

Ownership & Control of OnlyOffice

Overview

OnlyOffice, and R7 Office (named after a nuclear capable missile) seem to be owned and controlled by the same Russian persons. They appear to work quite hard to hide their national identity and the control of the Russian federation over their software. They try to sell this software for use with the most security critical documents across Europe and the world. This presents a potentially interesting strategic risk.

Their initial approach was to obscure their origin via a mix of Latvian and London companies controlled from Russia. Since the Ukraine war and introduction of sanctions their corporate structure got significantly more complex and migrated to Singapore.

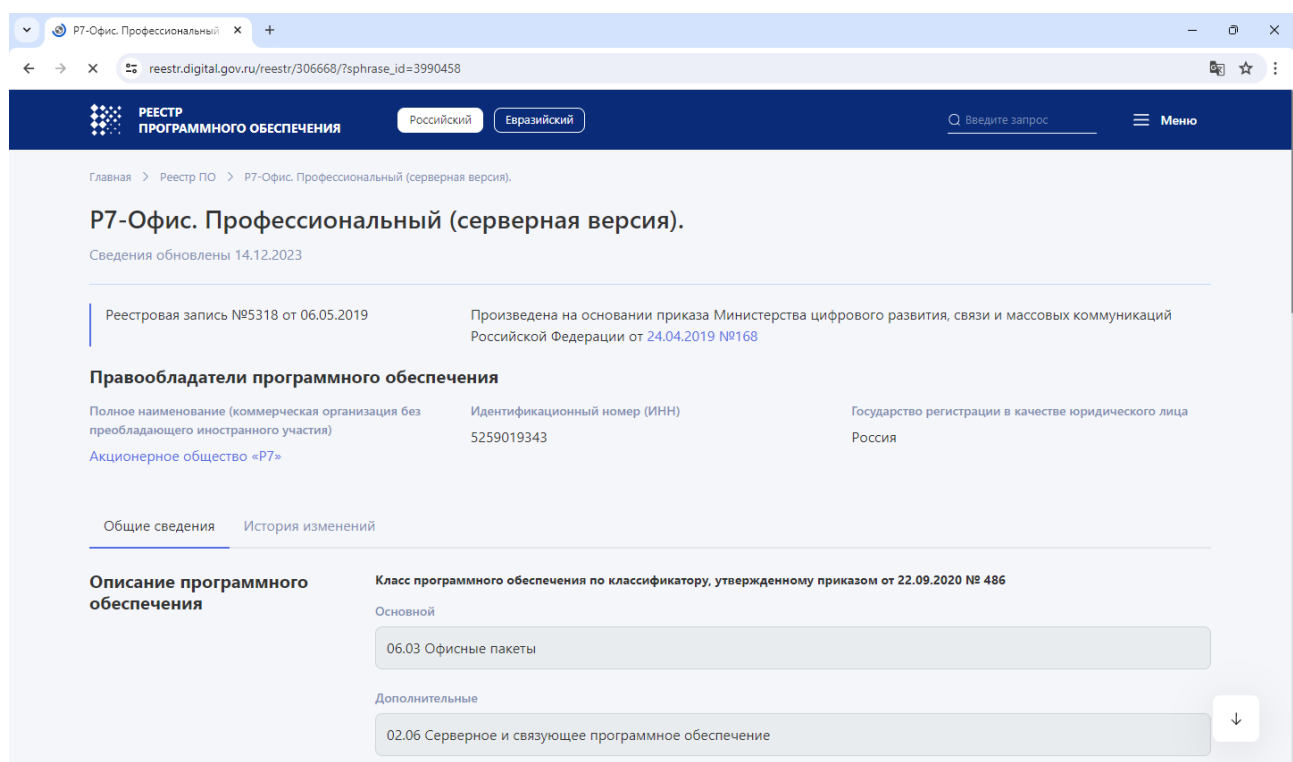
The software is indistinguishably different from both companies, even the logos share elements and colors.

The text below focuses on the fact that they are registered on the “registry of Russian software”. This requires software to be fully owned by a **subject of the Russian Federation**, and under that control. This matches the shareholding details we have from Creditreform reports from in the last weeks for both R7 and their previous holding company.

The text and associated documents below have a single purpose: to demonstrate from the available evidence that both OnlyOffice and R7 Office appear to be owned and controlled by Russian citizens, who present themselves with flags of convenience in each jurisdiction; thus attempting to avoiding sanctions, and potentially to mislead users as to the security risks of their products.

