



Russian and Belarusian Restricted Securities & Financial Institutions

In **February 2022**, the U.S. began issuing a series of sanctions that target investment in the Donetsk (DNR) and Luhansk (LHR) regions of Ukraine, Russian sovereign debt, the Russian financial system, and some individuals with ties to the Russian government. Please read more below about how these sanctions may affect TD Ameritrade clients.

Please note: This is a rapidly evolving situation. We are closely monitoring developments relating to the Executive Orders and are analyzing the impact to our clients. Please check this site regularly for updates.

What this means for you

TD Ameritrade relies on third-party clearing agents to process security transactions. These firms have ceased clearing trades in Russian securities. As a result, TD Ameritrade is unable to execute a buy or sell order in the securities listed below. For securities with a status of "Liquidations only," sell orders will only be attempted on a **best-effort basis**. In addition, U.S. sanctions prohibit third-party transfers of the below listed securities to U.S. persons.

To learn more about how this impacts your Russian holdings, please call us email us at clientservices@tdameritrade.com or call us at 800-669-3900. Please note that this list is not exhaustive.

As of as of July 11, 2022, the affected securities include:

Company Name	Ticker	CUSIP	STATUS
Aeroflot PJSC	AERAY	69343R101	No Trading
Aeroflot PJSC	AERZY	69343R309	No Trading
Amur Minerals Corp	AMMCF	G04240100	No Trading
Bashneft PJSC	BHNFF	X0710V114	No Trading
Cherkizovo Group PJSC	CRKZY	164145203	No Trading
CIAN PLC	CIAN	83418T108	No Trading
ENEL RUSSIA PJSC	ELOKY	29268L109	No Trading
EVRAZ PLC	EVRZF	G33090104	No Trading
Far-Eastern Shipping Co PLC	FESKF	X2379E102	No Trading
Federal Grid Co Unified Energy System PJSC	FGCUL	313354102	No Trading
Gazprom Neft PJSC	GZPFY	36829G107	No Trading
Gazprom PJSC	OGZPY	368287207	No Trading
Gazprom PJSC	OGZRY	368287108	No Trading
Headhunter Group PLD	HHR	42207L106	No Trading
HYDRO WGC JSC MOSC ORDF	N/A	X34577100	No Trading
Inter RAO UES PJSC	IRAOL	45835N105	No Trading
JSC VTB BANK GDR	JSCVL		No Trading
LENTA IPJSC SP/GDR	LENTY		No Trading
Lenta Plc	LENTY	52634T200	No Trading



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LSR Group PJSC	LSRGL	50218G107	No Trading
LUKOIL PJSC	LUKFY	69343P204	No Trading
LUKOIL PJSC	LUKOY	69343P105	No Trading
Magnit PJSC	MGJCL	55953Q103	No Trading
Magnit PJSC	MGJNF	X51729105	No Trading
Magnitogorsk Iron & Steel Works PJSC	MGMOL	559189105	No Trading
Mechel PJSC	MTL	583840608	No Trading
Mechel PJSC - preferred	MTL/pr	583840509	No Trading
MegaFon PJSC	MFOYY	58517T209	No Trading
MMC Norilsk Nickel PJSC	NILSY	55315J102	No Trading
Mobile TeleSystems Public Join	MBT	607409109	No Trading
Mosenergo PJSC	AOMOY	37376308	No Trading
Mosenergo PJSC	MSGRL	61954Q100	No Trading
Novatek PJSC	NOVKY	669888109	No Trading
Novatek PJSC	NSTKF	X5880H100	No Trading
Novolipetskiy Metallurgicheskiy Kombinat PAO	NISQY	67011E105	No Trading
Novorossiysk Commercial Sea Port PJSC	NVSKL	67011U109	No Trading
OGK-2 PJSC	OGKJL	670848100	No Trading
OZON Holdings PLC	OZON	69269L104	No Trading
Petropavlovsk PLC		G7053A101	No Trading
PhosAgro PJSC	PHOJY	71922G209	No Trading
PJSC AERPFL0T S/GDR	AERAY		No Trading
PJSC CHERKIZOVO	CRKZY		No Trading
POLYMETAL INTL PLC ADR	AUCOY	73178Q105	No Trading
Polyus PJSC	OPYGY	73181P102	No Trading
QIWI PLC	QIWI	42207L106	No Trading
Rosneft Oil Co PJSC	OCRNL	67812M108	No Trading
Rosneft Oil Co PJSC	OJSCY	67812M207	No Trading
Rosneft Oil Co PJSC	RNFTF	X7394C106	No Trading
Rostelecom PJSC	ROSMF	X7367F102	No Trading
Rostelecom PJSC	ROSY Y	778529107	No Trading
RusHydro PJSC	RSHRL	782183503	No Trading
RusHydro PJSC	RSHYY	782183404	No Trading
Sberbank of Russia PJSC	AKSJF	X76317100	No Trading
Sberbank of Russia PJSC	SBRCY	80585Y308	No Trading
Severstal PAO	SVJTL	818150104	No Trading



