



House of Commons  
Foreign Affairs Committee

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# Guns for gold: the Wagner Network exposed

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**Seventh Report of Session 2022–23**

*Report, together with formal minutes relating  
to the report*

*Ordered by the House of Commons  
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# Contents

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<b>Summary</b>	<b>3</b>
<b>1 A decade of entrenching Russian interests abroad</b>	<b>5</b>
Growth of the network	7
The perceived benefits of Wagner	18
A direct and indirect tool of the Russian state	18
Incentives for buyers	19
The price of Wagner military deployments	21
Operating with impunity	21
Delivering unreliable results	24
Thriving in instability	24
Coming out of the shadows: Renewed Illegal Invasion of Ukraine	27
National security implications	28
<b>2 Responses to the Wagner Network</b>	<b>31</b>
The UK's general response	31
A focus on Ukraine, not Africa	32
Cross-departmental working	33
Specific actions taken by the UK Government	34
Tracking and sanctioning	34
Carrot and stick diplomacy	40
<b>3 What next?</b>	<b>45</b>
What next for Wagner?	45
What next for 'PMCs'?	46
<b>Conclusions and recommendations</b>	<b>52</b>
<b>Appendix 1: Sanctions comparisons for the UK, United States and European Union</b>	<b>59</b>
<b>Appendix 2: Further individuals and entities associated with the Wagner Network</b>	<b>73</b>
<b>Formal minutes</b>	<b>76</b>
<b>Witnesses</b>	<b>77</b>
<b>Published written evidence</b>	<b>78</b>
<b>List of Reports from the Committee during the current Parliament</b>	<b>79</b>



## Summary

Russia's renewed illegal invasion of Ukraine confirmed long-standing but contested assumptions about the Russian Government's support, funding and facilitation of the Wagner Network. Recent events in Russia following Prigozhin's march on Moscow left significant questions over the future of the network and its founder, Yevgeny Prigozhin. The UK Government should seize this opportunity to deter countries and individuals from engaging with the Wagner Network, and to marshal Government efforts to monitor and assess the ambitions and impacts of Private Military Companies (PMCs).

Wagner's activities in Ukraine are not representative of the network's operations globally. A collection of individuals and entities globally make up the 'Wagner Network', engaged in military, economic, political and influencing operations — on several occasions with the consent and invitation of national authorities. The network's military operations can be mapped in at least seven countries (Ukraine; Syria; the Central African Republic; Sudan; Libya; Mozambique; and Mali), with medium or high confidence that the network has been involved in a non-military capacity in 10 further countries since 2014. There are many more countries where the network's presence is rumoured. Even when the Wagner Network has not acted as a direct proxy of the Russian Government, the Kremlin is likely to have benefited from its presence. So long as the Wagner Network survives in some form, we believe that countries may still, despite an apparent failure of Wagner to deliver on their commitments, turn to the network for security reasons, despite the high price: atrocities, corruption and the plunder of natural resources. There are serious national security threats to the UK and its allies of allowing malign PMCs to continue to thrive, not to mention devastating human consequences.

The Government counters the Wagner Network primarily via military support for Ukraine, which the Committee fully supports. However, it is a significant failing to see the Wagner Network primarily through the prism of Europe, not least given its geographic spread and the impact of its activities on UK interests further abroad. It is deeply regrettable that it was not until early 2022 that the Government began to invest greater resource in understanding the Wagner Network, despite Wagner fighters having already conducted military operations in at least seven countries for almost a decade. This leaves the Government even less prepared to respond to the network's evolution. The Government's failure to address the Wagner Network leads us to conclude a fundamental lack of knowledge of, and policy on, other malign PMCs.

The UK's efforts to sanction entities and individuals linked to the Wagner Network are underwhelming in the extreme. Beyond these limited sanctions, the Government has not told us anything specific that it is doing to challenge the network's influence and impunity outside of Ukraine. We received no evidence of any serious effort by the Government to track the Network's activities in other countries. Ministerial statements also lead us to question whether the Russia Unit provides the necessary join-up between the Foreign, Commonwealth and Development Office (FCDO) and Treasury on sanctions, let alone wider Government departments.

To challenge the mystique cultivated by the Wagner Network, deter involvement, and enable the Government to improve its apparently limited understanding, we are publishing Wagner-linked names, as identified via open-source research and with the

legal protection of parliamentary privilege. The Government should urgently assess these to consider whether the threshold for sanctions is met. We also recommend that the Government:

- improve its intelligence and analysis on the Wagner Network's activities in a wider range of countries;
- move faster and harder to sanction Wagner-linked actors, including those we list, and consider further sanctions on civilian enablers and corporate 'frontmen';
- establish a regular mechanism for coordinating with allies over sanctions and prioritise travel bans to deter Wagner involvement, in particular working with Turkey;
- urgently proscribe the Wagner Network as a terrorist organisation;
- offer a genuinely compelling alternative to priority countries in need of security partnership and revive the previous commitment to channelling 50% of UK aid to fragile and conflict-affected countries and regions;
- take a more strategic and coherent approach to addressing the challenges of the Wagner Network and other proxy 'PMCs' by establishing a taskforce and further empowering the Office for Conflict, Stabilisation and Mediation to protect UK interests.

# 1 A decade of entrenching Russian interests abroad

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1. On 24 June 2023, thousands of Wagner fighters occupied Rostov-on-Don, the Russian military headquarters responsible for directing Russia's renewed illegal invasion of Ukraine.<sup>1</sup> Their leader, Yevgeny Prigozhin, then threatened to march on Moscow.<sup>2</sup> The group came within 200km of the capital before Prigozhin and his fighters abandoned the mutiny,<sup>3</sup> leaving significant questions over the future of the Wagner Group in Ukraine and abroad.

2. We began this inquiry in March 2022 to cast a light on what was (then) a shadowy and under-examined organisation. We aimed to expose the Wagner Group's modus operandi, its impact on UK interests and values, and how this impact was being addressed. This report draws on evidence gathered since that time to examine the nature and extent of the Wagner Group's network and its expanding activities since 2014; the response of the UK Government; and how this response may affect what comes next. We used written and oral evidence;<sup>4</sup> commissioned open-source research;<sup>5</sup> reports from former members of the Wagner Network and drew on the many years' investigative work of journalists and non-governmental organisations.<sup>6</sup> Due to the secrecy and uncertainty that surround the Group's deployments, we make clear our level of confidence when commenting on its countries of operation. We thank all those who contributed to our inquiry, sometimes at risk to themselves.

3. The remainder of this report largely refers to the 'Wagner Network', rather than the Wagner Group. This describes more accurately what Prigozhin has been allowed to build: a sprawling, decentralised network of individuals and commercial entities, which is active in several countries and for which the 'membership' is not always clear. Exploiting this web of entities is central to the network's modus operandi.<sup>7</sup> This network has benefited the personal financial interests of Prigozhin<sup>8</sup> and the interests of Russian political elites.<sup>9</sup> It

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1 [Russian insurrection: Prigozhin's failed mutiny and the fallout](#), Financial Times, 6 July 2023

2 Yevgeny Prigozhin (also called Evgeny Prigozhin) is the self-professed founder of the Wagner Group, often referred to as 'Putin's chef' for his catering contracts.

3 Crisis Group, '[Assessing the Wagner Group's Aborted Run on Moscow: What Comes Next?](#)'. 29 June 2023 (accessed 10 July 2023); see also [Instability in Russia: Prigozhin's armed rebellion](#), Research Briefing [9823](#), House of Commons Library, 27 June 2023

4 We published 16 pieces of written evidence and received further confidential submissions. We held three public evidence sessions, taking oral evidence from nine witnesses: experts, representatives of Bellingcat, the Dossier Center and the UN Working Group on the Use of Mercenaries; and the Government.

5 The Committee commissioned small-scale open-source research into the Wagner Group's network and operations, which was carried out by the not-for-profit Centre for Information Resilience (CIR). The results of this research are integrated into this report (with citation) and in particular inform Appendix 2, in which we name individuals and entities who are not sanctioned by the UK but who we have strong reason to believe are associated with the Wagner Network. CIR used open-source intelligence triangulated with information collected by investigators from closed sources, and previous (academic) research. No deception was involved in this research.

6 This work is often highly dangerous. Three journalists in the Central African Republic doing relevant work were assassinated. Mikhail Khodorkovsky, founder of the Dossier Center, stated that "we demonstrated convincingly that people working for Mr Prigozhin participated in the murders". [Q96](#)

7 For example, the bank accounts of front/cover companies reportedly store the money for paying Wagner fighters. Anonymous ([WGN0026](#))

8 Verified by the CIR open-source research.

9 Anonymous ([WGN0026](#))

has often served and furthered Russian foreign policy goals,<sup>10</sup> as shown by the significant funding,<sup>11</sup> support<sup>12</sup> and (in some cases) direction<sup>13</sup> it received from the Russian state. Although complex to determine which individuals and entities sit within the ‘Wagner Network’, we consider that they all share an ultimate connection to Prigozhin’s financial interests and normally benefit the Russian state indirectly or directly.

4. Our inquiry also examined the Wagner Network through a wider lens, considering the legal and policy challenge of ‘Private Military Companies’ (PMCs) that states use as malign proxies (paragraphs 75–91). PMCs encompass a diverse set of organisations and are not clearly defined by international law (paragraph 77).<sup>14</sup> We use ‘PMC’ in a general sense in this report to mean a private company (or set of companies) that sells military services in exchange for compensation. Although the Wagner Network is often described as a PMC, we acknowledge that it is not one in the conventional sense of the term in the UK, given the network’s i) illegal status in Russia;<sup>15</sup> ii) close relationship with the Russian state,<sup>16</sup> and iii) extensive activities outside the defence sphere, with evidence of economic, electoral and influencing operations (paragraph 14).

5. Russia’s renewed illegal invasion of Ukraine confirmed many long-standing but contested assumptions about the Wagner Network: namely, that it operated with a high level of support from, and co-operation with, the Russian Ministry of Defence (paragraph 8); that it has been primarily state-funded; and that the Russian government facilitated its activities directly,<sup>17</sup> despite its illegal status as an arms-length body that has provided plausible deniability for the Russian Government. Wagner’s activities in Ukraine—

10 Speaking in relation to network’s previous activities, the Center on Terrorism, Extremism, and Counterterrorism noted that its objectives “are the Russian Federation’s objectives. Wagner pursues its activities with an eye towards advancing Russia’s national security interests in two primary ways: 1) undermining democracy, and; 2) benefiting from the profits derived from the exploitation the natural resources it has gained access to. [...] In doing this, the Wagner Group gains access to important resources that advance Russia’s geopolitical interests.” Center on Terrorism, Extremism, and Counterterrorism - Middlebury Institute of International Studies ([WGN0023](#))

11 President Putin recently stated that the Russian state “fully financed” the Group and provided over 86 billion rubles (approx. \$940 million) from May 2022 to May 2023. ‘[Putin admits Kremlin gave Wagner nearly \\$1 billion in the past year](#)’, POLITICO, 27 June 2023

12 In 2021, UN experts detailed the Russian military cargo flights that had “become routine” since Wagner’s first deployment to Libya in October 2020 and judged that Wagner “does not have indigenous logistic resources to allow the organization to operate independently on major deployments. It requires external hybrid commercial and military logistic support, in particular aviation and maritime assets, to deploy and sustain its operations.” [Letter dated 8 March 2021 from the Panel of Experts on Libya established pursuant to resolution 1973 \(2021\) addressed to the President of the Security Council S/2021/229, Annex 77, para 10](#)

13 For instance, see [Qq34–35](#) [Christo Grozev]. Also see this investigation by Bellingcat, The Insider and Der Spiegel, which showed Prigozhin’s disinformation, political and military operations to be integrated with the Russian Military of Defence and its intelligence arm, the GRU. Bellingcat, ‘[Putin Chef’s Kisses of Death: Russia’s Shadow Army’s State-Run Structure Exposed](#)’, 14 August 2020 (accessed 16 July 2023). On the many links between Wagner and the Russian military establishment, see CSIS, ‘[Band of Brothers: The Wagner Group and the Russian State | Center for Strategic and International Studies](#)’, 21 September 2020 (accessed 16 July 2023)

14 The same goes for the broader term, ‘Private Military and Security Companies’ (PMSCs).

15 [Qq8–9](#) [Christo Grozev]; [Q96](#) [Mikhail Khodorkovsky]

16 Henry Jackson Society ([WGN0020](#))

17 For example, its recruitment of fighters from Russian prisons and the Russian Ministry of Defence’s supply of ammunition to Wagner fighters.



although best-known—are not representative of the network’s wider spectrum of operations globally. Relative to other countries, the purpose, scale and nature of Wagner’s involvement in Ukraine are unique.<sup>18</sup>

6. Given the scope of our inquiry, this report focuses primarily (but not exclusively) on the network’s military activities and the actions of ‘Wagner fighters’. The network’s military deployments raise questions over how hostile and competitor states may use commercial entities for offensive and deniable military operations in future and the implications for UK interests, the conduct of war and the rules-based international order (paragraphs 76–91).

## Growth of the network

7. The Wagner Network was set up in 2014 by individuals close to the Russian military establishment,<sup>19</sup> with the reported involvement of former GRU<sup>20</sup> leader Dmitry Utkin.<sup>21</sup> In September 2022, after many years’ obfuscation, including efforts to sue individuals linking him to the organisation,<sup>22</sup> Yevgeny Prigozhin admitted that he founded Wagner.<sup>23</sup> The network’s fighters began their first known military activities in late 2014 in Ukraine, after Russia invaded the east of the country.<sup>24</sup> At this point, the idea of a “more structured” and “proxy actor” for the Russian state was attractive, due to its limited responsibilities (relative to the Russian army) and its “deniability in case of failure or of excesses”.<sup>25</sup> The Dossier Center, an investigative NGO, has said of Wagner fighters that:

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- 18 Wagner fighters have directly served Russia’s (aggressive) military goals in Ukraine, unlike in other countries where its engagement has benefited the Russian state more indirectly. Furthermore, in other countries, the network appears to have been present with the consent of the host government. The nature and scale of Wagner’s engagement in other countries also differs from the large-scale, conventional fighting force it has provided in Ukraine.
- 19 The Wagner Network was pre-dated by Slavonic Corps, which was registered in 2012 by Russian ex-servicemen and had links to Moran Security Group. Dossier Center ([WGN0009](#)) paras 18–21. Christo Grozev of Bellingcat noted that Wagner’s predecessor had acted as a for-profit fighting organisation in Syria in 2013 but “it did not act on behalf of or as a proxy of the Russian Government”. It was in 2014 that “what we know currently as the Wagner private military company was organised”. [Q9](#).
- 20 The GRU is Russia’s military intelligence service.
- 21 Dmitry Utkin is a former GRU leader who many, including the United States Government, have previously described as Wagner’s founder. It is likely that this is at least partly because Utkin started using ‘Wagner’ as his personal callsign in 2014. However, the investigative organisation Bellingcat has said “there is ample data suggesting that his role was more of a field commander, and that the “Wagner Group” mercenaries are integrated in an overall chain of command under central Kremlin control with its military intelligence (GU/GRU) apparatus”. Similarly, a former Wagner fighter told us that the first detachments of Wagner mercenaries were created in 2014 under the leadership of the Russian Ministry of Defence, and that Dmitry Utkin commanded one of these detachments. See Anonymous ([WGN0026](#)); US Department of the Treasury, ‘[Treasury Designates Individuals and Entities Involved in the Ongoing Conflict in Ukraine](#)’, 20 June 2017 (accessed 16 July 2023); Mr D White (Risk/Crisis Management Advisor at Freelance) ([WGN0001](#)); CSIS, ‘[Band of Brothers: The Wagner Group and the Russian State | Center for Strategic and International Studies](#)’, 21 September 2020 (accessed 16 July 2023); Dossier Center ([WGN0009](#)) para 21; Bellingcat, ‘[Putin Chef’s Kisses of Death: Russia’s Shadow Army’s State-Run Structure Exposed](#)’, 14 August 2020 (accessed 16 July 2023)
- 22 For example, see Henry Jackson Society ([WGN0020](#)) para 7; Matrix Chambers, ‘[Defamation claim against Bellingcat founder struck out](#)’ (accessed 16 July 2023)
- 23 Originally in a post on Russia social media site, VKontakte. For analysis, see [Putin ally Yevgeny Prigozhin admits founding Wagner mercenary group](#), The Guardian, 26 September 2022; [Russian oligarch Yevgeny Prigozhin admits he created the mercenary Wagner Group](#), POLITICO, 26 September 2022.
- 24 [Q9](#) [Christo Grozev].
- 25 [Q9](#) [Christo Grozev].

One of their first operations in Ukraine was the disarming of Crimea in 2014. They were also involved in the downing of the Ukrainian MOD IL-76 (resulting in 49 dead) and attacks on Luhansk airport and Debaltseve.<sup>26</sup>

8. The Wagner Network then significantly expanded its military and non-military operations in many countries: a trend described by Transparency International as “increasingly alarming”.<sup>27</sup> These interventions were often secretive<sup>28</sup> and met with denials from host governments,<sup>29</sup> the Russian government<sup>30</sup> and Prigozhin himself.<sup>31</sup> A former Wagner fighter told us that the Russian Government gave extensive military support to the Wagner Network from the time of its creation:

All that is necessary for combat- uniforms, equipment, weapons and ammunition, was received from Ministry of Defence stocks.<sup>32</sup>

Even the standard issued weapon of Wagner fighters, a 5.45mm machine gun, relied on the supply of ammunition by the Russian state.<sup>33</sup> The former Wagner fighter’s evidence—prepared in the first half of 2023—also noted the network’s continued use of the logistics of the Russian Ministry of Defence at that time. The fighter stated that the Ministry provides ammunition and weapons, and facilitates the transfer of Wagner operatives to Syria and Africa. There were also additional forms of support:

Military transport aircraft of the Russian Armed Forces deliver mercenaries and small dimension/weight cargo to the Khmeimim air base (Syria) and further to Africa. Air bases in the city of Chkalovsk (Moscow Region) and Krymsk (Krasnodar Territory) are used to transport operatives of PMC Wagner. Heavy duty cargo, equipment and ammunition for PMC Wagner are delivered to Syria by the Russian Navy.<sup>34</sup>

26 “Utkin and Wagner might also have been involved in the assassination of at least 10 Luhansk People’s Republic warlords.” Dossier Center ([WGN0009](#)) paras 22–23.

27 Transparency International Defence & Security, Transparency International UK ([WGN0021](#)) para 5.1

28 [Q39](#) [Dr Sorcha MacLeod]. Occasionally, Wagner deployments are referred to as visiting ‘Russian instructors’. Foreign, Commonwealth and Development Office ([WGN0025](#)) section 1

29 For example, [Sudan’s foreign ministry denies presence of Russian Wagner Group](#), Reuters, 22 March 2022; [Mali denies deployment of Russian mercenaries from Wagner Group](#), France 24, 25 December 2021. In conversations, ministers and officials in one country where we are confident Wagner fighters have been deployed were extremely cagey when we asked them whether they invited Wagner to operate in the country.

30 For example, see Sergei Lavrov quote in ‘[Russian mercenaries behind Central African Republic atrocities](#)’, BBC News, 3 May 2022; see the Russian delegate’s comments on Mali at ReliefWeb, ‘[Amid Executions, Forced Disappearances in Mali, Mission Head Tells Security Council Little Progress Made towards Implementing Peace Agreement](#)’, 7 April 2022 (accessed 10 July 2023)

31 Carnegie Endowment for International Peace, ‘[Putin’s Not-So-Secret Mercenaries: Patronage, Geopolitics, and the Wagner Group](#)’, 8 July 2019 (accessed 16 July 2023); [Leaked documents reveal Russian effort to exert influence in Africa | World news](#), The Guardian, 8 June 2019

32 Anonymous ([WGN0026](#))

33 The fighter added: “In the Middle East and Africa, the standard for the army is a 7.62 mm assault rifle and these countries do not produce/have ammunition for a 5.45 mm rifle.” Anonymous ([WGN0026](#))

34 Anonymous ([WGN0026](#))

9. Sources differ in their estimates of the number of countries where the network has been present.<sup>35</sup> The network’s interest in exaggerating its global presence adds to the challenges of counting and classification.<sup>36</sup> Due to these challenges, we used confidence assessments when commenting on countries of operation in this chapter and present these in Table 1.

**Table 1: Explanation of confidence assessments for countries of operation**

High confidence	Medium confidence	Low confidence
There are Prigozhin-affiliated structures in the country with verified images of Wagner mercenaries, official declaration/ recognition of Wagner operatives’ presence by host governments, and/or other official documents that point to a close-to-certain conclusion. We also treat information as reliable if it comes from highly trusted sources (for example, US Treasury designations)	There are multiple reports of Wagner presence, but data is of a lower quality or only partially verifiable, making conclusions likely but not certain.	Data is either entirely unverifiable or of much lower quality, making conclusions possible, but neither certain nor likely.

10. The evidence we received has given us **high confidence** that the Wagner Network has conducted **military operations in at least seven countries since 2014**: Ukraine; Syria; the Central African Republic (CAR); Sudan; Libya; Mozambique; and Mali. A primary purpose for authorities inviting Wagner onto their territories has been to help failing or fragile regimes retain power (paragraphs 16–17). Wagner’s interventions in African countries are “governed by agreements negotiated by Prigozhin’s staff”, which provide concessions for mineral deposits, in exchange for Wagner “military operations supporting the Kremlin’s regime of choice”, the protection of local infrastructure and military training.<sup>37</sup> Further information about Wagner’s military involvement in these seven countries is summarised in Table 2, drawing on the open-source research we commissioned and other sources.

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- 35 This is likely due to varying methodologies when it comes to what qualifies as a Wagner operation, as well as the limited transparency surrounding the network. Examples of varying estimates:  
 In 2022, the Government listed the Wagner’s countries of operation as Ukraine, Sudan, Mozambique, Syria, CAR, Libya and Mali. Foreign, Commonwealth and Development Office ([WGN0025](#)) section 1  
 The Dossier Center noted that Prigozhin’s staff were interested in Syria and over 50 African countries, which are “ranked into three categories – the first being the countries most vulnerable and beneficial to the Kremlin [...] and the third being the least interesting with high levels of cooperation with other foreign powers (according to 2018 internal documents). Since then, more than ten countries listed have hosted Russian mercenaries and political technologists (CAR, Sudan, Mali, Zimbabwe, Madagascar, South Africa, Mozambique, DRC, Angola, Guinea).” Dossier Center ([WGN0009](#)) para 31  
 Transparency International cites Wagner’s involvement in Ukraine, Syria and “at least 18 countries in Africa, including Mali, Central African Republic, Libya and Sudan”. Transparency International Defence & Security, Transparency International UK ([WGN0021](#)) para 5.1
- 36 As an example of possible inflation, in September 2022, Prigozhin praised Wagner “heroes” and alluded to their role in Latin America. However, the open-source research we commissioned for this inquiry could not verify with high or medium confidence that the Wagner Network had conducted operations in Latin America since 2014. The UK Government has not recognised the group’s presence in Latin America. Although it is not possible to verify at this stage, that does not mean that the Group has no operations in the continent. Foreign, Commonwealth and Development Office ([WGN0025](#))
- 37 Dossier Center ([WGN0009](#)) para 29. See also Anonymous ([WGN0026](#))

**Table 2: High-confidence countries where Wagner fighters have carried out offensive military operations (between 2014 and June 2023)**

Year of first involvement	Country	Nature of involvement	Further information
2014	Ukraine	Sustained involvement	Wagner fighters played a “decisive” role supporting pro-Russian separatists in the early battles of the war in Eastern Ukraine, including the seizure of Debaltseve in Donetsk (early 2015). <sup>38</sup> Wagner fighters have taken an active role as a conventional fighting force in the wider Russia-Ukraine war now underway, particularly the battle of Bakhmut.
2015	Syria	Sustained involvement	Wagner fighters have conducted ground operations in support of the Syrian government during the civil war, including a well-known (botched) attack in 2018 in the town of Deir al-Zour, which brought Wagner fighters into direct confrontation with the US military. <sup>39</sup> The Wagner Network has also carried out capacity-building of Syrian army personnel, and recruited Syrian soldiers to fight for it in Libya. <sup>40</sup> An allied PMC-style battalion named the Carpathians was attached to Wagner and fought in Syria. <sup>41</sup> Oil and gas revenues were part of the agreed payment for services to liberate and protect Syria’s oil fields. <sup>42</sup>
2017	Central African Republic (CAR)	Sustained involvement	Wagner has a significant presence in CAR and so-called ‘Russian instructors’ have participated in military operations in support of President Touadéra. <sup>43</sup> The network also has significant business interests in the country (in particular, gold mining) and has made use of aggressive anti-Western propaganda to solidify Russia’s position as a dominant power in the country. Some have described Wagner’s involvement in CAR as “state capture” (paragraph 23).

