



Cayman Monetary Regulatory Authority International

At the forefront of financial regulation, the Cayman Monetary Regulatory Authority International (CMRAI) is dedicated to upholding the highest standards of financial oversight and compliance. Our mission is to safeguard the stability and integrity of the global financial system by ensuring that financial services operate within a framework of transparency, accountability, and excellence.

As a trusted partner to financial institutions worldwide, CMRAI provides rigorous supervision, innovative solutions, and strategic guidance to foster a secure and thriving financial environment. With decades of experience and a commitment to global standards, we stand as a pillar of trust and security in an ever-evolving financial landscape.

With a legacy of excellence in financial oversight, the Cayman Monetary Regulatory Authority International (CMRAI) is a beacon of trust in the international financial community. Our role extends beyond regulation; we are innovators, collaborators, and protectors of the global financial ecosystem. By fostering compliance, promoting best practices, and embracing technological advancements, CMRAI ensures that financial services remain resilient and adaptable in a dynamic global market.

Our comprehensive approach to regulation encompasses a deep understanding of financial risks and a proactive stance on emerging challenges. We are committed to empowering financial institutions with the tools and guidance necessary to navigate complex regulatory landscapes, thereby contributing to global economic stability and growth.

Cayman KY1 1001, Cayman Islands

23 October 2020 NOTICE RE: Financial

Sanctions Notice The Cayman Monetary Regulatory Authority International (CMRAI) hereby notifies you that it has received a new Notice from the Office of Financial Sanctions Implementation, HM Treasury (OFSI), which is attached as an Annex to this Notice.

1. What you must do: A. In the case of an addition or amendment of a person to the Consolidated List and asset freeze: i. Check whether you maintain any accounts or hold any funds or economic resources for the persons set out in the OFSI Notice; ii. Freeze any such accounts and other funds or economic resources. iii. Refrain from dealing with the funds or assets or making them available (directly or indirectly) to such persons unless licensed by the Governor. iv. Report any findings to the Financial Reporting Authority (FRA) at together with any additional information that would facilitate compliance with the relevant legislative requirements. v. Provide any information concerning the frozen assets of designated persons to the FRA at and submitting a compliance reporting form. Information reported to FRA may be passed to other regulatory authorities or law enforcement. B. In the case of the removal of a person from the Consolidated List and unfreezing of assets i. Check whether you have frozen assets of any person or entity removed from the Consolidated List and verify that the person is no longer subject to an asset freeze. ii. Remove the person from your institution s list of persons or entities subject to financial sanction. iii. Un-freeze the assets of the person and where necessary re-activate all relevant accounts. 2 iv. Send advice to the person that the assets are no longer subject to an asset freeze. v. Advise the FRA at of the actions taken. 2. Failure to comply with financial sanctions legislation or to seek to circumvent its provisions is a criminal offence. Further Information. For general information on financial sanctions please see FRAs Industry Guidance on targeted financial sanctions.

21%20FRA%20Financial%20Sanctions%20Guidance%20(Final).pdf. Enquiries regarding this sanctions notice should be addressed to The Sanctions Coordinator Financial Reporting Authority P.O. Box 1054 Grand Cayman KY1-1102 Cayman Islands REGIME: Chemical Weapons INDIVIDUAL 1. Names (Last): Kostyukov (1): Igor (2): Olegovich (3): n/a (4): n/a (5): n/a Title: n/a Position: Head of the Main Directorate of the General Staff of the Armed Forces of the Russian Federation (GRU/GU) A.K.A: n/a Date of Birth: 21/02/1961 Place of Birth: n/a Nationality: Russian Passport Details: n/a Address: n/a Other Information

