

## CONFIRMATION OF IDENTIFIED RISK

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**OGREA, spol. s r.o.**

IČO: 25205838

 **Sanction list EU**

Alexander Pumpyanskiy, who is on the sanction list of EU, was according to the Czech Business Register until 2022-11-23 related to the company OGREA, spol. s r.o. (name and birthdate match). Alexander Pumpyanskiy is overall listed on following lists: AU,BE,CA,CH,EU,FR,UA,UK.

### Recommendation

*Risk of connection to a person on EU sanctions list has been identified. This may result in a ban on providing funds to the company. We recommend that the company be asked to provide evidence of controlling persons and to assess the situation appropriately in accordance with the **MMR methodology**.*

**As of 16.05.2025 for  
TESTING ACCESS**

# NOTICE

The conclusion of this certificate assesses a risk of applying Council Regulations (EU) No. 269/2014, No. 208/2014, and No. 833/2014 in relation to legal entities and natural persons, particularly the risk of connections to sanctioned individuals and control from the Russian Federation.

The assessment is based on a combination of data from public and non-public registers with supplementary calculations by the service provider (e.g., identification of common Russian names of executives or searching for inaccurate matches with names of sanctioned individuals).

**Its conclusion with respect to other regulations should be handled with caution. Due to the nature of source registries, the provider cannot guarantee the 100 % accuracy of the stated conclusion. The certificate however serves as a proof of appropriate effort to investigate stated risks. Given the development of ownership structures and sanction lists, this conclusion is only valid as of the date of verification.**

# ATTACHMENT

## Basic information

<b>Name:</b>	<b>OGREA, spol. s r.o.</b>
IČO:	25205838
Residence:	Třebízského 342, Mariánské Lázně 35301
Legal form:	Společnost s ručením omezeným
Institutional sector:	Nefinanční podniky pod zahraniční kontrolou
Number of employees:	Neuvedeno
Date of establishment:	Dec. 31, 1996

# ATTACHMENT

## Beneficiary owners overview

First name	Last name	Birth date	Nationality	Position	Creation date	Expiry date
Dmitry	Farber Silaev	02.1964	Španělské království	nepřímý skutečný majitel	04/24/2023	-

Source: esm.justice.cz

# ATTACHMENT

## Subject verification

Type	First and last name / Name		Birth date / IČO	Country	Position	Creation date	Expiry date
L	<b>OGREA, spol. s r.o.</b>		25205838	Česká republika	<i>verified subject</i>	12/31/1996	-
L	FURDBERG HOLDING LIMITED		-	Kypr	společníci	07/09/2024	-
N	Nataliya	Avlukova	06/06/1981	Švýcarsko	statutární orgán	11/23/2022	-
L	FURDBERG HOLDING LIMITED		-	Kypr	společníci	09/25/2023	07/09/2024
L	FURDBERG HOLDING LIMITED		-	Kypr	společníci	10/09/2014	09/25/2023
N	Alexander	Pumpyanskiy	05/16/1987	Švýcarsko	statutární orgán	05/17/2019	11/23/2022
N	Alexander	Goncharov	08/14/1968	Švýcarsko	statutární orgán	10/09/2014	05/17/2019
L	Společnost s ručením omezeným SPRED		-	Ruská federace	společníci	06/13/2014	10/09/2014
N	Victor	Strizhak	11/13/1961	Ruská federace	statutární orgán	09/29/2010	10/09/2014
L	Společnost s ručením omezeným SPRED		-	Ruská federace	společníci	08/31/2010	06/13/2014
N	Vladimir	Ogibenin	01/09/1949	Ruská federace	statutární orgán	10/22/2008	09/29/2010
N	Elena	Malyarevich	08/02/1976	Ruská federace	společníci	12/28/2009	08/31/2010
N	Andrey	Ogibenin	12/17/1970	Ruská federace	společníci	12/28/2009	08/31/2010
N	Vladimir	Ogibenin	01/09/1949	Ruská federace	společníci	12/28/2009	08/31/2010
N	Vladimir	Ogibenin	01/09/1949	Ruská federace	společníci	10/03/2008	12/28/2009
N	Jiří	Vlasák	11/13/1939	Česká republika	statutární orgán	12/28/2002	10/22/2008
N	Vladimir	Ogibenin		Ruská federace	společníci	03/21/2003	10/03/2008
N	Vladimir	Zaytsev	07/09/1962	Ruská federace	společníci	12/28/2002	10/03/2008
N	Jiří	Vlasák	11/13/1939	Česká republika	společníci	12/28/2002	10/03/2008
N	Jiří	Mauritz	08/29/1949	Česká republika	společníci	12/28/2002	10/03/2008
N	Vladimir	Ogibenin		Ruská federace	společníci	12/28/2002	03/21/2003
N	Vladimír	Oguibenine		Ruská federace	společníci	08/28/2001	12/28/2002

