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# Impact of Russia and Ukraine War on Accounting for Continuing and Discontinuing Operations

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#### Abstract

Conflicts tend to affect business operations in major ways. That is especially the case when it comes to the supply chain as such, following the Ukrane-Russian conflict, multinationals operating n Russia, Ukraine and Belarus have been forced to critically analyze the situation. That is with the aim of determining to what extent it affects their ability to control their operations in the conflict nations. The sanctions placed on Russia because of the conflict make it worse because some of the foreign nations have lost the control they had over the subsidiaries/operations in Russia, hence, forcing them to discontinue their operations. It is worth noting that as per IFRS 10 guidelines, there is no exclusion from consolidation due to loss of control or even as a result of challenges in exchanging foreign currencies. Hence, firms that do not discontinue their operations in Russia, Ukraine, and Belarus have to continue consolidating the financial statements of their subsidiaries.

Keywords: Continuing operations, discontinuing operations, subsidiaries, IFRS

#### 1. Introduction

Conflicts worldwide or in different parts of the world often disrupt many business operations. That is mainly because of the uncertainties businesses, especially multinationals running in the conflicting regions, face regarding whether they should continue reporting their activities in the area or discontinue the operations. One such event recently occurred following the conflict between Ukraine and Russia, affecting the operations of many companies in the two conflicting nations. The impact of this has been temporary and, in some cases, permanent closures of business operations in the two countries by some multinational corporations. That is because they fear that they would incur even more significant losses in these two nations if the conflict continues. From an accounting perspective, the closures of business operations in Ukraine and Russia are not voluntary and are primarily circumstantial, affecting the reporting for continuing, discontinuing, and discontinued operations (Biron, 2022). That is because some of these multinationals had not envisioned a scenario forcing them to close or discontinue their operations in these two regions.

It is worth noting that since the conflict broke out, more than 1000 companies have curtailed their operations in Russia and Ukraine. That's a large number, and due to transport and logistic issues, most companies cannot dispose of their assets trapped in the two nations. That is unlike what it would be in an ideal situation where the businesses are closing, suggesting that they already made prior arrangements on what happens to their assets on the discontinued operations (Yale School of Management, 2022). Therefore, it is paramount to understand the implication of the conflict on the reporting for discontinuing, discontinuing, or continuing operations. That is mainly regarding the material judgment used to determine how to report the discounting and discontinued business operations.

#### 2. Accounting for Continuing, Discontinuing, and Discontinued Operations

IFRS 5 requires entities to make all necessary material disclosures regarding their continuing, discontinuing, and discontinued operations. That includes reporting all the profits the firm has earned from the discontinuing or discontinued operations during the financial period under consideration. Besides reporting the incomes from the discontinued operations during the financial period in question, it is also necessary for entities to provide all relevant information on the assets from the discontinued operations that are being held for sale. That is because, in most instances, after stopping certain operations, the business might deem it necessary to dispose of its assets in the units which will no longer be running. In general terms, the assets held for sale

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following the discontinuation of certain operations are not depreciated (DeFond et al., 2020). Instead, they are measured at the lower carrying amount and fair value, less the costs the entity will incur in selling the said assets. They must also be presented in a separate schedule, not the entity's balance sheet. The guideline also requires entities to make specific disclosures for discontinued operations and disposals of non-current assets.

Per the IFRS provisions, disclosing discontinuing operations should start before the entity stops some operations. That is because it is expected that over the financial years, the managers would have analyzed the said operations' performance and determined that there is a need to discontinue such operations. Therefore, the accounting guideline requires companies to make necessary disclosures immediately after the entity gets into an agreement to sell the assets in the discontinuing operations or the board of directors or relevant governing body has approved and announced the planned discontinuance (IAS 35) (Kaplan, Kenchington & Wenzel, 2020). The disclosures are mandatory, especially for publicly traded companies, because they must provide all necessary information to their shareholders. It is worth noting that under normal circumstances, businesses should disclose planned operations discounting in the financial year during which the plans have been approved. Companies choose to discontinue operations due to changes in their values, missions, and visions or because they feel that some of their operations are more of cost centers than profit centers (DS Choi, 2011). Hence, the need to discontinue them to maximize profits in the already profitable operations by reducing the entity's focus on the processes that are not yielding expected results.

Over 1000 companies have had to curtail their operations in Russia and Ukraine following the conflict. These firms did not have time to make proper times for the discontinuation. Therefore, it is evident that most of them will have to make several considerations when reporting the discontinuation of their operations in the region. That is because there is a great deal of uncertainty about how or whether these businesses would effectively dispose of the assets they hold in Russia and Ukraine if the conflict continues (Biron, 2022). Besides, there is the effect of curtailed operations on the income statements of these companies. That must also be considered when making the necessary disclosures.

