



Observatoire ARGA

ARGA Atlas

EXECUTIVE MEMORANDUM

Concerning the Documentary Record, Analytical Research, and International Institutional Activities Relating to the Corporate Conflict Surrounding PJSC TogliattiAzot (TOAZ)

Author:

Sergei Khrabrykh — President of ARGA, PhD

Organization: Observatoire ARGA, ARGA Atlas

Mailing address: 21 route de l'Aviation, 12 C, 64600 Anglet, FRANCE

Contacts: info@argaobservatory.org, +33 7 58 49 62 27

Website: www.argaobservatory.org, <https://www.arga-atlas.com/>

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I. INTRODUCTION

This Executive Memorandum has been prepared by ARGA Observatory, the analytical division of Asylum Research & Global Assistance (ARGA), in connection with the extensive documentary, analytical, and institutional work conducted by the organization concerning the long-running corporate conflict surrounding PJSC TogliattiAzot (TOAZ). The purpose of this memorandum is to provide an objective overview of the scope of materials collected by ARGA, the international research activities undertaken in relation to the matter, and the reasons why the resulting body of information may be relevant for independent institutional assessment within sanctions, compliance, corporate governance, regulatory, and due diligence frameworks. This memorandum is not intended to advocate any governmental action, legal outcome, sanctions measure, or regulatory decision.

The document is limited to the presentation of factual information concerning:

- the scope of ARGA's research activities;
- the categories of materials assembled;
- the international institutional engagement undertaken by ARGA;
- the significance of the resulting documentary archive;
- the potential relevance of these materials for independent review by competent authorities and stakeholders.

II. ABOUT ARGA AND ARGA OBSERVATORY

Asylum Research & Global Assistance (ARGA) is an independent international organization engaged in documentation, research, and analytical assessment of complex cross-border matters involving legal proceedings, human rights concerns, corporate disputes, sanctions-related issues, compliance risks, and transnational governance challenges. ARGA's activities focus on the collection, preservation, verification, organization, and analysis of documentary evidence originating from multiple jurisdictions and legal systems. ARGA Observatory functions as the organization's dedicated analytical unit.

Its mandate includes:

- preparation of institutional reports;
- corporate governance analysis;
- sanctions and compliance research;
- legal process assessment;
- documentation of transnational disputes;
- development of structured evidentiary archives;
- preparation of analytical submissions for international institutions.

ARGA Observatory operates on the basis of a methodology emphasizing documentary verification, source transparency, factual neutrality, and institutional objectivity. The organization does not function as a law firm, political organization, lobbying entity, or litigation funder. Its role is limited to independent documentation and analytical research.

III. BACKGROUND OF THE TOAZ PROJECT

The TOAZ project originated as a research initiative aimed at understanding the evolution of one of the most significant and complex corporate conflicts in the post-Soviet industrial sector. Over time, the project expanded beyond the analysis of a conventional shareholder dispute. The materials reviewed by ARGA indicated the existence of a multi-layered conflict involving:

- corporate governance disputes;
- shareholder litigation;
- registry-related controversies;
- ownership challenges;
- criminal proceedings;
- insolvency proceedings;
- international litigation;
- cross-border corporate structures;
- international asset-related developments;
- sanctions and compliance implications.

The dispute attracted particular attention due to its transnational character. Corporate entities, holding structures, commercial partners, financial intermediaries, and litigation vehicles associated with the broader TOAZ ecosystem were identified across numerous jurisdictions, including:

- Russia;
- Ireland;
- Cyprus;
- British Virgin Islands;
- Hong Kong;
- Switzerland;
- Jersey;
- Guernsey;

- Mauritius;
- United Arab Emirates;
- additional jurisdictions connected through corporate, financial, or commercial operations.

As a result, the matter evolved into a complex international case study involving issues extending beyond domestic corporate litigation.

IV. DEVELOPMENT OF THE DOCUMENTARY ARCHIVE

The TOAZ archive maintained by ARGA was developed through the systematic accumulation of information from multiple categories of sources.

