

Annex 1. The rationale for the inclusion of the listed persons in the list of personal sanctions

Individual	Rationale
Kazakhstan	
<p>TOKAEV Kasym-Zhomart Kemeluly: born on 17 May 1953, a Kazakhstani politician and diplomat who is currently serving as the President of Kazakhstan since 20 March 2019.</p>	<p>As head of state, Tokayev controls all branches of government. All the actions of the customs service, the state railroad company, the country's financial regulator (controlling the second-tier banks that secure transactions) are subordinated to the President of Kazakhstan. Therefore, export operations to circumvent sanctions cannot take place without his direct instruction and coordination.</p>
<p>TASMAGAMBETOV Imangali Nurgaliyevich: born on 9 December 1956, a Kazakhstani politician and diplomat, Secretary General of the Collective Security Treaty Organisation (CSTO) since 1 January 2023, as the representative of the Republic of Kazakhstan.</p>	<p>As Secretary General of the CSTO, he manages the CSTO bodies and promotes the joint production and repair of weapons for Russia. He also supports Kremlin military propaganda, accusing the West of fomenting the war.</p>
<p>KULIBAYEV Timur Askarovich: born on 10 September 1966, a Kazakhstani oligarch, son-in-law of former Kazakhstani president Nursultan Nazarbayev.</p>	<p>On 13 April 2022, Timur Kulibayev through his Halyk Bank purchased from Sberbank Kazakhstan part of its loan portfolio that consisted of 7500 corporate borrowers (25% of the loan portfolio of Sberbank Kazakhstan). Kulibayev paid a purchase price of over USD 730 million for that loan portfolio, thereby providing much needed liquidity to the sanctioned Russian subsidiary bank. On 30 May 2022, the shareholder of Sberbank Kazakhstan, Sberbank Russia, decided to pay a shareholder dividend of 99.99% of Sberbank Kazakhstan's net profit, which was approximately USD 300 million.</p>

<p>TURLOV Timur Ruslanovich: born on 13 November 1987, a Russian oligarch, founder and major shareholder of <i>Freedom Holding</i>.</p>	<p>Freedom Bank, owned by Timur Turlov, provides Russians with access to the Mastercard international payment system, thus helping to circumvent financial sanctions. Timur Turlov has been on Ukraine’s sanctions list since autumn 2022, but without sanctions from the US and EU, he will continue to help Russia bypass financial sanctions.</p>
<p>VASILENKO Roman Yurievich: born on 14 August 1972, a Kazakhstani diplomat, Deputy Minister of Foreign Affairs of the Republic of Kazakhstan since January 2022.</p>	<p>Deputy Minister Vasilenko is responsible for disinforming Ukraine and Western countries about Kazakhstan’s alleged compliance with sanctions. However, official statistics on Kazakhstan’s foreign trade indicate massive shipments of sanctioned goods from Kazakhstan to Russia. Deliberate disinformation allows the regime in Kazakhstan to avoid secondary sanctions and enjoy impunity, while helping Russia to continue its aggressive war against Ukraine.</p>
<p>Freedom Holding: a Kazakhstani investment company, founded by Russian oligarch Timur Turlov.</p>	<p>The holding company owns the Freedom Bank, which assists Russians in circumventing financial sanctions. The company has been on Ukraine’s sanctions list since autumn 2022, but without sanctions from the US and EU, it will continue to help Russia bypass financial sanctions.</p>
<p style="text-align: center;">International organisations</p>	

<p>Collective Security Treaty Organisation (CSTO): an interstate military alliance in Eurasia consisting of six post-Soviet states: Armenia, Belarus, Kazakhstan, Kyrgyzstan, Russia and Tajikistan.</p>	<p>Despite the fact that Russia, with the support of Belarus, its closest ally and another member of the CSTO, launched a full-blown war in February 2022, Kazakhstan continues to regularly conduct military exercises and joint training with Russia and Belarus within the framework of the CSTO.</p> <p>Recent military exercises of the CSTO have focused on enhancing the organization's special forces management, air defense, and collective response capabilities. These exercises serve as a cover for Russia to train its troops and prepare for its military aggression against Ukraine.</p> <p>CSTO member states are making preparations for the potential involvement of the CSTO in a war against Ukraine.</p>
<p>Eurasian Economic Union (EEU): an interstate political union in Eurasia, consisting of five post-Soviet states: Armenia, Belarus, Kazakhstan, Kyrgyzstan and Russia.</p>	<p>EEU member states support Russia in circumventing sanctions. The EEU, as an organisation, promotes and facilitates parallel import procedures.</p>
<p>Kyrgyzstan</p>	
<p>JAPAROV Sadyr Nurgojoyevich: born on 6 December 1968, president of Kyrgyzstan since 28 January 2021.</p>	<p>As head of state, Sadyr Japarov oversees state authorities that facilitate the circumvention of sanctions in favour of Russia, including the State Customs Service and the National Bank of Kyrgyzstan. Without guidance from the head of state, the Customs Service and the financial regulator cannot take actions that facilitate the circumvention of sanctions.</p>
<p>TASHIYEV Kamchybek Kydyrshayevich: born on 27 September 1968, chairman of the State Committee for National Security of Kyrgyzstan since October 2020.</p>	<p>As chairman of the State Committee for National Security and the closest confidante of President Sadyr Japarov, Kamchybek Tashiyev oversees all security</p>