The national register of Russian Software

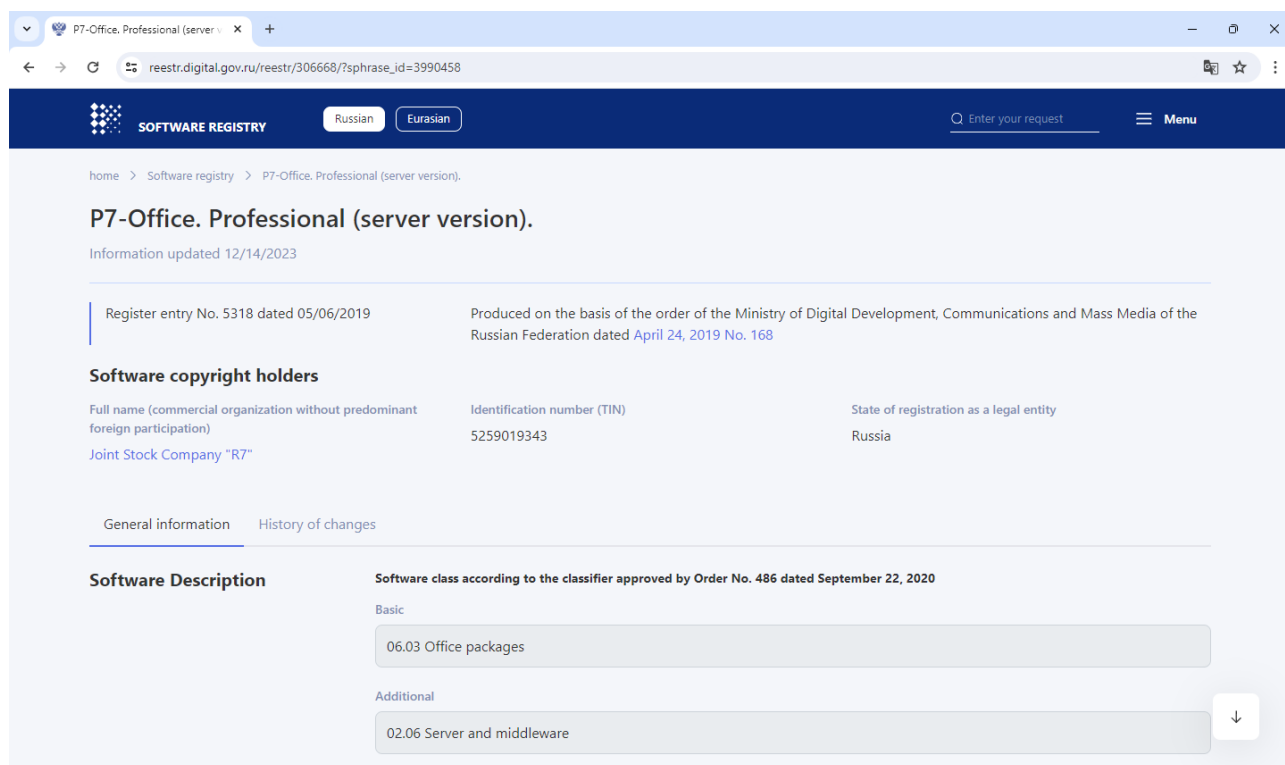
R7 Office is present on the national register of Russian Software.



The screenshot shows a web browser window with the URL `reestr.digital.gov.ru/reestr/306668/?sphrase_id=3990458`. The page is the Russian National Register of Software (Реестр Программного Обеспечения). The header includes the site logo, language selectors (Russian and Ukrainian), a search bar, and a menu. The main content area displays details for "R7-Office Professional (server version)". It includes the registration date (06.05.2019), the issuing authority (Ministry of Digital Development, Communications and Mass Communications), and the rights holders (Full name: "R7" Joint-Stock Company, INN: 5259019343, State registration: Russia). Below this, there are tabs for "General information" (selected) and "History of changes". The "General information" tab shows the software classification (Class 06.03 Office packages, Additional 02.06 Server and connecting software) and a download button.

Регистровая запись №5318 от 06.05.2019	Произведена на основании приказа Министерства цифрового развития, связи и массовых коммуникаций Российской Федерации от 24.04.2019 №168	
Правообладатели программного обеспечения		
Полное наименование (коммерческая организация без преобладающего иностранного участия) Акционерное общество «Р7»	Идентификационный номер (ИНН) 5259019343	Государство регистрации в качестве юридического лица Россия

Описание программного обеспечения	Класс программного обеспечения по классификатору, утвержденному приказом от 22.09.2020 № 486
Основной	06.03 Офисные пакеты
Дополнительные	02.06 Серверное и связующее программное обеспечение



Excerpts from Russian law - Decree 1236 from 2015 -

The text is cited in translation in full below in Appendix 1.