# 3. Financial Reporting Considerations Arising From the Russia-Ukraine War Geo-Political Environment

The Russian-Ukraine war is between two regions, and the military is taking the forefront. In this case, a lot of sanctions on Russia and Ukraine will take a huge toll on businesses in the present and future. This will affect not only the human toll and business operations in these two countries but also any other bodies around the region that trade with these two countries (Biron, 2022). The war has and will always have a global impact on accounting and financial markets and, most importantly, the geo-political environment. Therefore, any firms involved should consider whether they are willing to continue operating in the region, given the predictions. Given the macroeconomic conditions that the Russian-Ukraine war caused on the global financial markets, there must be a consideration of how much the sanctions will broaden (Deloitte, 2022a). The extent of military involvement, the duration that the war is expected to go on, the desired effects on businesses, and the possible strategies that other global financial markets are willing to put in place.

As a precautionary measure, it is essential for firms within the geographical area involved to share in the expected impacts of the war on the business. These may include: possible cyber-attacks from rival countries; an increase in the cost of productions due to sanctions put in place; disruption of the supply chains due to interference with the transport system in the regions affected, extensive loss of capital and property; and stock from military invasions, interference of the capital markets and the value of the currency in the FOREX, disruption of the production levels and quantity among many other possible effects of the war in the region.

#### 4. Significant Accounting and Financial Issues to Consider

Each firm will be affected differently given its dynamics of operations; however, some main points that will affect all of them collectively should be considered. Estimating future cash flows and preparing how to work with the changes expected. The firms will pursue information that will help them carry out assessments on non-financial assets, how much it relies upon tax assets deferments and whether, given all the implications of the war, the business will still stand a chance in the regional market. The firms can take the following measures to be ahead in future cash flow and expected changes. They include; since there is a wide range of uncertainty associated with the war's possible outcomes, which may influence an entity's long-term operating plan in the affected countries, the economic impact of the battle depends on variables that are difficult to predict (Deloitte, 2022b). Examples include the duration and degree to which government sanctions restrict the ability to operate in Russia, the nature and effectiveness of government assistance to the affected entity, and the effect of changes in vital macroeconomic factors that must be translated into estimates of an entity's own future cash flows.

The business will, therefore, have to develop more strategies, including good will measures that will ensure that it can point out the specific issues and how to deal with them in the future without affecting its operations significantly, secondly, disruption of the supply chains in different businesses within the region close to Ukraine and Russia (Ngoc et al., 2022). The war will have huge effects on the supply of the operations of other businesses in the area through military invasions, destruction of inventory, and misplacement of people, thus affecting the labor market, shortages of materials, higher costs of freight, and increased transportation delays (Deloitte, 2022a). Given these challenges, entities may need to review the costs associated with accounting for inventory and revenue recognition practices.

Thirdly, it will be hard for businesses affected by the war to recognize any events that will come after the war due to the volatility of the economy, bank markets, capital markets, and money markets. Things have been changing randomly over time, and given the uncertainties that come with war, it will be hard to predict upcoming events and counter those (Demertzis et al., 2022). For example, given the volatility in the FOREX market, it will be hard to make any investment or withdraw since no one knows how it will be affected.

Fourth, the firms will have to assess their current situation and determine whether they will be able to continue having open doors to the public in the next year, whether the war stops or continues. It should access its continuity potential through management plans made after issuing the annual financial reports. To do this, the management team must consider a few things (Korovkin & Makarin, 2023). The first is the specific challenges the firm is facing and the extent to which they will impact its operations.

Besides, there is also the need to consider the potential diminished demand and supply for products or services the firm is offering. Contractual and legal obligations due or anticipated within one year are another critical consideration that must be made in this case. Other considerations include complete working and working capital flow and accessibility to existing sources of capital for the firm (Ngoc et al., 2022).

Fifth, the firm might lose the level of control in the market given the various political constraints that maybe put in place as a repercussion of the war. Different political and economic policies that will be put in place to cope with the war will restrict certain business operations (Korovkin & Makarin, 2023). The firms in the affected region will be forced to tailor their consolidation and equity financial reforms to fit with the changes that will be made to ensure that the equity method used is significant and can be used in permanent situations.

