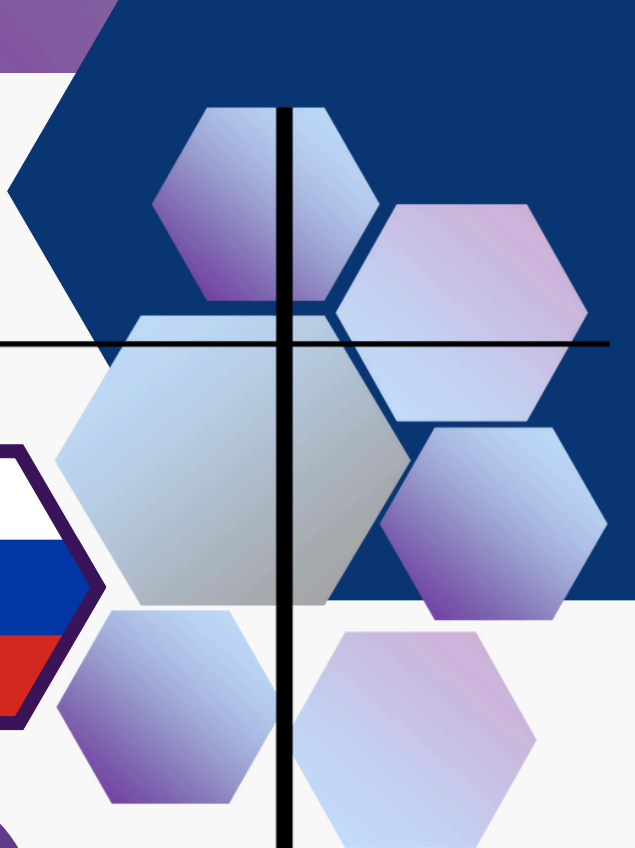
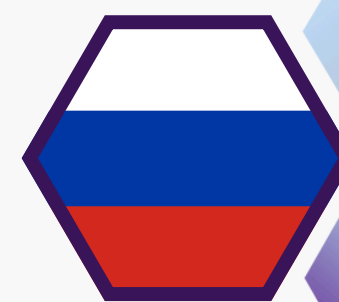




UK Sanctions Update

Russia

24 April 2025



UK Legal documents and announcement

UK Government announcement:

Based on the following UK Statutory Instrument:

Why the UK has sanctions on Russia?

The UK imposed sanctions in Russia in response to its invasion of Ukraine in 2022. The sanctions were created with the intention to put pressure on the Russian government to end its evasion of Ukraine, by targeting key sectors of its economy, including finance, energy, technology, food and defence, as well as oligarchs and those linked to the Putin regime.



Trade Sanctions

The UK Government announced a new package of trade sanctions under the Russia Regime. This wide-ranging package includes export bans on products including chemicals, electronics, machinery, plastics and metals, with the aim of further restricting Russian access to UK goods. The new trade sanctions align with the European Union.



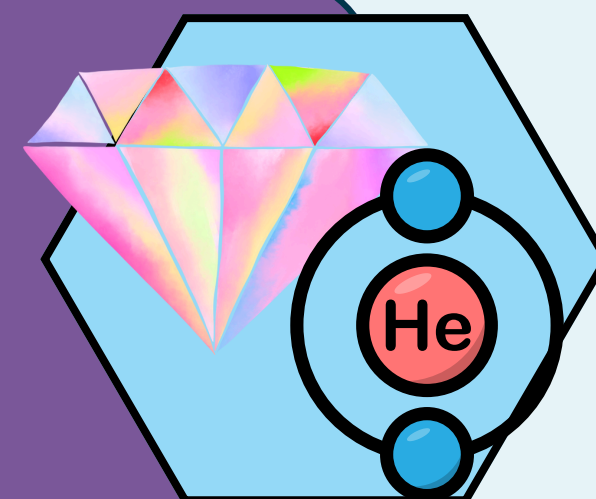
Technology and Energy-Related Prohibitions

The UK Government has also introduced prohibitions on the transfer, making available and ancillary services related to certain advanced and industrial manufactured goods. Sectoral software and technology prohibitions have also been introduced, preventing the transfer and making available of business enterprise, industrial design, and oil and gas related software and technology (as listed in the legislation), as well as the provision of ancillary services related to this software and technology. Sanctioning information flows associated with energy-related,



Diamonds and Helium

Import bans from the UK Government as part of the Russia sanctions regime now cover synthetic diamonds processed in third countries and helium. These measures have been designed to target Russia's revenue streams.