5. The register of Russian software includes information about software that meets the following requirements:

a) the exclusive right to the software throughout the world and for the entire duration of the exclusive right **belongs to** one or more of the following persons (right holders): ... Russian Federation; **subject of the Russian Federation**; municipality

...

5.1

a) the manufacturer of the software and hardware complex is a Russian legal entity that is **not under the control of** a foreign state, and (or) an international organization, and (or) a foreign legal entity or **individual**, and (or) a foreign structure without forming a legal entity.

From the statute, and the presence of R7 in this statutory directory - we can say that exclusive rights to R7 office belong to a subject of the Russian Federation, and that the manufacture is under the control of Russian individuals.

OnlyOffice and R7 Office are the same thing

OnlyOffice	R7-Office (Р7-Офис)
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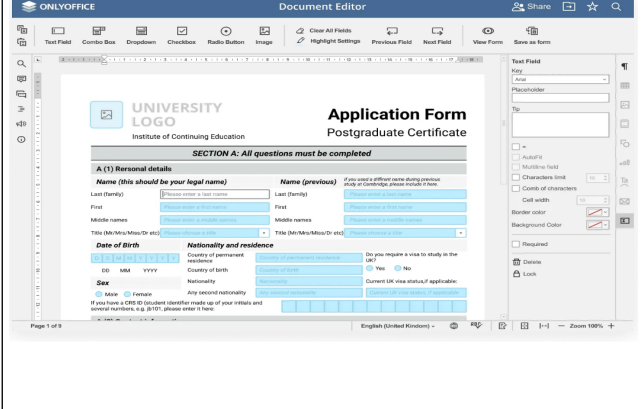


Website: <https://www.onlyoffice.com/>

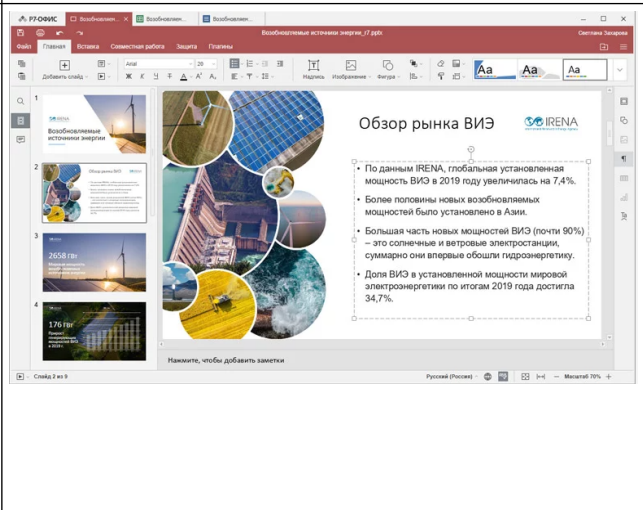
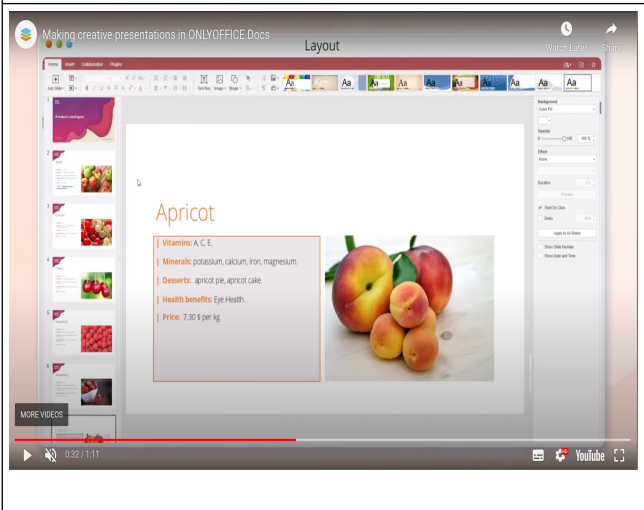
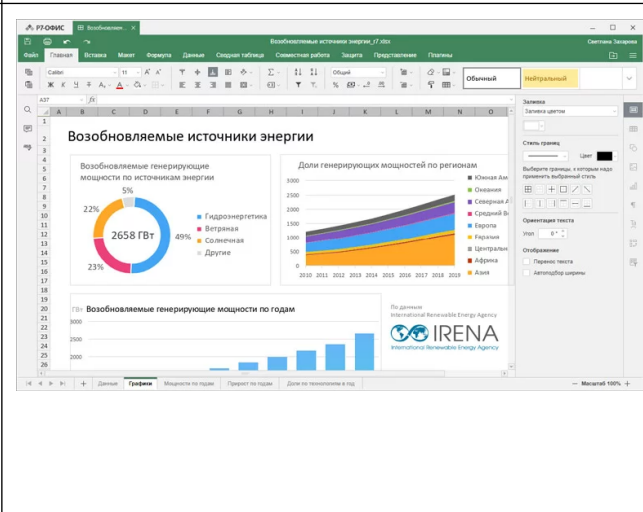
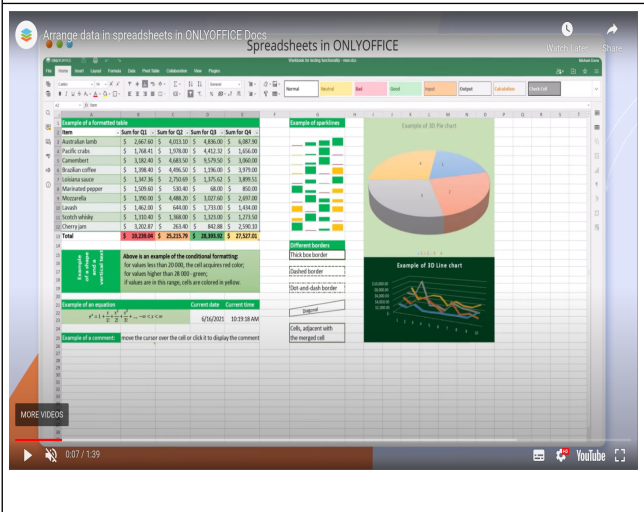
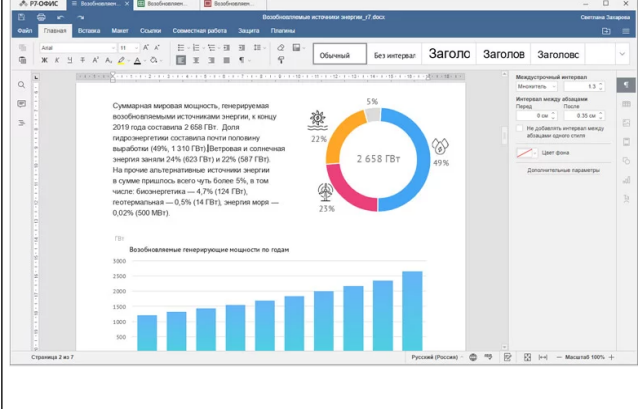