These sources include:

A. Judicial Materials

ARGA collected and reviewed a substantial volume of judicial documentation, including:

- court decisions;
- procedural rulings;
- appellate submissions;
- cassation materials;
- hearing transcripts;
- procedural complaints;
- evidentiary motions;
- judicial correspondence.

B. Criminal Procedure Documentation

The archive contains materials relating to criminal proceedings involving former managers and associated individuals.

The materials include:

- investigative decisions;
- procedural resolutions;
- expert reports;
- complaints submitted to investigative bodies;
- responses from supervisory authorities;

- procedural records.

C. Corporate Documentation

ARGA accumulated extensive materials concerning:

- corporate governance structures;
- board composition;
- shareholder relations;
- ownership transitions;
- voting procedures;
- corporate resolutions;
- management changes.

D. Insolvency and Asset-Related Materials

The archive also contains documentation concerning:

- insolvency proceedings;
- asset restructuring processes;
- creditor actions;
- valuation-related materials;
- ownership transfers;
- associated commercial developments.

E. International Documentation

Additional materials were obtained from international proceedings, regulatory filings, public registries, corporate disclosures, media archives, compliance databases, and public records located across several jurisdictions.

V. CREATION OF THE MASTER DOSSIER

Following the accumulation of the documentary record, ARGA undertook the creation of a comprehensive Master Dossier designed to organize the available information into a coherent and institutionally accessible format. The Master Dossier was conceived as a jurisdiction-neutral reference document capable of serving as a consolidated repository of factual information.

Its principal objectives were:

- preservation of chronology;

- preservation of evidentiary references;
- consolidation of procedural materials;
- identification of recurring factual patterns;
- facilitation of institutional review.

The dossier was designed to allow independent readers to understand the sequence of events without requiring familiarity with the underlying litigation history. Particular attention was devoted to ensuring that documentary references could be independently verified and traced to underlying source materials whenever possible.

VI. ANALYTICAL RESEARCH PROGRAM

In parallel with the compilation of documentary materials, ARGA launched a broader analytical research program concerning the TOAZ matter. The purpose of this research was not to determine legal liability or factual guilt of any participant. Instead, the objective was to identify and analyze broader patterns relevant to:

- corporate governance disputes;
- use of legal mechanisms during ownership conflicts;
- interaction between corporate and criminal proceedings;
- international asset movements;
- compliance-related implications;
- sanctions-related considerations;
- transnational reputational risk.

The resulting body of research produced a series of reports, memoranda, institutional submissions, and analytical summaries that collectively form one of the most comprehensive independent archives assembled concerning the TOAZ matter.

VII. ANALYTICAL PUBLICATIONS AND RESEARCH OUTPUTS

As ARGA's documentary archive expanded, the organization developed a structured body of analytical publications intended to facilitate institutional understanding of the various dimensions of the TOAZ matter. The resulting publications were prepared using a methodology focused on documentary verification, source attribution, chronological reconstruction, and comparative institutional analysis.

The principal outputs include the following categories.

A. Executive Summaries

ARGA prepared several executive-level analytical summaries designed for institutional stakeholders requiring concise factual overviews of the dispute.

These documents provided:

- chronological background;
- identification of principal actors;
- explanation of ownership structures;
- description of litigation developments;
- overview of international dimensions of the dispute.

The objective was to provide a neutral entry point for readers without prior familiarity with the matter.

B. Master Dossier

The Master Dossier represents the central documentary repository developed by ARGA.

The dossier consolidates:

- procedural chronology;
- corporate developments;
- judicial proceedings;
- ownership transitions;
- expert materials;
- international proceedings;
- institutional communications.

The dossier was designed as a reference document capable of supporting independent review by governmental, regulatory, compliance, legal, and academic stakeholders.

C. Analytical Reports

ARGA Observatory subsequently prepared specialized analytical reports addressing broader patterns emerging from the documentary record. Topics addressed include:

- corporate governance disputes;
- interaction between civil and criminal proceedings;
- evidentiary issues;
- procedural integrity concerns;
- cross-border implications of corporate conflicts;

- international compliance considerations.

