Dear Aivar,

We acknowledge receipt of your letter of 17 October 2025.

From the contents of your correspondence, we understand that you are seeking clarification with respect to payments made by UEFA to both Ukrainians and Russian clubs, in order to be in a position to transmit such information and give an explanation to your member clubs.

At the outset, we would like to recall that the decision taken by the UEFA Executive Committee, on 28 February 2022, which was confirmed by the Court of Arbitration for Sport, in Lausanne, was to suspend all Russian representative teams and clubs from taking part in UEFA Competition matches until further notice. Said decision is still in force. For the avoidance of doubt, the decision did not include any financial consequence on the Russian clubs.

On that basis, Russian clubs remain, in principle, entitled to any payments which accrue to them and UEFA cannot unilaterally withhold those monies without legal reason.

All such payments are, however, subject to them being permissible under applicable law, including relevant sanctions regimes.

In this regard, UEFA takes its sanctions compliance obligations extremely seriously and rigorously checks all proposed payments to relevant clubs including with input from, and screening by, specialist external lawyers across the jurisdictions applicable to UEFA and its activities. For obvious reasons, we cannot go into the details of individual club payments but can confirm that, in each and every case where a sanctions issue pertaining to a club has been identified after our due diligence exercises have been completed, payments to the relevant club have been immediately blocked and will not be resumed unless and until we obtain full clearance that we can proceed.

Where payments have been made to Russian clubs, this is because we are certain there is no legal reason why funds can or should be withheld. That view is supported by the fact that UEFA's bank, which operates its own in-depth sanctions screening programme, is also prepared to execute the relevant payments.

Turning to the issues surrounding the Ukrainian clubs, we would like to clarify that these arose as a result of the policies of the bank that UEFA uses to process the payments rather than a position taken by UEFA itself. In particular, the bank took the view that it would not process payments simply because the relevant clubs were located close to the active war zone. Having sought external legal advice on the status of these Ukrainian clubs, it was clear to us that there was, in fact, no justifiable legal reason not to make the relevant payments. Despite our best efforts to persuade the bank to reconsider, including by the provision of evidence and confirmations from the relevant Ukrainian Government department, the bank was not prepared to alter its opinion and execute the payments. UEFA, therefore, worked to find an alternative solution to this issue which has now been implemented. This issue has therefore been positively resolved.

Finally, we would like to emphasize that UEFA has provided full support and assistance to the Ukrainian National Association and its clubs since the beginning of the war. In particular, it is also thanks to UEFA's coordination that Ukraine and its teams could continue participating in UEFA

competitions as great efforts were made to facilitate not only a base camp for the national team, in Slovenia, but also neutral venues hosting the matches.

In addition to this, between 2022 and 2024, UEFA has allocated several special emergency funds totalling to EUR 6.5 million to assist in the delivery of international matches for the Ukrainian national teams and the operation of local football activities in consideration of the special circumstances in Ukraine. Equally, UEFA has assisted in the issuance of visas to enable players and staff to travel safely to all UEFA competition matches as well as training base camps. These are just a few examples of our ongoing commitment to supporting Ukrainian football during these exceptionally challenging times.

As you pointed out UEFA's values include solidarity and fairness amongst the football community, and we believe that the above-mentioned approach, fully reflects such values.

We trust that the information provided is of assistance and we understand that this properly addresses your request.

Yours faithfully,

Theodore Theodoridis General Secretary