Website: <https://r7-office.ru/>

Screenshots:



Screenshot:



There are many other similarities from versioning, to UI, feature-set etc. However R7-Office is not a faux- open-source product like OnlyOffice; however an identical user experience, color scheme, icon-set, tools, layout, etc. leaves little to the imagination.

Ascencio Systems / Riga Latvia

Another associated company has been Ascencio Systems – I attach a PDF: Lev-Bannov-Russian-2022-Ascencio.pdf is the Ascencio systems records from last year which has a more accurate affiliation stated:

Beneficial owners

Bannov Lev, 800019-83006, 11.10.1962

(Surname, name, id number, date of birth)

Time	Country of residence	Nationality
From 13.03.2018	Russian Federation	Russian Federation
Type of control: on the basis of ownership		

Control chain

-  Ascensio System, SIA
-  **ASCENSIO SYSTEM LIMITED**, Registration number: 1000324695, Registered address: Great Portland iela 85, Londona, W1W7LT, Lielbritānija
-  **AO "Tehnologii raspredelennih komunikacij"**, Registration number: 1000324707, Registered address: Nižnij Novgorod, Lva Tolstogo iela 8-12, Krievija, 603003
-  Bannov Lev

I expect that this year nationality will be Turkish I believe past the pay-wall at:

<https://company.lursoft.lv/en/ascensio-system/40103265308> to match the Singaporian company's stated nationality in Lev-Bannov-Turkish-2023.pdf also provided.

Appendix 1 – Russian Individual

Russian Law - Decree 1236 from 2015 -

Text is translated from: https://www.consultant.ru/document/cons_doc_LAW_189116/

Raw text as PDF (in Russian) is in Russian-Software-Statute.pdf.