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Severstal PAO	SVJTY	818150302	No Trading
Sistema PJSFC	JSFCF	48122U204	No Trading
Sistema PJSFC	JSFCY	48122U105	No Trading
Surgutneftegas PJSC	SGTPY	868861105	No Trading
Surgutneftegas PJSC	SGTZY	868861204	No Trading

Restrictions on ETFs concentrated in Russian securities

Due to regulatory trading halts, clients holding exchange-traded funds (ETFs) with a concentration in Russian securities are unable to purchase additional shares or liquidate their existing positions unless those ETFs resume trading. Those ETFs are listed below.

SECURITY NAME	TICKER	CUSIP
Direxion Daily Russia Bull ETF	RUSL	25490K273
Franklin FTSE Russia ETF	FLRU	35473P728
iShares MSCI Russia ETF	ERUS	46434G798
VanEck Russia ETF	RSX	92189F403
VanEck Russia Small Cap ETF	RSXJ	92189F734

Restrictions on mutual funds

The following mutual funds have been restricted to **Redemptions Only** status.

SECURITY NAME	TICKER	CUSIP
T. Rowe Price Emerging Europe	TREMX	77956H815
T. Rowe Price Emerging Europe I	TTEEX	77956H245
US Global Investors Emerging Europe	EUROX	90330L402
Voya Russia A	LETRX	92913X886
Voya Russia I	IIRFX	92913W698
Voya Russia W	IWRFX	92913W672

Sanctions on Russian and Belarusian financial institutions

President Biden recently expanded Executive Order 14024, to impose sanctions on Russian and Belarusian financial institutions and dozens of their subsidiaries. These actions prohibit U.S. persons*—



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including U.S. broker-dealers like TD Ameritrade—from doing business with the entities listed below. In addition, any property associated with these entities that is in the possession of a U.S. person must be blocked or rejected.

As of as of July 11, 2022, the affected financial institutions include:

- The Corporation Bank for Development and Foreign Economic Affairs Vnesheconombank (VEB)
- Joint Stock Commercial Bank Novikombank (Novikombank)
- Joint Stock Company Alfa-Bank
- Joint Stock Company Management Company of the Russian Direct Investment Fund (JSC RDIF)
- Limited Liability Company RVC Management Company (LLC RVC)
- Open Joint Stock Company Sovcombank (Sovcombank)
- Promsvyazbank Public Joint Stock Company (PSB)
- Public Joint Stock Company Bank Financial Corporation Otkritie (Otkritie)
- Public Joint Stock Company Sberbank of Russia
- Public Joint Stock Company Transkapitalbank
- Russian Direct Investment Fund (RDIF)
- VTB Bank Public Joint Stock Company (VTB Bank)
- Bank Dabrabyt Joint-Stock Company (Bank Dabrabyt)
- Belarussian Bank of Development and Reconstruction Belinvestbank Joint Stock Company (Belinvestbank)

The U.S., EU, U.K., and Canada also announced on February 28 that the Russian financial institutions listed below would be disconnected from the Society for Worldwide Interbank Financial Telecommunications (SWIFT) system—the messaging system used for international payments. Transactions through the below financial institutions will no longer be possible.

