



2026/511

23.4.2026

COUNCIL REGULATION (EU) 2026/511

of 23 April 2026

amending Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine

THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty on the Functioning of the European Union, and in particular Article 215 thereof,

Having regard to Council Decision 2014/145/CFSP of 17 March 2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine ⁽¹⁾,

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

Whereas:

- (1) Council Regulation (EU) No 269/2014 ⁽²⁾ gives effect to restrictive measures provided for in Decision 2014/145/CFSP.
- (2) On 23 April 2026, the Council adopted Decision (CFSP) 2026/504 ⁽³⁾, amending Decision 2014/145/CFSP. Regulation (EU) No 269/2014 should also be amended accordingly.
- (3) Decision (CFSP) 2026/504 amends the listing criterion for natural or legal persons, entities or bodies owning, controlling, managing or operating vessels involved in certain activities or that otherwise provide material, technical or financial support to the operations of such vessels.
- (4) Decision (CFSP) 2026/504 extends to a newly listed insurance company the existing derogation related to payments constituting an indemnity or benefit provided further to the materialisation of a risk.
- (5) Decision (CFSP) 2026/504 introduces additional derogations from the asset freeze and the prohibition on making funds and economic resources available to designated persons and entities for the work of state-funded intermediators for the foreign cultural policy of the Member States in Russia, such as cultural institutions, schools or organisations supporting Member States' ethnic minorities.

⁽¹⁾ OJ L 78, 17.3.2014, p. 16, ELI: [http://data.europa.eu/eli/dec/2014/145\(1\)/oj](http://data.europa.eu/eli/dec/2014/145(1)/oj).

⁽²⁾ Council Regulation (EU) No 269/2014 of 17 March 2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine (OJ L 78, 17.3.2014, p. 6, ELI: <http://data.europa.eu/eli/reg/2014/269/oj>).

⁽³⁾ Council Decision (CFSP) 2026/504 of 23 April 2026 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine (OJ L, 2026/504, 23.4.2026, ELI: <http://data.europa.eu/eli/dec/2026/504/oj>).

- (6) Claims brought by persons, entities or bodies listed in Annex I to Regulation (EU) No 269/2014, or by entities owned by such persons, entities or bodies can not be satisfied if they are related to contracts or transactions affected by restrictive measures. This prohibition also covers claims brought before arbitration tribunals by virtue of arbitration clauses in contracts, contrary to the objective of Article 11 of Regulation (EU) No 269/2014 or Article 11 of Council Regulation (EU) No 833/2014⁽⁴⁾. In order to discourage the initiation of arbitral proceedings by natural or legal persons, entities or bodies listed in Annex I to Regulation (EU) No 269/2014 after restrictive measure have been adopted, which could lead to a circumvention or frustration of restrictive measures, particularly where arbitration proceedings are initiated in a third country, Decision (CFSP) 2026/504 provides for a derogation allowing, under certain conditions, the release of frozen funds or economic resources solely for the payment of costs of arbitral proceedings awarded against such listed persons and to the benefit of parties that are neither persons listed in Annex I to Regulation (EU) No 269/2014 nor owned or controlled by listed persons subject to the restrictive measures set out in that Regulation, or that are not Russian nationals nor established in Russia and that are not subject to the restrictive measures set out in Regulation (EU) No 833/2014.
- (7) Decision (CFSP) 2026/504 introduces a new derogation to enable the release of frozen funds of a listed entity or the provision of economic resources thereto, where this is essential to facilitate a reduction by that entity, in the intake of, or reliance on, Russian crude oil imports. Decision (CFSP) 2026/504 also extends an existing derogation for the supply of specific goods and services necessary for the Sofia metro system.
- (8) At present, claims against Union persons, entities or bodies complying with restrictive measures can be brought by persons, entities or bodies other than those persons, entities or bodies listed in Regulation (EU) No 269/2014, or by persons other than those acting on their behalf or at their direction, for instance when Union persons discontinue the supply of funds or economic resources which could be made available to persons listed under this Regulation. Decision (CFSP) 2026/504 therefore strengthens the Union's framework of restrictive measures by extending the scope of the prohibition on the satisfaction of such claims in connection with any contract or transaction the performance of which has been affected, directly or indirectly, in whole or in part, by Union restrictive measures, in order to better protect Union operators. The scope of the prohibition in Regulation (EU) No 269/2014 on the satisfaction of such claims should therefore cover claims brought by natural or legal persons, entities or bodies established in third countries other than partner countries listed in Annex VIII to Council Regulation (EU) No 833/2014.
- (9) Russian natural or legal persons, entities or bodies, or persons, entities or bodies owned or controlled by them might seek to enforce, in third countries other than Russia, court and administrative decisions. Such attempts can be based on claims relating to contracts affected by restrictive measures. It is therefore appropriate to extend the possibility for Union natural or legal persons to claim damages from persons, entities and bodies who seek, in third countries other than Russia, the enforcement of those decisions, or who cooperate in their enforcement, as well as from persons, entities and bodies that are owned or controlled by them.
- (10) These measures fall within the scope of the Treaty on the Functioning of the European Union and therefore, in particular with a view to ensuring their uniform application in all Member States, regulatory action at the level of the Union is necessary.
- (11) Regulation (EU) No 269/2014 should therefore be amended accordingly,

HAS ADOPTED THIS REGULATION:

⁽⁴⁾ Council Regulation (EU) No 833/2014 of 31 July 2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine (OJ L 229, 31.7.2014, p. 1, ELI: <http://data.europa.eu/eli/reg/2014/833/oj>).