Type	First and last name / Name		Birth date / IČO	Country	Position	Creation date	Expiry date
N	Jiří	Mauritz	08/29/1949	Česká republika	společníci	10/04/1999	12/28/2002
N	Vladimir	Zaitsev	07/09/1962	Ruská federace	společníci	10/04/1999	12/28/2002
N	Jiří	Vlasák	11/13/1939	Česká republika	společníci	09/15/1999	12/28/2002
N	Jiří	Vlasák	11/13/1939	Česká republika	statutární orgán	12/31/1996	12/28/2002
N	Vladimír	Oguibenine		Ruská federace	společníci	10/04/1999	08/28/2001
N	Ivan	Brož	05/29/1938	Česká republika	společníci	09/15/1999	08/28/2001
N	Jiří	Mauritz	08/29/1949	Česká republika	společníci	09/15/1999	10/04/1999
N	Vladimír Viktorovič	Ogiběnin		Ruská federace	společníci	09/15/1999	10/04/1999
N	Ivan	Brož	05/29/1938	Česká republika	společníci	12/31/1996	09/15/1999
N	Vladimír Viktorovič	Ogiběnin		Ruská federace	společníci	12/31/1996	09/15/1999
N	Jiří	Vlasák	11/13/1939	Česká republika	společníci	12/31/1996	09/15/1999
N	Jiří	Mauritz	08/29/1949	Česká republika	společníci	12/31/1996	09/15/1999

Sources: or.justice.cz, rzp.cz, ares.gov.cz

**Captions**

N - natural body  
L - legal body

# ATTACHMENT

## Sanctions and PEP lists used for verification

Name	Last change on the list	Last checked
Czech Republic National Sanctions	04/04/2025	05/14/2025
EU Council Official Journal Sanctioned Entities	05/13/2025	05/14/2025
EU Financial Sanctions Files (FSF)	05/13/2025	05/14/2025
Entities sanctioned under EU Council Regulation 2023/2878	12/18/2023	05/14/2025
US OFAC Consolidated (non-SDN) List	03/28/2025	05/14/2025
US OFAC Specially Designated Nationals (SDN) List	05/14/2025	05/14/2025
US Trade Consolidated Screening List (CSL)	05/14/2025	05/14/2025
Belgian Financial Sanctions	05/13/2025	05/14/2025
Estonia International Sanctions Act List	03/22/2025	05/14/2025
French Freezing of Assets	06/22/2024	05/14/2025
Polish list of persons and entities subject to sanctions	06/12/2024	05/14/2025
UK OFSI Consolidated List of Targets	07/15/2023	05/14/2025
Argentine RePET	01/27/2024	05/14/2025
Australian Sanctions Consolidated List	04/08/2025	05/14/2025
Canadian Listed Terrorist Entities	02/21/2025	05/14/2025
Canadian Special Economic Measures Act Sanctions	06/21/2024	05/14/2025
Israel Terrorists Organizations and Unauthorized Associations lists	04/28/2025	05/14/2025
Japan Economic sanctions and list of eligible people	06/21/2024	05/14/2025
Kazakh Terror Financing list	04/21/2023	05/14/2025
Kyrgyz National List	10/19/2024	05/14/2025
Swiss SECO Sanctions/Embargoes	05/14/2025	05/14/2025
Ukraine National Security Sanctions	01/17/2024	05/14/2025
Ukraine SFMS Blacklist	03/18/2025	05/14/2025
UN Security Council Consolidated Sanctions	03/21/2025	05/14/2025
US BIS Denied Persons List	04/09/2025	05/14/2025
ACF List of bribetakers and warmongers	06/21/2024	05/14/2025
FBK Recommended List of Individuals for Sanctioning (Navalny 35)	08/10/2023	05/14/2025
Russian Oligarch Database	04/20/2023	05/14/2025
Russian Politically Exposed Persons	01/01/2025	05/14/2025

# ATTACHMENT

## Further assessed risks

Verified	Name
	<b>Insolvency</b> Proti dodavateli OGREA, spol. s r.o. byl dne 2012-06-12 podán insolvenční návrh. Řízení ukončeno dne 2012-09-06. Počet přihlášených pohledávek: 2.
	<b>Offshore</b> Vlastnická struktura společnosti OGREA, spol. s r.o. míří do offshore země (Kypr).