Due to sanctions that have been put in place against Russia, it is most likely that restrictions in the foreign currency market and multiple exchange rates will arise in the regions that are directly or indirectly related to the war countries. It is also important to note that the firms should be able to foresee the impairment of assets in the company and how they can be recovered due to the war (Korovkin & Makarin, 2023). If a business can withstand the geo-political challenges after the war, it will have a strong foundation that will increase its longevity and stand the test of time.

#### 5. Analysis of Financial Reporting Considerations Made

Since the conflict started, companies have been considering whether to continue or discontinue their operations in Russia and Ukraine. More than 1000 companies have been forced to either withdraw from the region or suspend their operations temporary as they analyse the situation and wait to see how it turns out. For the businesses that are yet to report or declare their operations in Russia discontinued, they have to bear the additional costs of running branches that are not operating at their maximum capacity. That is because with the conflict, their branches are experiencing major supply chain issues (Ngoc et al., 2022). That is especially the case following the sanctions that were placed on Russia. Some of the companies that have chosen to continue operating in Russia, despite the uncertainty that they face in that market include Agrana, which is a consumer staples companies from Austria. There is also the Agricultural Bank of China, Ambridge Interstate Hotels, and Align Technology. ANT Group, Anta Sports, Boggi, BPW, and Bharat Petroleum (BPCL) (Yale School of Management, 2022). Most of these firms have considered their operations prior to making decisions on whether to pull out or remain in operation in Russia. One of the main reasons why some of these companies have chosen to continue operating in Russia despite the uncertain business climate, is that they have vested interests in the region. For instance, Agricultural Bank of China despite being a multinational company offers banking services. Others such as ANTN Group have joint ventures with Russian-based companies (Biron, 2022). Hence, for such firms the strong ties that they have with Russia make it difficult to discontinue their operations in the country. Therefore, they have to continue reporting their operations in the conflict region despite the fact that they are incurring losses.

Other firms have had to suspend their operations temporary, hence, they cannot necessarily report the operations in Russia as discontinued. These are the firms that have been most affected as far as reporting their financial performance in Russia is concerned. That is because IFRS does not provide accounting procedures that should be followed to show that a firm has suspended its operations. Hence, they either have to report the operations in Russia as discontinued or reporting them as continuing operations. The impact of reporting their activities in Russia as discontinued includes the fact that it would result in some of these businesses losing potential clients and investors when they resume. That is because the clients and investors would most probably think that the companies have pulled out of Russia, hence, when they resume they would have to rebuild their credibility all over again, which is not necessarily an easy thing to do (Ngoc et al., 2022). Hence, Somme of these companies have had to go with reporting the operations as continuing, which implies that for most of them their subsidiaries and branches are reporting net losses considering that they have been greatly affected by the conflict between Russia and Ukraine. Besides, there are the supply chain challenges, which further make it difficult for the business' ranches and subsidiaries to operate as they would normally. These are key considerations that must be incorporated in the financial statements or better still notes regarding the same should be included with the aim of ensuring that the users of the financial statements understand that the firms have only suspended their operations in the conflict region temporarily. These include, firms such as Abbott Laboratories, Archer Daniels Midland (ADM), Calfrac Well Services and Colgate-Palmolive (Yale School of Management, 2022). These are firms that main have set production plants in Russia, hence, need to ensure that they have thoroughly analysed the situation and made the right judgment before they can pull out. Besides, given the nature of their investment in Russia and the conflict in place, it is challenging for these firms to withdraw their operations right way.

However, more than 1000 companies have determined that they cannot continue operating in Russia. That is especially the case for firms that relied heavily on supplies from outside Russia. As such, most of these firms have determined that they cannot continue operating with the major supply chain issues/challenges that they face. It is worth noting that some of these companies are in the process of discontinuing their operations. As such, they have not completely withdrawn from Russia but are gradually reducing or rather scaling their operations to ensure that they can comfortably operate at reduce capacities. These include firms such as ABB, AGCO, Boston Scientific, and Allianz, which have scaled down their operations but not completely discontinued their operations (Yale School of Management, 2022). However, they are in the process of discontinuing their operations, hence, must include such information in their financial reports That will help provide crucial details to the users of their financial statements in regard to the reasons why the firms are performing or rather producing below their normal capacities. Finally, there are those firms that have discontinued their operations in Russia following the conflict. These firms need to consider the impact of the conflict on the fair value of their assets prior to reporting their discontinued operations in the financial statements (Biron, 2022). That will help ensure that they incorporate the added risk from the fact that they cannot easily dispose of their assets in Russia. Some of these companies include Akin Gump, Acerinox, Aviva and Assicurazioni Generali. The main challenges that these firms face is in regard to disposing the assets of their discontinued operations. That is because the conflict has made it difficult for these companies to easily dispose their resources or assets in the conflict region.

