



Letter no. 309 of 7 April 2022

Members of the EU Parliament
EU Commission
EU Council

Dear distinguished colleagues,

On behalf of the Ukrainian Bar Association (UBA), I would like to assure you in our high respect, and to address you on the following.

On 30 March 2022, Politico published an [interview](#) with Mr Timur Suleimenov, First Deputy Chief of Staff to the Kazakh President. In the interview, Mr Suleimenov informed about the intent of Kazakhstan to become an intermediary between international companies and the Russian Federation so that to continue indirect trade of the said companies with RF. According to the article, "the European Commission has given its blessing to the arrangement... after meeting EU trade chief Valdis Dombrovskis in Brussels".

In view of this news, we believe it is important to recall that **every dollar that business invests in the Russian economy is spent not for humanitarian purposes, not for education, human rights protection or rule of law – all of which are lacking in Russia – but for financing military actions in Ukraine. Every day of war in Ukraine costs Russia around [USD 20 billion](#) (!), and these sums come from the biggest taxpayers to the Russian budget.** From the point of view of sanctions and other measures introduced by the EU in response to the war in Ukraine, money brought to Russia indirectly through Kazakhstan or any other third party supports and further enables Russian economy, and thus further enables massacres like the one in Bucha.

Here are some numbers to demonstrate what [foreign money can cover](#): USD 4,8 billion paid by Philip Morris in taxes to Russia in 2020 is enough to finance 68 (!) mobile short range ballistic missile systems Iskander. USD 502 million paid by Nestle would buy Russia 502 infantry fighting vehicles. USD 335 million paid by Leroy Merlin is enough to cover 335,000 AK-74. If these sums are paid through taxes of Kazakh intermediaries, all the results achieved by international pressure on businesses to leave Russia will be negated.

The war will not stop until the world agrees that economic isolation of Russia is the only alternative to aggressive, merciless, devastating war in Ukraine which eventually will be detrimental to both Ukrainian and EU budgets. Until foreign companies continue investing in the state budget of the Russian Federation – either directly or indirectly – the war in Ukraine, the flow of refugees to the EU and destruction of the Ukrainian infrastructure, which EU committed to rebuild, will continue.

In order to advance the end of the war, we urge EU institutions to strengthen economic and trade restrictions with regard to both Russia and the Republic of Belarus. In particular, we suggest to follow the approach of [US legislative initiatives](#) and **introduce a trade ban with companies (including their parent, subsidiary, successor entities, as well as beneficial owners) conducting business operations/commerce in any form in the Russian Federation**



and the Republic of Belarus while military actions in Ukraine continue. We also urge EU institutions to extend the notion of business operations in Russia and Belarus in this context onto any businesses conducted through third countries.

Best regards,

UBA President

Anna Ogrenchuk