and platforms established in Russia that allow the transfer and exchange of crypto assets. The package also bans transactions with the crypto currency RUBx, as well as all support for the development of the digital rouble. Netting transactions with Russian agents are also forbidden.

## **Russia's military-industrial complex**

The package designates 58 companies and associated individuals involved in the development and manufacturing of military goods, such as drones. Another 16 entities based in China, the United Arab Emirates, Uzbekistan, Kazakhstan and Belarus have been designated for providing dual-use goods or weapons systems to the Russian military-industrial complex.

In addition, 60 new entities are now subject to tighter export restrictions on items which contribute to the technological enhancement of Russia's defense sectors.

## **Trade**

The package prohibits the export of any computer numerical control machines or radios to Kyrgyzstan due to the high risk that these products will be re-exported to Russia.

The existing export ban is expanded to include laboratory glassware, certain high-performance lubricants and lubricant additives, certain energetic materials, certain chemicals, rubber and articles made of vulcanized rubber, articles made of steel, tools for metal production and industrial tractors.

Furthermore, the package introduced further restrictions on the import of goods to include certain raw materials, certain metals and minerals, scraps of steel and other metals, certain chemicals, articles made of vulcanized rubber and tanned fur skins.

All trade-related measures also include an enhanced prohibition on transit via Russian territory.

The package also introduced a quota for imports of ammonia.

## **Accountability**

The EU has listed five individuals and one entity for enabling the abduction, forced transfer and indoctrination of Ukrainian children, as well as four persons involved in the appropriation of Ukrainian cultural heritage. Also, it designates four propagandists.



## Other measures

Stronger legal safeguards to protect EU companies from violations of their intellectual property rights have been introduced. Also, the package includes a ban on the provision of cybersecurity services to Russia. The broadcasting prohibition is expanded to include sites that disseminate the same content as prohibited entities, circumventing in this way the EU measures.

The package introduced a requirement for importers of polished diamonds to provide a due diligence statement confirming that the diamonds were not mined, processed or produced in Russia.

## Belarus

The package designates three new entities including a Chinese state-owned entity.

In addition, measures intended to mirror those imposed on Russia, mainly trade measures, legal protections, measures on crypto and restrictions on the provision of cybersecurity services and tourism services are included.

Lastly, the Belarusian sanctions regime has been extended until 28 February 2027.

For the updated Regulation (EU) 269/2014, please follow the [link](#).

For the updated Regulation (EU) 833/2014, please follow the [link](#).

For the updated Regulation (EU) 765/2006, please follow the [link](#).