Gender: male. Igor Olegovich Kostyukov, given his senior leadership role as First Deputy Head of the GRU (a.k.a. GU) at that time, is responsible for the possession, transport and use in Salisbury during the weekend of 4 March 2018 of the toxic nerve agent Novichok by officers from the GRU. One of the units under his command is the 85th Main Centre for Special Services (GTsSS), also known as military unit 26165 (industry nicknames: AP28 , Fancy Bear , Sofacy Group , Pawn Storm and Strontium). In this capacity Igor Kostyukov is responsible for cyber-attacks carried out by the GTsSS. In particular, the cyber- attack against the German federal parliament which took place in April and May 2015 and the attempted cyber-attack aimed at hacking into the Wi-Fi network of the Organisation for the Prohibition of Chemical Weapons (OPCW) in the Netherlands in April 2018. Listed under both the Chemical Weapons and Cyber-Attacks regimes. Listed On: 21/01/2019 3 Last Updated: 23/10/2020 Group ID: 13748 REGIME: Cyber-Attacks INDIVIDUAL 1. Names (Last): Badin (1): Dmitry (2): Sergeyevich (3): n/a (4): n/a (5): n/a Title: n/a Position: n/a A.K.A: n/a Date of Birth: 15/11/1990 Place of Birth: Kursk Nationality: Russian Passport Details: n/a Address: n/a Other Information Gender: male. As a military intelligence officer of the 85th Main Centre for Special Services (GTsSS) of the Main Directorate of the General

Staff of the Armed Forces of the Russian Federation (GU/GRU), Dmitry Badin was part of a team of Russian military intelligence officers which conducted a cyber-attack against the German federal parliament in April and May 2015. Listed On: 23/10/2020 Last Updated: 23/10/2020 Group ID: 13983

2. Names (Last): Kostyukov (1): Igor (2): Olegovich (3): n/a (4): n/a (5): n/a Title: n/a Position: Head of the Main Directorate of the General Staff of the Armed Forces of the Russian Federation (GRU/GU) A.K.A: n/a Date of Birth: 21/02/1961 Place of Birth: n/a Nationality: Russian Passport Details: n/a Address: n/a Other Information Gender: male. Igor Olegovich Kostyukov, given his senior leadership role as First Deputy Head of the GRU (a.k.a. GU) at that time, is responsible for the possession, transport and use in Salisbury during the weekend of 4 March 2018 of the toxic nerve agent Novichok by officers from the GRU. One of the units under his command is the 85th Main Centre for Special Services (GTsSS), also known as military unit 26165 (industry nicknames: AP28 , Fancy Bear , Sofacy Group , Pawn Storm and Strontium). In this capacity Igor Kostyukov is responsible for cyber-attacks carried out by the GTsSS. In particular, the cyber- attack against the German federal parliament which took place in April and May 2015 and the attempted cyber-attack aimed at hacking into the Wi-Fi network of the Organisation for the Prohibition of Chemical Weapons (OPCW) in the Netherlands in April 2018. Listed under both the Chemical Weapons and Cyber-Attacks regimes. Listed On: 23/10/2020 4 Last Updated: 23/10/2020 Group ID: 13748

ENTITY 1. Names (Last): 85th Main Centre for Special Services (GTsSS) of the Main Directorate of the General Staff of the Armed Forces of the Russian Federation (GU/GRU) (1): n/a (2): n/a (3): n/a (4): n/a (5): n/a A.K.A: n/a Other Information The 85th Main Centre for Special Services (GTsSS) of the Main Directorate of the General Staff of the Armed Forces of the Russian Federation (GU/GRU), also known as military unit 26165 (industry nicknames: APT28 , Fancy Bear , Sofacy Group , Pawn Storm and Strontium), is responsible for cyber-attacks with a significant effect constituting an external threat to the Union or its Member States. In particular, military intelligence officers of the GTsSS took part in the cyber-attack against the German federal parliament which took place in April and May 2015 and the attempted cyber-attack aimed at hacking into the Wi-Fi network of the Organisation for the Prohibition of Chemical Weapons (OPCW) in the Netherlands in April 2018. Listed On: 23/10/2020 Last Updated: 23/10/2020 Group ID: 13984