38 CSIS, ‘[Moscow’s Mercenary Wars: The Expansion of Russian Private Military Companies](#)’, September 2020 (accessed 16 July 2023)

39 Andrew Linder, ‘[Russian Private Military Companies in Syria and beyond](#)’, 2018 (accessed 10 July 2023); [How a 4-Hour Battle Between Russian Mercenaries and US Commandos Unfolded in Syria](#), New York Times, 24 May 2018

40 CIR open-source research; [Letter dated 8 March 2021 from the Panel of Experts on Libya established pursuant to resolution 1973](#) (2021) addressed to the President of the Security Council S/2021/229, Annex 77, para 28

41 CIR open-source research

42 Dossier Center ([WGN0009](#)) para 25; Mr D White ([WGN0001](#))

43 [Q6](#) [Sorcha MacLeod]

Year of first involvement	Country	Nature of involvement	Further information
2017	Sudan	Sustained involvement	The network has mainly taken a non-combat role, providing a support force for the Bashir regime and guarding its business interests. <sup>44</sup> The network offered military training to intelligence and special forces and to the paramilitary Rapid Support Forces (RSF). <sup>45</sup> The network maintained close ties to Sudan's military after the fall of President Omar al-Bashir in 2019. <sup>46</sup> Despite the network's denials, <sup>47</sup> it appears to remain active in Sudan, supporting rebel paramilitaries (the RSF) in the ongoing conflict, <sup>48</sup> which broke out on 15 April 2023. Wagner's gold-smuggling operations from Sudan are significant, <sup>49</sup> with one calling them "critical to Russia's ability to withstand the significant sanctions deployed against it for its illegal invasion in Ukraine". <sup>50</sup>

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- 44 Although the Wagner Group temporarily became "an actual direct player in trying to repress the demonstrations" during the 2019 protests against Bashir, expert Samuel Ramani notes that it was pushed back into its 'guardianship' role after his overthrow. [Russian mercenaries in Sudan: What is the Wagner Group's role?](#), Al Jazeera, 17 April 2023
- 45 According to Sudanese officials and documents shared with the Associated Press. [US pressures allies to expel Russia's Wagner mercenaries from Libya, Sudan](#), France 24, 3 February 2023
- 46 Leaked documents published by Le Monde and the Organised Crime and Corruption Reporting Project in November 2022 shed further light on the close relationship between the Wagner Group and the Sudanese military. OCCRP, '[Documents Reveal Wagner's Golden Ties to Sudanese Military Companies](#)', 2 November 2022 (accessed 16 July 2023)
- 47 Several media outlets (for example, [Russia's private Wagner Group denies it is operating in Sudan](#), Reuters, 20 April 2023) reported the group's statement on its Telegram channel on 19 April 2023: "Due to the large number of inquiries from various foreign media about Sudan, most of which are provocative, we consider it necessary to inform everyone that Wagner staff have not been in Sudan for more than two years."
- 48 In February 2023, Sudanese officials anonymously told France24 that the group still has "dozens of operatives in the country" and that at that time the group was still providing training and guardianship services. All Eyes on Wagner, an open-source voluntary initiative tracking the Group's activities, reported evidence on 20th April that a plane associated with the Wagner Group was used to deliver weapons to the RSF on 17th April 2023, days after the fighting broke out. The initiative reports that the flight came via the Libyan military bases, Al-Khadim, Jufra. [US pressures allies to expel Russia's Wagner mercenaries from Libya, Sudan](#), France24, 3 February 2023; All Eyes on Wagner, '[Libya: Wagner Group's logistics platform](#)' (accessed 16 July 2023)
- 49 A CNN investigation released in July 2022 showed the sophisticated gold-smuggling network, drawing on "interviews with high-level Sudanese and US officials and troves of documents". It concluded that at least 16 flights in 2021 involved a military plane to and from Latakia, the Syrian port city that hosts a significant Russian airbase. According to the investigation, "at least seven sources familiar with events accuse Russia of driving the lion's share of Sudan's gold smuggling operations – which is where most of Sudan's gold has ended up in recent years, according to official statistics". A whistleblower from the Sudanese Central Bank shared data suggesting that 32.7 tons of gold were unaccounted for in 2021, equating to around \$1.9 billion of extracted gold. Some insiders told CNN the amount of Sudanese gold being smuggled from the country was higher, at approximately 90% of the production. This would equal as much as \$13.4 billion, although CNN could not verify this number. [Russia is plundering gold in Sudan to boost Putin's war effort in Ukraine](#), CNN, 29 July 2022
- 50 Center on Terrorism, Extremism, and Counterterrorism - Middlebury Institute of International Studies ([WGN0023](#))

Year of first involvement	Country	Nature of involvement	Further information
2018	Libya	Sustained involvement	Wagner personnel were deployed in October 2018 to offer technical assistance and weapons to the Libyan National Army. <sup>51</sup> Up to 1,000 Wagner fighters took part in the advance of the leader of the Libyan National Army (LNA), General Khalifa Haftar, against the UN-backed government in Tripoli in 2019–20. <sup>52</sup> The offensive failed. After a ceasefire was agreed in October 2020, instead of leaving the country as stipulated, <sup>53</sup> Wagner became a “logistics platform” to serve Russian interests, retaining control of military bases like Al-Khadim, Jufra, Qardabiyah and Brak al-Shati. <sup>54</sup> There were estimated to be around 2,000 Wagner staff in the country in 2021. <sup>55</sup> Wagner has been heavily involved in holding and guarding oilfields, training the LNA and establishing air bridges. <sup>56</sup> The network’s activities in Libya “have been multifarious, ranging from specialised military operations, physical security provision at Libya’s oil facilities, political advisory services, and social media influence operations”. <sup>57</sup>

51 All Eyes on Wagner, ‘[Libya: Wagner Group’s logistics platform](#)’ (accessed 16 July 2023)

52 Anonymous ([WGN0014](#))

53 CIR open-source research. See also Democracy & Human Rights Foundation ([WGN0011](#)); Anonymous ([WGN0014](#)); [Letter dated 8 March 2021 from the Panel of Experts on Libya established pursuant to resolution 1973 \(2021\)](#) addressed to the President of the Security Council S/2021/229, para 97

54 All Eyes on Wagner, ‘[Libya: Wagner Group’s logistics platform](#)’ (accessed 16 July 2023)

55 All Eyes on Wagner, ‘[Libya: Wagner Group’s logistics platform](#)’ (accessed 16 July 2023)

56 CIR open-source research

57 Anonymous ([WGN0014](#))

Year of first involvement	Country	Nature of involvement	Further information
2019	Mozambique	Temporary involvement	Wagner fighters started arriving in Mozambique in September 2019, <sup>58</sup> after an agreement on security and energy between Presidents Nyusi and Putin, shortly before the October 2019 Mozambique national election. <sup>59</sup> Wagner provided a personal protection force for the President, and was later deployed in an operation to counter Islamist extremists in Cabo Delgado. <sup>60</sup> This was a major failure <sup>61</sup> and Wagner fighters had to withdraw south by November that year. <sup>62</sup> In addition, the Wagner Network offered political assistance to Nyusi's party via an illegitimate electoral monitoring mission conducted by the Association For Free Research And International Cooperation (AFRIC). <sup>63</sup> The International Anticrisis Centre (IAC), another Prigozhin-linked entity, <sup>64</sup> also carried out questionable polling in the country in support of Nyusi's Frelimo party. <sup>65</sup>

58 CIR open-source research, which also cites '[Tropas russas em Cabo Delgado](#)', Moz24Hors, 13 September 2019 (accessed via The Internet Archive)

59 CIR open-source research, which also cites '[Mozambique, Russia sign energy, security deals](#)', France24, 22 August 2019

60 Crisis Group, '[Stemming the Insurrection in Mozambique's Cabo Delgado](#)', 11 June 2021 (accessed 11 July 2023)

61 Geopolitical Monitor, '[Russian Mercenaries: A String of Failures in Africa](#)', 24 August 2020 (accessed 11 July 2023)

62 '[Bloodshed and retreat from Mozambique for Putin's private army the Wagner Group](#)', The Times, 25 November 2019

63 US Department of the Treasury, '[Treasury Escalates Sanctions Against the Russian Government's Attempts to Influence US Elections](#)', 15 April 2021 (accessed 16 July 2023)

64 US Department of the Treasury, '[Treasury Escalates Sanctions Against the Russian Government's Attempts to Influence US Elections](#)', 15 April 2021 (accessed 16 July 2023)

65 [Mozambique elections: Russians help Frelimo backers to break the law – CIP Eleições](#), Club of Mozambique, 10 October 2019

Year of first involvement	Country	Nature of involvement	Further information
2021	Mali	Sustained involvement	Wagner was invited by Mali's military junta to provide security services against Islamist militant groups, following a coup by Colonel Assimi Goita in May 2021. Wagner operatives reportedly arrived in late 2021. <sup>66</sup> In December 2021, the UK and its international partners strongly condemned the deployment of Wagner fighters to Mali. <sup>67</sup> Before Wagner mercenaries were visible in Mali, Russian soft power had already played an important role in influencing public opinion on its involvement in Mali. <sup>68</sup> A Wagner/Prigozhin-affiliated entity, the Foundation for the Protection of National Values (FZNC), published surveys after the military coup in 2021, showcasing opinions in favour of Russian intervention and negative perceptions of the French military's Operation Barkhane. <sup>69</sup> Following Colonel Assimi Goita's accession to power, efforts continued to influence the perception of local populations in favour of an alliance with Russia and, in turn, to support the arrival of Wagner mercenaries. <sup>70</sup>

11. In addition to these seven countries, there are a **further four** where we have **high confidence** of the Wagner Network's **non-military involvement** since 2014: Zimbabwe, the DRC, Madagascar, and South Africa. These countries are presented in Table 3.

66 CSIS, '[Tracking the Arrival of Russia's Wagner Group in Mali](#)', 2 February 2022 (accessed 16 July 2023)

67 UK Government, '[UK and international partners condemn Wagner Group's plan to deploy mercenaries in Mali](#)', 23 December 2021 (accessed 16 July 2023)

68 CIR open-source research

69 CIR open-source research. Note FZNC has been sanctioned by the US Government. See Appendix 1.

70 CIR open-source research



**Table 3: High-confidence countries where the Wagner Network has carried out non-military activities (between 2014 and June 2023)**

Year of first involvement	Country	Nature of involvement	Further information
2018	Zimbabwe	Unknown	We have high confidence that the Prigozhin-linked entity, AFRIC, has provided political services, including illegitimate election observation missions. <sup>71</sup> Meta took down inauthentic accounts in 2022 linked to Prigozhin’s Internet Research Agency. <sup>72</sup>
2018	Democratic Republic of the Congo	Unknown	The Democratic Republic of the Congo, where we have high confidence that Prigozhin-linked AFRIC has sponsored illegitimate election monitoring missions. <sup>73</sup>
2018	Madagascar	Temporary	Madagascar, where we have high confidence of Wagner Network attempts at interference in the 2018 Presidential Election—including through AFRIC—and medium confidence of Prigozhin-linked mining interests. <sup>74</sup>
2018–2019	South Africa	Temporary	South Africa, where we have high confidence that AFRIC attempted to interfere in elections <sup>75</sup> and that other Prigozhin-linked entities, the Foundation for National Values Protection (FZNC) and the International Anticrisis Center, have been involved. <sup>76</sup> Both entities are part of Prigozhin’s malign influence operations globally.

- 71 AFRIC is under sanction by the US Government. When the sanction was announced, the US Treasury stated: “The Association For Free Research And International Cooperation (AFRIC), [...] facilitate[s] Prigozhin’s malign operations in Africa and Europe while primarily operating from Russia. AFRIC has served as a front company for Prigozhin’s influence operations in Africa, including by sponsoring phony election monitoring missions in Zimbabwe, Madagascar, the Democratic Republic of the Congo, South Africa, and Mozambique. Despite posing as an African-led initiative, AFRIC serves to disseminate Russia’s preferred messaging, often related to disinformation. AFRIC works in coordination with other elements of the Prigozhin network, including FZNC and the International Anticrisis Center, a fraudulent think tank controlled by Prigozhin’s operatives.” US Department of the Treasury, ‘[Treasury Escalates Sanctions Against the Russian Government’s Attempts to Influence US Elections](#)’, 15 April 2021 (accessed 16 July 2023)
- 72 Meta, ‘[January 2022 Coordinated Inauthentic Behavior Report](#)’, 16 February 2022 (accessed 17 July 2023)
- 73 US Department of the Treasury, ‘[Treasury Escalates Sanctions Against the Russian Government’s Attempts to Influence US Elections](#)’, 15 April 2021 (accessed 16 July 2023); EPDE, ‘[Fake election observation as Russia’s tool of election interference: The Case of AFRIC](#)’, 26 March 2020 (accessed 16 July 2023)
- 74 US Department of the Treasury, ‘[Treasury Escalates Sanctions Against the Russian Government’s Attempts to Influence US Elections](#)’, 15 April 2021 (accessed 16 July 2023); see also YouTube, ‘[Russia’s Madagascar Election Gamble - BBC Africa Eye documentary](#)’ (accessed 16 July 2023)
- 75 US Department of the Treasury, ‘[Treasury Escalates Sanctions Against the Russian Government’s Attempts to Influence US Elections](#)’, 15 April 2021 (accessed 16 July 2023); EPDE, ‘[Fake election observation as Russia’s tool of election interference: The Case of AFRIC](#)’, 26 March 2020 (accessed 16 July 2023)
- 76 Daily Maverick, ‘[Exclusive: Did Putin’s ‘Chef’ attempt to interfere in South African election?](#)’, 7 May 2019 (accessed 16 July 2023)

12. In addition to these 11 countries (paras 9–10), there are **six countries** where we have **medium confidence** that entities within the Wagner Network have operated since 2014, but **not as a fighting force**. These countries are presented in Table 4. Companies registered in other countries have also facilitated the Wagner Network’s payments and operations.<sup>77</sup>

**Table 4: Medium-confidence countries where the Wagner Network has carried out non-military activities (between 2014 and June 2023)**

Year of first involvement	Country	Nature of involvement	Further information
2021	Afghanistan	Unknown	We have medium confidence that Wagner has been recruiting former members of the Afghan army and that key figures linked to the Wagner Network have met with representatives of the Taliban since August 2021 to offer strategic communication services. <sup>78</sup>
2022	Burkina Faso	Durable	We have medium confidence that, since 2022, Prigozhin-affiliated media (RiaFan) organised pro-Russian campaigns on social media since mid-2022, in the build-up to a second coup. <sup>79</sup> There are unconfirmed reports of a deal between the national government and the Wagner Network. <sup>80</sup>
Allegedly 2017/2018	Cameroon	Durable	We have medium confidence that Wagner operatives have used Cameroon as a logistics corridor <sup>81</sup> and where we have medium confidence that the network uses the port at Douala to ship ‘blood diamonds’ and other mineral extracted products, constituting a durable presence in-country. <sup>82</sup>

77 Assessing US sanctions notices, Professor Jason Blazakis judged it “highly likely” that Asia-based companies in Thailand and Hong Kong (Shine Drago Group Limited, Shen Yang Jing Cheng Machinery Imp&Exp. Company, and Zhe Jiang Jiayi Small Commodities Trade Company Limited) “facilitated transactions on behalf of Prigozhin and the Wagner Group.” See Center on Terrorism, Extremism, and Counterterrorism - Middlebury Institute of International Studies ([WGN0023](#))

78 CIR provided this assessment, noting, “Complaints by Afghan forces that Wagner have been recruiting ex-soldiers exiled in Iran to fight in Ukraine are unconfirmed. HUMINT sources with networks in Afghanistan have reported the same, but cannot be verified. Supposedly, these are being recruited from the former elite National Army Commando Corps, and represent some of the best US-trained forces in the former Afghan army.” See also Foreign Policy, ‘[Russia Is Recruiting Afghan Soldiers for the War in Ukraine](#)’, 25 October 2022 (accessed 16 July 2023)

79 CIR open-source research

80 PQ UIN [108126](#) [on Burkina Faso], Answered on 20 December 2022

81 Jeune Afrique, ‘[Comment Wagner se finance : enquête sur l’eldorado d’Evgueni Prigojine en Centrafrique et au Cameroun](#)’ (French), 12 January 2023 (accessed 16 July 2023)

82 CIR open-source research

Year of first involvement	Country	Nature of involvement	Further information
2021	Chad	Unknown	We have medium confidence that since 2021 the Prigozhin-linked entity, FZNC (sanctioned by the US Government), has conducted questionable polling in which it asked Chadians if they would be willing to participate in demonstrations. This polling was accompanied by commentary from Maxim Shugaley, an individual sanctioned for his links to Wagner in some jurisdictions (see Appendix 1). There are rumours that FACT has been trained by Wagner but these have not been verified.
Unknown	Serbia	Durable	In January 2023, Serbian President Aleksandar Vucic denied Wagner's involvement in the country. We have high confidence that the network advertised in Serbia in January 2023 <sup>83</sup> for fighters in the war against Ukraine. There have been reports of connections between the Serbian 'People's Patrol' organisation and the Wagner Network.
Unknown	Zambia	Unknown	We have medium confidence that FZNC has conducted polling, even though this was not publicly released. <sup>84</sup> PDF reports on polling in Chad that were released on 25 March 2021 contained the following title (translated) in their metadata: "Qualitative research on public opinion in Zambia". <sup>85</sup>

Additionally, we have seen some evidence that Wagner operatives have been physically present in other countries since 2014. Due to our low confidence in the accuracy of this information, we have not named these countries.

**13. The Wagner Network is a collection of individuals and entities linked to Yevgeny Prigozhin and undertaking military, economic, political and influencing operations internationally. It formed in 2014 and began its military activities in Ukraine, where it has had sustained involvement. The network subsequently expanded to several other countries in Africa and the Middle East. It has undertaken offensive military operations in at least seven countries since 2014: Ukraine; Syria; the Central African Republic (CAR); Sudan; Libya; Mozambique; and Mali. There are 10 further countries where we have medium or high confidence that it has been involved in a non-military capacity since 2014, and many more countries where the network's presence is rumoured.**

83 [Russia's Wagner group denies recruiting Serbs to fight in Ukraine](#), Reuters, 20 January 2023

84 CIR open-source research.

85 [Wayback Machine \(archive.org\)](#)

## The perceived benefits of Wagner

### *A direct and indirect tool of the Russian state*

14. As shown by the above examples, the Wagner Network’s activities have gone beyond conventional military activities. Its services encompassed political advisory services, electoral services, media campaigns, mineral extraction and guarding/security services. It has also run “opportunistic” Russian disinformation campaigns via Prigozhin-affiliated media outlets,<sup>86</sup> which can serve as a precursor to the involvement of Wagner fighters—as occurred in Mali (see Table 2 above). Mark Galeotti, Honorary Professor at the UCL School of Slavonic and East European Studies, has noted the network:

... shifts almost seamlessly between being an out and out proxy of the Kremlin, and an essentially commercial organisation driven by the search for profit. This not only makes it often difficult to grasp its motivations in any one theatre, it also highlights the challenges of dealing with regimes in which the boundaries between the private and the public are both porous and mobile.<sup>87</sup>

He asserted that “while clearly Prigozhin would not deploy it [...] without getting clearance from the Kremlin, in most cases it is [not] actively tasked by the Russian government”.<sup>88</sup> He cited Ukraine and Libya as exceptions, where “Wagner is clearly and verifiably acting on Kremlin orders”.<sup>89</sup> However, even in countries where the network operates solely for economic gain and receives payments from host governments (rather than the Russian state):

... clearly Moscow does accrue some influence and soft power [from the Network’s presence], especially by being demonstrably willing to work with corrupt and authoritarian governments [...] Prigozhin’s contractors – not just mercenaries but also political technologists – can be a useful foot in the door. [...] Wagner can act as a cover for intelligence and influence operations conducted by the SVR (Foreign Intelligence Service) and, especially, GRU (military intelligence).<sup>90</sup>

86 [Inside the stunning growth of Russia’s Wagner Group - POLITICO](#), POLITICO, 18 February 2023

87 Prof. Mark Galeotti (Managing Director at Mayak Intelligence Ltd) ([WGN0005](#)) para 3

88 Prof. Mark Galeotti (Managing Director at Mayak Intelligence Ltd) ([WGN0005](#)) para 8

89 Prof. Mark Galeotti (Managing Director at Mayak Intelligence Ltd) ([WGN0005](#)) para 9. He also cited Venezuela, but there is doubt over whether Russian operatives in this country were Wagner-affiliated. We have not named this as a country where we have high or medium confidence that the network has operated.

90 Prof. Mark Galeotti (Managing Director at Mayak Intelligence Ltd) ([WGN0005](#)) para 12

Despite this symbiotic relationship, evidence from a former Wagner fighter indicates that operational tensions between the network and the Russian Ministry of Defence are long-standing.<sup>91</sup>

**15. The Wagner Network is highly opportunistic and not a straightforward proxy for Russia, even though the Russian state has sometimes directed, facilitated, and supported its military operations, notably in Libya and Ukraine. Even when the network has acted purely in its own economic interests, Russia is likely to have benefited financially or in geopolitical influence from its presence. Its guiding hand has been the Russian state.**

### *Incentives for buyers*

16. A former Wagner fighter was positive about the role of the Wagner Network, saying, “the Wagner Group has real autonomy and, in my view, has earned its well-developed brand.”<sup>92</sup> This individual provided detailed examples from CAR to demonstrate the point.<sup>93</sup> We received little other evidence that defended the record of Wagner fighters. However, it is logical to assume that the host governments perceived benefits from engaging with the Wagner Network. Many governments sought military protection against security threats, sometimes disillusioned with the international community’s efforts.<sup>94</sup> Accordingly, the network has offered counter-terrorism/counter-insurgency operations, provided training unrestrained by human rights obligations, and supplied weapons and military equipment.

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91 “In 2017, before the start of the operation to seize oil fields in Syria, Prigozhin tried to organise the deployment of combat units of the PMC Wagner to Syria and the supply of weapons and ammunition, bypassing the Ministry of Defence. On account of this, Prigozhin’s relations with Shoigu deteriorated [...] the Russian Minister of Defence sabotaged implementation of the agreed plan of co-operation [...] The military refused to transport PMC Wagner units on board their aircraft or by the navy’s ships. In addition, the military, under various pretexts, did not supply weapons and ammunition [...] Prigozhin could not buy enough weapons, then he was not given the power to acquire weapons and ammunition abroad in the amounts needed for large-scale military operations. After Putin intervened in this conflict between Shoigu and Prigozhin, the previous scheme of liaison between PMCs and military departments was restored. The mercenaries were delivered on military transport aircraft, and the PMC was again integrated with the Ministry of Defence, and received weapons and ammunition in the required quantities, although not of the latest designs.” Anonymous ([WGN0026](#))

92 Anonymous ([WGN0026](#))

93 “Since the suppression of rebel activity in the Central African Republic by the PMC Wagner detachments, the level of violence in this country has significantly decreased and the situation has stabilised. At the moment, there is no movement back to escalating tension or exacerbated civil conflict. The civil war subsided. This is a fact. PMC Wagner, as a result of assisting expansion of the zone of control of the central government in parallel with the displacement of rebel (in other words, criminal) formations in the interior, has contributed to stabilisation of this country. In Mali, Russian mercenaries are fighting against al-Qaeda and anti-government groups, erroneously implementing the same gameplan, but nevertheless without negative consequences for the civilian population.” Anonymous ([WGN0026](#))

94 For example “Mali’s Foreign Minister Abdoulaye Diop said that interventions by the international community had not worked and the country had to consider new options.” [Wagner Group: Why the EU is alarmed by Russian mercenaries in Central Africa](#), BBC News, 19 December 2021

It offered one or more of these services in CAR,<sup>95</sup> Mozambique,<sup>96</sup> Sudan,<sup>97</sup> Syria<sup>98</sup> and Mali.<sup>99</sup> The network also offered a personal protection detail for leaders; suppressed ‘security threats’ in the form of political protests and opposition;<sup>100</sup> and offered political ‘consultancy’ services to strengthen an incumbent regime.<sup>101</sup> The former Wagner fighter asserted that, except for Ukraine, Wagner operates “only by agreement with the current government”.<sup>102</sup> However, we note that rebel military leaders have also sought the network’s services to further their campaigns,<sup>103</sup> which appears to contradict the fighter’s claim. The network’s counter-terrorism services may have sometimes furthered stability. In CAR, its fighters helped the army to repel a major Islamist offensive in early 2021 and retake swathes of territory.<sup>104</sup> Growing concerns over terrorism in the Sahel region of Africa<sup>105</sup> may lead other national governments in the region to engage the network’s services.