Carlson (2022) explains that the conflict in Ukraine and Russia could lead changes in investors' relationships with investees, these include subsidiaries, associates, and associates. And joint ventures in Russia, Belarus and Ukraine. For instance, due to conflict foreign investors may decide to stop their operations in these markets or sometimes the sanctions could force them to do so. One of the greatest challenges involved in such discontinuation of operation under the circumstances is that it might be difficult for the firms to repatriate funds from investees in the affected regions. Under the continuous assessment provisions in IFRS standards, an investor should consider whether the changes in the environment will have a major impact on the business' ability to control, jointly control, or have a significant influence over each of the investees. Hence, they must account for each of the investment accordingly (Preobragenskaya & McGee, 2003). It is worth noting that regardless of whether there is a loss of control, joint control or significant influence, there are other major impacts that businesses need to consider such as possible impairment and presentation as held-for-sale or discontinued operations.

#### 6. Conclusion

To conclude, some of the key consideration that farms need to make when reporting continuing and discontinuing operations in Russia and Ukraine are captured under the IFRS 10 Consolidated financial statements guidelines. That is especially the case for firms that have subsidiaries or joint ventures in Russia or Ukraine. It is important to note that an investor is said to control operations of the subsidiaries if three key elements are met. These include power over the investee, exposure or rights to variable returns, and ability to use its power to influence the returns. In this case as observed in Appendix A, different companies have taken varied actions

depending on their assessment of the control that they have on the operations in Russia. For firms that feel that they can still maneuver the challenges they have continued operating in Russia. However, some have scaled back or temporarily suspended their operations until they can regain full control of their operations in Russia. It is necessary for the company to make the correct material judgement before deciding whether to continue or discontinue its operations in a foreign country. It is worth noting that the challenge of losing control off an existing subsidiary in a conflict-affected region or country is usually high and deconsolidation of the subsidiaries in such as region should not be presumed immediately. That is because there is no exclusion from consolidation because of difficulties in repatriating funds from the subsidiary to the parent or lack of exchangeability of currencies. Hence, an assessment of the situation at hand is important to guide the firm on whether to continue with operations in the conflict country or discontinue its operations.

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# Appendix 1: Decisions of Multinational Companies in Russia Companies Continuing Operations in Russia

| Name                   | Action  | Industry         | Country       |
|------------------------|---|------------------|---------------|
| Agrana                 | continue operating plant in Russia                | Consumer Staples | Austria       |
| Agricultural Bank of   | Russian companies open accounts with the          | Financials       | China         |
| China                  | bank; decline to comment                          |                  |               |
| Aimbridge   Interstate | still operating in Russia                         | Consumer         | United States |
| Hotels                 |   | Discretionary    |               |
| Air China              | still flying to Russia                            | Industrials      | China         |
| Air Serbia             | still flying to Russia                            | Industrials      | Serbia        |
| Alibaba                | still operating in Russia                         | Consumer         | China         |
|                        |   | Discretionary    |               |
| Align Technology       | still operating in Russia                         | Health Care      | United States |
| Alpina Žiri            | distributors in Russia                            | Consumer         | Slovenia      |
|                        |   | Discretionary    |               |
| Alumil                 | Not disclosed publicly                            | Materials        | Greece        |
| Anadolu Efes           | still operating in Russia                         | Consumer Staples | Turkey        |
| ANT Group              | joint venture with the Russian Sovereign          | Information      | China         |
|                        | Wealth Fund                                       | Technology       |               |
| Anta Sports            | still operating and providing online sales to     | Consumer         | China         |
|                        | Russia  | Discretionary    |               |
| Antal                  | still operating and actively hiring in Russia     | Industrials      | United        |
|                        |   |                  | Kingdom       |
| AnyDesk Software       | still providing services to Russia; not disclosed | Information      | Germany       |
|                        | publicly  | Technology       |               |
| Ariston Group          | still operating and actively hiring in Russia     | Consumer         | Italy         |
|                        |   | Discretionary    |               |
| Auchan-Retail          | still operating in Russia                         | Consumer Staples | France        |
| AVL                    | still operating in Russia                         | Industrials      | Austria       |
| B. Braun               | still operating in Russia                         | Health Care      | Germany       |
| Babolat                | still operating and selling to Russia             | Consumer         | France        |
|                        |   | Discretionary    |               |
| Bajaj Auto             | business as usual                                 | Consumer         | India         |
|                        |   | Discretionary    |               |
| Benetton               | continue operations in Russia                     | Consumer         | Italy         |
|                        |   | Discretionary    |               |
| Bharat Petroleum       | bought 2 million barrels of Russian Urals for     | Energy           | India         |
| (BPCL)                 | May loading                                       |                  |               |
| Binbit                 | Operating in Russia                               | Communication    | Mexico        |
|                        |   | Services         |               |
| Boggi                  | still operating in Russia & online sales running  | Consumer         | Italy         |
|                        |   | Discretionary    |               |
| Bonduelle              | still operating in Russia                         | Consumer Staples | France        |
| BPW                    | still cooperating with dealers in Russia; not     | Consumer         | Germany       |
|                        | disclosed publicly                                | Discretionary    |               |
| Buzzi Unicem           | continue operating plants in Russia               | Materials        | Italy         |
| Calzedonia             | continue sales in Russia                          | Consumer         | Italy         |
|                        |   | Discretionary    |               |
| Camille Albane         | franchised salons continue to operate             | Consumer         | France        |
|                        |   | Discretionary    |               |
| Carl's Jr.   CLK       | still operating in Russia                         | Consumer         | United States |
|                        |   | Discretionary    |               |
| Cham Wings             | still flying to Russia                            | Industrials      | Syria         |
| Charoen Pokphand       | still operating in Russia                         | Consumer Staples | Thailand      |
| Foods                  |   |                  |               |