- Bank Otkritie
- Novikombank
- Promsvyazbank
- Bank Rossiya
- Sovcombank
- Vnesheconombank (VEB)
- VTB Bank

What this means for you

TD Ameritrade clients will no longer be able to transfer funds to, from, or through the financial institutions listed above. Please avoid using them to avoid transactions from being rejected or blocked.

Please note: Because of U.S. Treasury Department regulations, we will need to block or reject any transactions with the specific financial institutions listed above. We are also required to report those transactions to the U.S. Treasury Department. You can find more information about Russian and Belarusian sanctions on their [website](#).

Restricted TD Ameritrade accounts held by Russian residents

TD Ameritrade has placed liquidation-only restrictions on accounts belonging to clients who reside in Russia. Those accounts will be limited to closing existing positions, and the account holders will not be permitted to open any new positions or deposit new funds in those accounts.



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What this means for you

If you're affected by this restriction, you have the option to liquidate your positions and request a wire for the remaining funds or to transfer your account(s) to another financial institution capable of accepting them.

- To transfer your account(s), you can start the process by contacting the receiving financial institution.
- To liquidate your positions and request a check or wire, log in to your account or call us for assistance. (In the U.S., call **800-669-3900**; outside the U.S., call **+1-800-368-3668**.)

USPS suspension of mail to Ukraine and the Russian Federation

As a result of widespread cancellations and restrictions, the United States Postal Service (USPS) has suspended mail delivery to Ukraine and the Russian Federation. TD Ameritrade is unable to send U.S. mail to clients residing in those countries.

What this means for clients

If you're a TD Ameritrade client in Ukraine or Russia and you have not already opted in to electronic delivery of account communications and documents, we strongly encourage you to do so. Just log in to your account and elect to receive paperless delivery. For more information, please visit [USPS.com](https://usps.com)'s Alerts and Updates and search for "Russia."

Sanctions on Russian state-owned and private entities

President Biden issued sanctions that expand prohibitions associated with Russian sovereign debt. Directive 1A under Executive Order 14024 broadens sanctions that prohibit participation in the primary market for bonds issued by the institutions listed below. Lending denominated funds to these institutions is also prohibited:

- The Central Bank of the Russian Federation
- The National Wealth Fund of the Russian Federation
- The Ministry of Finance of the Russian Federation

As of 1 March 2022, the new Russia-related Sovereign Debt Directive also prohibits participation in the secondary market for bonds issued by these entities.

President Biden has separately issued sanctions that prohibit all new investment in Russia. This includes any purchases of both new and existing debt or equity securities issued by any entity in the Russian Federation. In addition, for individuals or entities who already hold these securities, it prohibits their sale or transfer to U.S. persons.

What this means for clients.

If your account holds any debt securities of the above-listed Russian state-owned and private entities, please contact a Fixed Income Specialist at 877-883-2835 to discuss available options.



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If your account holds any equity securities issued by an entity in the Russian federation, the new investment prohibitions do not block U.S. persons from selling or divesting such securities to a non-U.S. person (not otherwise subject to blocking sanctions).

Impact of full blocking sanctions placed on Sberbank and options for other Russian ADR programs

In early April 2022, full blocking sanctions were placed on the Public Joint Stock Company Sberbank of Russia ("Sberbank") and associated securities. The Office of Foreign Assets Control (OFAC) authorized divestment or transfer to non-U.S. persons until 12:01 a.m. ET on May 25, 2022.