**17. Host governments and other non-regime actors must perceive benefits from engaging with the Wagner Network, because they consider it the most effective form of protection and security. There are examples of its fighters furthering a regime’s security objectives, even if this meant neutering political opposition.**

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- 95 In 2018, Wagner offered services to defend the President against rebel attacks on the capital. It also helped the army to repel a major Islamist offensive in early 2021. Wagner trained the army against further coup attempts. There are 1,890 ‘Russian instructors’ supporting government troops in the ongoing civil war, according to the Russian Ambassador (DW) and 1,500 according to Western officials (FT). Sources: Council on Foreign Relations, [‘What Is Russia’s Wagner Group Doing in Africa?’](#), May 2023 (accessed 17 July 2023); [Diamond-rich African country is a zombie host for Wagner Group](#), The Times, 19 May 2023; [Wagner mercenaries will not be withdrawn from Africa, says Russia](#), The Guardian, 26 June 2023; [How Russia’s Wagner Group Is Expanding in Africa](#), The New York Times, 31 May 2022; United States Institute of Peace, [‘In Africa, Here’s How to Respond to Russia’s Brutal Wagner Group’](#), 6 April 2023 (accessed 16 July 2023); DW, [‘Russia’s Wagner Group in Africa: More than mercenaries’](#), 24 June 2023 (accessed 16 July 2023); [Wagner’s future in Africa in question after Russian mutiny](#), Financial Times, 28 June 2023
- 96 In Mozambique, it offered to fight self-proclaimed Islamic State in northern Cabo Delgado province. Council on Foreign Relations, [‘What Is Russia’s Wagner Group Doing in Africa?’](#), May 2023 (accessed 17 July 2023)
- 97 In Sudan, Wagner provided advisers and riot control gear. [How Russia’s Wagner Group Is Expanding in Africa](#), The New York Times, 31 May 2022; United States Institute of Peace, [‘In Africa, Here’s How to Respond to Russia’s Brutal Wagner Group’](#), 6 April 2023 (accessed 16 July 2023); [Wagner’s future in Africa in question after Russian mutiny](#), Financial Times, 28 June 2023
- 98 Wagner forces attempted to drive Islamist State forces out of the city of Palmyra in 2016 and 2017. Middle East Institute, [‘Syria is where the conflict between Wagner and the Russian government began’](#), 14 July 2023 (accessed 16 July 2023)
- 99 From December 2021, Wagner acted to counter “complex set of numerous jihadi terrorist groups and regional Tuareg and other self-autonomy movements operates in the country” (including al-Qaida Sahel affiliates such as Jama’a Nusrat ul-Islam wa al-Muslimin (JNIM) and the Islamic State in the Greater Sahara (IS-GS)). Wagner operatives also carried out training. Brookings, [‘Russia’s Wagner Group in Africa: Influence, commercial concessions, rights violations, and counterinsurgency failure’](#), February 2022 (accessed 16 July 2023)
- 100 In CAR, the Network offered personal protection to the President. Sudan, the Network suppressed dissent against the government of President Bashir. Council on Foreign Relations, [‘What Is Russia’s Wagner Group Doing in Africa?’](#), May 2023 (accessed 17 July 2023)
- Council on Foreign Relations, [‘What Is Russia’s Wagner Group Doing in Africa?’](#), May 2023 (accessed 17 July 2023).
- 101 For example, in CAR and Sudan. CIR open-source research
- 102 Anonymous ([WGN0026](#))
- 103 In Sudan, Wagner were contracted by Bashir, but they then supported the generals who ousted him (including Dagalo/Hemedti). In Eastern Libya, Wagner assisted General Haftar to take control of oil fields and supported the failed assault on Tripoli. Council on Foreign Relations, [‘What Is Russia’s Wagner Group Doing in Africa?’](#), May 2023 (accessed 17 July 2023); Brookings, [‘Russia’s Wagner Group in Africa: Influence, commercial concessions, rights violations, and counterinsurgency failure’](#), February 2022 (accessed 16 July 2023); [How Russia’s Wagner Group Is Expanding in Africa](#), The New York Times, 31 May 2022
- 104 [How Russia’s Wagner Group Is Expanding in Africa](#), The New York Times, 31 May 2022; [Diamond-rich African country is a zombie host for Wagner Group](#), The Times, 19 May 2023
- 105 [Inside the stunning growth of Russia’s Wagner Group](#), POLITICO, 18 February 2023; HM Government, Integrated Review Refresh 2023: Responding to a more contested and volatile world, [CP 811](#), March 2023, para 9

## The price of Wagner military deployments

### *Operating with impunity*

18. The brutality of Wagner fighters when offering military services is notorious and well-documented, violating the norms of international law and taking the lives of civilians. Dr Sorcha MacLeod, Chair of the UN Working Group on Mercenaries, warned of the “trends of widespread violence and grave human rights violations” that surround them.<sup>106</sup> Wagner fighters stand accused of atrocities in virtually all of the countries where they have operated militarily since 2014.<sup>107</sup> Examples include:

- In **Ukraine**, the German foreign intelligence service intercepted messages in April 2022 suggesting Wagner fighters played a leading role in the massacre in Bucha.<sup>108</sup> Within the wider Russia-Ukraine war, Wagner fighters and regular members of the Russian Armed Forces are “given a free hand to conduct cruelty”, according to Bellingcat’s Christo Grozev.<sup>109</sup> The Ukrainian Prosecutor General is processing more than 93,000 incidents of potential war crimes in Ukraine; he said on 3 July 2023 that Wagner forces had committed “among the most severe crimes” within this number.<sup>110</sup>
- UN experts have said Wagner fighters in the **Central African Republic** carried out grave human rights abuses, including summary executions, torture and gender-based violence.<sup>111</sup> The Sentry, an investigative and policy NGO, accused Wagner fighters of creating “a climate of terror and fear”.<sup>112</sup> In October 2021, the CAR national authorities admitted Wagner fighters’ role in atrocities.<sup>113</sup>
- A UN fact-finding mission verified the involvement of Wagner fighters in an ‘anti-terrorist’ operation in **Mali** from December 2021, which, in March 2022, led

106 [Q42](#). See also Center on Terrorism, Extremism, and Counterterrorism - Middlebury Institute of International Studies ([WGN0023](#))

107 A BBC documentary found that Wagner fighters in Libya had been involved in suspected war crimes, including the intentional killing of civilians. There are accusations of Wagner-linked civilian attacks in the Um Dafuq region of western Sudan. [The lost tablet and the secret documents](#), BBC, August 2021 (accessed 16 July 2023); [To counter Russia in Africa, Biden deploys a favored strategy](#), POLITICO, 7 May 2023. For Syria, see [Man who filmed beheading of Syrian identified as Russian mercenary](#), The Guardian, 21 November 2019; Dossier Center ([WGN0009](#)) para 35

108 [Possible Evidence of Russian Atrocities: German Intelligence Intercepts Radio Traffic Discussing the Murder of Civilians in Bucha](#), DER SPIEGEL, 7 April 2022

109 [Qq40–41](#) [Christo Grozev]. On the involvement of both Wagner fighters and ordinary Russian armed forces in atrocities in Ukraine, see also [Q41](#) [Sean McFate], where he describes the “Russian policy” of “massacring civilians”, and [Q197](#) [Leo Docherty]

110 ‘[Putin’s comment on funding Wagner shows link to Ukraine, prosecutor says](#)’, Reuters, 3 July 2023

111 Specifically, UN experts noted (among others) reports of mass summary executions, arbitrary detentions, torture, forced disappearances and displacement and indiscriminate targeting of civilian facilities and attacks on humanitarian actors. OHCHR, ‘[CAR: Experts alarmed by government’s use of “Russian trainers”, close contacts with UN peacekeepers](#)’, 31 March 2021 (accessed 8 July 2023). There are also reports of sexual and gender-based violence: [Q6](#) [Sorcha MacLeod]. See also the Final report of the UN Panel of Experts on the Central African Republic extended pursuant to Security Council resolution 2536 (2020), paras 89–93, available in [Letter dated 25 June 2021 from the Panel of Experts on the Central African Republic extended pursuant to resolution 2536 \(2020\) addressed to the President of the Security Council](#), 25 June 2021.

112 The Sentry ([WGN0017](#)) para 18. See also Annex 2 in this evidence for further Wagner-alleged atrocities.

113 ‘[Russia’s Wagner Group committed atrocities in Central African Republic](#)’, The Times, 4 October 2021. See also Human Rights Watch, ‘[Central African Republic: Abuses by Russia-Linked Forces](#)’, 3 May 2022 (accessed 10 July 2023)

to the death of 500 people over five days in the rural town of Moura.<sup>114</sup> Corinne Dufka, Sahel director at Human Rights Watch, called this the “worst [atrocity] in Mali in a decade”.<sup>115</sup> UK Government officials directly linked the arrival of Wagner fighters to Mali’s deteriorating human rights situation in early 2022.<sup>116</sup>

In CAR and Mali, Wagner fighters are documented as having targeted civilians at a significantly higher rate than both state forces and major insurgent or terrorist groups in those countries.<sup>117</sup> The destabilising effects of Wagner engagement have been underlined by the United States<sup>118</sup> and European Union.<sup>119</sup> The UK Government stated that Wagner fighters [emphasis added]:

...**undermine security** and do not offer any kind of credible long-term approach [...] Wagner has also **interfered in African politics** by protecting and supporting military regimes and weakening democratic processes [...] The deployment of proxy military forces such as Wagner **undermines international law** and [...] The Wagner Group is a **driver of conflict** and **capitalises on instability** for its own interests [...] Wagner has committed **human rights abuses, undermined the work of international peacekeepers, and sought control of mineral resources**, to the detriment of local citizens and their economy.<sup>120</sup>

19. Dr Sorcha MacLeod, Chair of the UN Working Group on the Use of Mercenaries, told us it is “almost impossible” to hold “mercenaries and mercenary-type actors” to account for their crimes.<sup>121</sup> Wagner deployments foster a “context of impunity”.<sup>122</sup> This is because:

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- 114 OHCHR, [‘Rapport sur les évènements de Moura du 27 au 31 mars 2022’](#) (French only), May 2023, paras 20–21, 77. See also United States Department of State, [The Release of the UN Report on Moura, Mali](#), 15 May 2023 (accessed 10 July 2023): “We commend the UN’s Office of the High Commissioner for Human Rights for its diligence and tenacity in investigating these abuses, which include gang rape and other sexual violence, torture, and extrajudicial killings.”
- 115 [Russian mercenaries and Mali army accused of killing 300 civilians](#), The Guardian, 5 April 2022. Note there have been allegations of Wagner-linked violence in other towns: Nioni, Hombori, Mondoro and Boni. See [Russian mercenaries linked to civilian massacres in Mali](#), The Guardian, 4 May 2022
- 116 [Russian mercenaries linked to civilian massacres in Mali](#), The Guardian, 4 May 2022
- 117 Civilian targeting accounted for 52% and 71% of Wagner involvement in political violence in CAR and Mali respectively. By comparison, in CAR, 17% of state forces’ political violence events targeted civilians and 42% of rebels’ political violence events targeted civilians. ‘Rebels’ in CAR refers to CPC/UPC. In Mali, 20% of states forces’ political violence events targeted civilians and 27% of rebels’ political violence events targeted civilians. ‘Rebels’ in Mali refers to the Al Qaeda-affiliated JNIM. Data collected by the Armed Conflict Location & Event Data Project (ACLED), covering the timeframe between 1 December 2021 and 31 July 2022 for Mali and the timeframe between 1 January 2018 and 31 July 2022 for CAR. The data is presented in [Wagner Group Operations in Africa: Civilian Targeting Trends in the Central African Republic and Mali](#), ACLED, 30 August 2022
- 118 “The Wagner Group is a destabilizing force whose personnel have engaged in an ongoing pattern of abuses, including execution-style killings, sexual violence, and torture in Mali and other nations struggling with instability.” United States Department of State, [The Release of the UN Report on Moura, Mali](#), 15 May 2023 (accessed 10 July 2023)
- 119 Council of the EU, [‘Wagner Group: Council adds 11 individuals and 7 entities to EU sanctions lists’](#), 25 February 2023 (accessed 10 July 2023)
- 120 Foreign, Commonwealth and Development Office ([WGN0025](#)) section 7
- 121 [Q19](#) [Sorcha MacLeod]
- 122 Stated in the context of Libya: ReliefWeb, [Libya: Violations related to mercenary activities must be investigated](#), 17 June 2020 (accessed 10 July 2023)



- These actors lack the accountability systems of ordinary militaries<sup>123</sup>—”deliberately so”.<sup>124</sup> According to an ex-Wagner fighter, mercenaries “can act outside the law” and each is “forced to establish his own moral norms.”<sup>125</sup>
- Victims and investigatory bodies cannot easily determine the identity and organisation of mercenary fighters,<sup>126</sup> and ‘Wagner’ itself is not a single legal entity<sup>127</sup> with easily identifiable individuals and hierarchies;<sup>128</sup>
- Other than Ukraine, the Wagner Network often holds political sway in the countries where its fighters operate.<sup>129</sup> It is also usually present at the explicit request of the host Government, which can result in a desire by national authorities to hide atrocities. This situation undermines the independence of national investigations and makes complaints less likely,<sup>130</sup> especially where judicial independence is poor;
- The Russian Government (and Russian courts<sup>131</sup>) have repeatedly obstructed efforts to investigate<sup>132</sup> and/or challenge<sup>133</sup> Wagner alleged crimes;
- Wagner-like bodies and PMCs generally do not fit easily into the existing international legal framework.<sup>134</sup> Many have not subscribed to international voluntary initiatives promoting responsible activity (paragraph 79).

The response of the UK Government to the *de facto* impunity of Wagner fighters is discussed later in this report (paragraph 81).

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123 [Q40](#) [Christo Grozev]

124 The regular armed forces have “systems of accountability, clear chains of command, military codes of justice and courts martial”. Among mercenary groups, “the chains of command are not clear. There is opacity and lack of transparency around these types of actors—deliberately so.” [Q19](#) [Sorcha MacLeod]

125 A former fighter stated this in an interview with the Guardian. See [‘Mercenaries have skills armies lack’: former Wagner operative opens up](#), The Guardian, 10 February 2022

126 Mercenary groups “operate in the shadows for good reason. They do not wear clear uniforms or clear insignia. It is very difficult to identify who they are, [...] if you are a victim or the family of a victim or a human rights defender”. [Q19](#) [Sorcha MacLeod]

127 A new entity has been registered in Russia, however.

128 [Q25](#) [Sorcha MacLeod].

129 Proelium Law ([WGN0016](#)) para 16. For examples from CAR and Sudan, see The Sentry ([WGN0017](#)) para 15; OHCHR, [‘CAR: Experts alarmed by government’s use of “Russian trainers”, close contacts with UN peacekeepers’](#), 31 March 2021 (accessed 8 July 2023); Dossier Center ([WGN0009](#)) para 36.

130 This is well-documented in the Central African Republic, where victims, journalists and human rights defenders have faced harassment and intimidation. Wagner operatives have worked closely with police and/or local authorities to undermine investigations. [Q42](#) [Sorcha MacLeod]; Dossier Center ([WGN0009](#)) para 56; Final report of the UN Panel of Experts on the Central African Republic extended pursuant to Security Council resolution 2536 (2020), para 95, available in [Letter dated 25 June 2021 from the Panel of Experts on the Central African Republic extended pursuant to resolution 2536 \(2020\) addressed to the President of the Security Council](#), 25 June 2021.

131 A civilian in Homs, Syria, was tortured and murdered in 2017, with likely Wagner involvement. The victim’s family tried to bring a claim via Russian courts and “the decision not to investigate was upheld at all levels”. The UN Working Group on the Use of Mercenaries is “extremely concerned about the delays and obstacles that were put in the path of access to justice for the family of the victim”. [Q20](#) [Sorcha MacLeod]

132 Russia vetoed efforts to establish an independent UN investigation into atrocities in Mali. [Russian mercenaries linked to civilian massacres in Mali](#), The Guardian, 4 May 2022.

133 The UN Working Group on the Use of Mercenaries sent allegation letters to the Russian government on Libya and CAR, but Russia responded that mercenaries and private military and security companies are illegal under Russian law, meaning the allegations were impossible. [Q23](#) [Sorcha MacLeod]

134 Proelium Law ([WGN0016](#)) paras 7–8

### *Delivering unreliable results*

20. Although many host governments enter agreements with the Wagner Network to shore up their own power, or to tackle insurgencies or terror groups that threaten their control, the presence of the Wagner Network rarely delivers those outcomes. Wagner fighters frequently failed to fulfil many military objectives for which they were contracted. They were unsuccessful in countering Islamist extremists in Mozambique in 2019 and their extremely early departure appears to have further undermined national security.<sup>135</sup> Wagner fighters faced “decimation” at the hands of the US military after the failed assault on Deir al-Zour, Syria, in 2018.<sup>136</sup> Furthermore, the assistance and battle support offered by Wagner fighters in the Tripoli offensive (2019–20) were insufficient to ensure victory for the LNA.<sup>137</sup>

21. The invitation of the Wagner Network in the first place is a sign of weakness and openness to extreme violence and corruption.

### *Thriving in instability*

22. Witnesses noted Wagner’s vested interest in maintaining conflict<sup>138</sup> and impeding democratic processes. For instance, Wagner fighters have:

- **Undermined international efforts to promote peace and security.** Wagner fighters—along with other actors—have made the UN’s arms embargo for Libya “ineffective”, due to their continued supply of arms and military material to the country.<sup>139</sup> The persistent presence of its operatives violates the terms of Libya’s October 2020 ceasefire.<sup>140</sup>
- **Weakened democratic governance and fostered corruption.** Wagner’s gold-smuggling activities in Sudan enabled huge quantities of gold to bypass the state and relied in part on an illegal commercial arrangement; civilian officials attempting to challenge these practices have effectively been censured.<sup>141</sup> The network also advised then-President Bashir on how to suppress protests.<sup>142</sup> The Prigozhin-linked entity AFRIC has been involved in illegitimate election

135 Foreign, Commonwealth and Development Office ([WGN0025](#)) section 7

136 Prof. Mark Galeotti (Managing Director at Mayak Intelligence Ltd) ([WGN0005](#)) para 7

137 Anonymous ([WGN0014](#)) paras 10, 14

138 Sorcha MacLeod noted these kinds of actors “have a tendency to prolong the armed conflict, because they are motivated by financial gains, so they have no incentive to end the conflict. They tend to be very heavily armed and we see resulting asymmetric warfare”. [Q4](#). See also [Q103](#) [Mikhail Khodorkovsky] on their political influence in Russia being linked to the war in Ukraine.

139 [Letter dated 24 May 2022 from the Panel of Experts on Libya established pursuant to resolution 1973](#) addressed to the President of the Security Council S/2022/427, Annex 26, Tables 26.1 and 26.2

140 CIR open-source research. See also Democracy & Human Rights Foundation ([WGN0011](#)); Anonymous ([WGN0014](#)); [Letter dated 8 March 2021 from the Panel of Experts on Libya established pursuant to resolution 1973](#) (2021) addressed to the President of the Security Council S/2021/229, para 97

141 Civilian officials involved in these efforts included Sudan’s anti-corruption committee (disbanded after the military coup) and officials overseeing flights (many of whom were redeployed). [Russia is plundering gold in Sudan to boost Putin’s war effort in Ukraine](#), CNN, 29 July 2022

142 Dossier Center ([WGN0009](#)) para 36

monitoring processes in several countries. Undermining democracy has been directly linked to the pursuit of profit through the weakening of government capacity, processes and controls.<sup>143</sup>

- **Gained access to natural resources on preferential terms, to the detriment of the national economy.** In Sudan, Wagner-linked gold mining companies have benefited from generous concessions.<sup>144</sup> The network appears to have a “chokehold” over Libya’s natural resources and export facilities; consequently, “Libyan oil output has drastically decreased”.<sup>145</sup>

23. The consequences of the network’s involvement in the Central African Republic are particularly far-reaching. The Sentry’s many years of investigation led it to warn that CAR is “a successful testing ground for Wagner to perfect the art of state capture with a view to outsourcing it to more vulnerable countries”.<sup>146</sup> The deep involvement of the Wagner Network in the country is examined in Box 1 and shows the growing reliance of the CAR national government on the network for security. In the process, this undermines freedom of the press, political opposition, good governance, international engagement and even potentially the national constitution.

**Box 1: Case study on the Wagner Network’s involvement in the Central African Republic**

In 2017, President Touadéra signed a number of security agreements with the Russian government and requested military support in exchange for access to diamonds, gold and uranium.<sup>147</sup> In December 2017, the Russian Foreign Ministry successfully lobbied for an exemption to the United Nations’ (UN) arms embargo,<sup>148</sup> and Russia was permitted to provide weapons and ‘trainers’ to support CAR forces. It announced that 170 instructors would be deployed to CAR.<sup>149</sup>

Between 2018 and 19, Prigozhin negotiated mining access in exchange for Wagner services to secure the President’s re-election,<sup>150</sup> which the Wagner Network achieved using a combination of bribery, intimidation and “aggressive anti-Western and pro-Russian propaganda”.<sup>151</sup> The network is now seeking to secure a third term for the President, including by forcing a change to the country’s constitution if necessary.<sup>152</sup>

143 “The Wagner Group contributes to Russia’s efforts to undermine efforts of individuals and organizations to democratize by backing authoritarians and engaging in human rights abuses. In doing this, the Wagner Group gains access to important resources that advance Russia’s geopolitical interests. In essence, objective one, undermining democracy naturally feeds into profiteering, the second objective”. Center on Terrorism, Extremism, and Counterterrorism - Middlebury Institute of International Studies ([WGN0023](#))

144 The Wagner-linked company, Meroe Gold has been instrumental. The Sudanese government waived its 30% stake in gold mining by Meroe in 2018 and provided the company with other benefits. See OCCRP, ‘[Documents Reveal Wagner’s Golden Ties to Sudanese Military Companies](#)’, 2 November 2022 (accessed 16 July 2023)

145 Center on Terrorism, Extremism, and Counterterrorism - Middlebury Institute of International Studies ([WGN0023](#))

146 The Sentry ([WGN0017](#)) para 27. See The Sentry, ‘[Architects of Terror](#)’, June 2023

147 [Wagner Group: Why the EU is alarmed by Russian mercenaries in Central Africa](#), BBC News, 19 December 2021

148 LSE, [Russian mercenaries in the Central African Republic create problems for democratic actors](#), 5 May 2021

149 CIR open-source research

150 The Sentry ([WGN0017](#)) para 11

151 The Sentry ([WGN0017](#)) para 11

152 [How Wagner Group rode roughshod over the law to keep control of its African ‘client state’](#), The Times, 21 May 2023

In April 2022, it was estimated that up to 2,000 Wagner fighters were in CAR, although Russia maintained it was a lower number of 'instructors'.<sup>153</sup> The departure of French stabilisation troops in late 2022 means that the CAR government is now more dependent on the Wagner Network for maintaining security.<sup>154</sup>

The Wagner Network has protected President Touadéra against rebel forces, in addition to securing key economic locations such as Lobaye and Haute-Kotto (sites of exploration and mining).<sup>155</sup> Wagner operatives have also trained the national armed forces (FACA).<sup>156</sup> The network has significant political influence in CAR and a key Wagner representative, Valery Zakharov, served as the President's security advisor in Wagner's first three years in the country.<sup>157</sup>

The investigative and policy NGO The Sentry has said that the Network is primarily financed and operated via security and mining activities, which are carried out via three CAR-registered companies,<sup>158</sup> which "operate in total opacity".<sup>159</sup> One of these, Midas Resources, has facilities in the gold mine of Ndassima in central CAR, to which Wagner operatives have prevented access by Central African mining authorities.<sup>160</sup> US cables and internal documents from the Wagner Network suggested that it had at least 13 bases in the country in 2021, and revealed US concern over Wagner's dramatic expansion of the production area of Ndassima mine in the nine-month run-up to February 2023. US officials estimate that this mine could, in the long term, "produce rewards upward of \$1 billion".<sup>161</sup>

The Sentry has shown "how Wagner's top command structure has diverted political and security processes sponsored by international donors (e.g., elections, peace agreements, disarmament programs, and UN-backed operations) to serve Russia's geostrategic objectives and the financial interests of the organization."<sup>162</sup> Propaganda is key to how Wagner seeks to expand. For example, Prigozhin reportedly sponsored the film 'Tourist' (May 2021), which glorifies Wagner mercenaries in CAR.<sup>163</sup>

24. The African Union has long sought to eliminate the "scourge" of mercenarism within the continent of Africa of the type exemplified by the Wagner Network.<sup>164</sup> However, despite this multilateral commitment, there is a lack of will from some individual member states to reverse the proliferation of Wagner activities across the continent of Africa.

**25. There is a significant gap between perception and capability when it comes to the Wagner Network. Despite the continued belief by some that inviting them into a country will result in benefits, the reality is that regimes pay a high price for working with the Wagner Network. The original outcomes are rarely achieved. During the past 10 years, Wagner fighters have left behind a trail of atrocities in virtually all theatres where they have operated, with limited accountability. They may present themselves as a highly trained, professional fighting force but their indiscipline, their excessive violence and their financial motivation mean that the network has functioned like an**

153 [Q6](#) [Sorcha MacLeod]

154 [Inside the stunning growth of Russia's Wagner Group](#), POLITICO, 18 February 2023

155 Dossier Center ([WGN0009](#)) para 32

156 Dossier Center ([WGN0009](#)) para 15

157 The Sentry ([WGN0017](#)) para 14

158 Sewa Security Services, Lobaye invest, and Midas Resources. These are all under sanction by the United States, the first two are under sanction by the European Union and none are under sanction by the United Kingdom, as of 7 July 2023.