The reports were drafted in a jurisdiction-neutral format to maximize usability across different legal systems.

D. Corporate Structure Research

A significant portion of ARGA's work focused on reconstructing corporate ownership and governance structures associated with the broader TOAZ ecosystem.

Research included:

- ownership chains;
- shareholder structures;
- affiliated entities;
- litigation vehicles;
- intermediary companies;
- trust and holding arrangements;
- jurisdictional connections.

This work was conducted to facilitate institutional understanding of the international dimensions of the dispute.

E. Compliance and Risk Assessments

ARGA additionally prepared analytical memoranda examining:

- sanctions-related implications;
- financial integrity concerns;
- reputational risk indicators;
- corporate governance considerations;
- due diligence relevance.

The purpose of these documents was not to advocate any regulatory action but rather to identify areas potentially relevant to independent institutional review.

VIII. INTERNATIONAL INSTITUTIONAL ENGAGEMENT

As the documentary archive and analytical work matured, ARGA initiated a series of international information-sharing activities aimed at ensuring that competent institutions were aware of the existence of the collected materials. The objective was to create a documented institutional record rather than to seek predetermined outcomes.

A. United Nations Mechanisms

ARGA prepared submissions for a number of United Nations mechanisms whose mandates include issues relating to:

- due process;
- judicial independence;
- access to effective remedies;
- protection of affected individuals;
- broader rule-of-law concerns.

The purpose of these submissions was to provide information regarding documented developments and procedural issues reflected in the underlying materials.

B. Council of Europe Framework

ARGA transmitted analytical materials to relevant Council of Europe institutions responsible for monitoring rule-of-law developments and human rights issues.

These communications focused on:

- factual chronology;
- procedural developments;
- judicial materials;
- institutional concerns documented in the archive.

C. International Legal Community

ARGA also shared information with professional legal organizations and international legal networks.

The rationale for this engagement was that the TOAZ matter presents issues extending beyond a conventional domestic corporate dispute and may therefore be relevant to comparative discussions concerning corporate governance conflicts and legal process integrity.

D. Anti-Corruption and Compliance Institutions

Analytical materials were additionally transmitted to organizations and institutions involved in:

- anti-corruption research;
- financial integrity initiatives;
- corporate governance standards;

- compliance-related assessments.

The objective was to ensure that relevant stakeholders were aware of the existence of the documentary archive and associated analytical work.

E. Regulatory and Governmental Stakeholders

In certain jurisdictions, ARGAs provided informational materials to governmental and regulatory bodies responsible for:

- sanctions administration;
- financial crime prevention;
- international legal cooperation;
- compliance oversight.

Such communications were informational in nature and did not seek specific enforcement outcomes.

IX. SIGNIFICANCE OF THE DOCUMENTARY RECORD

ARGA considers the resulting TOAZ archive significant for several reasons.

First, the archive encompasses an unusually broad range of documentary categories. Unlike many corporate disputes that are documented primarily through court decisions or media reporting, the TOAZ archive contains materials originating from multiple procedural, corporate, and institutional contexts.

Second, the archive spans a prolonged period of time. The chronology extends across numerous phases of the dispute, including:

- ownership controversies;
- shareholder litigation;
- criminal proceedings;
- insolvency-related developments;
- governance changes;
- international proceedings.

This temporal continuity permits examination of long-term developments rather than isolated events.

Third, the archive incorporates substantial international dimensions. The materials involve entities, assets, transactions, legal proceedings, and institutional activities extending across multiple jurisdictions. This creates potential relevance beyond the domestic context in which many of the original events occurred.

Fourth, the archive provides a structured evidentiary framework. The value of the collection derives not only from the volume of materials accumulated but also from the effort devoted to organizing them into a coherent analytical structure capable of supporting independent review.

X. RELEVANCE TO COMPLIANCE, SANCTIONS, AND RISK ASSESSMENT FRAMEWORKS

The purpose of this section is not to advance any position regarding sanctions policy or regulatory outcomes.

Rather, it explains why the documentary record assembled by ARGGA may be relevant to institutions conducting independent assessments.

