**Summary of Russia/Ukraine-Related Sanctions**

**December 2023**

The United States has imposed certain economic sanctions (summarized below) in response to the Russian-led actions in Ukraine. The Charles Stewart Mott Foundation is responsible for ensuring that its grant funds are not used, directly or indirectly, in violation of these sanctions. Thus, as a condition to receiving a grant from the Foundation, Ukrainian grantees must certify that grant funds will not be used in a manner that violates the sanctions.

The Executive Orders summarized below prohibit U.S. persons (such as the Foundation) from making or receiving contributions and providing funds, goods or services to or for the benefit of any sanctioned individual or entity. The sanctioned individuals and entities are listed at: <https://sdnsearch.ofac.treas.gov/>. In addition to complying with all list-checking and other requirements set forth in the grant commitment letter, Ukrainian grantees must confirm that any secondary recipient of Foundation grant funds is not a sanctioned individual or entity.

**Executive Order 13660 of March 6, 2014** imposes sanctions on individuals and entities that have asserted governmental authority in the Crimea region of Ukraine without authorization of the Government of Ukraine, or are responsible for undermining democratic processes in Ukraine, violating the sovereignty and territorial integrity of Ukraine, or for stealing assets of the Ukrainian people. These sanctions also put in place restrictions on the travel of certain individuals and officials.

**Executive Order 13661 of March 16, 2014** expands the sanctions imposed under Executive Order 13660 to individuals and entities that are officials of the Government of Russia or that operate in the arms or related material sector in Russia.

**Executive Order 13662 of March 20, 2014** expands the sanctions imposed under Executive Order 13660 to individuals and entities that operate in certain sectors of the Russian economy (currently, the financial services, energy, and defense and related material sectors). Extending financing longer than 30 days in maturity to persons in those sectors (90 days in the case of the energy sector) is prohibited. The provision of goods, services or technology in support of exploration or production for deepwater, Arctic offshore or shale projects that have the potential to produce oil in Russia, or in maritime area claimed by Russia, are also prohibited.

**Executive Order 13685 of December 19, 2014** expands the sanctions imposed under Executive Order 13660 to individuals and entities that operate in the Crimea region of Ukraine. It also prohibits new investment in Crimea, the importation into the United States of goods, services or technology from Crimea, and the exportation or supply (directly or indirectly) by a U.S. person of any goods, services or technology to Crimea.

 **Executive Order 14065 of February 21, 2022** expands the scope of Executive Order 13660 to individuals and entities that operate (or have operated since February 21, 2022) in the so-called Donetsk People’s Republic (“DNR”) region of Ukraine, the Luhansk People’s Republic (“LNR”) region of Ukraine, or any other region of Ukraine that the U.S. Secretary of the Treasury determines to be covered by this Executive Order (collectively referred to as the “Covered Regions”). It also prohibits new investment in a Covered Region, the importation into the United States of goods, services or technology from a Covered Region, and the exportation or supply (directly or indirectly) by a U.S. person of any goods, services or technology to a Covered Region.

Copies of Executive Orders 13660, 13661, 13662, 13685, and 14065 are attached.