159 The Sentry ([WGN0017](#)) para 21

160 The Sentry ([WGN0017](#)) para 21

161 [Inside the stunning growth of Russia's Wagner Group](#), POLITICO, 18 February 2023

162 The Sentry ([WGN0017](#)) para 14

163 The Sentry ([WGN0017](#)) para 25

164 [OAU CONVENTION FOR THE ELIMINATION OF MERCENARISM IN AFRICA, CM/817](#) (XXIX), Annex II Rev.1

international criminal mafia, fuelling corruption and plundering natural resources. Some regimes' reliance on the network for survival means that Wagner actors show little respect for the citizens or the laws of the countries where they operate. The network's military and political involvement in the Central African Republic is all-encompassing and should serve as a warning of what may happen elsewhere. Even when Wagner's deployments do not result in benefits for the host country, they are often a great success for the network itself due to the lucrative resources it accesses, particularly in the Central African Republic and Sudan.

## Coming out of the shadows: Renewed Illegal Invasion of Ukraine

26. Before February 2022, Wagner offered to a great extent a “deniable military capability” for the Russian Government.<sup>165</sup> Their role and visibility transformed over the subsequent year and a half. They have played an increasingly visible role in the renewed illegal invasion by Russia of Ukraine, particularly in the battles of Soledar and Bakhmut. Wagner became a “key node within Russian’s fighting force in Ukraine”<sup>166</sup>—in what a UK Minister called a “sign of wholesale institutional failure on the part of Putin’s military”.<sup>167</sup> Support from the Russian Ministry of Defence to the network increased significantly.<sup>168</sup> British defence chiefs stated in January 2023 there were up to 50,000 Wagner fighters in Ukraine;<sup>169</sup> the United States Government provided further detail, estimating around 10,000 contractors and 40,000 convicts.<sup>170</sup>

27. Prigozhin’s willingness to admit his role in founding the Wagner Group<sup>171</sup> and his arguments with the Russian Ministry of Defence over the supply of ammunition to Wagner fighters<sup>172</sup> were some of the most public signs that the network no longer felt the need to exist in the shadows.<sup>173</sup> The Russian state celebrated Wagner fighters as patriots. In November 2022, the Russian dissident, Mikhail Khodorkovsky, told of their increased popularity in the war, as “people believe that the alternative to this [using a PMC] would be conscripts”.<sup>174</sup>

165 Stated in the designation of the Wagner Group in UK Government, [The UK Sanctions List](#) (ODT format accessed 7 July 2023). See also [Q99](#) [Mikhail Khodorkovsky]; Dossier Center ([WGN0009](#)) paras 6–8

166 Center on Terrorism, Extremism, and Counterterrorism - Middlebury Institute of International Studies ([WGN0023](#)). Similarly, Ben Fender (Director, Eastern Europe and Central Asia, FCDO) stated: “it is even more front and centre than it has been”. [Q143](#)

167 [Q197](#) [Leo Docherty]

168 A former fighter told us, since February 2022, “... the scale and volume of deliveries to PMC Wagner from the Russian Ministry of Defence has increased significantly. Moreover, the regular forces have provided Prigozhin with combat aircraft and the opportunity to use airfields and the air traffic control service of the Russian Aerospace Forces.” Anonymous ([WGN0026](#))

169 Ministry of Defence (via Twitter), ‘[Defence Intelligence update on the situation in Ukraine - 20 January 2023](#)’ (accessed 17 July 2023)

170 [Wagner Group: Putin’s ‘private army’ has up to 50,000 troops fighting in Ukraine, say UK defence chiefs | Evening Standard](#), 20 January 2023

171 [Putin ally Yevgeny Prigozhin admits founding Wagner mercenary group](#), The Guardian, 26 September 2022

172 [Timeline: Prigozhin’s Escalating Standoff With Russia’s Military - The Moscow Times](#), 24 June 2023

173 [Russia’s private military contractor Wagner comes out of the shadows in Ukraine war | Russia | The Guardian](#), 7 August 2022

174 [Q102](#)

28. The high rate of attrition among Wagner fighters in battles in Ukraine led some to call them “cannon fodder”<sup>175</sup> and to highlight their “suicidal tactics”.<sup>176</sup> In January 2023, the head of the charity Russia Behind Bars estimated that, of the fighters that the network had recruited from Russian prisons, around 80% were dead or missing.<sup>177</sup> Speaking of Wagner fighters’ activities in Ukraine, the Parliamentary Under Secretary of State (Europe), Leo Docherty MP, said:

Their appalling and obvious brutality, which they themselves celebrate, diminishes their status, their deniability and their brand, and therefore their utility and attractiveness as a partner.<sup>178</sup>

He added, however, that Wagner’s business model remains “potent”.<sup>179</sup> Even if that is the case, Wagner fighters do not always appear to be particularly competent.

### National security implications

29. The Wagner Network’s activities affect the UK’s national security. Looking first to our near neighbourhood, its fighters are directly participating in the renewed illegal invasion of Ukraine. The network’s activities in other countries are also believed to be assisting the financing of the Russian war machine (paragraph 50). The Prime Minister has said that

Ukraine’s security is all of our security. Russia’s invasion and continuing occupation of Georgia, invasion and occupation of Crimea, threats to the UK homeland and attempts to destroy Ukraine are assaults on European security<sup>180</sup>

Wider security consequences of the Wagner Network’s activities include:

- **Risk to relations with nations that uphold the rules-based international order:** Wagner activities may undermine the viability of UK Embassies, particularly in Africa. Russian influence—including via likely Wagner influence operations—significantly degraded France’s diplomatic relations with many African

175 [Wagner POW recruited from Russian prison ‘used as cannon fodder’: Life on the frontline](#), The Telegraph, 20 May 2023; [Cannon Fodder for “Putin’s Chef” | Wilson Center](#), 9 January 2023

176 [Wagner Group insider reveals desperate tactics as convicted prisoners are sent to die in waves | Daily Mail Online](#), 4 February 2023

177 Meduza, [‘Russia Behind Bars: Wagner Group’s losses 80 percent of 50K inmate-recruits’](#), 23 January 2023 (accessed 17 July 2023)

178 [Q223](#)

179 [Q223](#)

180 HM Government, Integrated Review Refresh 2023: Responding to a more contested and volatile world, [CP 811](#), March 2023, p 3

countries.<sup>181</sup> The FCDO acknowledged that “Wagner have had a clear effect on our ability to partner” in Mali.<sup>182</sup> Anti-France campaigns built on pre-existing opposition to the country, due to its colonial legacy. The UK may be similarly vulnerable.

- **Regional instability:** The breakdown of national order can have major regional consequences and Wagner activities can make this more likely. In April, conflict broke out in Sudan, which resulted in the displacement of nearly 3 million people internally and across borders.<sup>183</sup> Wagner activities were a contributory factor to the breakdown of order in Sudan. Within Africa, where the network has its most extensive geographic footprint, the presence of Wagner troops increases the likelihood of violence (including gender-based violence), corruption, autocracy, conflict escalation, the displacement of people, and greater competition over resources.<sup>184</sup> All of these go against the desire of the UK Government to enhance stability, reduce fragility and counter threats to UK nationals abroad. Migratory flows can increase pressures on neighbouring countries, which themselves may be fragile or conflict-affected.
- **Threats to the international order:** The UK Government believes that countries have a “shared higher interest in an open and stable international order”,<sup>185</sup> but use of malign proxy groups in warfare weakens this. There may also be risks to the UK of being seen not to stand up for its values.
- **Emboldening of violent groups:** The failure of the Wagner Network to effectively counter terrorist or insurgent groups can allow hostile groups to obtain further advantage, secure more weapons and consolidate (or even gain) territories. We also received evidence from a former Wagner fighter suggesting that Prigozhin once bought a batch of weapons and ammunition directly from Hezbollah.<sup>186</sup>

30. **There are serious national security threats to the UK and its allies of allowing the network to continue to thrive, not to mention devastating human consequences, including contributing to the refugee crisis for example, Sudan.**

31. **Over the past year and a half, Russia’s illegal invasion of Ukraine has eroded the Wagner Network’s deniability and Prigozhin’s public arguments with the Russian**

181 French troops have been deployed to West Africa since 2013 as part of efforts to fight jihadist groups. However, in June 2021, France suspended its aid and military cooperation with the Central African Republic, citing “massive disinformation campaigns” against the French. It withdrew its final troops from CAR in December 2022. In Mali, following deteriorating relations with the Government since 2020, France announced that it would withdraw all its troops from Mali in 2022. In April 2022, France accused the Wagner Network of staging a ‘French atrocity’ in Mali, which falsely implicated France in leaving behind mass graves. In January 2023, the French government announced that it would withdraw its forces from Burkina Faso within a month, following a request from the national government. It also stated that it would withdraw its ambassador there. [France suspends aid, military support for Central African Republic](#), Reuters, 9 June 2021; [CAR citizens react to departure of French troops](#), Africanews, 16 December 2022; UN ends peacekeeping force in Mali, Research Briefing 9827, House of Commons Library, 3 July 2023, p 9; [France says Russian mercenaries staged ‘French atrocity’ in Mali](#), The Guardian, 22 April 2022; [Burkina Faso: France recalls ambassador and will withdraw military forces](#), CNN, 26 January 2023

182 Q219 [Ben Fender]

183 IOM, ‘[Nearly 3 Million Displaced by Conflict in Sudan](#)’, 6 July 2023 (accessed 17 July 2023)

184 On these general effects, see Q60 [Sorcha MacLeod]

185 HM Government, Integrated Review Refresh 2023: Responding to a more contested and volatile world, [CP 811](#), March 2023, para 13

186 Anonymous ([WGN0026](#))

Ministry of Defence confirmed the network's long-suspected links to the Russian state. The brutality of its fighters in Ukraine is appalling but not atypical. So long as the network survives in some form, we believe that countries may still turn to it in future. Many leaders—mostly in insecure environments in Africa—are likely already to have known the price of engaging the network when they decided to work with it.

*32. We recommend that the Government explicitly states that it opposes the co-operation of any country with the Wagner Network, or future iterations thereof, due to the security threats of the 'Wagner model' of business and governance. Where countries can be incentivised not to partner with the network or to re-engage after partnering with it, they should be. National governments that collude with the Wagner Network to breach UN sanctions, or that take no steps to protect their populations from Wagner-perpetrated atrocity crimes, should face financial and diplomatic consequences, where appropriate.*



## 2 Responses to the Wagner Network

### The UK's general response

33. In February, the Minister told us that “we must treat [the Wagner Network] very seriously as a destabilising threat”.<sup>187</sup> The UK Government’s response focuses on Ukraine, which is the Wagner Network’s “main theatre of operations”.<sup>188</sup> The Minister called the UK’s lethal aid and support to the Ukrainian military “front and centre of our effort”.<sup>189</sup> As of 23 May 2023, the UK was the second largest donor of military assistance to Ukraine and had committed £4.6 billion so far.<sup>190</sup> Calling it “gruesome”, Christo Grozev of Bellingcat told us that “Ukraine is doing part of the job for all of us now” by killing so many Wagner fighters on the battlefield.<sup>191</sup>

34. In addition to defence support to Ukraine, the UK is responding to the Wagner Network via:

- sanctions (see paragraphs 43–61),
- bilateral and multilateral diplomacy,<sup>192</sup> including work with partner states on “nation building and investing in institutions”,<sup>193</sup>
- ministerial statements<sup>194</sup> of condemnation;<sup>195</sup> and
- tracking activity by the Ministry of Defence and the Foreign Office.<sup>196</sup>

The UK has also committed to [emphasis added]:

a new approach to countering state threats below the threshold of armed conflict, organising cross-government activity into four lines of effort: **protecting** ourselves, our allies and partners from the impact of this activity; **engaging** domestically and internationally to raise awareness of it and to deepen cooperation on countering it; **building a deeper understanding** of states’ activity and how to respond effectively; and **competing directly** with these states in creative and assertive ways, when appropriate.<sup>197</sup>

187 [Q223](#)

188 [Q108](#)

189 [Q108](#)

190 Military assistance to Ukraine since the Russian invasion, Research Briefing [9477](#), House of Commons Library, 23 May 2023, p 4

191 [Q59](#)

192 The UK raised concerns directly with the Russian, Libyan and Sudanese authorities. The Government has also said it is working closely with international partners to counter the malign use of such proxies by Russia and it aims to “build consensus around responsible state behaviour and competition and promote understanding globally about the risks that PMCs acting as state proxies pose to international security and stability.” Foreign, Commonwealth and Development Office ([WGN0025](#)) section 4; PQ UIN [59567](#) [on Sudan: Gold], Answered on 18 October 2022

193 [Q108](#) [Leo Docherty]

194 For instance, the FCDO’s written evidence notes that the Secretary of State for Defence has spoken out about Wagner activities in Africa, the Middle East and Ukraine; FCDO Minister Ford expressed concern over Wagner presence in Mali.

195 Foreign, Commonwealth and Development Office ([WGN0025](#)) section 4

196 Foreign, Commonwealth and Development Office ([WGN0025](#)) section 5

197 HM Government, Integrated Review Refresh 2023: Responding to a more contested and volatile world, [CP 811](#), March 2023, para 16

The details of this new approach are not yet clear. Some aspects of the UK response are unlikely to be public, for example, activity to counter malign Russian disinformation.<sup>198</sup>

### **A focus on Ukraine, not Africa**

35. Given that Ukraine is “front and centre”, we asked the Department at what point the network’s activities in other countries should become a point of interest for the UK Government, given the negative effects of its presence and the likely use of resources from African operations to fund Russia’s renewed illegal invasion of Ukraine. The FCDO did not directly answer. Instead, it re-emphasised the use of sanctions and noted:

We are stepping up what we are doing inside Government on this. We have, frankly, much more activity inside Government aimed at understanding Wagner and trying to take steps against it than we did six months ago.<sup>199</sup>

36. Mikhail Khodorkovsky—a Russian dissident, former senior businessman, and the founder of the Dossier Center—suggested that the UK and its allies under-estimated the significance of the network’s activities in Africa.<sup>200</sup> In some cases, it is not clear that the disruptive and destabilising influence of the Wagner Network has informed important decisions over the UK’s policy towards specific countries and regions:

- In March 2021, wider aid cuts led to the premature ending of a £2.6 million UK-funded programme designed to foster stability in Sudan,<sup>201</sup> a country where the Wagner Network had been involved since 2017. We disagree with the Foreign Secretary that there is no connection between ODA expenditure and the conflict in Sudan.<sup>202</sup>
- In late 2022, the UK, along with many other countries,<sup>203</sup> announced that it would withdraw its peacekeeping forces from Mali, ending involvement earlier than expected. Wagner involvement appears to have contributed to this decision.<sup>204</sup> It is not clear what efforts the UK made to encourage the Malian authorities to allow the UN Mission to operate freely. The decision to withdraw was taken collectively via the National Security Council, via a “write-round process initiated by the Defence Secretary”. We do not know whether FCDO officials raised alternatives to withdrawal for discussion with the Ministry of Defence.<sup>205</sup>

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198 “The National Security Bill will create a more challenging operating environment for states and other actors who seek to undermine UK interests, and we will make use of the full range of powers available to us – including considering proscription – to tackle the threats we face from organisations such as Wagner. We will also continue to develop our broader deterrence and defence toolkit, including information operations and offensive cyber tools, and make greater use of open source information alongside our intelligence capabilities.” HM Government, Integrated Review Refresh 2023: Responding to a more contested and volatile world, [CP 811](#), March 2023, para 19(iv)

199 [Q199](#) [Ben Fender]

200 [Q107](#) [Mikhail Khodorkovsky]

201 The figures in the text specifically refer to CSSF funding. [UK agrees to review if aid cuts left it ‘off guard’ in Sudan](#), Devex, 1 June 2023

202 Oral evidence taken on 12 June 2023, HC (2022–23) 171, [Q529](#) [James Cleverly]

203 For example, France, Sweden, Germany. See UN ends peacekeeping force in Mali, Research Briefing [9827](#), House of Commons Library, 3 July 2023, p 9

204 UK Government, ‘[Minister for the Armed Forces statement on the UN Peacekeeping Mission in Mali](#)’ 14 November 2022 (accessed 17 July 2023)

205 [Correspondence with the Parliamentary Under-Secretary of State \(Europe\) following up on the FAC evidence session on 6 February 2023, dated 28/02/2023 and 09/02/2023](#)

### Cross-departmental working

37. Responsibility for responding to the Wagner Network sits across several departments within the UK Government and reaches across multiple directorates within the FCDO. Among departments, the FCDO and Ministry of Defence receive the greatest focus in the Government’s written evidence to this inquiry. However, relevant powers also sit within:

- the Home Office, which has the power to proscribe organisations as terrorist entities and to ban foreign nationals from entering the UK when “conducive to the public good”;<sup>206</sup> and
- the Treasury, which has day-to-day decision-making power over sanctions implementation measures, including sanctions waivers.<sup>207</sup>

Ben Fender (Director, Eastern Europe and Central Asia, FCDO) told us:

Day to day, Government are coming together to look at Wagner as a problem, because we think it is a growing issue.<sup>208</sup>

It has not been possible during this inquiry to ascertain which minister has lead responsibility. The Government’s evidence to this inquiry arrived several months late, due to the challenges of obtaining input from multiple departments.<sup>209</sup>

38. Mechanisms to enable departments to work together include, at the highest level, the National Security Council, a Cabinet committee dedicated to the discussion of national security issues “in the round” and “in a strategic way”.<sup>210</sup> Among civil servants, the Russia Unit within the FCDO brings together officials from the Foreign Office and other departments.<sup>211</sup> It is intended to support “joined-up policy” on the Wagner Network and other Russia-related issues.<sup>212</sup> In February, the Minister said it had surged resources to this unit in the past year.<sup>213</sup> Referring to this unit, the Minister told us:

I am confident that we have a joined-up cross-Whitehall mechanism for ensuring the best possible execution of our policy...<sup>214</sup>

He added that:

...there are more people looking at this as part of a very defined effort over the last year—to surge resource into a very considerable ramping up of our efforts around Ukraine and wider issues...<sup>215</sup>

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206 PQ UIN [HL3473](#) [on Wagner Group: Sanctions], Answered on 30 November 2022

207 “OFSI is the authority for implementing the UK’s financial sanctions on behalf of HM Treasury. OFSI helps to ensure that financial sanctions are properly understood, implemented and enforced in the UK.” UK Government, ‘[Russia sanctions: guidance](#)’, 3 July 2023 (accessed 17 July 2023)

208 [Q125](#)

209 The original deadline for written evidence was May 2022; the Government’s evidence was submitted in October 2022.

210 UK Government, ‘[National Security Council](#)’ (accessed 17 July 2023)

211 [Q135](#) [Ben Fender]

212 [Q114](#) [Leo Docherty]. Ben Fender elaborated that the Unit “convenes people from human rights, Africa, and the multilateral people who look at policy on private military companies, and so on”. [Q130](#)

213 [Qq114–115](#)

214 [Q128](#)

215 [Q117](#)

39. Supporting Ukraine militarily is the Government’s priority when it comes to countering the Wagner Network. We fully support the continued supply of defence assistance and wider support to Ukraine as it fights to liberate itself from Russian illegal occupation. Through this, the UK has enabled Ukrainian Armed Forces to challenge Wagner fighters directly, often resulting in a high rate of attrition.

40. However, it is a significant failing to see the Wagner Network primarily through the prism of Europe, not least given its geographic spread, the impact of its activities on UK interests further abroad, and the fact that its wealth creation sits largely in Africa.

41. The Government believes that it is becoming more important to consider the network’s activities, although it did not say where it would do so. In February 2023, the FCDO told us there was now “much more activity” in Government to understand and respond to the network than there had been six months earlier. The Government also said it had surged resources into the Russia Unit over the last year.

42. The Wagner Network began its activities in 2014. By early 2022, when the Government began to invest greater resource in understanding the network, Wagner fighters had already undertaken military deployments in at least seven countries. It is deeply regrettable that it took this long, and that the Government continues to give so little focus to countries beyond Ukraine. This leaves us even less prepared to respond to the evolution of this notoriously shape-shifting network.

## Specific actions taken by the UK Government

### *Tracking and sanctioning*

43. The FCDO’s geographical Directorates track and respond to the activities of ‘Private Military Companies’, working with the Ministry of Defence.<sup>216</sup> At a minimum, this work covers the network’s military activities in Ukraine.<sup>217</sup> The intelligence on its activities in Africa appears more limited. Ben Fender acknowledged a lack of “granular understanding” of the network’s numbers in Africa, but added: “it doesn’t look as if it is growing—it is certainly not growing fast”.<sup>218</sup> The Minister emphasised the need not to over-estimate the

216 The Minister of Defence “works across HMG to enable evidence sharing to support sanctioning of those involved in malign PMC activity”. Foreign, Commonwealth and Development Office (WGN0025) sections 4–5

217 Such activities have been the regular subject of public updates from Defence Intelligence since the start of the full-scale Russia-Ukraine war. For example, Ministry of Defence (via Twitter), ‘[Defence Intelligence update on the situation in Ukraine – 28 March 2022](#)’ (accessed 17 July 2023); Ministry of Defence (via Twitter), ‘[Defence Intelligence update on the situation in Ukraine – 3 February 2023](#)’ (accessed 17 July 2023)

218 [Q109](#)

network's importance.<sup>219</sup> Contributors pushed for the Government to invest in “network analysis tools and systems”, to better understand and respond to organisations like the Wagner Network.<sup>220</sup>

44. Sanctions are one tool that the UK Government uses to respond to the Wagner Network, with 39 geographic and thematic regimes for making designations.<sup>221</sup> Sanctions can include asset freezes (for individuals and entities), trust services sanctions<sup>222</sup> (for individuals and entities) and travel bans (for individuals). The Minister told us in February that that UK sanctions against Wagner have “focused on high-impact targets and disrupting its overall network”; the Government is “considering further sanctions,” but makes it “a matter of policy not to speculate on whether or not we are considering specific cases.”<sup>223</sup> There are now 150 staff members in the FCDO's Sanctions Taskforce (“treble its previous number”), as well as many others in Government who work “substantially or partially on sanctions policy and implementation.”<sup>224</sup>

45. According to the Dossier Center, identifying and sanctioning all Wagner-linked individuals and entities is “almost impossible”, due to the “efforts employed by [Prigozhin's] staff to disguise their activities and companies”.<sup>225</sup> The sanctions process is “comparatively slow” relative to the time needed to register a new company,<sup>226</sup> and Prigozhin's affiliates have “managed to evade sanctions through continuous turnover”.<sup>227</sup> Wagner operatives have also changed their names to avoid sanctions, and there is evidence that officials of at least one host government have assisted Wagner-linked individuals to register companies in a way that obscures their true connection.<sup>228</sup>

46. The Government told us at the end of February that it had sanctioned Yevgeny Prigozhin, as well as a further seven Wagner-linked individuals, including Dmitri Utkin, commanders in Syria and officials supporting Wagner recruitment in Russian prisons.<sup>229</sup> To understand the level of sanctioning of Wagner actors, we compared and analysed the official sanctions lists of the United Kingdom, the United States and the European Union,

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219 “...it is easy to overstate their success. [...] I think it is easy to overstate their growing impact [...] they are very definitely a global force for bad and instability, but at the same time, we mustn't assign them too much success...” [Q109](#)

220 Protection Approaches ([WGN0024](#)) para 4.1: “Network analysis brings to light the full spectrum of actors that enable the perpetration of violence, including supply chains, human trafficking networks, the arms trade, media outlets, armed groups, and communities themselves. Network analysis allows actors to target those weak spots – be they the financial flows of private companies such as the Wagner group, their communication systems, or other forms of enablement. Such analysis of private and proxy armed actors should inform the application of travel bans; sanctions; accountability the design of programming; and wider strategy.” See similar points within [The Sentry \(WGN0017\)](#) para 27

221 [Correspondence with the Parliamentary Under-Secretary of State \(Europe\) following up on the FAC evidence session on 6 February 2023, dated 28/02/2023 and 09/02/2023](#)

222 Since 21 March 2023, the Government has also used ‘trust services sanctions’ to make it harder for specific sanctioned individuals and entities to access services that would reduce the impact of sanctions on them. OFSI, ‘[Trust Services Sanctions update](#)’, 21 March 2023 (accessed 17 July 2023)

223 [Correspondence with the Parliamentary Under-Secretary of State \(Europe\) following up on the FAC evidence session on 6 February 2023, dated 28/02/2023 and 09/02/2023](#)

224 The others working on this include: “others across the FCDO in our overseas network, Trade Directorate, geographic and thematic directorates and others across Government”. Foreign, Commonwealth and Development Office ([WGN0025](#)) section 5

225 Dossier Center ([WGN0009](#)) para 57

226 Dossier Center ([WGN0009](#)) para 54

227 Dossier Center ([WGN0009](#)) para 43

228 Dossier Center ([WGN0009](#)) paras 55–56

229 [Correspondence with the Parliamentary Under-Secretary of State \(Europe\) following up on the FAC evidence session on 6 February 2023, dated 28/02/2023 and 09/02/2023](#)

as of 7 July 2023.<sup>230</sup> We identified 44 individuals and 37 entities that had been sanctioned—in one or more of these three jurisdictions—for their direct connection to the Wagner Network, or for relevant activities in support of Prigozhin.<sup>231</sup> According to our analysis (presented in Appendix 1), the UK has sanctioned Wagner-linked targets at a lower rate than either the EU or the US. Specifically:

- **Among the individuals identified**, the UK has sanctioned 15 of 44, i.e. around one in three (34%). In comparison, the US has sanctioned 61% and the EU 68%.
- **Among the entities identified**, the UK has sanctioned 5 out of these 37 (13.5% sanctioning rate). By comparison, the EU has sanctioned 16 of these entities (43%) and the US has sanctioned 30 (81%).