Exceptions and Licences

There are some new exceptions relating to contracts relating to technologies which are now prohibited; for greater guidance, explore the exceptions here: <https://www.gov.uk/government/publications/russia-sanctions-guidance/russia-sanctions-guidance#exceptions>. Likewise, as with any sanctions regime, licences are available in some instances.



Activity is permissible

Activity is permissible but requires caution, including potentially a licence.

Activity is not permissible and should cease immediately

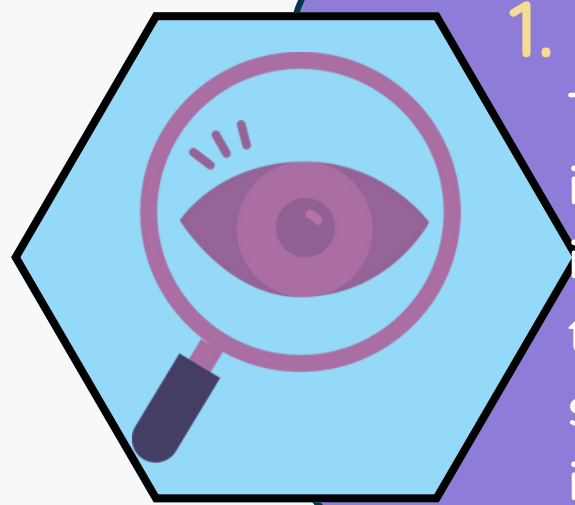
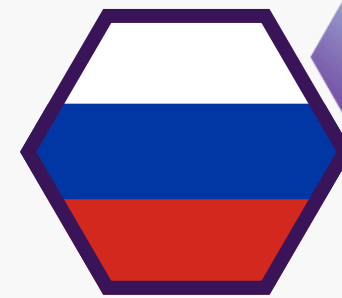
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UK Sanctions Update

Russia

Practical tips and key takeaways



1. Screening

Thorough screening is essential to prevent sanctioned individuals or industries from being inadvertently engaged in business activities. This process ensures compliance with international regulations and mitigates legal and reputational risks. A critical component of this effort is supply chain screening, which meticulously examines all entities involved in the supply chain to detect and eliminate any connections to sanctioned parties. By implementing rigorous screening protocols, organisations can safeguard their operations.

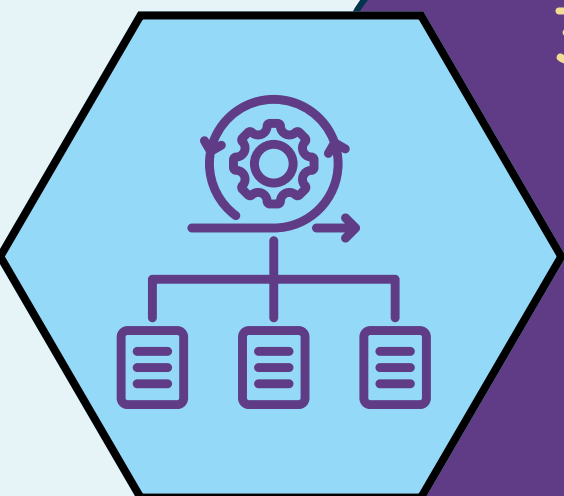
2. Blocking and Freezing

For banks and other financial institutions, it is imperative to immediately freeze any funds related to any of the above mentioned prohibited goods and block any attempts to open related accounts. This action is crucial to ensure compliance with international sanctions and prevent the flow of illicit funds. By taking swift and decisive measures, financial institutions can avoid legal repercussions and uphold their regulatory obligations.



3. Control Framework

To ensure compliance, companies involved in the new prohibited goods must establish a robust control framework. This framework should encompass policy controls, clearly defined risk appetite, and comprehensive senior management policies and procedures. Additionally, effective incident management protocols are essential to address and mitigate any compliance breaches swiftly.



4. Training

It is important that all members of a compliance team receive appropriate and adequate training and that this is completed on a regular basis. The training should be tailored for individual company needs. Training guidance should include looking at the most common causes of sanctions breaches, and compliance programme failings.



We can help.....

If you would like assistance with any element of the control framework or training, including bespoke training, we are here to help. Please get in touch.

Contact us:

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