Appendix 2: Those Buying Time

| Name                         | Action  | Industry                  | Country           |
|------------------------------|---|---------------------------|-------------------|
| Aalberts                     | continue operations on an unspecified "lower"   | Industrials               | Netherlands       |
|                              | level & postpone investments  |                           |                   |
| Abbott Laboratories          | suspend non-essential business activity   | Health Care               | United States     |
| Abbvie                       | suspend aesthetics operations, pause new clinical trials  | Health Care               | United States     |
| Accor                        | suspend new investments/development   | Consumer<br>Discretionary | France            |
| Accumalux                    | still operating plant in Togliatti, Russia  | Consumer<br>Discretionary | Luxembourg        |
| Air Liquide                  | Some clients no longer supplied, others scaled down; all Russian investments on hold                              | Materials                 | France            |
| Airbus                       | suspend supply of parts and<br>deliveries/servicing, t but continue substantial<br>titanium purchases from Russia | Industrials               | Netherlands       |
| Akrapovič                    | still operating in Russia   | Consumer<br>Discretionary | Slovenia          |
| Alcon                        | suspend new investments and new clinical trial enrollment in Russia   | Health Care               | Switzerland       |
| AmerisourceBergen            | cease new business initiatives but continue<br>existing clinical trials, and distributing health<br>products      | Health Care               | United States     |
| Andbank                      | investigate if Russian customers are subject to<br>European sanctions   | Financials                | Andorra           |
| Andritz                      | suspend unspecified new business in Russia for time being   | Industrials               | Austria           |
| Anecoop                      | diverting sales away from Russia  | Consumer<br>Staples       | Spain             |
| Archer Daniels Midland (ADM) | unspecified scaling down of non-essential operations  | Consumer<br>Staples       | United States     |
| Arconic                      | pause new contracts but continue existing   | Materials                 | United States     |
| AstraZeneca                  | halt new investments/new clinical trials  | Health Care               | United<br>Kingdom |
| Aurubis AG                   | monitor situation and review structures of Russian business partners  | Industrials               | Germany           |
| Bang & Bonsomer              | suspend new investments but still operating in Russia   | Materials                 | Finland           |
| Barilla                      | all new investments and advertising activities<br>on hold; limit Russia production to pasta and<br>bread          | Consumer<br>Staples       | Italy             |
| Barry Callebaut              | suspend capital investment  | Consumer<br>Staples       | Switzerland       |
| Bayer                        | stopping unspecified non-essential business activity  | Health Care               | Germany           |
| Binance                      | restrict Russian accounts with over €10,000   | Financials                | China             |
| BlaBlaCar                    | Stopped new investment but stays in Russia  | Information<br>Technology | France            |
| Boiron                       | suspend new investments & stop clinical trials  | Health Care               | France            |
| Bolt                         | remove all Russia-manufactured and Russian-<br>branded goods  | Information<br>Technology | Estonia           |
| Bristol-Myers Squibb         | pause new trials & stop enrollment of new participants; still actively hiring in Russia                           | Health Care               | United States     |
| Calfrac Well Services        | suspension of new investments in Russia   | Energy                    | Canada            |
| Califac Well Scrvices        |   |                           |                   |

