DEPARTMENT OF THE TREASURY
WASHINGTON, D.C.

LICENSE NO. RU-2024-1[redacted]
RUSSIAN HARMFUL FOREIGN ACTIVITIES SANCTIONS REGULATIONS

SPECIFIC LICENSE
(Issued under the authority of Executive Order 14024 and 31 C.F.R. Part 587)

To: Ivan [redacted] (the "Applicant")
Authorized Representative: Lucy Wong, Legal Representative of Koch Securities [redacted]
Infinitus Plaza, 199 Des Voeux [redacted] Wan, Hong Kong

Date of Blocking: November 2023
Value Date: 2023-11-03
Value of Blocked Securities: USD 212,900
Remitting Financial Institution: PJSC SPB Bank
Beneficiary Financial Institutions: PT PG Berjangka and Alpaca Securities LLC ([redacted])

(a) Except as provided in paragraph (b) of this License, all transactions necessary to effect the transfer, unblocking, and disposition of blocked funds and assets currently held in, or processed through, the Applicant's account within the custodial infrastructure of PJSC SPB Bank and/or SPB Exchange are authorized, provided that:

(1) The transactions are limited to the specific purpose described in the application submitted to OFAC (as supplemented or otherwise clarified in the administrative record), and to such steps as are strictly necessary to complete those transactions.

(2) The underlying shares were purchased through Brokerage Credit Service Ltd., as represented in the application submitted to OFAC.

(3) Any funds and assets unblocked pursuant to this License shall be transferred exclusively to accounts maintained with the designated non-sanctioned financial institutions specified in the application, namely: [redacted] (PT PG Berjangka) and Alpaca Securities LLC (Alpaca Clearing), 12 E 49th St., Floor 11, New York, NY 10017, USA.

(4) No blocked person shall receive any economic benefit, directly or indirectly, from the transactions authorized under this License, other than standard, customary administrative service fees associated with the transfer. For purposes of this License, "blocked person" includes any person or entity designated on OFAC's Specially Designated Nationals and Blocked Persons List (SDN List), including PJSC SPB Bank and/or SPB Exchange.

(5) The Applicant shall not divert, redirect, reroute, or otherwise transfer any portion of the blocked funds and assets to any person or account outside the scope of, or to a destination not specified in this License or the application.

(6) The Applicant shall comply with the following recordkeeping and reporting requirements:

(i) Pursuant to 31 C.F.R. § 501.603, submit a written report to the OFAC Compliance Division within thirty (30) calendar days following the completion of the transactions authorized by this License.

(ii) The report must include:

(A) a complete description and itemized list of all assets transferred, including CUSIP/ISIN identifiers, quantities, and market value at the time of transfer;

(B) official written confirmation from, and a receipt statement issued by, the receiving, non-sanctioned financial institution; and

(C) copies of transfer confirmations provided by all U.S. intermediaries and sub-custodians involved.

(iii) Maintain records relating to transactions conducted pursuant to this License for not less than five (5) years from the date of the transaction and make such records available to OFAC upon request.

(7) In the event OFAC revokes or suspends this License, the Applicant shall immediately cease all authorized activity to the extent affected by such revocation or suspension and shall take all steps necessary to ensure continued compliance with applicable sanctions requirements.

(b) This License does not authorize:

(1) Any transfer of funds, securities, or other property to, or for the benefit of, any blocked person that is not explicitly identified or described in this License or in the application.

[redacted]

(c) Effective Dates. This License is effective on July 17, 2026, and expires automatically on July 16, 2027. No transactions are authorized beyond the expiration date.

(d) Presentation Requirement. A copy of this License must be provided to the relevant U.S. intermediaries and sub-custodians to effect the release of the property.

Bradley T. Smith Digitally signed by Bradley T. Smith Date: 2026.07.17 09:25:48 -04'00'

Dated: July 17, 2026

Bradley T. Smith
Director
Office of Foreign Assets Control