Beyond these 44 individuals and 37 entities, the UK may have applied sanctions to additional targets, without making clear their association to the Wagner Network or to Prigozhin when doing so. When questioned on this point, the Minister appeared unsure as to why the UK may have sanctioned fewer individuals and entities than the US and EU, suggesting it may be because they are “larger”.<sup>232</sup> He added:

We work with our allies. If you have a list there that you think we should be seeing, I imagine that that list will be considered by our sanctions team.<sup>233</sup>

In subsequent correspondence, the Minister disputed that the UK has sanctioned fewer people than the United States. However, the supporting statistics he provided referred to individuals sanctioned under the wider Russia sanctions regime, rather than those sanctioned specifically for their role within the Wagner Network.<sup>234</sup> Appendix 1 provides our own list for the FCDO’s consideration. We acknowledge that there are specific reasons why the UK may have sanctioned at a lower rate than these allies.<sup>235</sup>

47. The Government further implied that its limited sanctioning of specific Wagner-linked entities is irrelevant. It stated that its designation of the ‘Wagner Group’ in 2022 automatically freezes the assets of entities that the Wagner Group owns or controls.<sup>236</sup>

230 UK Government, [The UK Sanctions List](#) (ODT format accessed 7 July 2023); Office of Foreign Assets Control, [Specially Designated Nationals and Blocked Persons List](#), 29 June 2023 (PDF accessed 7 July 2023); separate EU decisions (see Appendix 1).

231 This is a non-exhaustive list. It is challenging to count all the sanctions that the UK and its partners have applied to ‘Wagner-linked’ individuals and entities. Some individuals and entities linked to the Wagner Network may be sanctioned for other reasons, beyond this association.

232 [Qq150–151](#)

233 [Qq158](#)

234 [Correspondence with the Parliamentary Under-Secretary of State \(Europe\) following up on the FAC evidence session on 6 February 2023, dated 28/02/2023 and 09/02/2023](#). It is possible that there is overlap between those sanctioned under the Russia regime and those within in the Wagner Network, even if the Wagner links are not explicit in their designation.

235 A challenge may be information-sharing. “If, for example, the US or another G7 counterpart has imposed sanctions, they will often do it based on their own analysis. Some of that analysis will be able to be shared across borders; some of it will not, to protect individuals who have provided the evidence. What you have within a sanctions designation, in general, is what is available if it goes to public scrutiny or into a court scrutiny environment. You also have the evidence underneath that, and sometimes the evidence cannot be shared across borders. That has, in the past, proved to be an issue in imposing multilateral sanctions.” Oral evidence taken on 8 March 2022, HC (2021–22) 1089, [Q79](#) [Dr Walker]

236 “By designating Wagner Group, our asset freeze also applies to any other entity it owns or controls. The US has designated a number of entities that it considers controlled by Wagner Group; entities controlled by Wagner are already subject to a UK asset freeze through our ownership and control provisions”. [Correspondence with the Parliamentary Under-Secretary of State \(Europe\) following up on the FAC evidence session on 6 February 2023, dated 28/02/2023 and 09/02/2023](#).

However, the Wagner Network encompasses a complex web of entities (paragraph 3). It is unclear how organisations that implement Government sanctions, such as banks and other financial institutions, are expected to know which entities are within their scope.

48. Witnesses were sceptical of the level of effort that national governments—including the UK—had devoted to mapping and tracking the Wagner Network,<sup>237</sup> with the exception of Ukraine.<sup>238</sup> Christo Grozev judged that sanctions on Prigozhin himself are “maxed out”. However, he believed that

stopping all of those [Prigozhin-linked] people from being able to travel internationally—at least to the western world—might, incrementally, have a much bigger impact than slapping one more sanction on Prigozhin<sup>239</sup>

Grozev believed a travel ban could be a meaningful deterrent, because many in the Wagner Network see their involvement as transactional.<sup>240</sup> He felt this tool could be stronger if the UK worked with Turkey: a popular holiday destination for many Russians.<sup>241</sup> The Centre for Information Resilience, the not-for-profit organisation that carried out open-source research for this inquiry, also argued in favour of expanding sanctions targets, noting:

Sanctions are rarely applied to individuals working as civilian specialists in key fields, for example mineral extraction, where Wagner-affiliated entities employ specialists in fields such as geology, gemology or logistics. Whilst some may not know who their ultimate benefactors are, these ‘faceless’ individuals make the wider network’s activities possible. Similarly, those who act as frontmen – directors of key companies, for example – are also largely ignored as avenues of research or accountability.<sup>242</sup>

49. Alongside calls for the UK to apply further sanctions to the Wagner Network,<sup>243</sup> some witnesses expressed doubt over the impact of the sanctions imposed to date.<sup>244</sup> An FT investigation published in February 2023 analysed corporate records of Prigozhin-linked companies and concluded that Prigozhin had generated over \$250 million from his commercial empire in the four years prior to the full-scale illegal invasion of Ukraine, despite ever-increasing sanctions on him.<sup>245</sup> In February, the Minister told us he was “confident” that there were no significant assets of the Wagner Network in the UK that

237 Christo Grozev of Bellingcat stated that he assumes governments are generally incompetent when it comes to tracking individuals linked to the Wagner Group. To justify this assertion, he gave the example of a “known persona” in the Wagner Group, who it took his team around two weeks to identify, but who had been issued with visas by multiple European governments. Grozev stated that “nobody has really mapped out the whole structure and kept tabs on it”. Sean McFate agreed that there is limited tracking of the Network, stating that “the Five Eyes have not taken this issue seriously until maybe very recently”. [Q30](#). See also Protection Approaches ([WGN0024](#)) para 2.2

238 Christo Grozev believed that Ukraine was exceptional (relative to other countries) for its in-depth work to map the Wagner Group, but that, as it is fighting a war, it now lacks resources. He judged that “any other country that wished to have a complete mapping might be able to do it at a much better rate” [Q30](#).

239 [Q49](#)

240 [Qq 55, 57](#)

241 [Q57](#)

242 CIR open-source research

243 For example, Democracy & Human Rights Foundation ([WGN0011](#)); The Sentry ([WGN0017](#)); Center on Terrorism, Extremism, and Counterterrorism - Middlebury Institute of International Studies ([WGN0023](#)); Dr. Marc DeVore (Senior Lecturer at University of St. Andrews); Dr. Kristen Harkness (Senior Lecturer at University of St. Andrews); Professor Andrew Orr (Associate Professor at Kansas State University); Mr. Marcel Plichta (Ph.D. Candidate at University of St. Andrews) ([WGN0008](#))

244 [Q67](#) [Jason Blazakis]; [Q55](#) [Sean McFate]

245 [Wagner leader generated \\$250mn from sanctioned empire](#), FT, 21 February 2023

could be frozen.<sup>246</sup> Furthermore, the existence of sanctions is no guarantee of their implementation and enforcement: a point we have made in previous reports.<sup>247</sup> The Sentry called for the UK to ensure the effectiveness of its sanctions:

The UK must deploy a cross-government approach, including the NCA, FCDO, and HM Treasury, to effectively implement these sanctions and ensure that they have the maximum impact and lead to the actual seizure of UK based assets, travel bans, and the denial of services. This must be coupled with effective in-country and international messaging that clearly sets out the reason for and aim of the sanctions.<sup>248</sup>

50. There is concern that the financial benefits of the Wagner Network’s activities may be reaching the Russian government. Professor Blazakis told us last November that the Wagner Network had “become instrumental in Putin’s ambitions in gaining access to natural resources throughout Africa”, adding: “whether gold, oil or diamonds, the Russian Federation has acquired fungible assets that keep the war machine churning in Ukraine”.<sup>249</sup> It is also unclear whether the Government has assessed the likelihood that Wagner Network activities have helped Russia to evade sanctions:<sup>250</sup> The Minister was “sure that the Department is tracking that”, but said that he had no “particular knowledge” of such activity.<sup>251</sup>

51. On 23 January 2023, it was reported that HM Treasury—specifically, the Office of Financial Sanctions Implementation (OFSI)—had granted special licenses to Yevgeny Prigozhin to enable him to circumvent UK sanctions against him and to launch a legal campaign against Eliot Higgins, founder of Bellingcat.<sup>252</sup> The aim of this case appears to have been to rebut allegations made by Bellingcat against Prigozhin, which played a role in his original sanctions designation. The Treasury approved a British firm, Discreet Law, to work on this case, and enabled Prigozhin to pay the fees. Responding to an Urgent Question on 25 January 2023, Treasury Minister James Cartlidge MP noted that such decisions are routinely taken by officials in OFSI, without ministerial oversight.<sup>253</sup> He noted that, under the UK’s sanctions regime, there can be circumstances when frozen assets are used to pay for sanctioned individuals’ legal fees, due to the universal right to legal representation. On 30 March 2023, the Treasury Minister, Baroness Penn, announced that, when assessing future applications for sanctions waivers, OFSI takes “a presumption that legal fees relating to defamation and similar cases will be rejected”.<sup>254</sup> She also noted that updates to the decision-making framework would clarify “when it is appropriate for Ministers to take these decisions personally, or where officials can take these decisions”.

52. The FCDO’s direct involvement in Treasury decisions over sanctions waivers appears limited. The Foreign Office had no involvement, for example, in OFSI’s decision over

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246 [Qq155–156](#) [Leo Docherty]

247 Foreign Affairs Committee, Second Report of Session 2022–23, [The cost of complacency: illicit finance and the war in Ukraine](#) HC 168, paras 29–30. See, for example, [Three Russians under sanctions own UK property via overseas entities](#), The Guardian, 31 January 2023

248 The Sentry ([WGN0017](#)) para 27

249 [Q67](#)

250 [Q161](#) [Leo Docherty]

251 [Q162](#) [Leo Docherty]

252 [How Rishi Sunak’s Treasury helped Putin ally sue Bellingcat’s Eliot Higgins](#), openDemocracy, 23 January 2023

253 HC Deb, 25 January 2023, [col 1013](#) [Commons Chamber]

254 Statement UIN [HLWS686](#) by Baroness Penn [on Office of Financial Sanctions Implementation update], 30 March 2023



the general conditions under which persons and entities sanctioned under the Russia Regulations and Belarus Regulations could pay legal fees to UK service providers.<sup>255</sup> In the Prigozhin case, the Minister was not confident that the FCDO had been involved in OFSI's decision, although he thought it "extremely likely".<sup>256</sup> When pressed on how the FCDO monitors sanctions waivers, he noted that there would be "communication between Departments".<sup>257</sup> He indicated that relevant advice on sanctions waivers would come to him via officials, but clarified that he had received "none specifically".<sup>258</sup> While defending the joined-up nature of UK policy in general, he conceded:

This case is a cause for reconsideration, and I think we will reflect and work with Treasury colleagues to consider what might have been done differently.<sup>259</sup>

53. In relation to the Prigozhin case, the Centre for Information Resilience stated:

Though Wagner-affiliated individuals likely have property and investments held through proxy companies in the UK and EU, their physical (and most profitable) activities take place outside of these territories. This means there is limited data available on sanctions evasion. It is clear, however, that Prigozhin and his affiliates see value in attempting to evade certain sanctions in the UK and EU, particularly where it relates to their reputation.<sup>260</sup>

54. **We have received no evidence of any serious effort by the Government to track the Network's activities in countries other than Ukraine. We recommend that the Government improve its intelligence-gathering on the Wagner Network's activities in a wider range of countries, particularly in the countries where we have medium-confidence of attempts at Wagner involvement. This intelligence should make use of network-mapping capabilities. A cross-Government taskforce would be particularly useful as the Wagner Network transforms, following the attempted march on Moscow.**

55. **The UK's efforts to sanction the Wagner Network are underwhelming in the extreme, compared to those of the European Union and the United States. The responses from the Minister leave us with limited confidence that the UK coordinates effectively with its allies to share intelligence on the Wagner Network and to impose sanctions on relevant individuals and entities. Equally, the Government left us with very little confidence that those British nationals pursued by the Wagner Network receive any meaningful support from the British Government; indeed, they were made more vulnerable due to decisions made from within Government.**

56. **The Government claimed that its sanctioning of the 'Wagner Group' automatically covered all the entities that the Group owns or controls. This approach underappreciates the complexity of the network. It is also completely unrealistic. It leaves both enforcement agencies and implementing organisations, such as banks, estate agents and other financial services, with no idea which affiliated entities they should target. This makes it possible, if not probable, that Wagner-linked entities are continuing**

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255 Specifically, General Licence INT/2022/2252300. [Correspondence with the Parliamentary Under-Secretary of State \(Europe\) following up on the FAC evidence session on 6 February 2023, dated 28/02/2023 and 09/02/2023](#)

256 [Q167](#)

257 [Q170](#)

258 [Q173](#)

259 [Q182](#)

260 CIR open-source research

to benefit from access to the UK's financial markets. The lack of certainty about this denotes a scandalous failure to exercise due diligence. At its worst, this could mean the UK is inadvertently undermining the efforts of our allies.

57. The Minister had no specific knowledge of work within his Department to analyse whether Wagner activities undermine the financial impact of UK sanctions on the Russian war machine. Despite finding it “likely”, he could not confirm that the FCDO had had any input to HM Treasury's unwise decision to issue sanctions waivers to Prigozhin. Despite assuring us that the Treasury and FCDO communicate over sanctions waivers in general, the Minister himself had not received any official advice specifically on sanctions waivers. Given his position as the Parliamentary Under Secretary of State for Europe, we would expect him to have an interest and role in questions relating to sanctions waivers linked to Russia and Ukraine. His statements also lead us to question whether the Russia Unit is providing the necessary join-up between the FCDO and Treasury, given the central role of sanctions as a tool of UK foreign policy.

58. *We recommend that the Government move faster and harder in sanctioning Wagner-linked individuals and entities. Specifically, it should:*

- a) *Sanction all individuals and entities provided in Appendix 1, which the United States and European Union have already targeted but which the UK has not;*
- b) *Consider bringing forth sanctions on civilian enablers and corporate ‘frontmen’ for the network’s activities; and*
- c) *Close enforcement gaps.*

59. *We recommend that the Government establishes a specific and regular mechanism for coordinating with the United States and the European Union over Wagner-linked sanctions; it should report back to us on what these mechanisms are, and how frequently and effectively they are being used.*

60. *We further recommend that the Government prioritises introducing and enforcing travel bans for Wagner-linked individuals as a likely deterrent to involvement in the network, in particular working with Turkey, a popular holiday destination for Russians.*

61. In the public interest, we have compiled Wagner-linked names that are already a matter of public record, as identified via our commissioned open-source research (see Appendix 2). In doing so, we hope to challenge the mystique that the Wagner Network cultivated in many countries, make it as difficult as possible for it to operate, create a deterrent effect, and enable the Government to improve its apparently limited understanding of the network. *We implore the Government to urgently assess these names and impose sanctions on these individuals and entities if the necessary threshold is met.*

### **Carrot and stick diplomacy**

If we do not turn up and work with allies [...]—if we do not show up and stay active—then certainly, proxies of this nature do see an opportunity<sup>261</sup>

62. The UK's future foreign policy depends on its ability to form relationships with a wide group of countries, "in the Commonwealth, in the African Union, in ASEAN and elsewhere".<sup>262</sup> When the Wagner Network is involved in a country, it becomes harder for the UK to engage there, both diplomatically and militarily.<sup>263</sup> Although working with the Wagner Network is a sovereign decision of national governments, the UK can seek to influence these decisions.

63. UK diplomats have brought up the network's activities in discussions with national authorities who have engaged with the network.<sup>264</sup> The means by which the UK has sought to dissuade countries from working with the Wagner Network are unclear. Ben Fender (Director, Eastern Europe and Central Asia, FCDO) pointed out that many governments in West Africa are concerned about the Wagner Network's activities in Mali, noting: "I like to think that our diplomacy and our efforts have contributed" to those concerns<sup>265</sup> - but he did not elaborate on the role of UK diplomacy in informing these countries' views. The Government has not provided examples of individual countries that it has successfully deterred from choosing to engage with the network.<sup>266</sup> In other words, in its evidence to our inquiry, the Government was unable to provide any direct evidence of having limited or successfully challenged the Wagner Network's efforts and ambitions in countries where it is invited. The United States is currently working to deter African countries from engaging with the network by sharing intelligence strategically with allies.<sup>267</sup> US officials credited this approach with blunting a planned destabilisation operation in Chad.<sup>268</sup>

64. Another mode of influencing governments' decisions to engage with the Wagner Network may be to offer a 'carrot' in the form of a compelling alternative. The UK's work with partner states on "nation building and investing in institutions" is

critical to the ability of often fragile states to build their own capacity so that they are not subject to the business model of a Wagner-type group<sup>269</sup>

The Minister highlighted the UK's work to strengthen institutions in "much of Africa and other regions"; he judged that the UK military and Foreign Office represent a "very successful agent of institutional state building and improving".<sup>270</sup> Our sister Committee, the International Development Committee, called on the Government in October 2022 to reassess whether a sufficient share of UK aid is reaching communities in fragile and conflict-affected states.<sup>271</sup>

65. In contrast, a 'stick' to influence governments' decisions could be to increase the negative consequences of associating with the network. One such tool would be to

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262 The Foreign Secretary also highlighted the opportunity for the UK to be a "reliable, trustworthy and long term partner" via "investments of faith". UK Government, ['British foreign policy and diplomacy: Foreign Secretary's speech](#), 12 December 2022 (accessed 17 July 2023)

263 [Qq221-222](#) [Leo Docherty]

264 The UK raised concerns directly with the Russian, Libyan and Sudanese authorities. Foreign, Commonwealth and Development Office ([WGN0025](#)); PQ UIN [59567](#) [on Sudan: Gold], Answered on 18 October 2022

265 [Q108](#)

266 [Q108](#)

267 [To counter Russia in Africa, Biden deploys a favored strategy](#), POLITICO, 7 May 2023

268 [To counter Russia in Africa, Biden deploys a favored strategy](#), POLITICO, 7 May 2023

269 [Q108](#) [Leo Docherty]

270 [Q110](#)

271 International Development Committee, Third Report of Session 2022-23, [From Srebrenica to a safer tomorrow: Preventing future mass atrocities around the world](#), HC 149, para 91

proscribe the network as a terrorist organisation.<sup>272</sup> Contributors to this inquiry called for this action,<sup>273</sup> as have other parliamentarians,<sup>274</sup> and expert witnesses provided evidence that the activities of the network already fulfil the UK’s legal threshold for proscription.<sup>275</sup> It was also suggested that making the proscription would have a deterrent effect,<sup>276</sup> as it would “change the cost of doing business”<sup>277</sup> with the network. Stigma from this designation “could be leveraged [...] to limit Wagner’s access to ports, natural resources, and corridors of power that the group has been able to exploit for the benefit of the Russian Federation”.<sup>278</sup> The Dossier Center said:

those supporting [Wagner] in host countries will also be subject to punishment. Moreover, it would restrict the use of European, African and Middle Eastern companies as vehicles for the movement of money, without which Wagner cannot operate. It would also impose greater responsibility on those countries that cooperate with and hire such organisations. It would also make it difficult for employees affiliated with Prigozhin to move around the world<sup>279</sup>

A proscription may also support legal action against Wagner members in British courts,<sup>280</sup> encourage whistle-blowers to come forward,<sup>281</sup> and allow the use of pre-existing international mechanisms of counter-terrorist financing.<sup>282</sup> Risks of a proscription include the possibility that it would drive the network “underground”,<sup>283</sup> as well as causing damage to the UK’s diplomatic ties with affected countries.<sup>284</sup>

66. The media have reported that proscription of the Wagner Group in the UK is imminent.<sup>285</sup> The Government also committed “to use the full range of powers available to us—including considering our robust counter-terrorism powers, such as proscription

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272 Among other things, proscription of a group as a terrorist entity makes it a criminal offence to belong to the organisation in the UK or overseas, to invite support for it or to arrange a meeting in support of it. Proscription also means that the financial assets of the organisation become terrorist property and can be subject to freezing and seizure. Proscribed Terrorist Organisations, Research Briefing [00815](#), House of Commons Library, 23 November 2021, p 6

273 [Q75](#) [Jason McCue]; Dossier Center ([WGN0009](#)) para 58; [Q87](#) [Jason McCue]. Center on Terrorism, Extremism, and Counterterrorism - Middlebury Institute of International Studies ([WGN0023](#)) called for governments to consider it.

274 For example, MEPs and MPs in Canada. [Conservative MPs call for Russia’s Wagner Group to be listed as terrorist entity](#), Western Standard News, 30 January 2023; European Parliament ‘[European Parliament declares Russia to be a state sponsor of terrorism](#)’, 23 November 2022

275 [Q75](#) [Jason McCue]; [Qq76, 91–95](#) [Jason Blazakis]. McCue listed Wagner’s relevant actions, including the planting of explosives around a nuclear facility, assassination attempts on President Zelensky, threats to use chemical and biological weapons, war crimes and the promotion of atrocities.

276 [Qq86–87](#)

277 Center on Terrorism, Extremism, and Counterterrorism - Middlebury Institute of International Studies ([WGN0023](#))

278 Center on Terrorism, Extremism, and Counterterrorism - Middlebury Institute of International Studies ([WGN0023](#))

279 Dossier Center ([WGN0009](#)) para 58

280 [Q87](#) [Jason McCue]

281 [Q87](#) [Jason McCue]

282 Jason Blazakis, [Sanctions: Bringing the Wagner Group and State Proxies into the CTF Fold](#), 2023

283 [Q90](#) [Jason Blazakis]

284 However, Professor Blazakis noted that, despite Iran being listed as a state sponsor of terrorism since 1983, it was still possible for the international community to negotiate the JCPOA. [Qq 79–80](#)

285 For example, [Home Office preparing to proscribe Wagner Group as a terrorist organisation](#), The Telegraph, 3 February 2023

—to tackle the threats we face from organisations such as the Wagner Group”.<sup>286</sup> Despite these signs, the UK Government’s official policy remains not to comment on the possible proscription of the Wagner Network as a terrorist organisation,<sup>287</sup> and UK allies such as the EU and US have also held back from proscription.<sup>288</sup> Professor Blazakis suggested that the UK and Five Eyes countries have been “reticent” to use terrorist proscriptions against groups that are linked to a nation state, and that “precedent is a very difficult line for bureaucrats to cross”, due to its wider implications.<sup>289</sup> It is worth noting that the UK lacks a system for proscribing a country as a ‘State Sponsor’ of Terrorism,<sup>290</sup> as some have advocated for Russia, but the decision not to designate a state actor through terrorism legislation is nevertheless a policy decision, rather than a legal one.<sup>291</sup>

67. Summing up options, Professor Blazakis recommended that the Government: [emphasis added]

consider deploying terrorism proscriptions, expand law enforcement investigations against individuals that facilitate activities on behalf of the Wagner Group, and ratchet up diplomatic efforts to tarnish Wagner’s reputation overseas. Of course, civil society should pursue legal action against known Wagner Group members [...]. **A combination of those activities could still erode Wagner’s effectiveness, but time is becoming short**<sup>292</sup>

68. **There is an opportunity to disrupt the Wagner Network at a time when its future is uncertain. We recommend that the Government seizes this opportunity and works with international partners to deter countries from engaging with the Wagner Network, using a carrot and stick approach.**

69. **As the Government improves its intelligence on the network, it should declassify it strategically and share it with countries that are considering engaging with the Wagner Network, to demonstrate the organisation’s destabilising effects, following the lead of the United States administration.**

70. **The Government should offer a genuinely compelling alternative to priority countries in need of investment and security partnership, in collaboration with partners. Priority countries are especially likely to be neighbouring countries to those where the Wagner Network is engaged. A compelling alternative may involve customising packages of military, aid and trade support to specific countries, particularly in the Sahel region.**

71. **In its response to this report, the Government should set out the factors it will assess in determining whether countries are priorities for UK security partnerships. These factors should include (but not be limited to):**

286 HM Government, Integrated Review Refresh 2023: Responding to a more contested and volatile world, [CP 811](#), March 2023, para 16

287 Oral evidence taken on 12 June 2023, HC (2022–23) 171, [Q508](#) [James Cleverly]

288 [UK poised to label Wagner group terrorists as France urges EU to act](#), The Guardian, 10 May 2023. However, the US has labelled the Wagner Group as a transnational criminal organisation. US Department of the Treasury, ‘[Treasury Sanctions Russian Proxy Wagner Group as a Transnational Criminal Organization](#)’, 26 January 2023 (accessed 16 July 2023)

289 [Q78](#)

290 PQ [UIN88866](#) [on Russia: Terrorism], Answered on 23 November 2022

291 Given the Government’s power to change law.

292 [Q67](#)

- a) *the UK's capacity for influence in a specific country;*
- b) *the level of security challenge faced by a country (in the short, medium and long term);*
- c) *the level of demand for a bilateral/multilateral security partnership within a country;*
- d) *the possible regional implications of the country's 'capture' by a Russian or other malign proxy; and*
- e) *the level of willingness on both sides to uphold transparency and standards of good governance as part of any future partnership.*

72. *The Government should revive its previous commitment to channel 50% of Official Development Assistance to fragile and conflict-affected countries and regions. The Government should also revive its 2019 manifesto commitment to spending 0.7% of the UK's Gross National Income on Official Development Assistance at the earliest opportunity, in light of refugee and asylum pressure in multiple countries.*

73. *As a 'stick', the Government should proscribe the Wagner Network as a terrorist organisation, recognising that—while there are risks of doing so—there are also risks of failing to do so, when the Network appears to meet the legal criteria.*

## 3 What next?

### What next for Wagner?

74. At the time of writing, the situation is fluid. Recent events in Russia fundamentally altered the relationship between Yevgeny Prigozhin and the Russian Government. The network may be consolidating its operations abroad or it may be fighting for its life. Russian media have shown Wagner flags being lowered, suggesting its operations in Russia are winding down. Although the last month has seen significant debate on the future of the Wagner Network,<sup>293</sup> no early signs have yet emerged on its future. The network's heavy reliance on the Russian state for military equipment and logistical support may challenge its combat operations, unless the network can find alternative suppliers of weapons and ammunition.<sup>294</sup> The Russian government may seek to 'nationalise' the network—as we have seen with demands that all fighters sign paperwork to join Russia's standing forces—but whether it can is another question.<sup>295</sup> There is reason to believe that the network will evolve rather than cease its operations altogether, as the Russian state has a vested interest in maintaining it for foreign policy and wealth acquisition purposes. Russia's Foreign Minister Sergey Lavrov has already stated Wagner's operations in Mali and the Central African Republic "will continue".<sup>296</sup> Likewise, a Russian envoy recently reassured General Haftar of Wagner operatives' continued presence in Libya,<sup>297</sup> and Russia remains a committed regional actor in Africa.<sup>298</sup> The network's ties to the GRU may also support its survival.<sup>299</sup> **The last decade has shown that the Wagner Network is highly effective at reconfiguring itself. We expect its activities to continue in some form, as they are too valuable, especially financially, to the Russian state to be lost. The question is not just what happens to the Wagner Network but what happens to a wider set of PMCs in**

293 Some aspects of Prigozhin's media operations have already closed; some Wagner personnel left CAR; there has been a pause in recruitment. See [Prigozhin media group closes following leader's exile from Russia](#), JURIST, 4 July 2023; [Wagner troops leave Central African Republic after 'refusing contracts with Russia'](#), Sky News, 7 July 2023; [Russia's Wagner Group Suspends Recruitment In Wake Of Mutiny](#), Radio Free Europe, 3 July 2023.