Rules

for the formation and maintenance of a unified register of Russian programs for electronic computers and databases and a unified register of programs for electronic computers and databases from member states of the Eurasian Economic Union, with the exception of the Russian Federation (approved by Decree of the Government of the Russian Federation of November 16, 2015 N 1236)

I. General provisions

1. These Rules determine the procedure for the formation and maintenance of a unified register of Russian programs for electronic computers and databases (hereinafter referred to as the register of Russian software) and a unified register of programs for electronic computers and databases from member states of the Eurasian Economic Union, with the exception of the Russian Federation (hereinafter - the register of Eurasian software), the composition of the information included in them, the conditions for their inclusion in the register of Russian software and the register of Eurasian software (hereinafter - the registers) and exclusions from the registers, the procedure for providing such information, the procedure for making a decision on the inclusion of such information to registers and exclusion of information from registers, as well as the criteria and procedure for determining operators involved in the formation and maintenance of registers.

2. The concepts used in these Rules mean the following:

"software" - a program for electronic computers and databases;

"software class" - a group that unites software that has similar functional, technical and (or) operational characteristics, and which is determined in accordance with the classifier of programs for electronic computers and databases (hereinafter referred to as the classifier) and the rules for its application, approved by the Ministry of Digital Development, Communications and Mass Communications of the Russian Federation;

"state - member of the Eurasian Economic Union" - state - member of the Eurasian Economic Union, with the exception of the Russian Federation;

"software and hardware complex" - a complex of hardware and software (software) working together to perform one or more special tasks, which is an electronic computer or specialized electronic device (devices), the functional and technical characteristics of which are determined solely by the combination software and hardware and cannot be implemented when they are separated. The software and hardware complex is an independently used, complete technical product with a serial number;

"class of software and hardware complex" - a group that unites software and hardware systems that have similar functional and technical characteristics, taking into account the purpose and scope of application, and which is determined in accordance with the classifier of software and hardware

systems and the rules for its use, approved by the Ministry of Digital Development , communications and mass communications of the Russian Federation.

3. The formation of registers is carried out by the Ministry of Digital Development, Communications and Mass Communications of the Russian Federation, which is the authorized federal executive body for the formation and maintenance of registers (hereinafter also referred to as the authorized body).

The formation of a register of Russian software is carried out by the authorized body by making decisions on the inclusion of information about software, software and hardware systems in the register of Russian software or on the exclusion of information about software, software and hardware systems from the register of Russian software.

The formation of a register of Eurasian software is carried out by the authorized body by making decisions on including information about software in the register of Eurasian software or excluding information about software from the register of Eurasian software.

The maintenance of registers is carried out in electronic form by creating, changing and (or) deleting register entries using the federal state information system “Registers of programs for electronic computers and databases.

II. The procedure for creating and maintaining a register of Russian software

4. The software registry entry contains the following information:

- a) serial number of the register entry;
- b) date of formation of the register entry;
- c) name of the software;
- d) previous and (or) alternative names of the software (if available);
- e) product code(s) in accordance with the All-Russian Classifier of Products by Type of Economic Activity;
- f) information about the copyright holders of the software:

in relation to a citizen of the Russian Federation - last name, first name, patronymic (if any), taxpayer identification number, name and details of an identity document of a citizen of the Russian Federation on the territory of the Russian Federation, registration address at the place of residence (stay) or address of the place of actual residence;

in relation to a legal entity - full name, main state registration number of registration as a legal entity, taxpayer identification number;

in relation to the Russian Federation - the words “Russian Federation”;

in relation to a subject of the Russian Federation - the full name of the subject of the Russian Federation;

in relation to a municipal entity - the full name of the municipal entity (according to the charter of the municipal entity);

g) the address of the page of the copyright holder's website on the information and telecommunications network "Internet" (hereinafter referred to as the "Internet"), which contains documentation containing a description of the functional characteristics of the software and information necessary for installing and operating the software;

h) information on the grounds for the copyright holder(s) to have an exclusive right to software throughout the world and for the entire period of validity of the exclusive right;

i) date of state registration and registration number of the software (if available);

j) the software class(es) to which the software corresponds;

k) date of adoption by the authorized body of the decision to include information about the software in the register;

l) information about the date and content of changes made to the register (if any);

m) the address of the page of the copyright holder's website on the Internet, which contains information about the cost of the software or the procedure for determining it, or information about the possibility of using the software under the terms of an open license or other free license agreement;

Clause 4 was supplemented with subclause "o" from January 1, 2018 - Decree of the Government of the Russian Federation of December 20, 2017 N 1594

o) information on the availability of software in the national fund of algorithms and programs for electronic computers;

o) information on the compliance of the software with the requirements established by paragraph 5 of these Rules;

p) about software modules, which are separate functional components of the software (if any);

c) a special sign indicating that the software belongs to the field of artificial intelligence (if any);

Clause 4 was supplemented with subclause "t" from January 1, 2023 - Decree of the Government of Russia of December 28, 2022 N 2461

r) a list of foreign software that has similar functional characteristics to the software (if available);