| CANPACK                  | Stopped new investments                          | Materials     | Poland        |
|--------------------------|--|---------------|---------------|
| CAPRI Holdings (Versace, | online orders unavailable but still advertising; | Consumer      | United States |
| Michael Kors, Jimmy Cho) | no information about on-site sales               | Discretionary |               |
| Cargill                  | unspecified scaling down of non-essential        | Consumer      | United States |
|                          | operations                                       | Staples       |               |
| Carmim                   | suspend some orders in backlog                   | Consumer      | Portugal      |
|                          |  | Staples       |               |
| Citadele Banka           | still allows transactions to Russia but          | Financials    | Latvia        |
|                          | introduced more thorough checks                  |               |               |
| Colgate-Palmolive        | continue essential health and hygiene products   | Consumer      | United States |
|                          |  | Staples       |               |
| Corticeira Amorim        | commerical activity suspended                    | Materials     | Portugal      |
| Crèdit Andorrà           | investigate if Russian customers are subject to  | Financials    | Andorra       |
|                          | European sanctions                               |               |               |
| Deceuninck               | stop investments & cut links with other          | Industrials   | Belgium       |
|                          | establishments                                   |               |               |
| Delonghi                 | paused new shipments and investments             | Consumer      | Italy         |
|                          |  | Discretionary |               |
| DMK Group                | suspend new investments/advertising but          | Consumer      | Germany       |
|                          | continue sales and plant operations in Russia    | Staples       |               |

# Appendix 3: Scaling Back

| Name           | Action  | Industry         | Country     |
|----------------|---|------------------|-------------|
| ABB            | temporarily pausing all new orders and operational activity | Industrials      | Switzerland |
| Activision     | suspend new sales of and in our games in Russia             | Communication    | United      |
| Blizzard       |   | Services         | States      |
| ADEO   Leroy   | Stopped new investments, imports, and financing in          | Consumer         | France      |
| Merlin         | Russia  | Discretionary    |             |
| Adobe          | suspend all new sales in Russia and Belarus; current        | Information      | United      |
|                | services continue   | Technology       | States      |
| AGCO           | stop sale of new machines to Russia                         | Industrials      | United      |
|                |   |                  | States      |
| AkzoNobel      | suspend new investments in Russia; end Aerospace work       | Materials        | Netherlands |
| Allianz        | meaningfully reduce exposure to Russia                      | Financials       | Germany     |
| Alphabet       | withdraw all operations in Moscow; stop taking new          | Communication    | United      |
| -              | customers; stop ads   | Services         | States      |
| Amadeus IT     | suspend partnership with Aeroflot                           | Information      | Spain       |
| Group          |   | Technology       |             |
| Amgen          | suspend all non-essential business activities; keep         | Health Care      | United      |
|                | delivering some medicines                                   |                  | States      |
| AmRest         | suspend operations with some brands in Russia               | Consumer         | Spain       |
|                |   | Discretionary    | _           |
| ASBIS          | amends contracts following new sanctions                    | Information      | Cyprus      |
|                |   | Technology       |             |
| Aspo           | reducing operations in Russia                               | Industrials      | Finland     |
| Avaya          | limit certain services; cease new maintenance and support   | Information      | United      |
|                | arrangements  | Technology       | States      |
| Bacardi        | paused exports to Russia but not domestic operations        | Consumer Staples | Bermuda     |
| Bank of Cyprus | maintain loan book; observe banking sanctions               | Financials       | Cyprus      |
| Beiersdorf     | maintain skin and bodycare products; stop other products    | Consumer Staples | Germany     |
| Bekaert        | scale back business in Russia                               | Industrials      | Belgium     |
| Black Red      | divesting from Russian subsidiary, still has a significant  | Consumer         | Poland      |
| White          | stake in a company operating in Belarus, which also         | Discretionary    |             |
|                | suspended Russian exports                                   | <u> </u>         |             |
| BNY Mellon     | suspend new business activity and investments; continue     | Financials       | United      |
|                | cooperation with current clients                            |                  | States      |