What happened on May 25, 2022?

Federal law required Schwab to place Sberbank shares into an escrow account from which only OFAC-authorized transactions may be made.

How does the escrow account work?

If you hold Sberbank shares, you will be unable to access them without permission from OFAC. On May 25, the Sberbank shares in your account were assigned an escrow CUSIP number and the value began to appear as zero or "N/A." This OFAC-mandated restriction only affects Sberbank shares and does not affect any other activity or funds in your account(s).

Useful information to note.

OFAC has given guidance that Schwab clients may participate in the conversion of Sberbank American Depositary Receipts (ADRs) to local shares under JP Morgan's (Converting Institution) license. However, JP Morgan has announced that it will no longer accept requests for Sberbank conversions after 11 August 2022.

Please note: After conversion, Sberbank shares must be deposited into a like-titled account at a Russian financial institution.

For more information on sanctions that affect Sberbank shares, please contact:

Phone: **800-540-6322** (OFAC's Hotline)

Phone: **202-622-2480** (OFAC's Licensing Division)

[OFAC website](#)

Office of Foreign Assets Control
U.S. Department of the Treasury
Treasury Annex
1500 Pennsylvania Avenue N.W.
Washington, D.C. 20220

As of March 10, 2022, the new Russia-related Sovereign Debt Directive also prohibits participation in the secondary market for bonds issued by these entities.

Impact to Russian Fixed Income Securities

Due to regulatory halts and restrictions by TD Ameritrade's market makers and clearing agents, neither buy nor sell orders on the following Russian fixed income securities are being accepted.

Security Description	CUSIP
CBOM FIN P.L.C. 7.5% 27F DUE 10/05/27	G2019RAE8

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RUSSIA	7.5% 30F	DUE 03/31/30	X74344DM5
RUSSIA	12.75% 28F	DUE 06/24/28	X7435HAE6
RUSSIA	12.75% 28F	DUE 06/24/28	X7435HAE6
RUSSIA	7.5% 30F	DUE 03/31/30	X74344DM5
RUSSIA	12.75% 28F	DUE 06/24/28	X7435HAE6
RUSSIA	12.75% 28F	DUE 06/24/28	X7435HAE6
VTB CAPITAL S.A.	6.95% 22F	DUE 10/17/22	L96814AG0
LUKOIL INTERNT	6.656% 22F	DUE 06/07/22	N55218AB2
VEB FIN PUBLIC	6.902% XXX	**MATURED**	G93249AA1
VTB CAPITAL S.A.	6% XXX	**MATURED**	L96814AA3
VTB CAPITAL SA	7.5% 17F	DUE 12/11/17	L96814AJ4
CJSC VTB-DEVEL	6.875% 18F	DUE 05/29/18	L9679TAW4
VTB CAPITAL S.	6.551% 20F	DUE 10/13/20	L9679TBC7
VTB CAPITAL S.A.	6.95% 22F	DUE 10/17/22	L96814AG0
VTB EURASIA DESI	9.5% 99F	DUE 12/31/99	G93951AA2
TRANSREGIONAL	9.125% XXX	**MATURED**	X9213UAB7
SB CAPITAL S.A.	5.5% 24F	DUE 02/26/24	L8084DAM2
SB CAPITAL S.A.	6.125% XXX	**MATURED**	L8084MAB6
SB CAPITAL S.A.	5.499% XXX	**MATURED**	L8084DAC4
RUSSIA	12.75% 28F	DUE 06/24/28	X7435HAE6
RUSSIA	7.6% XXX	**MATURED**	X74351BP5
RUSSIA	8.15% 27F	DUE 02/03/27	X54006AA3
RUSSIAN FEDN, GO	6.2% XXX	**MATURED**	X5424XAL2
RUSSIA	7.5% 30F	DUE 03/31/30	X74344DM5
RUSSIA	11% XXX	**MATURED**	X7435HAJ5
THE STATE CORPORAT	0% XXX	**MATURED**	X97998AB8
RUSSIA	7.5% 30F	DUE 03/31/30	78307ACZ4



