



2025/2037

23.10.2025

COUNCIL REGULATION (EU) 2025/2037

of 23 October 2025

amending Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine

THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty on the Functioning of the European Union, and in particular Article 215 thereof,

Having regard to Council Decision 2014/145/CFSP of 17 March 2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine ⁽¹⁾,

Having regard to the joint proposal from the High Representative of the Union for Foreign Affairs and Security Policy and the European Commission,

Whereas:

- (1) Council Regulation (EU) No 269/2014 ⁽²⁾ gives effect to restrictive measures provided for in Decision 2014/145/CFSP.
- (2) On 23 October 2025, the Council adopted Decision (CFSP) 2025/2036 ⁽³⁾, amending Decision 2014/145/CFSP.
- (3) Decision (CFSP) 2025/2036 introduces an additional criterion for the listing of natural or legal persons, entities or bodies responsible for, supporting or implementing actions or policies contributing to the deportation, forced transfer, forced assimilation, including indoctrination, or militarised education of Ukrainian minors.
- (4) Decision (CFSP) 2025/2036 also extends to two listed insurance companies the existing derogation related to payments constituting an indemnity or benefit provided further to the materialisation of a risk.
- (5) These measures fall within the scope of the Treaty on the Functioning of the European Union and therefore, in particular with a view to ensuring their uniform application in all Member States, regulatory action at the level of the Union is necessary.
- (6) It is appropriate to harmonise terminology across Union legal acts and thereby ensure consistent application of Regulation (EU) No 269/2014 and its alignment with other Union restrictive measures frameworks. Such coherence is essential to avoid ambiguity, enhance legal certainty and ensure the effectiveness of Union restrictive measures across various sanctions regimes. It is therefore appropriate to include in Regulation (EU) No 269/2014 definitions of 'owning' and 'controlling' a legal person, entity or body, to align with the definitions used in Council Regulation (EC) No 2580/2001 ⁽⁴⁾.
- (7) It is also appropriate to clarify the provision on the freezing of funds and economic resources of listed persons and the prohibition on making funds and economic resources available to such persons.
- (8) Regulation (EU) No 269/2014 should therefore be amended accordingly,

⁽¹⁾ OJ L 78, 17.3.2014, p. 16, ELI: [http://data.europa.eu/eli/dec/2014/145\(1\)/oj](http://data.europa.eu/eli/dec/2014/145(1)/oj).

⁽²⁾ Council Regulation (EU) No 269/2014 of 17 March 2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine (OJ L 78, 17.3.2014, p. 6, ELI: <http://data.europa.eu/eli/reg/2014/269/oj>).

⁽³⁾ Council Decision (CFSP) 2025/2036 of 23 October 2025 amending Decision 2014/145/CFSP concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine (OJ L, 2025/2036, 23.10.2025, ELI: <http://data.europa.eu/eli/dec/2025/2036/oj>).

⁽⁴⁾ Council Regulation (EC) No 2580/2001 of 27 December 2001 on specific restrictive measures directed against certain persons and entities with a view to combating terrorism (OJ L 344, 28.12.2001, p. 70, ELI: <http://data.europa.eu/eli/reg/2001/2580/oj>).

HAS ADOPTED THIS REGULATION:

Article 1

Regulation (EU) No 269/2014 is amended as follows:

(1) in Article 1, the following points are added:

- ‘(i) “owning” a legal person, entity or body means being in possession of 50 % or more of the proprietary rights of a legal person, entity or body, or having a majority interest therein;
- (j) “controlling” a legal person, entity or body means, but is not limited to:
 - (i) having the right or exercising the power to appoint or remove a majority of the members of the administrative, management or supervisory body of a legal person, entity or body;
 - (ii) having appointed solely as a result of the exercise of one’s voting rights a majority of the members of the administrative, management or supervisory bodies of a legal person, entity or body who have held office during the present and previous financial year;
 - (iii) controlling alone, pursuant to an agreement with other shareholders in or members of a legal person, entity or body, a majority of shareholders’ or members’ voting rights in that legal person, entity or body;
 - (iv) having the right to exercise a dominant influence over a legal person, entity or body, pursuant to an agreement entered into with that legal person, entity or body or to a provision in its Memorandum or Articles of Association, where the law governing that legal person, entity or body permits its being subject to such agreement or provision;
 - (v) having the power to, de facto, exercise the right to exercise a dominant influence referred to in point (iv), without being the holder of that right;
 - (vi) having the right to use all or part of the assets of a legal person, entity or body;
 - (vii) managing the business of a legal person, entity or body on a unified basis, while publishing consolidated accounts; or
 - (viii) sharing jointly and severally the financial liabilities of a legal person, entity or body, or guaranteeing them.’;

(2) Article 2 is replaced by the following:

‘Article 2

1. All funds and economic resources belonging to, owned, held or controlled by any natural or legal persons, entities or bodies listed in Annex I shall be frozen.
2. No funds or economic resources shall be made available, directly or indirectly, to or for the benefit of natural or legal persons, entities or bodies listed in Annex I.’;

(3) in Article 3(1), the following point is added:

- ‘(n) natural or legal persons, entities or bodies responsible for, supporting or implementing actions or policies contributing to the deportation, forced transfer, forced assimilation, including indoctrination, or militarised education of Ukrainian minors.’;

(4) in Article 6b, paragraph 5e is amended as follows:

- (a) in the introductory wording, the words ‘entity listed under entry number 270’ are replaced by the words ‘entities listed under entry numbers 56, 270 and 579’;
- (b) in point (a), the words ‘entity listed under entry number 270’ are replaced by the words ‘entities listed under entry numbers 56, 270 and 579’.

Article 2

This Regulation shall enter into force on the date of its publication in the *Official Journal of the European Union*.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels, 23 October 2025.

For the Council

The President

M. BJERRE
