



**THE FOUNDATION  
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**#52335**

**Date:** April 28, 2023

**Subject:** Mechel PAO – Broker-to-Broker Settlement  
Option Symbol: MTL

Effective March 16, 2022, the National Securities Clearing Corporation (“NSCC”) no longer accepted MTL exercise and assignment activity for settlement. As a result, all exercise and assignment activity for MTL options beginning March 16, 2022, was subject to broker-to-broker settlement, as stated in OCC Information Memos #50186, #50211, #50789, #51196, #51215, #51875, and #52028. On July 22, 2022, the Office of Foreign Assets Control (“OFAC”) of the U.S. Department of the Treasury published Russia-related General License 45, which permitted, through 12:01 a.m. Eastern Daylight Time on October 20, 2022, certain transactions that were ordinarily incident and necessary to the wind down of financial contracts or other agreements that were entered into on or before June 6, 2022, and involved or were linked to debt or equity securities issued by an entity in the Russian Federation. Russia-related General License 45 expired at 12:01 a.m. Eastern Daylight Time on October 20, 2022.

OCC discussed the implications of the expiration of General License 45 with OFAC. In connection with those discussions and OCC’s request that OFAC consider an extension, OFAC issued License No. RUSSIA-EO14024-2022-983909-1 (“Initial License”) late on October 19, 2022. The License authorized the purchase of equities issued by an entity in the Russian Federation where that purchase would otherwise be prohibited by section (1)(a)(i) of Executive Order 14071 and is ordinarily incident and necessary to the wind down of covered contracts. Consequently, settlement of MTL option exercises and assignments in MTL shares was permissible while the Initial License was in effect. The Initial License expired on the earlier of the completion of the authorized transactions or on January 31, 2023. In advance of the expiration date, OCC requested an extension of the Initial License, and as a result, OFAC issued License No. RUSSIA-EO14024-2022-983909-2 (“Extended License”), which expired on February 28, 2023. In advance of the expiration date for the Extended License, OFAC issued License No. RUSSIA-EO14024-2022-983909-3 (“Further Extended License”), providing a further extension that will expire on April 30, 2023.

**In advance of the expiration date for the Further Extended License, OFAC issued License No. RUSSIA-EO EO14024-2022-983909-4 (“License”) which amends the Further Extended License to expire on January 31, 2024.** The License authorizes (1) the purchase by U.S. persons of debt or equity issued by an entity in the Russian Federation where that purchase is ordinarily incident and necessary to the wind down of covered contracts; and (2) the facilitating, clearing, and settling of a purchase by U.S. persons of debt or equity issued by an entity in the Russian Federation, where that purchase is ordinarily incident and necessary to the wind down of covered contracts, including the performance of delivery obligations from prior exercise and assignments covered securities with the ticker symbol MTL.

**As permitted by the License, MTL options will continue to settle on a broker-to-broker basis. OCC will provide a copy of the License to each Clearing Member with outstanding settlement obligations for MTL options.**

Clearing Members that have MTL exercise and assignment obligations are reminded to mark such obligations as settled on OCC's broker-to-broker screen once such obligations have settled.

## **Disclaimer**

This Information Memo provides an unofficial summary of the terms of corporate events affecting listed options or futures prepared for the convenience of market participants. OCC accepts no responsibility for the accuracy or completeness of the summary, particularly for information which may be relevant to investment decisions. Option or futures investors should independently ascertain and evaluate all information concerning this corporate event(s).

The determination to adjust options and the nature of any adjustment is made by OCC pursuant to OCC By-Laws, Article VI, Sections 11 and 11A. The determination to adjust futures and the nature of any adjustment is made by OCC pursuant to OCC By-Laws, Article XII, Sections 3, 4, or 4A, as applicable. For both options and futures, each adjustment decision is made on a case by case basis. Adjustment decisions are based on information available at the time and are subject to change as additional information becomes available or if there are material changes to the terms of the corporate event(s) occasioning the adjustment.

ALL CLEARING MEMBERS ARE REQUESTED TO IMMEDIATELY ADVISE ALL BRANCH OFFICES AND CORRESPONDENTS ON THE ABOVE.

For questions regarding this memo, please email the Investor Education team at [options@theocc.com](mailto:options@theocc.com). Clearing Member Firms of OCC may contact Member Services at 1-800-544-6091 or, within Canada, at 1-800-424-7320, or email [memberservices@theocc.com](mailto:memberservices@theocc.com).