Clause 4 was supplemented with subclause "y" from January 1, 2023 - Decree of the Government of Russia of December 28, 2022 N 2461

s) the amount of payments expressed as a percentage under licensing and other agreements providing for the granting of the right to use the result of intellectual activity and means of individualization, performance of work, provision of services in connection with the development,

adaptation and modification of software in favor of foreign legal entities and (or) individuals persons, Russian commercial and (or) Russian non-profit organizations controlled by them, agents, representatives of foreign persons and Russian commercial and (or) Russian non-profit organizations controlled by them, from the proceeds received by the copyright holder (copyright holders) of the software for the past calendar year as remuneration for granting the right to use software on the basis of a license or other type of agreement;

t) information on compatibility with the operating system, information about which is included in the register of Russian software and (or) the register of Eurasian software (if available);

x) information on the presence or absence of vulnerabilities in the software from the database of information security threats of the Federal Service for Technical and Export Control (if available).

The rules are supplemented by clause 4.1 from January 1, 2023 - Decree of the Government of Russia of December 28, 2022 N 2461

4 1 . The registry entry about the hardware and software complex contains the following information:

a) serial number of the register entry;

b) date of formation of the register entry;

c) name of the software and hardware complex;

d) previous and (or) alternative names of the software and hardware complex (if available);

e) code(s) of the software and hardware complex in accordance with the All-Russian Classifier of Products by Type of Economic Activity (if available);

f) information about the manufacturer (manufacturers) of the software and hardware complex:

in relation to a citizen of the Russian Federation - last name, first name, patronymic (if any), taxpayer identification number, name and details of an identity document of a citizen of the Russian Federation on the territory of the Russian Federation, registration address at the place of residence (stay) or address of the place of actual residence;

in relation to a legal entity - full name, main state registration number of registration as a legal entity, taxpayer identification number;

in relation to the Russian Federation - the words "Russian Federation";

in relation to a subject of the Russian Federation - the full name of the subject of the Russian Federation;

in relation to a municipal entity - the full name of the municipal entity (according to the charter of the municipal entity);

g) serial number of the software registry entry from the register of Russian software as part of the hardware and software complex;

h) serial number of the register entry of technical equipment from paragraph 5 1 of these Rules;

i) information on the grounds for the manufacturer of the hardware and software complex to have the right to use the software as part of the hardware and software complex;

j) class (classes) of the software and hardware complex, to which the software and hardware complex corresponds according to the classifier of software and hardware complexes;

k) name, type and code(s) of equipment as part of the hardware and software complex in accordance with the All-Russian Classifier of Products by Type of Economic Activity (if any);

l) date of adoption by the authorized body of the decision to include information about the software and hardware complex in the register;

m) information about the date and content of changes made to the register (if any).

Clause 5 amended from January 1, 2018 - Decree of the Government of the Russian Federation of December 20, 2017 N 1594

See previous edition

5. The register of Russian software includes information about software that meets the following requirements:

a) the exclusive right to the software throughout the world and for the entire duration of the exclusive right belongs to one or more of the following persons (right holders):

Russian Federation;

subject of the Russian Federation;

municipality;

a Russian non-profit organization, the highest management body of which is formed directly and (or) indirectly by the Russian Federation, constituent entities of the Russian Federation, municipalities and (or) citizens of the Russian Federation and the decisions of which a foreign person does not have the opportunity to determine due to the peculiarities of the relationship between such a foreign person and the Russian non-profit organization (hereinafter referred to as a Russian non-profit organization without predominant foreign participation);

a Russian commercial organization in which the total share of direct and (or) indirect participation of the Russian Federation, constituent entities of the Russian Federation, municipalities, Russian non-profit organizations without predominant foreign participation, citizens of the Russian Federation is more than 50 percent (hereinafter referred to as a Russian commercial organization without predominant foreign participation);

citizen of the Russian Federation;

b) the software has been lawfully introduced into civil circulation on the territory of the Russian Federation, copies of the software or the right to use the software, services for providing access to the software are freely implemented throughout the Russian Federation, there are no restrictions established, including by foreign states, that prevent distribution or other use of a program for electronic computers and a database on the territory of the Russian Federation or the territories of

individual constituent entities of the Russian Federation;

c) the total amount of payments under licensing and other agreements providing for the granting of the right to use the result of intellectual activity and means of individualization, performance of work, provision of services for the development, modification and adaptation of a program for electronic computers or a database in favor of foreign legal entities and (or) individuals, Russian commercial and (or) non-profit organizations controlled by them, agents, representatives of foreign persons and Russian commercial and (or) non-profit organizations controlled by them, amounts to less than 30 percent of the revenue received by the copyright holder (copyright holders) for the past calendar year as remuneration for granting the right to use a program for electronic computers or a database on the basis of a license or other type of agreement;