294 According to a former fighter, "For PMC Wagner the Russian MOD remains its main supply hub for weapons and ammunition. If this artery is blocked, then PMC Wagner, having used up the available ammunition, will simply lose its ability to conduct combat operations. The base camp of PMC Wagner is located on a Russian military training ground i.e. land belonging to the Ministry of Defence." Anonymous ([WGN0026](#)). See also [Wagner's future in Africa in question after Russian mutiny](#), Financial Times, 28 June 2023.

295 Whether the Russian state could match the salaries of Wagner fighters is a question. Many operatives also feel loyal to Prigozhin personally. ['It is like a virus that spreads': business as usual for Wagner group's extensive Africa network](#), The Guardian, 6 July 2023; [Wagner still recruiting despite mutiny, BBC finds](#), BBC News, 29 June 2023

296 [Wagner and Russia are here to stay in Africa, says Kremlin's top diplomat](#), POLITICO, 26 June 2023

297 ['It is like a virus that spreads': business as usual for Wagner group's extensive Africa network](#), The Guardian, 6 July 2023

298 It is hosting its Russia-Africa summit in late July 2023. [Wagner Will Keep Part of Its African Business After Russian Mutiny](#), Yahoo, 10 July 2023; [Wagner mercenaries will not be withdrawn from Africa, says Russia](#), The Guardian, 26 June 2023

299 [Wagner's future in Africa in question after Russian mutiny](#), Financial Times, 28 June 2023

**Russia which continue to have close and intimate relationships with Russian officials<sup>300</sup>**  
*We recommend that the UK Government takes advantage of the current uncertainty and seeks to disrupt the Wagner Network. In particular, at a moment when its usual supply channels from the Russian Ministry of Defence are in doubt, the Government should do all within its power to restrict the flow of arms and other military equipment to the Wagner Network, to reduce the viability of future combat operations. The UK Government should also share intelligence with host Governments to demonstrate the ineffectiveness of the Wagner Network and to demonstrate how it is a tool of enrichment for the Russian state.*

## What next for 'PMCs'?

75. Our report focused on the Wagner Network as an obvious example of a 'PMC'—also often called PMSC<sup>301</sup>—that poses a threat to the UK's interests and values. We acknowledge that many dispute the applicability of this term. It is not the only Russia-aligned PMC,<sup>302</sup> even if it is unique.<sup>303</sup> SORCHA MacLeod, Chair of the UN Working Group on the Use of Mercenaries, warned of an "extremely concerning" increase in the use of 'PMCs' as proxies by Russia and others.<sup>304</sup> Some drew attention to the significant growth of China's private sector industry in the context of the Belt and Road Initiative,<sup>305</sup> and warned that countries may consider using proxies in future in a similar way to Russia, as we have seen in Iran.<sup>306</sup> As we watch the fallout of the Wagner Network and where it continues to have influence, we should be particularly looking at Syria and whether Iran

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- 300 The Foreign Office listed Russia-linked PMCs as: RSB Group, Redut, Moran Security Group, ENOT Corp, Vegacy Strategic Services and PMC MAR. There is also the PMC 'Patriot Group', which the U.S. State Department has said is run by the Russian Defence Minister, Sergei Shoigu. A former Wagner fighter described the other PMC, Redut, in this way: "Redut was created to protect the factories transferred to the management of [...] Timchenko (a Russian oligarch and former KGB officer close to Putin)'s structures. The godfather for this project, Timchenko, was proposed by the Russian military. The head of the Redut, K. Merzoyants, has maintained close friendly relations with some high-ranking officers of the Russian General Staff. [...] Redut receives weapons, military equipment and ammunition from the stocks of the Russian forces in Syria." Foreign, Commonwealth and Development Office ([WGN0025](#)); Anonymous ([WGN0026](#)); [Russia's private armies](#), POLITICO, 28 June 2023
- 301 Private Military and Security Company. This term is not clearly defined in international law. It has been used in a general sense in this report to cover a company that sells military and/or security services for compensation.
- 302 As mentioned in a previous footnote, other PMCs include: RSB Group, Redut, Moran Security Group, ENOT Corp, Vegacy Strategic Services and PMC MAR. Foreign, Commonwealth and Development Office ([WGN0025](#)).
- 303 FCDO sees it as "highly likely" that "none are as close to the state as Wagner". There is fluidity between the members of various PMCs. Grozev noted: "We see that these different incarnations of private military companies in Russia are fluid—they flow from one another—simply because they are not companies, they are proxies for the state." Foreign, Commonwealth and Development Office ([WGN0025](#); [Q64](#)). See also Dossier Center ([WGN0009](#)) para 46–52
- 304 "We are seeing increasing use of them. We are seeing them being used not just by Russia but also by other countries, and it is extremely concerning to the working group that that trend is emerging. We published a report in 2020 that was submitted to the UN General Assembly. We highlighted the new manifestations, the proxy actors and a lot of the points that I made earlier. From our perspective, the biggest concern is the insertion and deployment of these types of actors into armed conflicts where they do not help the situation." [Q18](#). Similar point in Prof. Mark Galeotti (Managing Director at Mayak Intelligence Ltd) ([WGN0005](#)) para 15.
- 305 Companies mentioned included China Security & Protection, the Shandong Huawei Security Group and Genghis Security Services, HuaXin Zhong, Beijing DeWe Security Services Limited Company, Frontier Services Group and China Overseas Security Group. See Transparency International Defence & Security, Transparency International UK ([WGN0021](#)) para 5.3; Prof. Mark Galeotti (Managing Director at Mayak Intelligence Ltd) ([WGN0005](#)) para 16; CSIS, '[A Stealth Industry: The Quiet Expansion of Chinese Private Security Companies](#)', 12 January 2022 (accessed 16 July 2023)
- 306 PMCs are currently banned in China. Private Security Companies (PSCs) are permitted, but they are officially banned from carrying weapons abroad: a significant difference to Russia. Prof. Mark Galeotti (Managing Director at Mayak Intelligence Ltd) ([WGN0005](#)) para 16



steps into that fold. We are also aware of the Turkish-headquartered SADAT increasing its presence across the continent of Africa. It has been operating since at least 2013, including in Libya and Sudan.<sup>307</sup>

76. The UK Government does not wish to disincentivise the use of PMCs in general, as their activity as “not necessarily illegal or harmful”.<sup>308</sup> Other contributors emphasised the need to recognise that such companies can make a positive contribution to security.<sup>309</sup> However, the Government recognised that the “malign use of PMCs as proxies of States increasingly forms part of an intensified competition over norms and values”.<sup>310</sup> The Government appears to think it can manage these risks. We disagree. The Ministry of Defence has a “policy framework to understand where and how the use and activities of PMCs threatens UK interests and values”.<sup>311</sup> As the Government has not provided this to us, however, we do not know which PMCs it considers a threat or why, nor are we aware of what the Government does with this information. Overall, we perceived the coordination of analysis across Government to be poor.

77. The Government has underlined that the rules of international law governing state relations with PMCs are “well-established”.<sup>312</sup> If true, this would make it considerably easier to challenge states whose malign use of PMCs falls foul of these rules. However, other evidence disputes the clarity of international rules. There is no widely agreed international legal definition of a Private Military Company,<sup>313</sup> and there are ambiguities over the status of PMC employees under international humanitarian law.<sup>314</sup> We were also told that the legal tests to meet the term ‘mercenary’ are “near impossible” to fulfil, due to

307 Grey Dynamics, ‘[SADAT: Turkey’s Paramilitary Wings Take Flight in Africa](#)’, 16 April 2021 (accessed 18 July 2023)

308 Foreign, Commonwealth and Development Office ([WGN0025](#)) section 4

309 International Code of Conduct Association ([WGN0015](#)) paras 16, 25; Sean McFate, *The Modern Mercenary: Private Armies and what they mean for World Order* (OUP, 2014), xv; Mr D White ([WGN0001](#)). Relatedly, data suggests that PMSCs are not on average associated with greater harm to civilians, even if PMSCs headquartered in non-democracies are. Dr Ulrich Petersohn (Senior Lecturer at University of Liverpool) ([WGN0004](#))

310 Foreign, Commonwealth and Development Office ([WGN0025](#)) section 4

311 Foreign, Commonwealth and Development Office ([WGN0025](#)) section 4

312 Foreign, Commonwealth and Development Office ([WGN0025](#)) section 6

313 [Q4](#) [Sorcha MacLeod]; [Q5](#) [Sean McFate]; Proelium Law ([WGN0016](#)) para 5.1. There is, however, a draft Convention on Private Military and Security Companies (PMSCs), which defines a Private Military and/or Security Company as a corporate entity which provides on a compensatory basis military and/or security services by physical persons and/or legal entities. There is a similar definition in the Montreux Document, although this goes further in that it defines military and security services as including armed guarding and protection of persons and objects; maintenance and operation of weapons systems; prisoner detection and advice to or training of local forces and security personnel. See [Report of the Working Group on the use of mercenaries as a means of violating human rights and impeding the exercise of the right of peoples to self-determination, A/HRC/15/25](#), 2 July 2010

314 Their status as civilians or direct participants in hostilities relates to the nature and circumstances of their functions. Some PMC employees have also tried to benefit from combatant status. ICRC, ‘[International humanitarian law and private military/security companies - FAQ](#)’, 10 December 2013 (accessed 16 July 2023); Lindsey Cameron, ‘[Private military companies: their status under international humanitarian law and its impact on their regulation](#)’ *International Review of the Red Cross*, vol 88 (2006), pp 573–598

the six cumulative conditions that must be satisfied.<sup>315</sup> Proelium Law called for a workable international definition that “adequately differentiates PMSCs used to build capability for corrupt governments and those which are legitimate businesses”.<sup>316</sup>

78. Perhaps implicitly recognising these ambiguities, the UK Government expressed a desire to “build consensus around responsible state behaviour and competition” when it comes to states’ use of PMCs.<sup>317</sup> It promotes international voluntary initiatives to encourage responsible practices among PMSCs themselves.<sup>318</sup> There is also domestic regulation of companies.<sup>319</sup> The Government has limited interest in changing the existing national regulation or non-voluntary initiatives, believing that its current approach “provide[s] the necessary safeguards” for PMSC activities. The fact that the Government has no plans to ratify the UN Mercenaries Convention (an international treaty designed to ban the recruitment, use or financing of mercenaries) due to disagreements with its definitions, would suggest that this is not as clear as the Government asserts.<sup>320</sup>

79. Transparency International called international voluntary initiatives a “step in the right direction”, but warned of their limited support among states.<sup>321</sup> KCL academic Christopher Kinsey and Col. Christopher Mayer (US Army Retd) have warned that recent changes to the International Code of Conduct for Private Security Services may inadvertently provide greater legitimacy to organisations like the Wagner Network, because they appear to have made it more acceptable for PMSCs to carry out offensive activities.<sup>322</sup>

80. Our predecessor committee carried out a detailed report in 2002 into PMCs, responding to the Government’s Green Paper (June 2002) outlining different legislative

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315 Proelium Law ([WGN0016](#)) para 5.2. See also [Q7](#) [Sorcha MacLeod]. These six conditions are as follows. According to Article 47 of Additional Protocol I to the Geneva Conventions, a mercenary is any person who:

- (a) is specially recruited locally or abroad in order to fight in an armed conflict;
- (b) does, in fact, take a direct part in the hostilities;
- (c) is motivated to take part in the hostilities essentially by the desire for private gain and, in fact, is promised, by or on behalf of a Party to the conflict, material compensation substantially in excess of that promised or paid to combatants of similar ranks and functions in the armed forces of that Party;
- (d) is neither a national of a Party to the conflict nor a resident of territory controlled by a Party to the conflict;
- (e) is not a member of the armed forces of a Party to the conflict; and
- (f) has not been sent by a State which is not a Party to the conflict on official duty as a member of its armed forces

316 Proelium Law ([WGN0016](#))

317 Foreign, Commonwealth and Development Office ([WGN0025](#)) section 4

318 For example, the International Code of Conduct for Private Security Services and the ISO management system. The Government has also worked with the Security in Complex Environments Group (SCEG), a “UK-based Special Interests Group for the Private Security Sector, on the transparent regulation of Private Security and Maritime companies”. Among other things, SCEG members are expected to comply with national legislation and documents such as the UN Guiding Principles on Business and Human Rights, the Voluntary Principles on Security and Human Rights, the International Code of Conduct for Private Security Services, and the Montreux Document. Foreign, Commonwealth and Development Office ([WGN0025](#)) section 6

319 Domestically, the UK Security Industry Authority (set up in 2001 by Private Security Industry Act) regulates the private security industry “by operating a licensing regime for individual security operatives and a voluntary approvals scheme for security businesses”. Foreign, Commonwealth and Development Office ([WGN0025](#)) section 6

320 [Correspondence with the Parliamentary Under-Secretary of State \(Europe\) following up on the FAC evidence session on 6 February 2023, dated 28/02/2023 and 09/02/2023](#)

321 Transparency International Defence & Security, Transparency International UK ([WGN0021](#)) para 3.4

322 Defence-in-Depth, ‘[A step too far: how the ICoCA actions could unintentionally help to privatise war \(Part One\)](#)’ (accessed 16 July 2023); Defence-in-Depth, ‘[A step too far: how the ICoCA actions could unintentionally help to privatise war \(Part Two\)](#)’ (accessed 16 July 2023)

options for such companies.<sup>323</sup> The report recognised the benefits of PMCs and stated that a new regime for regulation should not undermine these.<sup>324</sup> However, the report concluded that:

a voluntary code is insufficient to regulate the private military industry, because it would not enable the Government to prevent the activities of disreputable companies which were detrimental to the United Kingdom's interests<sup>325</sup>

The report recommended that the UK Government (with others) develop a new international convention to regulate PMCs, which might replace the UN Mercenaries Convention. It also made recommendations to balance the benefits and costs of new regulation and proposed a distinction between combat and non-combat activities when regulating PMCs (even if difficult to determine). It is worth noting that a draft UN Convention on Regulating PMSC Activities has been the subject of international debate since 2011.<sup>326</sup> That no meaningful progress has been made on these issues is disappointing.

81. International crimes abroad may be prosecuted before the UK courts when there is a connection between the perpetrator and the UK.<sup>327</sup> However—as explained above (paragraph 19)—there are many practical obstacles to holding Wagner fighters to account. These obstacles apply to other, if not all, PMCs. In February, the Government told us that it is “spending more time and focus on accountability” than it was a “few months ago”.<sup>328</sup> The UK has provided significant support to the Ukrainian legal system and to the International Criminal Court, to enable accountability for crimes in the Russia-Ukraine war.<sup>329</sup> This assistance is likely to support the prosecution of offences committed by Wagner fighters in Ukraine. The UK is “not specifically” pursuing accountability for crimes committed within the context of Wagner’s operations in other countries.<sup>330</sup> The FCDO told us that:

323 Foreign Affairs Committee, Ninth Report of Session 2001–02, [Private Military Companies](#), HC 922.

324 Foreign Affairs Committee, Ninth Report of Session 2001–02, [Private Military Companies](#), HC 922, para 163

325 Foreign Affairs Committee, Ninth Report of Session 2001–02, [Private Military Companies](#), HC 922, para 137

326 RUSI, ‘[Private Military and Security Companies: Views from the UK and Russia on Regulation and Accountability](#)’, 22 April 2020 (accessed 16 July 2023)

327 For the domestic courts to have jurisdiction to prosecute international crimes, there must be a nexus with the domestic jurisdiction. The nature of the nexus depends on the specific offence. For offences covered by the International Criminal Court Act 2001, domestic courts can exercise jurisdiction over any person who is, or was, a UK national or UK resident at the time of the offence, or who became a UK national/resident after the offence was committed but still resides in the UK, or a person subject to UK service jurisdiction (see s54 and s67 ICCA). Other international crimes, such as torture and grave breaches of the Geneva Conventions, can be prosecuted on the basis of universal jurisdiction (i.e. torture or grave breaches which have been committed on a foreign territory by a perpetrator of any nationality can be prosecuted in the UK courts). International crimes in this context refers to those set out within the Rome Statute of the International Criminal Court, including genocide and crimes against humanity.

328 [Q200](#) [Ben Fender]

329 For example, the Atrocity Crimes Advisory Group (founded with US and EU) is “the way in which we co-ordinate our support to the Ukrainian domestic system”. The UK has put £2.5 million towards this. Actions include: “funding mobile evidence-gathering teams and providing training in international humanitarian law to the Ukrainian judiciary.” The UK has also supported the ICC by providing extra £1 million to the court. [Q194](#) [Hazel Cameron]

330 [Q196](#) [Hazel Cameron]

...regarding accountability, a lot of what the Wagner Group is accused of, and is alleged to have done, falls within the standard jurisdiction of a domestic court, or an international court, such as the ICC. We do not create a new work strand for that. We need to reinforce what we have...<sup>331</sup>

82. For nearly 10 years, the Government has under-played and under-estimated the Wagner Network's activities, as well as the security implications of its significant expansion. The Government has not told us anything specific that it is doing to challenge the network's influence and impunity in countries other than Ukraine, beyond sanctions coordination (which itself appears limited). The Government has also failed to adequately structure its response to the Wagner Network. When asked to give evidence to this inquiry, six weeks were spent on internal discussions to try to identify which was the lead Government department, demonstrating a lack of leadership across Government to tackle the Wagner Network. In oral evidence, the Minister was unable to demonstrate joined-up working within the department, lessons-sharing, strategic thinking, or a clear definition of what the Wagner Network is. It is evident that a taskforce should have been established at least by 2016.

83. The Wagner Network is merely the best-known and documented example of a PMC acting deniably on behalf of a state to further its interests and enrich its elites, at the expense of local citizens' safety and stability in the long term – as well as security and stability in Europe. We are deeply concerned that the Government's failure to address the network hints at a fundamental lack of knowledge of, and policy on, other malign PMCs.

84. *The Government should take a more strategic and coherent approach to addressing the challenges of this network and other proxy 'PMCs' by:*

- a) *assigning clear responsibility for the Wagner Network and adjacent 'PMCs' to a senior official in the Russia Unit, whose primary job it is to ensure that all levers of government are working together to tackle the challenges of Russia-aligned PMCs;*
- b) *establishing a cross-Government lead on Private Military Companies, operating from the Cabinet Office's Office for Conflict, Stabilisation and Mediation, focused on analysing this trend, mapping activity globally, and bringing together different geographic desks and teams across the MoD, Treasury, intelligence community and FCDO as appropriate to assess threats to British interests, and to identify British responses as appropriate;*
- c) *establishing a taskforce for addressing the challenges posed by the Wagner Network and other linked PMCs, to enable swift cross-government collaboration.*

85. The Government appears remarkably complacent about the growing practice of states using PMCs for malign purposes. Although the expansion of the Wagner Network and the harm it has caused appears to have led to some re-examination of the Government's approach (paragraph 34), we have no detailed information to understand the Government's new approach to countering state threats.

86. The Government continues to rely on a largely voluntary model of PMC regulation. Our predecessor committee conducted a detailed report into the subject of PMCs in 2002. Even then, the risks of a voluntary model were clear, in that it does little to prevent the “activities of disreputable companies” that are “detrimental to the United Kingdom’s interests”. The current approach also does little to protect the UK’s domestic PMCs, which may be tarred with the same brush as malign actors. We do not want our successor committee to have to raise these issues again in 20 years’ time.

