



DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C.

LICENSE No. MUL-2022-900756-9

**RUSSIAN HARMFUL FOREIGN ACTIVITIES SANCTIONS REGULATIONS  
UKRAINE-/RUSSIA-RELATED SANCTIONS REGULATIONS**

**LICENSE RENEWAL**

(Issued under the authority of one or more of 50 U.S.C. §§ 1601-51, 1701-06, Executive Orders 13660, 13661, 13662, 13685, 13849, 13883, 14024, 14039, 14065, 14066, 14068, 14071, 14114, and 31 C.F.R. Parts 501, 587, and 589.)

**To: MeSoFa Vermögensverwaltungs AG in Abwicklung, formerly Sberbank Europe AG  
Kroißberggasse 13  
Vienna, Austria 1230  
Attn: Pavel Barchugov**

1. Based upon the request dated April 8, 2022, and additional correspondence dated May 18, 2022, May 27, 2022, October 18, 2022, October 25, 2022, October 26, 2022, November 21, 2022, November 22, 2022, December 8, 2022, December 9, 2022, December 15, 2022, December 21, 2022, August 16, 2023, August 17, 2023, August 18, 2023, August 22, 2023, September 29, 2023, October 5, 2023, October 18, 2023, October 20, 2023, November 22, 2023, December 6, 2023, December 12, 2023, January 9, 2024, January 16, 2024, June 18, 2024, June 26, 2024, June 27, 2024, July 16, 2024, and May 27, 2025, and information otherwise available to the Office of Foreign Assets Control (the "Application"), the transactions described herein are hereby authorized. This License supersedes License No. MUL-2022-900756-8 in all respects.
2. This License is subject to the condition, among others, that the Licensee(s) comply with its terms and with all regulations, rulings, orders, and instructions issued under any of the authorities cited above.
3. This License **expires on the earlier of the completion of the authorized transactions or on July 31, 2026** and is not transferable. The transactions described in this License are subject to the authorities cited above and any regulations and rulings issued pursuant thereto. This License may be revoked or modified at any time. If this License was issued as a result of willful misrepresentation it may be declared void from the date of its issuance or from any other date.
4. This License does not authorize transactions prohibited by any law or regulation administered by the Office of Foreign Assets Control other than those listed above.
5. This License does not excuse the Licensee(s) from the need to comply with any law or regulation (including reporting requirements) administered by any other agency or the need to obtain any required authorization(s) from any other agency.

Issued on behalf of the Secretary of the Treasury:

**OFFICE OF FOREIGN ASSETS CONTROL**

By \_\_\_\_\_  
**Andrew Sens**  
**Chief, Licensing Division**

Attention is directed to, *inter alia*, 18 U.S.C. § 1001 and 50 U.S.C. § 1705 for provisions relating to penalties.

**SECTION 1 - AUTHORIZATION:** Subject to the limitations and conditions herein, United States financial institutions and other U.S. person service providers (collectively, the “Licensees”) are hereby authorized to engage in all transactions that are ordinarily incident and necessary to the wind down of MeSoFa Vermögensverwaltungs AG in Adwicklung, f.k.a. Sberbank Europe AG (hereinafter, referred to as “MeSoFa”), an entity designated pursuant to Executive Order 14024, the Russian Harmful Foreign Activities Sanctions Regulations, 31 CFR Part 587 (RuHSR), and subject to prohibitions pursuant to Directive 1 under Executive Order 13662, the Ukraine-/Russia-Related Sanctions Regulations, 31 C.F.R. Part 589, or any entity in which MeSoFa owns, directly or indirectly, a 50 percent or greater interest, such as Sberbank CZ, a.s. and Sberbank Hungary Ltd., “under voluntary dissolution,” f.k.a. Sberbank Hungary Ltd., including the processing and payment of salaries, severance, and expenses; payments to legal counsel, consultants, vendors, and landlords; opening, maintaining, and closing of accounts; tax payments, payment of fees, and conducting regulatory filings; collection of payments; repayment of deposits placed by individuals, corporations, and financial institutions; and the sale of corporate loan portfolios; as described in the Application.

**SECTION 2 - WARNINGS:** (a) This License does not authorize the transfer of any blocked property, the debiting of any blocked account, the entry of any judgment or order that effects a transfer of blocked property, or the execution of any judgment against property blocked pursuant to any Executive order, statute, or 31 C.F.R. Chapter V.

(b) This License does not authorize any transactions involving any person blocked pursuant to the RuHSR or any person blocked or otherwise sanctioned pursuant to any Executive order, statute, or 31 C.F.R. Chapter V, including PJSC Sberbank of Russia, other than MeSoFa or any entity in which MeSoFa owns, directly or indirectly, a 50 percent or greater interest.

(c) Any transfer of funds through the U.S. financial system pursuant to the authority set forth in **SECTION 1** hereof should reference the number of this License to avoid the blocking or rejection of the transfer.

**SECTION 3 - RECORDKEEPING AND REPORTING REQUIREMENTS:** (a) MeSoFa shall submit quarterly reports no later than thirty days following the end of each three-month period during the term of this License describing the progress made towards the wind down of MeSoFa. Reports are to be filed via email to OFACReport@treasury.gov and Sanctions\_inbox@state.gov, and are to refer to this License No. **MUL-2022-900756-9**.

(b) The Licensees are subject to the recordkeeping and reporting requirements of, *inter alia*, 31 C.F.R. §§ 501.601 and 501.602, including the requirement to maintain full and accurate records concerning the activities undertaken pursuant to this License for a period of at least 10 years from the date of each transaction. Such records shall be made available for examination upon demand.

**SECTION 4 - PRECEDENTIAL EFFECT:** The authorization contained in this License is limited to the facts and circumstances specified in the Application.

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