

Observatoire ARGA

ARGA Atlas

INTERNATIONAL ACTIONS REPORT

International Legal, Analytical, Compliance, and Institutional Activities Conducted by ARGA Observatory in Relation to PJSC TogliattiAzot (TOAZ)

I. Purpose of the Report

This International Actions Report summarizes the confirmed international actions undertaken by ARGA Observatory in connection with the case of PJSC TogliattiAzot (TOAZ). The report is prepared in chronological and institutional format and reflects only actions, documents, publications, submissions, notifications, and research activities that have been documented in the materials available to ARGA.

The report does not contain political assessments, allegations not supported by the record, or requests for any specific governmental, sanctions-related, law-enforcement, or regulatory measure. Its purpose is to document the international scope of ARGA's work, including the preparation of analytical materials, publication of research reports, submissions to competent authorities, engagement with international organizations, and development of compliance and evidence-preservation frameworks.

II. Formation of the Evidence Base and International Master Dossier

The first stage of ARGA Observatory's international work consisted of creating a structured evidence base concerning the TOAZ matter. ARGA prepared an international Master Dossier on PJSC TogliattiAzot, bringing together factual chronology, procedural documents, key corporate events, criminal and civil proceedings, expert materials, and records concerning the change of corporate control on 27 November 2021.

The Master Dossier was prepared in a neutral, jurisdiction-independent format. It recorded the principal developments identified in the documentary record, including the change of corporate control, the initiation of criminal and civil proceedings, issues relating to expert evidence, refusals to conduct repeat or state-commissioned examinations, refusals to summon experts for questioning, alleged inconsistencies in procedural records, measures affecting relatives and third parties, and the exhaustion of available domestic remedies.

The dossier was subsequently registered and published on Zenodo with a DOI. This ensured external fixation of the document, preservation of the version, public citability, and the possibility of using the dossier as a stable archival source in international institutional, legal, regulatory, and compliance settings.

In parallel, ARGA created a structured archive of primary materials intended for recipients requiring access to original documents, annexes, procedural records, expert materials, and supporting evidence.

III. Preparation and Publication of the ARGA Observatory Analytical Report

Following the creation of the Master Dossier, ARGA Observatory prepared the analytical report titled “Criminalization of Corporate Governance and Substitution of Justice: The Case of PJSC TogliattiAzot (TOAZ).”

The report was prepared as a jurisdiction-neutral analytical document. Its purpose was to explain the TOAZ matter as a case study involving the interaction between corporate governance disputes, criminal proceedings, judicial processes, evidentiary issues, and international consequences. The report addressed issues documented in the underlying materials, including the role of economic expert evidence, refusal to conduct repeat expert review, procedural-record concerns, restrictions affecting the defence, refusal to register reports concerning alleged falsification, and measures affecting families and third parties.

The analytical report was also published on Zenodo with a DOI, creating a stable international reference point for subsequent institutional submissions. The report became one of the core analytical documents used in ARGA’s later communications with international bodies, professional organizations, regulatory stakeholders, and foreign authorities.

IV. International Human Rights and Rule-of-Law Engagement

On the basis of the Master Dossier and analytical report, ARGA prepared and transmitted materials to international human rights and rule-of-law institutions. These included submissions to United Nations Special Procedures, including mandates concerning arbitrary detention, independence of judges and lawyers, human rights defenders, ill-treatment, and the impact of legal measures on families and third parties.

Materials were also transmitted to the Council of Europe framework, including the Commissioner for Human Rights and parliamentary monitoring channels. In parallel, information was provided to relevant units of the European Commission within the context of rule-of-law, investment-climate, and judicial-environment assessment.

These actions were intended to ensure institutional awareness of the documented procedural and rule-of-law aspects of the TOAZ matter. The submissions were not framed as private litigation claims but as structured information concerning a complex matter with broader implications for judicial independence, fair-trial guarantees, access to remedies, and the use of legal mechanisms in corporate conflicts.

V. Professional Legal and Anti-Corruption Engagement

ARGA also transmitted materials to international professional legal organizations and anti-corruption bodies. These included the International Bar Association, the International Commission of Jurists, the American Bar Association, the Council of Bars and Law Societies of Europe, UNODC, ICC Commercial Crime Services, and FraudNet.

The purpose of this stage was to place the documented materials within professional and institutional environments concerned with legal process integrity, judicial standards, abuse of legal

mechanisms, anti-corruption typologies, and transnational commercial risk. The materials were presented as analytical and documentary submissions, not as requests for predetermined action.

VI. Compliance and Financial-Regulatory Engagement

ARGA prepared and transmitted analytical materials to institutions and organizations operating in the fields of financial integrity, corporate governance, AML standards, and compliance review. These included FATF-related mechanisms, OECD units concerned with corporate governance and anti-corruption, and Transparency International.