| Boehringer     | scale back to just supplying medicine                            | Health Care      | Germany     |
|----------------|--|------------------|-------------|
| Ingelheim      |  |                  |             |
| Bosch          | suspend some shipments and plants but not all                    | Industrials      | Germany     |
| Boston         | suspend all new investment and non-essential activity            | Health Care      | United      |
| Scientific     |  |                  | States      |
| Brenntag       | suspend exports to Russia; no information about local operations | Materials        | Germany     |
| Bucher         | not specified business activities in Russia were reduced         | Industrials      | Switzerland |
| Industries     | "substantially"  |                  |             |
| Bunge          | suspend exports but continue certain domestic                    | Consumer Staples | United      |
| C              |  | 1                | States      |
| Bureau Veritas | scaled back  | Industrials      | France      |
| Carl Zeiss     |  | Health Care      | Germany     |
| Carrier        | not pursue new business opportunities but continue               | Industrials      | United      |
|                | fulfilling existing contracts                                    |                  | States      |
| Carter's       | stop all shipments of merchandise to Russia                      | Industrials      | United      |
| Oshkosh        |  |                  | States      |
| Caterpillar    | suspend minor Russian manufacturing facilities but not           | Industrials      | United      |
| 1              | import sales   |                  | States      |
| CHR Hansen     | suspend operations outside of staple food products               | Materials        | Denmark     |
| Coca-Cola      | suspend certain operations in Russia but continue to             | Consumer Staples | United      |
|                | operate some chains (Costa Coffee)                               |                  | States      |
| Coinbase       | block certain illicit Russian accounts but not all               | Financials       | United      |
|                |  |                  | States      |
| Confor Step    | Stopped producing or shipping to Russia                          | Consumer         | Portugal    |
| •              |  | Discretionary    |             |
| Continental    | resumed local production after having previously                 | Consumer         | Germany     |
|                | suspended Russian factory  | Discretionary    |             |
| Corning        | suspend almost all sales in Russia except minor life-saving      | Information      | United      |
| O              | products   | Technology       | States      |
| Credit Suisse  | stop new business in Russia while meaningfully cutting           | Financials       | Switzerland |
|                | exposure by 56%  |                  |             |
| Danske Bank    | ban Russian investments in customers' portfolios                 | Financials       | Denmark     |
| DB Schenker    | suspend direct shipments to Russia; continue Europe to           | Industrials      | Germany     |
|                | Kazakhstan and Russia to Kazakhstan routes                       |                  |             |

## Appendix 4: Temporary Closure

| Name         | Action                                   | Industry         | Country       |
|--------------|--|------------------|---------------|
| 3M           | suspend operations in Russia             | Industrials      | United States |
| AAK          | halted delivery and sales                | Consumer Staples | Sweden        |
| Abrdn        | suspend investments in Russia and reduce | Financials       | United        |
|              | exposure                                 |                  | Kingdom       |
| ACCA         | suspend operations in Russia and Belarus | Industrials      | United        |
|              |  |                  | Kingdom       |
| Acer         | suspend its business in Russia           | Information      | Taiwan        |
|              |  | Technology       |               |
| Acne Studios | put all Russian activities on hold       | Consumer         | Sweden        |
|              |  | Discretionary    |               |
| Adamed       | halt sales and production in Russia      | Health Care      | Poland        |
| Adidas       | suspend operations in Russia             | Consumer         | Germany       |
|              |  | Discretionary    |               |
| ADP          | suspend sales/services to Russia         | Information      | United States |
|              |  | Technology       |               |
| AICPA        | suspend sale and delivery of services    | Industrials      | United States |
|              | indefinitely                             |                  |               |
| Air Astana   | suspend flights to Russia                | Industrials      | Kazakhstan    |

| Air France           | halt flight to and from Russia                       | Industrials      | France        |
|----------------------|--|------------------|---------------|
| Air Malta            | suspend all flights to and from Russia               | Industrials      | Malta         |
| Airbnb               | block bookings and block accepting guests in         | Consumer         | United States |
|                      | Russia   | Discretionary    |               |
| Akamai               | suspend sales in Russia                              | Information      | United States |
|                      |  | Technology       |               |
| Akin Gump            | suspend operations in Russia                         | Industrials      | United States |
| AL-KO Vehicle        | suspend deliveries to Russia and Belarus             | Consumer         | Germany       |
| Technology           |  | Discretionary    |               |
| Alaska Airlines      | temporarily suspend partnership with Russian airline | Industrials      | United States |
| Alimentation Couche- | suspend operations                                   | Consumer Staples | Canada        |
| Tard                 |  |                  |               |
| Alstom               | suspend shipments to Russia                          | Industrials      | France        |
| AM Best              | suspend all commercial activities to Russian         | Information      | United States |
|                      | clients  | Technology       |               |
| Amazon               | suspend operations in Russia                         | Consumer         | United States |
|                      |  | Discretionary    |               |
| Ambarella            | suspend shipments into Russia                        | Information      | United States |
|                      |  | Technology       |               |
| AMD                  | suspend all sales to Russia                          | Information      | United States |
|                      |  | Technology       |               |
| Amdocs               | stop all new sales of product and services in        | Information      | United States |
|                      | Russia   | Technology       |               |
| Amer Sports          | suspend all commercial activities in Russia          | Consumer         | Finland       |
|                      |  | Discretionary    |               |
| American Express     | suspend operations in Russia                         | Financials       | United States |
| Amica                | suspended Russian exports                            | Consumer         | Poland        |
|                      |  | Discretionary    |               |
| Amway                | suspend operations in Russia                         | Consumer Staples | United States |
| Analog Devices       | suspend sales to Russia according to sanctions       | Information      | United States |
|                      |  | Technology       |               |
| Ansys                | suspend all sales and business activity              | Information      | United States |
|                      |  | Technology       |               |
| Aon PLC              | suspend operations in Russia                         | Financials       | United        |
|                      |  |                  | Kingdom       |
| Apple                | suspend all official site sales; turn off select     | Information      | United States |
|                      | apps and services                                    | Technology       |               |
| Arla                 | suspends all operations                              | Consumer Staples | Denmark       |
| ARM                  | suspend shipments according to sanctions             | Information      | United        |
|                      |  | Technology       | Kingdom       |