87. *The Government should improve its understanding of other PMCs and Private Security Companies (PSCs) connected in particular to Russia and China, and from all states. This is likely to be a growth industry, with more Governments seeking to create PMCs to secure their geopolitical and economic interests. The Government should provide further information on how its new approach to countering state threats, outlined in the Integrated Review Refresh, will tackle the challenge of states’ malign use of proxy PMCs.*

88. *In its response, the Government should set out the steps that it will take to strengthen the international legal framework governing PMCs’ activities, drawing on the UK’s deep legal expertise. Its response should address the following aspects:*

- i) *how the UK will take steps to move forward the debates around the definition of ‘mercenaries’ and PMCs;*
- ii) *how the UK will work to improve the accountability of Wagner fighters in more countries;*
- iii) *how the UK will promote greater accountability and responsibility of states where PMCs are headquartered, if PMCs engage in destabilising activities.*

*To address the first point (i), the Government should revisit its position on the UN Mercenaries Convention and ratify it, or else propose specific revisions that would make ratification acceptable. The Government could also participate actively in ongoing international debates around a draft convention on private military and security companies (PMSCs). The Government may be able to address the second point (ii), by drawing lessons from work to bolster accountability of Wagner fighters in Ukraine.*

89. *The UK Government should use its significant support to the Office of the Prosecutor General in Ukraine to identify mechanisms to prosecute the Wagner Network. A prosecution in this theatre would serve to help deter the sense of impunity abroad.*

90. *The Government should provide the evidence base that leads it to believe in the effectiveness of its mostly voluntary model of PMC regulation.*

## Conclusions and recommendations

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### A decade of entrenching Russian interests abroad

1. The Wagner Network is a collection of individuals and entities linked to Yevgeny Prigozhin and undertaking military, economic, political and influencing operations internationally. It formed in 2014 and began its military activities in Ukraine, where it has had sustained involvement. The network subsequently expanded to several other countries in Africa and the Middle East. It has undertaken offensive military operations in at least seven countries since 2014: Ukraine; Syria; the Central African Republic (CAR); Sudan; Libya; Mozambique; and Mali. There are 10 further countries where we have medium or high confidence that it has been involved in a non-military capacity since 2014, and many more countries where the network's presence is rumoured. (Paragraph 13)
2. The Wagner Network is highly opportunistic and not a straightforward proxy for Russia, even though the Russian state has sometimes directed, facilitated, and supported its military operations, notably in Libya and Ukraine. Even when the network has acted purely in its own economic interests, Russia is likely to have benefited financially or in geopolitical influence from its presence. Its guiding hand has been the Russian state. (Paragraph 15)
3. Host governments and other non-regime actors must perceive benefits from engaging with the Wagner Network, because they consider it the most effective form of protection and security. There are examples of its fighters furthering a regime's security objectives, even if this meant neutering political opposition. (Paragraph 17)
4. There is a significant gap between perception and capability when it comes to the Wagner Network. Despite the continued belief by some that inviting them into a country will result in benefits, the reality is that regimes pay a high price for working with the Wagner Network. The original outcomes are rarely achieved. During the past 10 years, Wagner fighters have left behind a trail of atrocities in virtually all theatres where they have operated, with limited accountability. They may present themselves as a highly trained, professional fighting force but their indiscipline, their excessive violence and their financial motivation mean that the network has functioned like an international criminal mafia, fuelling corruption and plundering natural resources. Some regimes' reliance on the network for survival means that Wagner actors show little respect for the citizens or the laws of the countries where they operate. The network's military and political involvement in the Central African Republic is all-encompassing and should serve as a warning of what may happen elsewhere. Even when Wagner's deployments do not result in benefits for the host country, they are often a great success for the network itself due to the lucrative resources it accesses, particularly in the Central African Republic and Sudan. (Paragraph 25)
5. There are serious national security threats to the UK and its allies of allowing the network to continue to thrive, not to mention devastating human consequences, including contributing to the refugee crisis for example, Sudan. (Paragraph 30)

6. Over the past year and a half, the Russia-Ukraine war eroded the Wagner Network's deniability and Prigozhin's public arguments with the Russian Ministry of Defence confirmed the network's long-suspected links to the Russian state. The brutality of its fighters in Ukraine is appalling but not atypical. So long as the network survives in some form, we believe that countries may still turn to it in future. Many leaders—mostly in insecure environments in Africa—are likely already to have known the price of engaging the network when they decided to work with it. (Paragraph 31)
7. *We recommend that the Government explicitly states that it opposes the co-operation of any country with the Wagner Network, or future iterations thereof, due to the security threats of the 'Wagner model' of business and governance. Where countries can be incentivised not to partner with the network or to re-engage after partnering with it, they should be. National governments that collude with the Wagner Network to breach UN sanctions, or that take no steps to protect their populations from Wagner-perpetrated atrocity crimes, should face financial and diplomatic consequences, where appropriate.* (Paragraph 32)

### Responses to the Wagner Network

8. Supporting Ukraine militarily is the Government's priority when it comes to countering the Wagner Network. We fully support the continued supply of defence assistance and wider support to Ukraine as it fights to liberate itself from Russian illegal occupation. Through this, the UK has enabled Ukrainian Armed Forces to challenge Wagner fighters directly, often resulting in a high rate of attrition. (Paragraph 39)
9. However, it is a significant failing to see the Wagner Network primarily through the prism of Europe, not least given its geographic spread, the impact of its activities on UK interests further abroad, and the fact that its wealth creation sits largely in Africa. (Paragraph 40)
10. The Government believes that it is becoming more important to consider the network's activities, although it did not say where it would do so. In February 2023, the FCDO told us there was now "much more activity" in Government to understand and respond to the network than there had been six months earlier. The Government also said it had surged resources into the Russia Unit over the last year. (Paragraph 41)
11. The Wagner Network began its activities in 2014. By early 2022, when the Government began to invest greater resource in understanding the network, Wagner fighters had already undertaken military deployments in at least seven countries. It is deeply regrettable that it took this long, and that the Government continues to give so little focus to countries beyond Ukraine. This leaves us even less prepared to respond to the evolution of this notoriously shape-shifting network. (Paragraph 42)
12. We have received no evidence of any serious effort by the Government to track the Network's activities in countries other than Ukraine. (Paragraph 54)
13. *We recommend that the Government improve its intelligence-gathering on the Wagner Network's activities in a wider range of countries, particularly in the countries where*

*we have medium-confidence of attempts at Wagner involvement. This intelligence should make use of network-mapping capabilities. A cross-Government taskforce would be particularly useful as the Wagner Network transforms, following the attempted march on Moscow. (Paragraph 54)*

14. The UK's efforts to sanction the Wagner Network are underwhelming in the extreme, compared to those of the European Union and the United States. The responses from the Minister leave us with limited confidence that the UK coordinates effectively with its allies to share intelligence on the Wagner Network and to impose sanctions on relevant individuals and entities. Equally, the Government left us with very little confidence that those British nationals pursued by the Wagner Network receive any meaningful support from the British Government; indeed, they were made more vulnerable due to decisions made from within Government. (Paragraph 55)
15. The Government claimed that its sanctioning of the 'Wagner Group' automatically covered all the entities that the Group owns or controls. This approach underappreciates the complexity of the network. It is also completely unrealistic. It leaves both enforcement agencies and implementing organisations, such as banks, estate agents and other financial services, with no idea which affiliated entities they should target. This makes it possible, if not probable, that Wagner-linked entities are continuing to benefit from access to the UK's financial markets. The lack of certainty about this denotes a scandalous failure to exercise due diligence. At its worst, this could mean the UK is inadvertently undermining the efforts of our allies. (Paragraph 56)
16. The Minister had no specific knowledge of work within his Department to analyse whether Wagner activities undermine the financial impact of UK sanctions on the Russian war machine. Despite finding it "likely", he could not confirm that the FCDO had had any input to HM Treasury's unwise decision to issue sanctions waivers to Prigozhin. Despite assuring us that the Treasury and FCDO communicate over sanctions waivers in general, the Minister himself had not received any official advice specifically on sanctions waivers. Given his position as the Parliamentary Under Secretary of State for Europe, we would expect him to have an interest and role in questions relating to sanctions waivers linked to Russia and Ukraine. His statements also lead us to question whether the Russia Unit is providing the necessary join-up between the FCDO and Treasury, given the central role of sanctions as a tool of UK foreign policy. (Paragraph 57)
17. *We recommend that the Government move faster and harder in sanctioning Wagner-linked individuals and entities. Specifically, it should: (Paragraph 58)*
  - (a) *Sanction all individuals and entities provided in Appendix 1, which the United States and European Union have already targeted but which the UK has not;*
  - (b) *Consider bringing forth sanctions on civilian enablers and corporate 'frontmen' for the network's activities; and*
  - (c) *Close enforcement gaps.*



18. *We recommend that the Government establishes a specific and regular mechanism for coordinating with the United States and the European Union over Wagner-linked sanctions; it should report back to us on what these mechanisms are, and how frequently and effectively they are being used.* (Paragraph 59)
19. *We further recommend that the Government prioritises introducing and enforcing travel bans for Wagner-linked individuals as a likely deterrent to involvement in the network, in particular working with Turkey, a popular holiday destination for Russians.* (Paragraph 60)
20. In the public interest, we have compiled Wagner-linked names that are already a matter of public record, as identified via our commissioned open-source research (see Appendix 2). In doing so, we hope to challenge the mystique that the Wagner Network cultivated in many countries, make it as difficult as possible for it to operate, create a deterrent effect, and enable the Government to improve its apparently limited understanding of the network. (Paragraph 61)
21. *We implore the Government to urgently assess these names and impose sanctions on these individuals and entities if the necessary threshold is met.* (Paragraph 61)
22. There is an opportunity to disrupt the Wagner Network at a time when its future is uncertain. (Paragraph 68)
23. *We recommend that the Government seizes this opportunity and works with international partners to deter countries from engaging with the Wagner Network, using a carrot and stick approach.* (Paragraph 68)
24. *As the Government improves its intelligence on the network, it should declassify it strategically and share it with countries that are considering engaging with the Wagner Network, to demonstrate the organisation's destabilising effects, following the lead of the United States administration.* (Paragraph 69)
25. *The Government should offer a genuinely compelling alternative to priority countries in need of investment and security partnership, in collaboration with partners. Priority countries are especially likely to be neighbouring countries to those where the Wagner Network is engaged. A compelling alternative may involve customising packages of military, aid and trade support to specific countries, particularly in the Sahel region.* (Paragraph 70)
26. *In its response to this report, the Government should set out the factors it will assess in determining whether countries are priorities for UK security partnerships. These factors should include (but not be limited to):* (Paragraph 71)
  - (a) *the UK's capacity for influence in a specific country;*
  - (b) *the level of security challenge faced by a country (in the short, medium and long term);*
  - (c) *the level of demand for a bilateral/multilateral security partnership within a country;*

*(d) the possible regional implications of the country's 'capture' by a Russian or other malign proxy; and*

*(e) the level of willingness on both sides to uphold transparency and standards of good governance as part of any future partnership.*

27. *The Government should revive its previous commitment to channel 50% of Official Development Assistance to fragile and conflict-affected countries and regions. The Government should also revive its 2019 manifesto commitment to spending 0.7% of the UK's Gross National Income on Official Development Assistance at the earliest opportunity, in light of refugee and asylum pressure in multiple countries. (Paragraph 72)*
28. *As a 'stick', the Government should proscribe the Wagner Network as a terrorist organisation, recognising that—while there are risks of doing so—there are also risks of failing to do so, when the Network appears to meet the legal criteria. (Paragraph 73)*

### What next?

29. The last decade has shown that the Wagner Network is highly effective at reconfiguring itself. We expect its activities to continue in some form, as they are too valuable, especially financially, to the Russian state to be lost. The question is not just what happens to the Wagner Network but what happens to a wider set of PMCs in Russia which continue to have close and intimate relationships with Russian officials (Paragraph 74)
30. *We recommend that the UK Government takes advantage of the current uncertainty and seeks to disrupt the Wagner Network. In particular, at a moment when its usual supply channels from the Russian Ministry of Defence are in doubt, the Government should do all within its power to restrict the flow of arms and other military equipment to the Wagner Network, to reduce the viability of future combat operations. The UK Government should also share intelligence with host Governments to demonstrate the ineffectiveness of the Wagner Network and to demonstrate how it is a tool of enrichment for the Russian state. (Paragraph 74)*
31. For nearly 10 years, the Government has under-played and under-estimated the Wagner Network's activities, as well as the security implications of its significant expansion. The Government has not told us anything specific that it is doing to challenge the network's influence and impunity in countries other than Ukraine, beyond sanctions coordination (which itself appears limited). The Government has also failed to adequately structure its response to the Wagner Network. When asked to give evidence to this inquiry, six weeks were spent on internal discussions to try to identify which was the lead Government department, demonstrating a lack of leadership across Government to tackle the Wagner Network. In oral evidence, the Minister was unable to demonstrate joined-up working within the department, lessons-sharing, strategic thinking, or a clear definition of what the Wagner Network is. It is evident that a taskforce should have been established at least by 2016. (Paragraph 82)

32. The Wagner Network is merely the best-known and documented example of a PMC acting deniably on behalf of a state to further its interests and enrich its elites, at the expense of local citizens' safety and stability in the long term – as well as security and stability in Europe. We are deeply concerned that the Government's failure to address the network hints at a fundamental lack of knowledge of, and policy on, other malign PMCs. (Paragraph 83)
33. *The Government should take a more strategic and coherent approach to addressing the challenges of this network and other proxy 'PMCs' by:* (Paragraph 84)
- (a) assigning clear responsibility for the Wagner Network and adjacent 'PMCs' to a senior official in the Russia Unit, whose primary job it is to ensure that all levers of government are working together to tackle the challenges of Russia-aligned PMCs;*
- (b) establishing a cross-Government lead on Private Military Companies, operating from the Cabinet Office's Office for Conflict, Stabilisation and Mediation, focused on analysing this trend, mapping activity globally, and bringing together different geographic desks and teams across the MoD, Treasury, intelligence community and FCDO as appropriate to assess threats to British interests, and to identify British responses as appropriate;*
- (c) establishing a taskforce for addressing the challenges posed by the Wagner Network and other linked PMCs, to enable swift cross-government collaboration.*
34. The Government appears remarkably complacent about the growing practice of states using PMCs for malign purposes. Although the expansion of the Wagner Network and the harm it has caused appears to have led to some re-examination of the Government's approach (paragraph 34), we have no detailed information to understand the Government's new approach to countering state threats. (Paragraph 85)
35. The Government continues to rely on a largely voluntary model of PMC regulation. Our predecessor committee conducted a detailed report into the subject of PMCs in 2002. Even then, the risks of a voluntary model were clear, in that it does little to prevent the "activities of disreputable companies" that are "detrimental to the United Kingdom's interests". The current approach also does little to protect the UK's domestic PMCs, which may be tarred with the same brush as malign actors. We do not want our successor committee to have to raise these issues again in 20 years' time. (Paragraph 86)
36. *The Government should improve its understanding of other PMCs and Private Security Companies (PSCs) connected in particular to Russia and China, and from all states. This is likely to be a growth industry, with more Governments seeking to create PMCs to secure their geopolitical and economic interests. The Government should provide further information on how its new approach to countering state threats, outlined in the Integrated Review Refresh, will tackle the challenge of states' malign use of proxy PMCs.* (Paragraph 87)
37. *In its response, the Government should set out the steps that it will take to strengthen the international legal framework governing PMCs' activities, drawing on the UK's deep legal expertise. Its response should address the following aspects:* (Paragraph 88)

*(i) how the UK will take steps to move forward the debates around the definition of 'mercenaries' and PMCs;*

*(ii) how the UK will work to improve the accountability of Wagner fighters in more countries;*

*(iii) how the UK will promote greater accountability and responsibility of states where PMCs are headquartered, if PMCs engage in destabilising activities.*

*To address the first point (i), the Government should revisit its position on the UN Mercenaries Convention and ratify it, or else propose specific revisions that would make ratification acceptable. The Government could also participate actively in ongoing international debates around a draft convention on private military and security companies (PMSCs). The Government may be able to address the second point (ii), by drawing lessons from work to bolster accountability of Wagner fighters in Ukraine. (Paragraph 88)*

38. *The UK Government should use its significant support to the Office of the Prosecutor General in Ukraine to identify mechanisms to prosecute the Wagner Network. A prosecution in this theatre would serve to help deter the sense of impunity abroad. (Paragraph 89)*
39. *The Government should provide the evidence base that leads it to believe in the effectiveness of its mostly voluntary model of PMC regulation. (Paragraph 90)*

## Appendix 1: Sanctions comparisons for the UK, United States and European Union

These Tables have been prepared by analysing the sanctions lists and decisions of the United States, European Union and United Kingdom, as of 7 July 2023.<sup>332</sup> The below individuals and entities have been identified due to the explicit links drawn to Prigozhin, Wagner or Prigozhin-linked entities in the designation of one or more jurisdictions. The analysis is not intended to be exhaustive. Every effort has been made to ensure the accuracy of this information as of 7 July 2023, via cross-checks and the additional use of sanctions comparison resources.<sup>333</sup>

### Sanctions comparisons for 44 individuals sanctioned for their association with Prigozhin and/or the Wagner Group in the US, the EU and/or the UK

Name of sanctioned individual, starting with surname  (with supporting information from the time of designation) <sup>334</sup>	Sanctioned by the US?	Sanctioned by EU?	Sanctioned by UK?
AFANASYEVA, Yulia.  Afanasyeva, an employee of the "Africa Back Office," ran AFRIC and the International Anticrisis Center "(US designation).	Yes	No	No
BEZRUKIKH, Dmitriy Nikolaevich.  A Russian official at the rank of colonel, equivalent or higher, involved in allowing Prigozhin to recruit soldiers from prisons in Rostov, leading to suspected involvement in destabilising activities in Ukraine. (UK designation)	Yes	No	Yes
BICHKOV, Peter Alexandrovich (a.k.a. BYCHKOV, Petr Alexandrovich; a.k.a. BYCHKOV, Pyotr Aleksandrovich).  He manages Prigozhin's "Africa Back Office," a team of political consultants tasked with devising strategies for manipulating African politics in support of Prigozhin's interests (U.S. designation).	Yes	No	No
BOGATOV, Andrei Mikhailovich.  Sanctioned for his involvement as a commander in Wagner activities in Syria.	No	Yes	Yes

332 UK Government, [The UK Sanctions List](#) (ODT format accessed 7 July 2023); Office of Foreign Assets Control, [Specially Designated Nationals and Blocked Persons List](#), 29 June 2023 (PDF accessed 7 July 2023); separate EU decisions.

333 For example, Ukrainian Government, [Personal sanctions tracker: War and sanctions](#) (accessed 17 July 2023)

334 U.S. designation information is drawn from the Treasury press releases.

Name of sanctioned individual, starting with surname (with supporting information from the time of designation) <sup>334</sup>	Sanctioned by the US?	Sanctioned by EU?	Sanctioned by UK?
DJUMA, Abbas (a.k.a. DZHUMA, Abbas, a.k.a. DZHUMA, Abbas Mokhammadovich).  Involved in PMC Wagner's acquisition of Iranian UAVs to support combat operations in Ukraine (U.S. designation)	Yes	No	No
DYCHKO, Stanislav Evgenievitch.  Wagner mercenary who took part in the torture of a Syrian deserter in 2017 (EU designation under the human rights regime)	No	Yes	No
ELIZAROV, Anton Olegovich.  Wagner commander in Ukraine (EU designation)	No	Yes	No
GASPARYAN, Hayk Arsenovich  Wagner commander in Ukraine (EU designation)	No	Yes	No
GERGES, Fawaz Mikhail.  CEO of Al-Sayyad Company for Guarding and Protection Services in Syria, a company supervised by Wagner (EU designation)	No	Yes	Yes
GOSTEV, Arkadiy Aleksandrovich.  A Russian official at the rank of colonel, equivalent or higher, involved in supporting the recruitment of soldiers to the Wagner Network, thus supporting destabilising activities in Ukraine (UK designation)	Yes	No	Yes
IBRAHIM, Yasar Hussein.  Co-owner of Al-Sayyad Company for Guarding and Protection Services Ltd, a Syrian private security company supervised by the Wagner Group in Syria, active in the protection of Russian interests (phosphates, gas and securing oil sites). The company recruits Syrian mercenaries to Libya and Ukraine (EU designation)	Yes	Yes	Yes
IVANOV, Aleksandr Aleksandrovich (a.k.a. IVANOV, Alexander).  Wagner representative in CAR; director of OUIS (U.S. and EU designations)	Yes	Yes	No
IVANOV, Andrey Nikolayevich.  A Wagner executive who, during spring 2023, worked closely with Prigozhin's entity Africa Politology and senior Malian government officials on weapons deals, mining concerns, and other Wagner Group activities in Mali (U.S. designation).	Yes	No	No

Name of sanctioned individual, starting with surname (with supporting information from the time of designation) <sup>334</sup>	Sanctioned by the US?	Sanctioned by EU?	Sanctioned by UK?
KHARITONOV, Denis Yurievich  Deputy regional head of the Astrakhan branch of the Union of Donbass Volunteers, member of Duma of Astrakhan Oblast and Wagner Group mercenary, sanctioned for activities in Ukraine (EU designation)	No	Yes	No
KHODOTOV, Yevgeniy Garryevich (a.k.a. KHODOTOV, Yevgeny).  Served as the director of Lobaye Invest. Involved in Prigozhin's CAR operations since 2017 (U.S. designation)	Yes	No	No
KUZIN, Aleksandr Yuryevich (a.k.a. KUZIN, Alexander).  Prigozhin's employee operating in CAR, who has been involved in Prigozhin's CAR operations since 2017 (U.S. designation).	Yes	No	No
KUZNETSOV, Alesandr.  Involved in Wagner activities in Libya (EU designation)	No	Yes	No
LAVRENKOV, Igor Valerievich.  Director and owner of Shine Dragon Group Limited (U.S. designation)	Yes	No	No
MALKEVICH, Alexander Aleksandrovich.  His company, the Foundation for National Values Protection (FZNC), facilitated Prigozhin's global influence operations since at least 2019. (U.S. designation)	Yes	Yes	Yes
MALOLETKO, Aleksander Grigorievitch  A close collaborator of Yevgeny Prigozhin. He has been working as an instructor for the Wagner Group in the Central African Republic (CAR). He is associated with Wagner, listed for serious human rights abuses in several countries, including in CAR, and is responsible for supporting the acts of the Wagner Group. (EU designation)	No	Yes	No
MALYAREVICH, Aleksei Alekseevich  Linked to Charter Green Light: see entities table below (U.S. designation).	Yes	No	No
MANDEL, Andrei Sergeevich.  M Invest's Director General (U.S. designation)	Yes	Yes	No

Name of sanctioned individual, starting with surname (with supporting information from the time of designation) <sup>334</sup>	Sanctioned by the US?	Sanctioned by EU?	Sanctioned by UK?
MASLOV, Ivan Aleksandrovich (a.k.a. "MASLOV, Ivan Oleksandrovich").  Head of 'Wagner' paramilitary units and principal administrator in Mali (U.S. designation)	Yes	Yes	No
PERFILEV, Vitalii.  Wagner operative in CAR (EU designation).	No	Yes	No
PETROVSKIY, Yan Igorovich  Head of the 'Rusich' military taskforce that is linked to Wagner (EU designation)	Yes	Yes	No
PIKALOV, Konstantin  Wagner Commander in the CAR (EU designation)	No	Yes	No
POTEPKIN, Mikhail Sergeyeovich  Ex-employee of the Internet Research Agency, M Invest's and Meroe Gold's Regional Director based in Sudan (U.S. designation)	Yes	Yes	No
PRIBYSHIN, Taras.  Pribyshin has conducted influence operations in Africa for the Internet Research Agency in support of Prigozhin's objectives in the region since at least 2019 (U.S. designation).	Yes	No	No
PRIGOZHIN, Evgeny (a.k.a. PRIGOZHIN, Yevgeniy Viktorovich).  Founder and financier of the Wagner Group/ Network	Yes	Yes	Yes
PRIGOZHIN, Pavel Evgenyevich  Prigozhin's family facilitates the activities of his enterprise, which benefits from his favored status within Russia's elite. Pavel Prigozhin is his son. (U.S. designation)	Yes	Yes	Yes
PRIGOZHINA, Lyubov Valentinovna.  Prigozhin's family facilitates the activities of his enterprise, which benefits from his favored status within Russia's elite. Lyubov Prigozhina (Lyubov) is Prigozhin's wife. (U.S. designation)	Yes	Yes	Yes
PRIGOZHINA, Polina Evgenyevna.  Prigozhin's family facilitates the activities of his enterprise. Polina Prigozhina (Polina) is his daughter (U.S. designation).	Yes	No	Yes



Name of sanctioned individual, starting with surname (with supporting information from the time of designation) <sup>334</sup>	Sanctioned by the US?	Sanctioned by EU?	Sanctioned by UK?
<p>PRIGOZHINA, Violetta Kirovna</p> <p>The mother of Yevgeniy PRIGOZHIN. There are reasonable grounds to suspect that Violetta Kirovna PRIGOZHINA is associated with Yevgeniy Viktorovich PRIGOZHIN, and has obtained a financial benefit or other material benefit from him. (UK designation)</p>	No	Yes	Yes
<p>PROKOPENKO, Ivan Pavlovitch</p> <p>A Russian official at the rank of colonel, equivalent or higher, involved in supporting the recruitment of soldiers to the Wagner Network and thus supporting destabilising activities in Ukraine (UK designation).</p>	Yes	No	Yes
<p>SHAMMOUT, Abu Hani</p> <p>A former Syrian military officer charged by Wagner Group to recruit veterans as mercenaries (EU designation).</p>	No	Yes	Yes
<p>SHCHERBAKOV, Sergey Vladimirovich</p> <p>Freelance employee of GRU and Wagner mercenary in Ukraine (EU designation)</p>	No	Yes	No
<p>SHUGALEY, Maxim</p> <p>Conducts pro-Wagner propaganda (EU designation)</p>	No	Yes	No
<p>SRABIONOV, Tigran Khristoforovich</p> <p>Involved in Wagner's acquisition of Iranian UAVs to support combat operations in Ukraine (U.S. designation)</p>	Yes	No	No
<p>SYTII, Dmitry (a.k.a. SYTII, Dmitry Sergeevich (a.k.a. SYTYI, Dmitry)</p> <p>Prigozhin's employee and the founder of Lobaye Invest. Sytii has also worked for the Internet Research Agency. Involved in Prigozhin's CAR operations since 2017 (U.S. designation)</p>	Yes	Yes	No
<p>TENSIN, Alexey.</p> <p>Director of joint-stock company 'PMC Wagner Centre' (EU designation)</p>	No	Yes	No
<p>TRONIN, Alexander.</p> <p>Founder and curator of a young wing of Wagner, operating on the premises of 'PMC Wagner Centre'. (EU designation).</p>	No	Yes	No

Name of sanctioned individual, starting with surname (with supporting information from the time of designation) <sup>334</sup>	Sanctioned by the US?	Sanctioned by EU?	Sanctioned by UK?
TROSHEV, Andrey Nikolaevich  Commander in the Wagner Group and involvement in destabilising activities in Syria (UK designation)	No	Yes	Yes
UTKIN, Dmitriy Valeryevich.  Commander of the Wagner Network involved in actions threatening the territorial integrity of Ukraine (UK designation).	Yes	Yes	Yes
ZAKHAROV, Valerii (a.k.a. ZAKHAROV, Valery Nikolayevich)  Former FSB, security counsellor to CAR President (at time of designation) and key figure in Wagner command structure, sanctioned under the EU's human rights regime (EU designation).	Yes	Yes	No

## Sanctions comparisons for 37 entities sanctioned for their association with Prigozhin and/or the Wagner Group in the US, EU and/or UK

