

**Russian counter-sanctions regulations:
Temporary administration introduced over Auchan,
Nestlé, FM Logistic and Lemana PRO**

21 September 2026

On 17 September 2026, the Russian President introduced, by Decree No. 661, temporary administration over the businesses in Russia of Auchan, Nestlé, logistics operator FM Logistic and the Lemana PRO hypermarkets (formerly Leroy Merlin).

Joint Stock Company L.E.V. Management has been appointed as temporary administrator in charge of all of these assets. There is limited information on L.E.V. Management available publicly.

The list of the assets under temporary administration attached to Presidential Decree No. 302 dated 25 April 2023 On Temporary Administration of Certain Assets (the *Decree*) has been expanded accordingly.

As we advised in our previous client alerts, the Decree provides that if the Russian Federation or any Russian nationals or legal entities are deprived of, or limited in, ownership or other property rights in any assets in any of the unfriendly states, or if there is a threat of such deprivation or limitation, or otherwise to Russian public interests, temporary administration may be introduced in relation to Russian assets owned or controlled by parties associated with the relevant unfriendly states.

Under the Decree, the temporary administrator may exercise the rights of the owner of the relevant assets, except for the right of sale. The attendant costs are covered from the operating proceeds of the assets concerned. The administration will terminate if and when so decided by the President.

We will continue monitoring the situation.