	<p>agencies in Kyrgyzstan and pursues a policy of repression against opponents of the authorities.</p> <p>As the closest confidante of the President and chairman of the State Committee for National Security, he ensures the security of shipments of sanctioned goods to Russia.</p>
<p>ZULUSHEV Kurmankul Toktoralievich: born on 12 February 1970, General Prosecutor of Kyrgyzstan since October 2020.</p>	<p>As General Prosecutor, whose function is to oversee the rule of law, Kurmankul Zulushev has engaged in political persecution of civil society and restriction of the activities of independent media. By suppressing civil society, Prosecutor General Kurmankul Zulushev prevents unbiased reporting of facts on the circumvention of sanctions.</p>
<p>NIYAZBEKOV Ulan Omokanovich: born on 28 August 1975, Minister of Internal Affairs of Kyrgyzstan since 14 October 2020.</p>	<p>As Minister of Internal Affairs, Ulan Niyazbekov is directly responsible for human rights violations in Kyrgyzstan and political persecution of civil activists, human rights defenders and politicians, in particular in the case of the transfer of the <i>Kempir-Abad</i> reservoir to Uzbekistan and the arbitrary detention of peaceful protesters supporting Ukraine. By suppressing civil society, Minister of Internal Affairs Ulan Niyazbekov prevents unbiased reporting of facts on the circumvention of sanctions.</p>
<p>MAKSUTOV Altynbek Askarovich: born on 13 October 1972, Minister of Culture, Information, Sports and Youth Policy of Kyrgyzstan since October 2022.</p>	<p>As Minister of Culture and Information, Altynbek Maksutov is directly responsible for suppressing independent media such as <i>Radio Azattyk</i>, limiting critical coverage of socially important processes in Kyrgyzstan, including the facts of sanctions circumvention and human rights abuses.</p>
<p>BOKONTAEV Kubanychbek Keneshovich: Born on 18 January 1969, chairman of the National Bank of Kyrgyzstan since 29 September 2021.</p>	<p>As chairman of the National Bank of Kyrgyzstan, Kubanychbek Bokontayev is directly responsible for helping Kyrgyzstan's banks circumvent financial sanctions. The financial regulator, led by Kubanychbek Bokontayev, encourages Kyrgyzstan's</p>

	banks to provide Russians with access to international payment systems, as well as provide export transactions for sanctioned goods to Russia.
ISABEKOV Samat Satarovovich: born on 9 October 1972, chairman of the State Customs Service of Kyrgyzstan from 20 January 2022.	As chairman of the State Customs Service of Kyrgyzstan, Samat Isabekov allows the re-export of sanctioned goods from Kyrgyzstan to Russia.
RSK Bank Kyrgyzstan	One of the commercial banks in Kyrgyzstan that gave Russians access to international financial transactions while bypassing sanctions.
Bakai Bank Kyrgyzstan	One of the commercial banks in Kyrgyzstan that gave Russians access to international financial transactions while bypassing sanctions.
Demir Bank	One of the commercial banks in Kyrgyzstan that gave Russians access to international financial transactions while bypassing sanctions. In October 2022, Demir Bank unjustifiably blocked the account of <i>Azattyk Media</i> without a court decision in a politically motivated case.
RUSSIA	

PETON Engineering Holding

PETON Engineering Holding owns the Novoshakhtinsk oil refinery in the Rostov region of Russia. The Novoshakhtinsk refinery was placed under sanctions for supplying petroleum products to the occupied Donbass, including for fuelling Russian military equipment in Donbass. However, PETON Engineering Holding itself is not under Western sanctions.