Name of entity, with supporting information from the time of designation <sup>335</sup>	Designated by US?	Designated by EU?	Designated by UK?
<p>224TH FLIGHT UNIT STATE AIRLINES</p> <p>(a.k.a. JOINT STOCK COMPANY THE 224TH FLIGHT UNIT STATE AIRLINES; a.k.a. JSC THE 224TH FLIGHT UNIT STATE AIRLINES; a.k.a. LYOTNY OTRYAD 224; a.k.a. OJSC GOSUDARSTVENNAYA AVIAKOMPANIYA 224 LETNY OTRYAD; a.k.a. TTF AIR HEAVY LIFTING; a.k.a. "224 FU JSC"; a.k.a. "224TH FLIGHT UNIT"; a.k.a. "OAO 224 LO").</p> <p>Listed as linked to Wagner in the designation (U.S. designation)</p>	Yes	No	No
<p>AFRICA POLITOLOGY.</p> <p>Owned or controlled by, or for having acted or purported to act for or on behalf of, directly or indirectly, Yevgeniy Prigozhin. Africa Politology develops strategies and mechanisms to induce Western countries to withdraw their presence in Africa and is involved in a series of Russian influence tasks in the Central African Republic, to include undermining Western influence, discrediting the UN, and carrying out lawsuits against Western press outlets. (U.S. designation)</p>	Yes	No	No
<p>AL-SAYYAD COMPANY FOR GUARDING AND PROTECTION SERVICES LTD</p> <p>Also known as 'ISIS Hunters', this is a Syrian private security company overseen by Wagner (EU designation)</p>	No	Yes	Yes

335 U.S. designation information is drawn from the supporting Treasury press releases.

Name of entity, with supporting information from the time of designation <sup>335</sup>	Designated by US?	Designated by EU?	Designated by UK?
<p>ASSOCIATION FOR FREE RESEARCH AND INTERNATIONAL COOPERATION (a.k.a. "AFRIC")</p> <p>The Association For Free Research And International Cooperation (AFRIC), [...] facilitate[s] Prigozhin's malign operations in Africa and Europe while primarily operating from Russia. AFRIC has served as a front company for Prigozhin's influence operations in Africa, including by sponsoring phony election monitoring missions in Zimbabwe, Madagascar, the Democratic Republic of the Congo, South Africa, and Mozambique. Despite posing as an African-led initiative, AFRIC serves to disseminate Russia's preferred messaging, often related to disinformation. AFRIC works in coordination with other elements of the Prigozhin network, including FZNC and the International Anticrisis Center, a fraudulent think tank controlled by Prigozhin's operatives. (U.S. designation)</p>	Yes	No	No
<p>CHANGSHA TIANYI SPACE SCIENCE AND TECHNOLOGY RESEARCH INSTITUTE CO. LTD (SPACETY CHINA).</p> <p>A People's Republic of China (PRC)-based entity that has provided Terra Tech synthetic aperture radar satellite imagery orders over locations in Ukraine. These images were gathered in order to enable Wagner combat operations in Ukraine (U.S. designation)</p>	Yes	No	No
<p>CHARTER GREEN LIGHT MOSCOW</p> <p>Operating or has operated in the aerospace sector of the Russian Federation economy. Charter Green Light is an aircraft charter service that offers VIP, group, cargo, and helicopter charters based in Moscow, Russia. It has been reported that it is the preferred company of the Wagner Group, which uses its charter planes to transport Wagner personnel and equipment. (U.S. designation)</p>	Yes	No	No
<p>CHINA HEAD AEROSPACE TECHNOLOGY COMPANY (a.k.a. CHINA HEAD TECHNOLOGY CO; a.k.a. HEAD AEROSPACE GROUP)</p> <p>A PRC-based satellite image reseller that supplied satellite imagery of locations in Ukraine to entities affiliated with PMC Wagner and Yevgeniy Prigozhin. (U.S. designation)</p>	Yes	No	No

Name of entity, with supporting information from the time of designation <sup>335</sup>	Designated by US?	Designated by EU?	Designated by UK?
<p>DIAM VILLE (a.k.a. DIAMVILLE; a.k.a. DIAMVILLE COMPANY; a.k.a. DIAMVILLE SAU; a.k.a. DIAMVILLE SAUAG)</p> <p>A gold and diamond purchasing company based in the CAR and controlled by Prigozhin. Diamville is one of several Prigozhin-connected entities that is intimately involved in the CAR mining sector. In 2022, Diamville participated in a gold selling scheme that entailed converting CAR-origin gold into U.S. dollars. Following the imposition of U.S. sanctions on several Russian financial institutions, participants in the scheme planned to move the proceeds by transferring cash by hand. Additionally, Diamville shipped diamonds mined in the CAR to buyers in the UAE and in Europe. (U.S. designation)</p>	Yes	Yes	No
<p>EVRO POLIS LTD. (a.k.a. EVRO POLIS)</p> <p>A Russian company that has contracted with the Government of Syria to protect Syrian oil fields in exchange for a 25 percent share in oil and gas production from the fields. Evro Polis Ltd. is being designated for being owned or controlled by Yevgeniy Prigozhin, (U.S. designation)</p>	Yes	Yes	Yes
<p>FEDERAL STATE GOVERNMENTAL INSTITUTION 223 FLIGHT UNIT STATE AIRLINES OF THE MINISTRY OF DEFENSE OF THE RUSSIAN FEDERATION (a.k.a. 223RD STATE AIRLINE FLIGHT UNIT; a.k.a. FGBU GAK 223 LETNYI OTRYAD MO RF; a.k.a. FGBU GOSUDARSTVENNAYA AVIAKOMPANIYA 223 LETNYY OTRYAD MO RF (Cyrillic: ФГБУ ГОСУДАРСТВЕННАЯ АВИАКОМПАНИЯ 223 ЛЕТНЫЙ ОТРЯД МО РФ); a.k.a. "223RD FLIGHT DETACHMENT"; a.k.a. "223RD FLIGHT UNIT").</p> <p>Wagner-linked entity (U.S. designation)</p>	Yes	No	No

Name of entity, with supporting information from the time of designation <sup>335</sup>	Designated by US?	Designated by EU?	Designated by UK?
<p>INDUSTRIAL RESOURCES GENERAL TRADING (a.k.a. INDUSTRIAL RESOURCES GENERAL TRADING LLC)</p> <p>A Dubai-based industrial goods distributor that has provided financial support to Prigozhin through its business dealings with Diamville. Industrial Resources also participated in the aforementioned gold selling scheme. Following U.S. sanctions on various Russian financial institutions, Industrial Resources wittingly participated in the transfer by hand of cash to Russia. Industrial Resources works with Diamville to generate revenue and move funds for Prigozhin. (U.S. designation)</p>	Yes	No	No
<p>INTERNATIONAL ANTICRISIS CENTER.</p> <p>A fraudulent think tank controlled by Prigozhin’s operatives (U.S. designation)</p>	Yes	No	No
<p>JOINT STOCK COMPANY RESEARCH AND PRODUCTION CONCERN BARL (AO BARL).</p> <p>A Russian space company supporting Russia’s military activities in Ukraine. AO BARL has shared foreign high-resolution satellite imagery with Russia’s military. It is listed in a section on entities and individuals that have supported Wagner’s military operations. (U.S. designation)</p>	Yes	No	No
<p>JOINT STOCK COMPANY TERRA TECH.</p> <p>Operating or has operated in the technology sector of the Russian Federation economy. It is listed in a section on entities and individuals that have supported Wagner’s military operations (U.S. designation).</p>	Yes	No	No
<p>KRATOL AVIATION (a.k.a. KRATOL AVIATION COMPANY; a.k.a. KRATOL AVIATION ‘FZC’).</p> <p>A UAE-based aviation firm. Wagner uses Kratol-provided aircraft to move personnel and equipment between the CAR, Libya, and Mali. (U.S. designation)</p>	Yes	No	No
<p>LIMITED LIABILITY COMPANY DM</p> <p>Limited Liability Company DM (OOO DM) is a Russia-based firm that also participated in the aforementioned gold selling scheme (see Diam Ville above). (U.S. designation)</p>	Yes	No	No
<p>LOBAYE INVEST (a.k.a. LOBAYE INVEST SARL; a.k.a. LOBAYE INVEST SARLU)</p> <p>Mining company linked to Prigozhin’s operations in CAR (U.S. designation)</p>	Yes	Yes	No

Name of entity, with supporting information from the time of designation <sup>335</sup>	Designated by US?	Designated by EU?	Designated by UK?
<p>M FINANS (a.k.a. M-FINANCE LLC; a.k.a. M-FINANS OOO).</p> <p>A mining company under sanction linked to Wagner’s operations in CAR. (U.S. designation)</p>	Yes	No	No
<p>M INVEST.</p> <p>Involved in furthering Prigozhin’s operations in Sudan and owned or controlled by Prigozhin. Serves as a cover for PMC Wagner forces operating in Sudan (U.S. designation)</p>	Yes	Yes	No
<p>MERCURY LLC.</p> <p>An oil and gas company in Syria, involved in supporting or benefiting from the Syrian regime and associated with Prigozhin (UK designation)</p>	No	Yes	Yes
<p>MEROE GOLD CO. LTD.</p> <p>A subsidiary of M Invest in Sudan (U.S. designation).</p>	Yes	Yes	No
<p>MIDAS RESSOURCES</p> <p>(a.k.a. MIDAS RESSOURCES LIMITED LIABILITY; a.k.a. MIDAS RESSOURCES MINING COMPANY; a.k.a. MIDAS RESSOURCES SARLU; a.k.a. MIDAS RESSOURCES SURL; a.k.a. MIDAS SURL; a.k.a. “MIDAS RESOURCES”)</p> <p>Owned or controlled by, or for having acted or purported to act for or on behalf of, directly or indirectly, Prigozhin (U.S. designation).</p>	Yes	No	No
<p>OFFICER’S UNION FOR INTERNATIONAL SECURITY (a.k.a. SODRUZHESTVO OFITSEROV ZA MEZHDUNARODNUYU BEZOPASNOST; a.k.a. “OUIS”)</p> <p>Involved in Wagner’s CAR operations. It is a front company that claims to represent Russian “instructors” in CAR. Starting in 2021, Wagner used OUIS to obscure an increase of Wagner Group personnel operating in CAR. (U.S. designation)</p>	Yes	No	No
<p>PATRIOT MEDIA GROUP</p>	No	Yes	No

Name of entity, with supporting information from the time of designation <sup>335</sup>	Designated by US?	Designated by EU?	Designated by UK?
<p>PMC WAGNER</p> <p>(a.k.a. CHASTNAYA VOENNAYA KOMPANIYA 'VAGNER'; a.k.a. CHVK VAGNER; a.k.a. PRIVATE MILITARY COMPANY 'WAGNER'; a.k.a. WAGNER GROUP (Cyrillic: ГРУППА ВАГНЕРА)).</p> <p>A private military company that has recruited and sent soldiers to fight alongside separatists in eastern Ukraine. Responsible for or complicit in, or having engaged in, directly or indirectly, actions or policies that threaten the peace, security, stability, sovereignty, or territorial integrity of Ukraine (U.S. designation).</p>	Yes	Yes	Yes
<p>PRIME SECURITY AND DEVELOPMENT (a.k.a. PRIME SECURITY AND DEVELOPMENT JSC)</p> <p>Owned or controlled by, or for having acted or purported to act for or on behalf of, directly or indirectly, Wagner. Has acted as a Wagner front company and its Director General has represented Wagner in discussions with African governments. (U.S. designation)</p>	Yes	No	No
<p>RADIO LENGO SENGO</p> <p>A Central African radio station conducting disinformation campaigns and promoting Wagner's presence in CAR (EU designation)</p>	No	Yes	No
<p>RIA FAN MEDIA GROUP</p> <p>Prigozhin-linked media group (EU designation)</p>	No	Yes	No
<p>RUSICH MILITARY GROUP.</p> <p>Linked to Wagner (EU designation).</p>	Yes	Yes	No
<p>SEWA SECURITY SERVICES (Latin: SEWA SÉCURITÉ SERVICES).</p> <p>A CAR-based security company controlled by the Wagner Network that provides protection for senior CAR government officials. Sewa has also claimed to provide "instructors" for "training exercises" in CAR. (U.S. designation)</p>	Yes	Yes	No



Name of entity, with supporting information from the time of designation <sup>335</sup>	Designated by US?	Designated by EU?	Designated by UK?
<p>SHEN YANG JING CHENG MACHINERY IMP&amp;EXP. CO.</p> <p>Designated for having materially assisted Prigozhin. Owned by Shine Dragon Group Limited. Involved in facilitating over 100 transactions exceeding \$7.5 million that were sent in the interest of Prigozhin" (U.S. designation)</p>	Yes	No	No
<p>SHINE DRAGON GROUP LIMITED.</p> <p>Designated for having materially assisted Prigozhin. Involved in facilitating over 100 transactions exceeding \$7.5 million that were sent in the interest of Prigozhin (U.S. designation)</p>	Yes	No	No
<p>SPACETY LUXEMBOURG S.A. (SPACETY LUXEMBOURG).</p> <p>Spacety China's Luxembourg-based subsidiary, mentioned among companies that had support Wagner's military operations (U.S. designation)</p>	Yes	No	No
<p>THE FOUNDATION FOR NATIONAL VALUES PROTECTION (Cyrillic: ФОНДА ЗАЩИТЫ НАЦИОНАЛЬНЫХ ЦЕННОСТЕЙ) (a.k.a. "FZNC").</p> <p>Alexander Malkevich (Malkevich) and his company, the Foundation for National Values Protection (FZNC), have facilitated Prigozhin's global influence operations since at least 2019. (U.S. designation)</p>	Yes	Yes	No
<p>VELADA LLC.</p> <p>An oil and gas company in Syria, involved in supporting or benefiting from the Syrian regime and associated with Prigozhin (UK designation).</p>	No	Yes	Yes
<p>ZHE JIANG JIAYI SMALL COMMODITIES TRADE COMPANY LIMITED.</p> <p>Designated for having materially assisted Prigozhin. Owned by Shine Dragon Group Limited. Involved in facilitating over 100 transactions exceeding \$7.5 million that were sent in the interest of Prigozhin (U.S. designation)</p>	Yes	No	No

Name of entity, with supporting information from the time of designation <sup>335</sup>	Designated by US?	Designated by EU?	Designated by UK?
<p data-bbox="236 309 528 338">"PMC Wagner Centre".</p> <p data-bbox="236 367 778 551">A Russian commercial venture, aiming to support private sector investment and innovation to support and bolster Russia's defence capabilities, with close links to the unincorporated 'PMC Wagner Group'. (EU designation)</p>	No	Yes	No

## Appendix 2: Further individuals and entities associated with the Wagner Network

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The Committee commissioned small-scale open-source research into the Wagner Group's network and operations, which was carried out by the not-for-profit Centre for Information Resilience (CIR). This research identified individuals and entities involved with the Wagner Network's operations.

Individuals and entities that are not widely sanctioned are listed in tables below, with notes supplied by CIR. The inclusion of these names supports paragraph 61 of this report, where we explain that, by releasing these names identified via our commissioned open-source research, we hope to challenge the mystique that the Wagner Network cultivated in many countries, maximise operating inconvenience, create a deterrent effect and enable the Government to improve its apparently limited understanding of the Network.

We implore the Government to urgently assess these names and sanction these individuals and sanctions if the necessary threshold is met (paragraph 61).

**We are publishing the names of individuals and entities with the legal protection afforded by parliamentary privilege. Readers should note that this protection does not apply to those repeating its contents outside the formal proceedings of the House and its committees.**

### Individuals

The table below draws together key players in the Wagner Network. Despite their seniority within companies/organisations that have been sanctioned by the UK, the US and/or the EU, these individuals have not been sanctioned by the UK.

Details	Location	Position	Notes on Wagner link
<p>Name: Igor Viktorovich Khodyrev</p> <p>Nationality: Russian</p>	Syria, Russia	<p>General Director of Kapital (see next table);</p> <p>Chief geologist of Evro Polis (aka. Evropolis)</p>	Involved in the Russian extraction of resources in the Middle East and Africa, including through organisations associated with Prigozhin's network. Chief geologist of Evro Polis, the legal cover of Wagner and affiliated entities in Syria. General director of Kapital, the Russian oil and gas company on contract with the Syrian government.
<p>Name: Artem Ivanovich Tolmachev</p> <p>Nationality: Russian</p>	CAR	Commercial Director of Bois Rouge (see next table)	A senior businessman within Prigozhin's network, Tolmachev leads efforts to exploit the timber industry in the CAR.
<p>Name: Pavel Andreevich Karasev</p> <p>Nationality: Russian</p>	Syria	CEO of Mercury LLC	Mercury LLC is an oil and gas company in Syria, which supports and benefits from the Syrian regime and is associated with Prigozhin. It is sanctioned by the UK and others.
<p>Name: Irina Vladimirova Markova</p> <p>Nationality: Russian</p>	Syria	CEO of Velada LLC since January 2023	Velada LLC is an oil and gas company in Syria, which supports and benefits from the Syrian regime and is associated with Prigozhin. It is sanctioned by the UK and others.
<p>Name: Rafael Marsilovich Slaimonov</p> <p>Nationality: Russian</p>	Syria	CEO of Evro Polis LLC	As the head of Evro Polis, Slaimanov is responsible for significant wealth generation for Prigozhin through oil and gas extraction in Syria. Evro Polis is an oil and gas company in Syria, which is supports and benefits from the Syrian regime and is associated with Prigozhin. It is sanctioned by the UK and others.

Details	Location	Position	Notes on Wagner link
<p>Name: Jose Matemulane</p> <p>Aliases: José Matemulane; José Zacarias Samuel Matemulane</p> <p>Nationality: Mozambican</p>	Unknown	Director of AFRIC (an entity sanctioned by the US Government)	<p>Matemulane has attended events such as the 2019 Russia-Africa Summit in Sochi, which was likely a recruiting event for the Kremlin.</p> <p>One open source claims that Matemulane directed AFRIC from Maputo, Mozambique. Some of Matemulane's activities through AFRIC include meddling in the 2018 Zimbabwe general elections under the guise of "election observation".</p>

## Entities

The table below draws together key Wagner-linked entities identified by CIR. They are not widely sanctioned.

Entity	Activities	Notes on Wagner link
<p>Bois Rouge</p> <p>Country registered: CAR</p>	Timber	The company Bois Rouge is linked to Russia and the Prigozhin network through its significant purchasing of Russian equipment and machinery, and transactions conducted with Broker Expert LLC (see below). <sup>336</sup> Bois Rouge received a concession for timber access in the Lobaye region, at the same time that the Central African Armed Forces (FACA) launched a military campaign there. The campaign was allegedly launched to remove rebel groups holding various cities in the region, including Boda city, held by the Coalition des Patriotes pour le Changement (CPC). The Wagner Network supported the military operation. The investigative project All Eyes on Wagner confirmed that Wagner and FACA controlled Boda by the time Bois Rouge was awarded the concession.
<p>Kapital LLC</p> <p>Country registered: Russia</p>	Oil and gas production; mineral extraction; crops cultivation	Effective beneficiary is Prigozhin. Has a Syrian branch and holds an oil and gas contract with the Syrian Government.
<p>Broker Expert LLC</p> <p>Country registered: Russia</p>	Wholesale and other activities	A company linked to several entities, all of which fall under the directorship or beneficial ownership of members of the Prigozhin family. Broker Expert LLC also conducts business with other alleged Wagner-affiliated companies, such as Meroe Gold and M-Finance (see Appendix 1).

336 All Eyes on Wagner, '[Come follow the redwood trees – tracking Wagner's forestry business in CAR](#)' (accessed 16 July 2023)

# Formal minutes

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**Tuesday 18 July 2023**

## ***Members present***

Alicia Kearns

Sir Chris Bryant

Neil Coyle

Drew Hendry

Henry Smith

Graham Stringer

## **The Wagner Group and beyond: proxy Private Military Companies**

Draft Report (*Guns for gold: the Wagner Network exposed*), proposed by the Chair, brought up and read.

*Ordered*, That the draft Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 90 read and agreed to.

A Paper was appended to the Report as Appendix 1.

A Paper was appended to the Report as Appendix 2.

Summary agreed to.

*Resolved*, That the Report be the Seventh Report of the Committee to the House.

*Ordered*, That the Chair make the Report to the House.

*Ordered*, That embargoed copies of the Report be made available (Standing Order No. 134).

## **Adjournment**

Adjourned till Tuesday 5 September at 2.00 pm.

## Witnesses

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The following witnesses gave evidence. Transcripts can be viewed on the [inquiry publications page](#) of the Committee's website.

### Tuesday 19 April 2022

**Dr SORCHA MacLeod**, Associate Professor, University of Copenhagen, Chair, UN Working Group on the use of mercenaries; **Christo Grozev**, Executive Director and ex-Russia investigator, Bellingcat; **Dr Sean McFate**, Senior Fellow, Atlantic Council, Professor, National Defense University

[Q1–65](#)

### Tuesday 1 November 2022

**Jason McCue**, Senior Partner, McCue Jury & Partners; **Professor Jason Blazakis**, Executive Director of the Center on Terrorism, Extremism, and Counterterrorism, Middlebury Institute of International Studies, Senior Research Fellow, The Soufan Center

[Q66–95](#)

**Mikhail Khodorkovsky**, Public figure, former political prisoner and pro-democracy activist

[Q96–107](#)

### Monday 6 February 2023

**Leo Docherty MP**, Parliamentary Under-Secretary of State, Foreign, Commonwealth & Development Office; **Ben Fender OBE**, Director, Eastern Europe and Central Asia, Foreign, Commonwealth & Development Office; **Hazel Cameron**, Head of the Human Rights Department, Foreign, Commonwealth & Development Office

[Q108–282](#)

## Published written evidence

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The following written evidence was received and can be viewed on the [inquiry publications page](#) of the Committee's website.

WGN numbers are generated by the evidence processing system and so may not be complete.

- 1 Anonymised ([WGN0014](#))
- 2 Anonymised ([WGN0026](#))
- 3 Center on Terrorism, Extremism, and Counterterrorism – Middlebury Institute of International Studies ([WGN0023](#))
- 4 Democracy & Human Rights Foundation ([WGN0011](#))
- 5 DeVore, Dr Marc; Harkness, Dr Kristen; Orr, Professor Andrew; and Plichta, Mr Marcel ([WGN0008](#))
- 6 Dossier Center ([WGN0009](#))
- 7 Foreign, Commonwealth and Development Office ([WGN0025](#))
- 8 Galeotti, Professor Mark ([WGN0005](#))
- 9 Henry Jackson Society ([WGN0020](#))
- 10 International Code of Conduct Association ([WGN0015](#))
- 11 Petersohn, Dr Ulrich ([WGN0004](#))
- 12 Proelium Law ([WGN0016](#))
- 13 Protection Approaches ([WGN0024](#))
- 14 Tamil Information Centre ([WGN0010](#))
- 15 The Sentry ([WGN0017](#))
- 16 Transparency International UK and Transparency International Defence & Security ([WGN0021](#))
- 17 White, Mr Darren ([WGN0001](#))



# List of Reports from the Committee during the current Parliament

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All publications from the Committee are available on the [publications page](#) of the Committee's website.

## Session 2022–23

Number	Title	Reference
1st	Missing in action: UK leadership and the withdrawal from Afghanistan	HC 169
2nd	The cost of complacency: illicit finance and the war in Ukraine	HC 168
3rd	Encoding values: Putting tech at the heart of UK foreign policy	HC 170
4th	Developments in UK Strategic Export Controls	HC 282
5th	Refreshing our approach? Updating the Integrated Review	HC 882
6th	Stolen years: combatting state hostage diplomacy	HC 166
1st Special	Lagos calling: Nigeria and the Integrated Review: Government Response to the Committee's Seventh Report of Session 2021–22	HC 573
2nd Special	Missing in action: UK leadership and the withdrawal from Afghanistan: Government Response to the Committee's First Report	HC 630
3rd Special	The cost of complacency: illicit finance and the war in Ukraine: Government Response to the Committee's Second Report	HC 688
4th Special	Encoding values: Putting tech at the heart of UK foreign policy—Government Response to the Committee's Third Report	HC 811
5th Special	Refreshing our approach? Updating the Integrated Review: Government Response to the Committee's Fifth Report	HC 1401
6th Special	Stolen years: combatting state hostage diplomacy: Government Response to the Committee's Sixth Report	HC 159

## Session 2021–22

Number	Title	Reference
1st	In the room: the UK's role in multilateral diplomacy	HC 199
2nd	Never Again: The UK's Responsibility to Act on Atrocities in Xinjiang and Beyond	HC 198
3rd	Sovereignty for sale: the FCDO's role in protecting strategic British assets	HC 197
4th	The UK Government's Response to the Myanmar Crisis	HC 203

<b>Number</b>	<b>Title</b>	<b>Reference</b>
5th	Global Health, Global Britain	HC 200
6th	Sovereignty for sale: follow-up to the acquisition of Newport Wafer Fab	HC 1245
7th	Lagos calling: Nigeria and the Integrated Review	HC 202
1st Special	A climate for ambition: Diplomatic preparations for COP26: Government Response to the Committee's Seventh Report of Session 2019–21	HC 440
2nd Special	Government response to the Committee's First Report of Session 2021–22: In the room: the UK's role in multilateral diplomacy	HC 618
3rd Special	Government Response to the Committee's Fourth Report: The UK Government's Response to the Myanmar Crisis	HC 718
4th Special	Government response to the Committee's Third Report: Sovereignty for sale: the FCDO's role in protecting strategic British assets	HC 807
5th Special	Never Again: The UK's Responsibility to Act on Atrocities in Xinjiang and Beyond: Government Response to the Committee's Second Report	HC 840
6th Special	Global Health, Global Britain: Government Response to the Committee's Fifth Report	HC 955
7th Special	Government Response to the Committee's Sixth Report: Sovereignty for sale: follow-up to the acquisition of Newport Wafer Fab	HC 1273