A. Corporate Governance Assessment

The materials provide substantial information concerning:

- shareholder relations;
- governance transitions;
- ownership disputes;
- management changes;
- control-related developments.

Such information may be relevant in evaluating governance-related risks.

B. Beneficial Ownership and Control Analysis

The archive contains extensive information concerning corporate structures operating across multiple jurisdictions.

These materials may assist institutions seeking to understand:

- ownership chains;
- governance influence;
- corporate relationships;
- historical control arrangements.

C. Enhanced Due Diligence

The volume and complexity of the documentary record may be relevant to enhanced due diligence exercises conducted by:

- financial institutions;
- regulatory authorities;

- compliance professionals;
- corporate counterparties.

D. Reputational Risk Assessment

The existence of extensive litigation, regulatory proceedings, international submissions, and competing factual narratives may be relevant to reputational risk analysis performed by independent stakeholders.

E. Cross-Border Compliance Review

Because the matter involves multiple jurisdictions, international corporate structures, and transnational legal developments, it may be relevant to broader compliance assessments extending beyond any single legal system.

XI. RELEVANCE TO CURRENT INTERNATIONAL REVIEW PROCESSES

ARGA takes no position concerning the merits of any ongoing judicial, administrative, sanctions-related, or governmental proceedings in any jurisdiction. Nevertheless, the organization recognizes that the documentary archive it has assembled may be relevant to independent reviews undertaken by competent institutions.

The materials provide a consolidated factual resource concerning:

- the historical development of the TOAZ conflict;
- the evolution of ownership disputes;
- associated legal proceedings;
- governance developments;
- international dimensions of the matter;
- resulting compliance considerations.

For this reason, ARGA considers it appropriate to maintain the archive in a structured format capable of supporting institutional review where such review may occur.

XII. CONCLUSION

Over the course of its research activities, ARGA and ARGA Observatory have assembled an extensive documentary and analytical record concerning the corporate conflict surrounding PJSC TogliattiAzot and its international ramifications. The resulting archive incorporates a broad range of source materials, analytical studies, institutional submissions, and supporting documentation developed through a methodology emphasizing documentary verification, neutrality, and institutional rigor. The purpose of this memorandum is not to advance legal claims, advocate regulatory action, or influence policy outcomes. Its purpose is limited to documenting the existence, scope, and significance of the materials accumulated by ARGA and to explaining why these materials may be relevant to independent institutional assessment within sanctions, compliance, corporate governance, and risk-analysis frameworks. ARGA remains committed to

maintaining the archive, preserving the integrity of the documentary record, and facilitating access to relevant materials for competent institutions conducting independent review.

APPENDIX A

RELEVANCE OF THE TOAZ DOCUMENTARY ARCHIVE TO THE AUSTRALIAN SANCTIONS, COMPLIANCE, AND REGULATORY ENVIRONMENT

A. Purpose of this Appendix

This Appendix has been prepared to explain the institutional rationale for the preparation of the present memorandum in connection with developments occurring within Australia and, in particular, public proceedings concerning sanctions-related measures affecting Mr. Dmitry Arkadievich Mazepin. The Appendix does not address the merits of any ongoing judicial proceedings, administrative decisions, sanctions measures, or governmental actions. ARGA does not advocate any particular outcome. The purpose of this Appendix is solely to explain why ARGA considers its accumulated documentary archive concerning the TOAZ matter to be potentially relevant for independent institutional awareness and review.

B. Background Context

Over the course of its research activities, ARGA has accumulated a substantial body of documentary and analytical materials concerning:

- the historical shareholder conflict involving PJSC TogliattiAzot (TOAZ);
- disputes concerning ownership and corporate control;
- related civil and criminal proceedings;
- insolvency and restructuring processes;
- international litigation developments;
- transnational asset-related issues;
- sanctions and compliance implications arising from the broader dispute.

The resulting archive spans multiple jurisdictions and incorporates a significant volume of primary and secondary source material. The archive was assembled independently of any Australian proceedings and predates current Australian developments. Its existence therefore reflects a long-term research effort rather than a response to any specific litigation event.