The materials presented the TOAZ matter as a documented case involving corporate governance, legal-process integrity, asset-related developments, and potential compliance relevance. The communications were designed to create an international compliance record and to preserve the factual materials in a form suitable for review by financial institutions, regulators, auditors, investors, and other due-diligence stakeholders.

VII. United States Track

A major component of ARGA's international work concerned the United States. ARGA prepared and transmitted analytical briefing materials to the U.S. Department of Justice, including relevant divisions and sections such as the Criminal Division, Fraud Section, Money Laundering and Asset Recovery Section, Organized Crime and Gang Section, and Office of International Affairs.

Materials were also transmitted through official registration channels, enabling formal receipt and potential internal allocation within relevant U.S. authorities. ARGA separately provided information to the U.S. Department of State in connection with the broader legal, institutional, and diplomatic context of the matter.

At a later stage, ARGA expanded the U.S. track by preparing materials for financial-regulatory and sanctions-related bodies, including the U.S. Department of the Treasury, FinCEN, OFAC, and the SEC Division of Enforcement. The materials included analytical memoranda, supporting documentation, descriptions of corporate structures, and information concerning transnational financial and commercial arrangements.

Within this track, ARGA also prepared preliminary structured submissions in the form of initial disclosures. These materials were intended to preserve the case within AML and sanctions-review contexts and to prepare for possible further whistleblower or enforcement-related submissions, subject to procedural requirements and the availability of additional evidence.

A confirmed official response from the U.S. Department of Justice was received, indicating that the submission had been registered and assigned an incoming reference number. This confirmed formal receipt of the materials, without implying any commitment to further action.

VIII. European Union and United Kingdom Track

ARGA transmitted materials to several European Union institutions and regulatory bodies, including the European Commission, DG FISMA, the European External Action Service sanctions division, the European Central Bank, the European Banking Authority, the European Securities and Markets Authority, the European Public Prosecutor's Office, Europol's European Financial and Economic Crime Centre, the European Commission Anti-Money Laundering Unit, and EU sanctions-related channels.

The purpose of the EU track was to create institutional awareness among financial regulators, sanctions authorities, AML stakeholders, and bodies concerned with cross-border financial and economic crime. The materials were adapted to the language of sanctions policy, banking compliance, AML risk, corporate transparency, and cross-border risk.

In the United Kingdom, ARGA transmitted materials to OFSI and prepared an assessment concerning potential engagement with the FCA, NCA, UKFIU, HM Treasury sanctions channels, SFO, and Companies House intelligence functions. These actions formed part of the broader sanctions-compliance and financial-integrity track.

IX. Switzerland, Asia, and Middle East Track

ARGA transmitted materials to relevant Swiss authorities, including SECO, MROS, and FINMA. The Swiss track focused on beneficial-ownership opacity, cross-border asset structures, AML risk, and sanctions exposure within a financial-regulatory context.

In Asia, ARGA transmitted materials to Hong Kong authorities, including the Hong Kong Monetary Authority and the Securities and Futures Commission. A framework was also prepared for possible interaction with the Joint Financial Intelligence Unit, subject to the availability of further evidence. In Singapore, ARGA prepared a structure for potential notification to the Monetary Authority of Singapore, although the available record indicates that transmission had not yet been completed at the relevant stage.

In the Middle East, ARGA transmitted materials to authorities in the United Arab Emirates, including the Central Bank of the UAE and the UAE Financial Intelligence Unit. Additional materials were directed to regional financial-regulatory bodies, including the Dubai Financial Services Authority and other Gulf-related regulatory channels. These communications addressed cross-border asset exposure, regional corporate structures, AML considerations, and sanctions-related risk awareness.

X. Ireland Track

ARGA developed a separate Ireland track because of the relevance of Irish proceedings and Irish corporate structures to the broader TOAZ matter. Materials were transmitted to Irish judicial and legal institutions in a third-party informational format. The purpose was to provide contextual information concerning potential cross-border implications, including risks associated with reliance on foreign procedural materials and the broader due-process context of the case.

ARGA sent an informational letter to the Commercial Court through the Central Office of the High Court of Ireland. The letter briefly described ARGA's activities, informed the court of the existence of analytical materials concerning TOAZ, and noted that witness materials from former senior managers could be prepared separately and, if required, submitted in an appropriate procedural format.

ARGA also conducted outreach to Irish legal professionals with expertise in commercial litigation, company law, insolvency, and cross-border corporate disputes. Informational communications were sent to solicitor firms including Arthur Cox LLP, McCann FitzGerald LLP, Philip Lee LLP, Dillon Eustace LLP, Hayes Solicitors LLP, and Beauchamps LLP. Communications were also sent to barristers practicing in commercial and corporate matters, including Michael M. Collins SC, Garret Flynn BL, Alexander White SC, Anthony Thuillier BL, Cian McGoldrick BL, and Deirdre Ní Fhloinn BL.