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RSHB CAPITAL S7.207% 21F DUE 06/03/21	L7982DAL9
RSHB CAPITAL S6.299% 17F DUE 05/15/17	L7982DAC9
PSB FIN S.A. 10.2% 19F DUE 05/15/17	X6944PAA2
KUZNETSKI CAPIT 6.02%17F DUE 05/10/17	L58705AE1
GPB EUROBOND FI 6.25%XXX **MATURED**	G4120BAD7
RZD CAPITAL PU 2.177%18F DUE 02/26/18	G77518AB7
GPB EUROBOND F 9.831%99F DUE 12/31/99	G4120BAK1
GPB EUROBOND FIN 6.5%15F DUE 09/23/15	X32056AA5
PUBLIC JOINT ST10.5% XXX **MATURED**	X3123FAD8
GAZPROMBANK (JO 7.25%19F DUE 05/03/19	G40826AA0
MINISTRY OF FIN 5.9% 31F DUE 03/12/31	X5424XDB1
MINISTRY OF FIN 7.4% 22F DUE 12/07/22	X5424XBJ6
MINISTRY OF FIN 7.7% 33F DUE 03/23/33	X5424XBK3
MINISTRY OF FIN OF 7%23F DUE 08/16/23	X5424XAQ1
RUSSIA 4.875% 23F DUE 09/16/23	X74359AE4

What this means for you

If your account holds any debt securities of the above-listed Russian state-owned and private entities, please contact a Fixed Income Specialist at 877-883-2835 to discuss available divestment options. In some cases, TD Ameritrade clients may be able to divest the holdings listed above to a non-U.S. person prior to May 25, 2022.

In April 2022, these sanctions were expanded to include full blocking on the Public Joint Stock Company Sberbank of Russia (Sberbank) and associated securities.

What this means for you

- TD Ameritrade clients cannot purchase shares of Sberbank.
- If your account holds any securities in Sberbank, please contact Client Services at 800-672-2098, Option 2 to discuss available divestment or transfer options. In some cases, TD Ameritrade clients may be able to divest or transfer Sberbank holdings to a non-U.S. person prior to May 25, 2022.
- After May 25, TD Ameritrade will be required to place any of Sberbank holdings into an escrow account for [Office of Foreign Assets Control](#) (OFAC)-authorized transactions only. Clients will not be able to access these shares without OFAC's permission. This block will only affect shares of Sberbank and will not affect any other activity or funds in account(s). If you have any questions please contact Client Services.



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- TD Ameritrade cannot provide guidance regarding OFAC approved transactions.

The term “United States person” means any United States citizen, permanent resident, entity organized under the laws of the United States or any jurisdiction within the United States (including foreign or foreign affiliate branches), or any person in the United States. By extension, TD Ameritrade is prohibited from performing any opening transaction for any US or Non-US client in any of the associated securities.

Some financial institutions use an intermediary bank when sending or receiving a money, wire transfer, payments, passing through one of the above-named banks, if acting as an intermediary bank, will be blocked and/or rejected, even if the sending or receiving financial institution is not sanctioned included on the sanctions list.

The lists of restricted securities and financial institutions are subject to change at any time, without notice.

TD Ameritrade does not provide tax advice. We encourage you to speak with a tax-planning professional about your particular situation.

Market volatility, volume, and system availability may delay account access and trade execution. Please log into your account and ensure all account information is accurate. All prices in USD unless noted otherwise. Investment involves risk. The price of a security may fluctuate, sometimes dramatically, and may move up or down. Consequently, losses may be incurred and a security may become valueless. Past performance is not an indication of future results. All clients must consider all relevant risk factors and their personal financial situation and objectives before making any investment decisions.

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