d) information about the software does not constitute a state secret and the software does not contain information constituting a state secret;

e) compliance of the software with information security requirements is confirmed by a certificate of the information security certification system for information security requirements, issued in the manner established by the Government of the Russian Federation (only for software whose main function is the protection of confidential information);

f) the exclusive right to software throughout the world and for the entire period of validity of the exclusive right belongs to the persons (right holders) specified in paragraphs five to seven of subparagraph "a" of this paragraph, who have a license to carry out activities for the development and production of means of protecting confidential information (only for software whose main function is to protect confidential information);

Clause 5 was supplemented with subclause "g" from January 1, 2018 - Decree of the Government of the Russian Federation of December 20, 2017 N 1594

g) the software is not subject to forced updating and control from abroad;

h) warranty service, technical support and software modernization, including modification of the source code of the software, are carried out by a Russian commercial or non-profit organization without predominant foreign participation or by a citizen of the Russian Federation;

i) technical means of storing the source text and object code of the software, as well as technical means of compiling the source text into the object code of the software are located on the territory of the Russian Federation;

j) the technical means necessary for activation, release, distribution, management of software license keys are located on the territory of the Russian Federation, controlled by Russian organizations or citizens of the Russian Federation;

k) the graphical user interface of the software is implemented in Russian.

The rules are supplemented by clause 5.1 from January 1, 2023 - Decree of the Government of Russia of December 28, 2022 N 2461

5 1 . The register of Russian software includes information about the hardware and software complex if the following requirements are met:

a) the manufacturer of the software and hardware complex is a Russian legal entity that is not under

the control of a foreign state, and (or) an international organization, and (or) a foreign legal entity or individual, and (or) a foreign structure without forming a legal entity. In this case, a legal entity is considered to be under the control of a foreign state, and (or) a foreign person, and (or) a foreign structure without forming a legal entity if one of the following signs is present:

the controlling person has the right to directly or indirectly dispose (including on the basis of a property trust management agreement, a simple partnership agreement, an agency agreement or as a result of other transactions or on other grounds) more than 50 percent of the total number of votes attributable to voting shares (stakes) , constituting the authorized capital of the controlled entity;

the controlling person, on the basis of an agreement or for other reasons, has acquired the right or authority to determine decisions made by the controlled person;

the controlling person has the right to appoint the sole executive body and (or) more than 50 percent of the composition of the collegial executive body of the controlled entity and (or) has the unconditional opportunity to elect more than 50 percent of the composition of the board of directors (supervisory board) or other collegial management body of the controlled entity;

the controlling person exercises the powers of the management company of the controlled person;

b) information about the software as part of the hardware and software complex is included in the register of Russian software or the register of Eurasian software;

c) technical means as part of the hardware and software complex meet one of the conditions:

technical means as part of the software and hardware complex are included in the unified register of Russian radio-electronic products or the register of Russian industrial products;

technical means included in software and hardware systems designed to ensure information security comply with the requirements given in the appendix to these Rules;

technical means included in software and hardware systems not intended to ensure information security comply with the requirements given in the appendix to these Rules;

d) technical means and software as part of the hardware and software complex are functionally compatible with each other.

5 2 . Information about software and hardware systems that meet the requirements of subparagraphs “a” and “b” , paragraph four of subparagraph “c” and subparagraph “d” of paragraph 5 1 of these Rules are included in the register of Russian software for a period of 5 years. In this case, compliance with the requirement provided for in subparagraph “c” of paragraph 1 of the appendix to these Rules must be confirmed no later than 2 years from the date of inclusion of information about the software and hardware complex in the register of Russian software and then annually.

6. The Russian software registry is maintained by the Russian software registry operator, which is engaged by the authorized body in the manner prescribed by the legislation of the Russian Federation (hereinafter referred to as the Russian software registry operator). An organization performing the functions of an operator of the Russian software registry must be registered on the territory of the Russian Federation.

7. The operator of the Russian software registry determines from among its employees persons authorized to include information in the Russian software registry, change it and (or) exclude it from the Russian software registry (hereinafter referred to as authorized employees). Authorized employees must be registered in the federal state information system “Unified system of identification and authentication in the infrastructure that ensures information and technological interaction of information systems used to provide state and municipal services in electronic form” (hereinafter referred to as the identification and authentication system).