Article 1

Regulation (EU) No 269/2014 is amended as follows:

(1) in Article 3(1), point (k) is replaced by the following:

‘(k) natural or legal persons, entities or bodies that own, control, manage or operate vessels that transport crude oil or petroleum products or mineral products originating in Russia or exported from Russia and practice irregular and high-risk shipping practices as set out in the International Maritime Organisation General Assembly resolution A.1192(33), or that otherwise provide material, technical or financial support to the operations of such vessels; or’;

(2) in Article 4(1), the following points are added:

‘(f) necessary for the needs of state-funded intermediate organisations for the foreign cultural policy of the Member States in Russia;

(g) necessary for Member States’ historical responsibility programmes or for the support of Member States’ ethnic minorities in Russia.’;

(3) the following Article is inserted:

‘Article 5c

1. By way of derogation from Article 2, the competent authorities of the Member States may authorise the release of certain frozen funds or economic resources where such funds or economic resources are subject to an arbitral decision rendered after the date on which the natural or legal person, entity or body referred to in Article 2 was included in Annex I, provided that the arbitral proceedings giving rise to that decision were initiated by that natural or legal person, entity or body. Such authorisation may be granted insofar as the arbitral decision concerns the award of costs of arbitral proceedings, and the arbitral decision awards such costs to a party that is a natural or legal person, entity or body that is neither listed, nor owned or controlled by a listed person, entity or body subject to the restrictive measures in this Regulation, or that is not a Russian national nor established in Russia and that is not subject to the restrictive measures set out in Regulation (EU) No 833/2014.

2. Such authorisation shall be limited to the payment of costs of the arbitral proceedings, including, where applicable, the fees and expenses of the arbitral tribunal, administrative fees of the arbitral institution, and reasonable legal and other procedural costs incurred by the opposing party, as awarded by the arbitral tribunal in connection with the conduct of the arbitral proceedings. It shall not extend to the payment of any principal amount, damages, interest or other substantive claims awarded for as long as sanctions are in force.’;

(4) Article 6a(1a) is replaced by the following:

‘1a. By way of derogation from Article 2(2), the competent authorities of a Member State may authorise, under such conditions as they deem appropriate, payments to the entity listed under entry number 265 under heading “B. Entities” in Annex I, for goods and services that can only be provided by that entity and that are necessary for the operation, maintenance or repair of Budapest metro line 3 cars delivered by Metrowagonmash in 2018 and of Sofia metro lines 1, 2 and 4 cars, delivered by Metrowagonmash before 2017.’;

(5) Article 6b is amended as follows:

(1) paragraph 5e is amended as follows:

- (a) in the introductory wording the words ‘entities listed under entry numbers 56, 270 and 579’ are replaced by the words ‘entities listed under entry numbers 56, 270, 579 and 726’;
- (b) in point (a), to the words ‘entities listed under entry numbers 56, 270 and 579’ are replaced by the words ‘entities listed under entry numbers 56, 270, 579 and 726’;

(2) the following paragraph is inserted:

‘5k. By way of derogation from Article 2, the competent authorities of a Member State may authorise the release of certain frozen funds belonging to the entity listed under entry number 639 under the heading “Entities” in Annex I to this Regulation, or the making available of certain economic resources to that entity, under such conditions as they deem appropriate after having determined that such funds and economic resources are strictly necessary to facilitate a significant reduction in the intake of, or reliance on, the import of Russian crude oil and provided that the release of funds or making available of economic resources is completed before 24 October 2026.’;

(6) in Article 11(1), the following point is added:

- ‘(c) any natural person of a third country or any legal person, entity or body established in a third country, with the exception of partner countries listed in Annex VIII of Council Regulation (EU) No 833/2014, making available funds or economic resources the making available of which is prohibited under this Regulation, to the persons, entities or bodies referred to in points (a) or (b) of this paragraph.’;

(7) Article 11a is replaced by the following:

‘Article 11a

1. Any person referred to in Article 17, point (c) or (d), shall be entitled to recover, in judicial proceedings before the competent courts of a Member State, any direct or indirect damages, including legal costs, incurred by that person, or by a legal person, entity or body that the person referred to in Article 17, point (d), owns or controls, as a consequence of claims lodged with courts in third countries by persons, entities and bodies referred to in Article 11(1), point (a) or (b), in connection with any contract or transaction the performance of which has been affected, directly or indirectly, in whole or in part, by the measures imposed under this Regulation, provided that the person concerned does not have effective access to the remedies under the relevant jurisdiction. Such damages may be recovered from the persons, entities or bodies referred to in Article 11(1), point (a) or (b), that lodged the claims with the courts in the third country, or from persons, entities or bodies that own or control those entities or bodies.

2. Without prejudice to paragraph 1, any person referred to in Article 17, point (c) or (d), shall be entitled to recover, in judicial proceedings before the competent courts of a Member State, any direct or indirect damages, including legal costs, incurred by that person or by a legal person, entity or body that the person referred to in Article 17, point (d), owns or controls, as a consequence of injunctions, orders, reliefs, judgments or other judicial or administrative decisions rendered in third countries other than Russia, which seek to enforce judgments upholding claims referred to in paragraph 1, provided that the person concerned does not have effective access to the remedies under the relevant jurisdiction. Such damages may be recovered from the persons, entities or bodies, that seek or cooperate in the enforcement of judgments upholding claims referred to in paragraph 1 in a third country other than Russia, or from persons, entities or bodies that own or control those entities or bodies, with the exception of their lawyers and of members of the judiciary, and with the exception of persons referred to in Article 17, point (c) or (d), or legal persons, entities or bodies that the persons referred to in Article 17, point (c) or (d), own or control, against whom a judgment upholding claims referred to in paragraph 1 has been issued.’.

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 Brussels, 23 April 2026.

For the Council

The President

M. RAOUNA
