

## **OFAC FAQs Related to Ukraine-/Russia-related General License 14**

### **575. Why is OFAC issuing General License 14, and what new activity does it authorize?**

The purpose of [General License 14](#) is to allow United Company RUSAL PLC (RUSAL) or any other entity in which RUSAL owns, directly or indirectly, a 50 percent or greater interest, to continue maintenance or wind down activities until October 23, 2018. Although all funds blocked prior to 12:01 a.m. eastern daylight time, April 23, 2018 remain blocked, the general license authorizes the use of these blocked funds for the maintenance and wind down activities described in General License 14. In addition, U.S. persons are not required to block transactions authorized by General License 14 that occur on or after April 23, 2018, except for transactions involving blocked persons other than RUSAL or any other entity in which RUSAL owns, directly or indirectly, a 50 percent or greater interest. For a discussion of the relationship between General License 14 and foreign persons, please see FAQs [579](#) and [580](#).

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### **576. Under what circumstances can OFAC give further sanctions relief to RUSAL or any other entity in which RUSAL owns, directly or indirectly, a 50 percent or greater interest?**

Consistent with OFAC regulations, parties may be removed by demonstrating a change in the circumstances that led to their designation. In the case of RUSAL, absent other adverse information and consistent with the facts and circumstances of any petition for delisting, the path for the United States to provide sanctions relief is through divestment and relinquishment of control of RUSAL by Oleg Deripaska.

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### **577. I am a U.S. person holding accounts for or other property of RUSAL or another entity in which RUSAL owns, directly or indirectly, a 50 percent or greater interest. Does General License 14 allow me to unblock this property?**

No. All accounts or other property of RUSAL or any other entity in which RUSAL owns, directly or indirectly, a 50 percent or greater interest blocked as of April 23, 2018 remain blocked, except for the use in maintenance and wind-down activities described in [General License 14](#). U.S. persons, however, may engage in transactions authorized by General License 14 that occur on or after April 23, 2018 without blocking payments associated with such transactions, except for transactions involving blocked persons other than RUSAL (including any other entity in which RUSAL owns, directly or indirectly, a 50 percent or greater interest).

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### **578. How is General License 12A different from General License 12?**

[General License 12A](#) now reflects the authorization in [General License 14](#). Specifically, U.S. persons are not required to place into a blocked account payments to or for RUSAL, or any other entity in which RUSAL owns, directly or indirectly, a 50 percent or greater interest, for activities authorized by General License 14. Activities necessary to the maintenance or wind down of operations or existing contracts of RUSAL and any other entity in which RUSAL owns, directly or indirectly, a 50 percent or greater interest, are authorized pursuant to General License 14 through October 23, 2018.

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**579. Will foreign persons be subject to sanctions under CAATSA for engaging in activity with RUSAL or any other entity in which RUSAL owns, directly or indirectly, a 50 percent or greater interest?**

As described in FAQs [542](#), [545](#), and [574](#), a transaction will not be considered “significant” for the purposes of a sanctions determination under section 10 of [SSIDES](#), as amended by section 228 of [CAATSA](#), and section 5 of [UFSA](#), as amended by section 226 of CAATSA, if U.S. persons would not require specific licenses from OFAC to participate in such a transaction. Therefore, activity authorized by [General License 14](#), and occurring within the time period authorized by General License 14, would not be considered “significant” for the purposes of a sanctions determination under section 10 of SSIDES, as amended by CAATSA, or section 5 of UFSA, as amended by CAATSA.

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**580. I am a foreign person that seeks to pay RUSAL or another entity in which RUSAL owns, directly or indirectly, a 50 percent or greater interest for goods or services connected with maintenance or wind-down activities authorized by General License 14. Am I required to deposit payment into a blocked account at a U.S. financial institution in order for my payment to not be considered “significant” for purposes of section 10 of SSIDES, as amended by section 228 of CAATSA, or section 5 of UFSA, as amended by section 226 of CAATSA?**

No. U.S. persons may engage in activities authorized by [General License 14](#) that occur on or after April 23, 2018, except for activities involving blocked persons other than RUSAL (including any other entity in which RUSAL owns, directly or indirectly, a 50 percent or greater interest) without making associated payments into a blocked account. Similarly, foreign persons may engage in activities that would be authorized by General License 14 if engaged in by a U.S. person without making associated payments into a blocked account.

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**581. I am a U.S. person that seeks to supply goods to RUSAL. Am I permitted to export those goods from the United States to RUSAL pursuant to General License 14?**

Yes. [General License 14](#) does not restrict exports to RUSAL (or any other entity in which RUSAL owns, directly or indirectly, a 50 percent or greater interest), provided that the activity is for maintenance or wind down and consistent with the requirements of other federal agencies.

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**582. I am located outside of the United States and seek to export goods from a third-country location in connection with activity for the maintenance or wind down of an entity listed on General License 12A (or any other entity in which a listed entity in 12A owns, directly or indirectly, a 50 percent or greater interest). Would such exports be prohibited under General License 12A or otherwise subject to section 10 of SSIDES, as amended by section 228 of CAATSA, or section 5 of UFGA, as amended by section 226 of CAATSA?**

No. Although [General License 12A](#) does not authorize the exportation of goods from the United States, paragraph (c)(4) of General License 12A does not similarly apply to the exportation of goods from a third country to another location.

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