

FEOC Compliance Certificate

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Issued: 2026-06-21

Verification ID: FEOC-357BFCED410E

Source: live federal-list snapshot

VTB PENSION ADMINISTRATOR LIMITED

Russia · COVERED NATION · Entity · ID: 18730

FEOC FLAGGED

Why this matters: VTB PENSION ADMINISTRATOR LIMITED appears on a critical federal screening list. Equipment, services, or transactions involving this entity likely fail FEOC requirements for IRA tax credits (45X, 48E, 30D). Confirm identity against the cited authority before procurement or compliance decisions.

FEDERAL-LIST SCREENING MATRIX

LIST	AUTHORITY	STATUS	LISTED AS	SEVERITY
OFAC SDN	Treasury OFAC	Listed	VTB PENSION ADMINISTRATOR LIMITED	CRITICAL
BIS Entity List	Commerce / BIS	Not listed	—	CRITICAL
DOD 1260H (Chinese Military Companies)	DOD	Not listed	—	CRITICAL
UFLPA Entity List	DHS / FLETF	Not listed	—	CRITICAL
CBP Withhold Release Orders	DHS / CBP	Not listed	—	CRITICAL
BIS Denied Persons	Commerce / BIS	Not listed	—	HIGH
BIS Military End User	Commerce / BIS	Not listed	—	HIGH
BIS Unverified List	Commerce / BIS	Not listed	—	MEDIUM
State ITAR Debarred	State Department	Not listed	—	HIGH
State Nonproliferation	State Department	Not listed	—	HIGH

ALSO KNOWN AS

VTB PENSION ADMINISTRATOR LTD · OBSHCHESTVO S OGRANICHENNOI OTVETSTVENNOSTYU VTB PENSIONNY ADMINISTRATOR · VTB PENSIONNY ADMINISTRATOR OOO

KNOWN ADDRESSES

• d. 52 str. 1 nab.Kosmodamianskaya, Moscow 115054, Russia

SANCTIONS PROGRAMS / AUTHORITIES

UKRAINE-E013662] [RUSSIA-E014024

SANCTIONING AUTHORITY NOTES

Executive Order 13662 Directive Determination - Subject to Directive 1; Secondary sanctions risk: Ukraine-/Russia-Related Sanctions Regulations, 31 CFR 589.201 and/or 589.209; alt. Secondary sanctions risk: See Section 11 of Executive Order 14024.; Organization Type: Activities of holding companies; Registration ID 1097746178232 (Russia); For more information on directives, please visit the following link: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/ukraine.aspx#directives>; Linked To: VTB BANK PUBLIC JOINT STOCK COMPANY.

DATA SOURCES

OFAC SDN

<https://ofac.treasury.gov/specially-designated-nationals-list-data-formats-data-schemas>

Informational only. Not legal advice. Cross-list matching is name-based — verify identity with the cited source authority before procurement, financing, or compliance decisions.

This document is a point-in-time snapshot. The Verification ID can be reproduced from the entity ID + the date of issue.

Verification ID: FEOC-357BFCED410E · Entity ID: b46deba0-9805-4fdb-827e-e6258a08cb85 · Issued 2026-06-21