C. Emergence of Australian Relevance

ARGA became aware that aspects of the broader TOAZ-related history have entered a context potentially relevant to Australia through public sanctions-related proceedings involving Mr. Dmitry Mazepin. Without expressing any view regarding those proceedings, ARGA recognizes that Australian institutions may encounter references to:

- historical corporate disputes involving TOAZ;

- ownership-related controversies;
- criminal proceedings involving former managers;
- allegations advanced by various parties over time;
- competing narratives concerning the underlying conflict.

Where such circumstances arise, the availability of a structured documentary archive may assist in ensuring that historical events are examined within a broader factual context.

D. Importance of Documentary Context

One of the principal challenges presented by long-running transnational disputes is the fragmentation of information. Events occurring over many years frequently become dispersed across:

- different jurisdictions;
- multiple legal proceedings;
- separate regulatory processes;
- media reporting;
- corporate disclosures;
- sanctions-related materials.

As a result, decision-makers may encounter isolated factual elements without access to the wider documentary record. The primary objective of ARGGA's archive has been to reduce this fragmentation by preserving and organizing relevant materials within a unified framework. ARGGA believes that the existence of such a framework contributes to informed institutional assessment irrespective of the conclusions ultimately reached by competent authorities.

E. Potential Relevance to Compliance and Due Diligence Functions

The TOAZ archive may be relevant to stakeholders engaged in:

- sanctions compliance;
- enhanced due diligence;
- beneficial ownership analysis;
- corporate governance review;
- reputational risk assessment;
- financial integrity evaluation;
- cross-border litigation risk assessment.

The archive includes information concerning:

- historical ownership structures;
- corporate governance developments;
- shareholder disputes;
- litigation history;
- insolvency-related developments;
- international proceedings involving persons associated with the dispute.

Such information may be relevant when institutions seek to understand the broader context within which contemporary issues are being assessed.

F. Neutrality of ARGGA's Position

ARGGA emphasizes that neither this memorandum nor any accompanying materials should be interpreted as:

- support for any party involved in the TOAZ dispute;
- opposition to any party involved in the TOAZ dispute;
- advocacy concerning sanctions policy;
- advocacy concerning judicial outcomes;
- advocacy concerning governmental action.

The organization takes no position regarding:

- whether sanctions should be imposed, maintained, modified, or removed;
- the merits of any litigation;
- the merits of any governmental decision;
- the merits of claims advanced by any participant in the dispute.

ARGGA's role is limited to documentation, preservation, analysis, and presentation of information.

G. Public Interest Considerations

The TOAZ matter presents characteristics frequently associated with issues of broader international interest, including:

- complex corporate control disputes;
- transnational ownership structures;

- cross-border commercial operations;
- international litigation activity;
- sanctions-related implications;
- compliance-related implications.

For this reason, ARGA considers the preservation and organization of the documentary record to be a matter of legitimate public-interest research. The objective is not to influence outcomes but to facilitate informed review by institutions possessing decision-making authority.

H. Availability of Supporting Materials

ARGA currently maintains a substantial body of supporting materials, including:

- documentary archives;
- analytical reports;
- corporate structure analyses;
- chronological reconstructions;
- institutional submissions;
- compliance-related assessments;
- supporting evidentiary materials.

Where appropriate and legally permissible, additional documentation may be made available to competent authorities, regulators, governmental institutions, academic researchers, and other stakeholders conducting legitimate review activities.

I. Concluding Observations

ARGA considers that the documentary archive assembled in relation to the TOAZ matter constitutes a significant body of information concerning a complex transnational corporate conflict and its subsequent legal, commercial, and compliance-related consequences. The existence of current Australian proceedings involving matters that may intersect with aspects of this historical record provides the institutional context for the preparation of the present memorandum. The purpose of ARGA's involvement is limited to ensuring that a substantial documentary record exists, is preserved, and remains available for independent review by competent institutions. ARGA expresses no opinion regarding the outcome of any Australian proceedings and respectfully leaves all factual, legal, regulatory, and policy determinations to the competent authorities of Australia.