8. In order to conduct an examination when including information about software and software and hardware systems in the register of Russian software, the Ministry of Digital Development, Communications and Mass Communications of the Russian Federation is creating an expert council on software under the Ministry of Digital Development, Communications and Mass Communications of the Russian Federation (hereinafter referred to as the expert council), which may include representatives of:

federal executive bodies and executive bodies of the constituent entities of the Russian Federation;

Federation Council and State Duma of the Federal Assembly of the Russian Federation;

Eurasian Economic Commission;

associations (unions), whose members are Russian organizations that develop and sell software developed by them and (or) produce and sell software and hardware systems produced by them and have a share of income from the sale of software developed by them or software and hardware systems produced by them, their maintenance, technical support, adaptation, modification of at least 50 percent of the amount of all income for the calendar year (hereinafter referred to as the association of Russian software developers and manufacturers of software and hardware systems);

scientific and educational organizations;

Russian organizations carrying out innovative activities and (or) supporting such activities.

The regulations on the expert council and its composition are approved by the Ministry of Digital Development, Communications and Mass Communications of the Russian Federation.

The number of representatives of federal executive bodies, executive bodies of constituent entities of the Russian Federation, the Federation Council and the State Duma of the Federal Assembly of the Russian Federation and the Eurasian Economic Commission cannot exceed 20 percent of the total number of members of the expert council.

At least 70 percent of the total number of members of the expert council is formed based on proposals from associations of Russian software developers and manufacturers of software and hardware systems in the manner prescribed by the regulations on the expert council.

8 1 . The Ministry of Digital Development, Communications and Mass Communications of the Russian Federation may involve an expert organization in the manner prescribed by the legislation of the Russian Federation for the purposes of:

checking an application for inclusion of information about software, software and hardware systems in the register of Russian software (hereinafter referred to as the application for inclusion of information) and the documents and materials attached to it, provided for in paragraphs 9 - 12 of these Rules, for compliance with the requirements established by these Rules ;

checking an application for amendments to the register of Russian software (hereinafter referred to as the application for amendments) provided for in paragraph 30 1 of these Rules;

checking the information contained in the register of Russian software for compliance with the requirements established by these Rules, in accordance with paragraph 30 4 of these Rules;

conducting verification of information received in accordance with subparagraphs “b” , “d” and “e” of paragraph 33 of these Rules;

carrying out verification of changes in information provided for in subparagraphs “k” , “r” - “y” of paragraph 4 , subparagraphs “e” and “l” of paragraph 4 1 of these Rules.

9. An application for inclusion of information is submitted to the authorized body by the copyright holder (a person authorized by all copyright holders) of the software, the manufacturer (a person authorized by all manufacturers) of the software and hardware complex.

If an application is submitted in relation to software, the exclusive right to which belongs to the Russian Federation, a constituent entity of the Russian Federation, a municipal entity, respectively, by a federal executive body, an executive body of a constituent entity of the Russian Federation, a local government body or an organization that manages (disposes) such right (hereinafter referred to as the applicant).

See the Instruction of the Ministry of Telecom and Mass Communications of Russia "Procedure for submitting an application for entering information about software into the unified register of Russian programs for electronic computers and databases"

See Guidelines for preparing applications for inclusion of software in the Unified Register

10. The application for inclusion of information must contain the following information:

a) in relation to software - information provided for in subparagraphs “c” - “h” , “k” and “n” - “f” of paragraph 4 of these Rules;

in relation to the hardware and software complex - information provided for in subparagraphs “c” - “l” of paragraph 4 1 of these Rules;

b) information on the shares of direct and indirect participation of the Russian Federation, constituent entities of the Russian Federation, municipalities, Russian non-profit organizations without predominant foreign participation and citizens of the Russian Federation in the copyright holder (if the exclusive right to the software belongs to a Russian commercial organization without predominant foreign participation);

information on the size of all specified shares, the size of which exceeds 5 percent (if the sum of such shares in the aggregate exceeds 50 percent);

information on the size of all specified shares, in the aggregate exceeding 50 percent, including information on the size of all shares exceeding 5 percent (if the sum of shares, the size of which exceeds 5 percent, in the aggregate does not exceed 50 percent);

information about the owners of these shares in the amount corresponding to the information provided for in subparagraph “e” of paragraph 4 or subparagraph “e” of paragraph 4 1 of these

Rules;

c) email address and telephone number by which the applicant can be contacted;

d) declaration (applicant's assurance) of compliance:

software requirements established by paragraph 5 of these Rules;

hardware and software complex requirements established by paragraph 5 1 of these Rules;

e) declaration (assurance of the applicant) about the accuracy of the information contained in the application.