XI. Latin America and Costa Rica Track

The available materials identify Latin America and Costa Rica as part of the broader international direction to be reflected in the International Actions Report. However, within the confirmed record presently available for this report, no detailed documentary description has been provided concerning specific submissions, recipients, dates, or institutional actions undertaken in Costa Rica or other Latin American jurisdictions.

Accordingly, ARGA records Latin America and Costa Rica as an identified international workstream requiring further evidentiary confirmation before inclusion as a completed action track. Any future version of this report should incorporate this section in greater detail if supporting documentation becomes available, including copies of submissions, institutional recipients, transmission dates, acknowledgement receipts, or related correspondence.

For purposes of the present version, no unverified actions are attributed to ARGA in Costa Rica or Latin America.

XII. International Media Outreach

On 13 March 2026, ARGA Observatory carried out an international media outreach campaign concerning the analytical memorandum on PJSC TogliattiAzot. The outreach was directed to international business, investigative, political, and public-affairs media outlets.

The purpose of the campaign was to inform relevant editorial teams about the publication of ARGA Observatory's analytical memorandum concerning the TOAZ corporate conflict, related criminal proceedings, and transnational aspects of asset reallocation, financial structures, logistics infrastructure, and corporate control.

The communication included references to open-source publication channels, including the ARGA Observatory website, Zenodo, and Figshare. The letter indicated that ARGA Observatory was prepared to provide additional documentation, analytical clarifications, expert commentary, and assistance in facilitating contacts with relevant individuals upon request.

XIII. Research Publications and International Repositories

ARGA Observatory undertook publication of its analytical memoranda and reports in international research repositories and analytical databases. The publication of the materials with DOI identifiers was intended to ensure stability, citability, version control, and accessibility for international institutional and research use.

These publications formed part of ARGA's broader strategy of converting the TOAZ case from a fragmented dispute file into a structured, externally verifiable research and compliance archive. The publication of reports on platforms such as Zenodo and Figshare created stable reference points for subsequent institutional submissions and media communications.

XIV. Witness Protection and Cooperating Individuals Track

ARGA also developed a protective and institutional framework for former senior managers and cooperating individuals connected with the TOAZ matter. The available materials specifically identify Nikolai Neplyuev and another former senior manager as individuals whose status was positioned within international communications as cooperating former executives.

In this track, ARGA sought to distinguish cooperating individuals from potential objects of compliance review and to record their role as sources of information. The materials also documented concerns relating to pressure, retaliation, and the need to preserve the integrity and safety of individuals providing information.

A specific humanitarian-protection track was prepared for Nikolai Neplyuev in France. ARGA formed a humanitarian visa package for the purpose of enabling his arrival in France to submit an asylum application. The package included a personal dossier in French, evidentiary annexes, identity documents, Interpol-status documentation, and a SPADA-related confirmation indicating the need for personal presence in France. The package was transmitted to French consular services in Turkey, Armenia, Georgia, and Serbia, with Turkey identified as the priority jurisdiction due to his actual location.

XV. European Data and Travel-Security Track

ARGA prepared and transmitted preventive data-integrity notices concerning European information systems, including SIS II, Europol Information System, EES, and ETIAS. These notices referred to the decision of the Commission for the Control of Interpol's Files concerning deletion of data and the recognition of political motivation in the relevant Interpol context.

The purpose of this track was to ensure that European data, border, and travel-security systems were aware of the relevant Interpol status in the event of alternative signals or information transmitted through other channels. The communications were framed as preventive data-integrity notices designed to reduce the risk of inconsistent treatment across European information systems.

XVI. Sanctions and Compliance Memorandum

During a later stage of the project, ARGA prepared a Sanctions & Compliance Memorandum addressing key individuals and corporate structures connected with the broader TOAZ conflict. The memorandum was framed in the language of international financial compliance and avoided accusatory rhetoric. It addressed issues such as sanctions exposure, AML risk, facilitation patterns, beneficial-ownership concerns, cross-border structures, and financial flows.

The memorandum was registered in an international research repository with a DOI, thereby ensuring external fixation and citability. This step formed part of the broader effort to create a stable sanctions-compliance and regulatory-awareness framework surrounding the case.

XVII. Overall Assessment of Confirmed International Actions

The confirmed international actions undertaken by ARGA Observatory demonstrate a structured and multi-jurisdictional approach to the TOAZ matter. The work included evidence preservation, publication of research materials, international legal submissions, engagement with human rights mechanisms, communication with professional legal organizations, compliance notifications, financial-regulatory outreach, U.S. submissions, Irish legal outreach, media communications, protection-related work for cooperating individuals, and preventive data-integrity notifications.

The work was conducted through documentary and analytical methods. The record indicates that ARGA's actions were designed to preserve evidence, create an international institutional footprint, inform competent authorities and organizations, and make available a structured factual archive for future review.

The report records no request by ARGA for any specific sanctions decision, law-enforcement outcome, or judicial determination. The international actions described above are best characterized as documentation, institutional notification, research publication, compliance awareness, and protective framework development.

Anglet, France, 5 June 2026