### Appendix 6: Discontinued Operations

| Name      | Action   | Industry         | Country       |
|-----------|--|------------------|---------------|
| AB InBev  | sold stake in joint ventures and suspend using its | Consumer Staples | Belgium       |
|           | license in Russia                                  |                  |               |
| Accenture | exiting Russia completely                          | Information      | Ireland       |
|           |  | Technology       |               |
| Accountor | withdrawal from Russia                             | Information      | Finland       |
|           |  | Technology       |               |
| Acerinox  | Ceased Operations                                  | Materials        | Spain         |
| Acronis   | suspend operations in Russia                       | Information      | Switzerland   |
|           |  | Technology       |               |
| Adenza    | discontinue all operations in Russia               | Information      | United        |
|           | _  | Technology       | Kingdom       |
| AECOM     | exit Russia operations                             | Industrials      | United States |

| Aegon                     | Sold exposure  | Financials                | Netherlands       |
|---------------------------|--|---------------------------|-------------------|
| AerCap                    | cease leasing activity with Russian airlines   | Industrials               | Ireland           |
| AG Barr                   | cut ties with Russian market   | Consumer Staples          | United            |
|                           |  |                           | Kingdom           |
| Air Products              | full divestiture from Russia   | Materials                 | United States     |
| AirBaltic                 | leave Russian market until further notice  | Industrials               | Latvia            |
| Akvelon                   | close offices in Moscow  | Information<br>Technology | United States     |
| Alcoa                     | cease buying raw materials from, or selling our products to, Russian businesses        | Materials                 | United States     |
| Aldi                      | remove products from Russia  | Consumer Staples          | Germany           |
| Allegro                   | bans Russian & Belarussian products  | Consumer<br>Discretionary | Poland            |
| Allen & Overy             | wind down Russian operations   | Industrials               | United<br>Kingdom |
| American Airlines         | end agreements with Russian airlines   | Industrials               | United States     |
| Ametek                    | closing TPM Russia subsidiary due to war in Ukraine                                    | Industrials               | United States     |
| Amsted Rail               | exit Russia completely   | Industrials               | United States     |
| AP7                       | sell off all of Russian shares   | Financials                | Sweden            |
| APG                       | sell all Russian investment  | Financials                | Netherlands       |
| ArcelorMittal             | removed all Russian materials from supply chain  | Materials                 | Luxembourg        |
| Arendt &<br>Medernach     | pull out of Russia; close Russian office and suspend select Russian client engagements | Industrials               | Luxembourg        |
| Asda                      | remove products from Russia  | Consumer Staples          | United<br>Kingdom |
| Asics                     | Ceased all business operations in Russia   | Consumer<br>Discretionary | Japan             |
| Assicurazioni<br>Generali | exit Russia completely   | Financials                | Italy             |
| Atos                      | exit from Russia   | Information<br>Technology | France            |
| Atria                     | exit business in Russia  | Consumer Staples          | Finland           |
| Avery Dennison            | exit Russian operations  | Materials                 | United States     |
| Avid                      | cease all sales and support to all customers, users and resellers in Russia & Belarus  | Information<br>Technology | United States     |
| Aviva                     | Exited all equity and debt positions   | Financials                | United<br>Kingdom |
| Baker Botts               | wind down Moscow office  | Industrials               | United States     |
| Baker McKenzie            | cease operations in Russia and transfer them to an independent entity                  | Industrials               | United States     |