



UK Sanctions Update

Syria

24 April 2025



UK Legal documents and announcement

UK Government announcement:

Based on the following UK Statutory Instrument:



Why does the UK have sanctions on Syria?

The UK first used sanctions on Syria to pressure the Assad regime to stop human rights abuses, including the use of chemical weapons and violent repression of civilians. The measures targeted individuals and entities linked to the regime to aim and support a peaceful political resolution to the conflict. In December 2024, the Assad regime was overthrown by Hay'at Tahrir al-Sham (HTS) who are now considered the new government in Syria.



Significant New Sanctions on Assad and Associates

Amendments made to the UK Sanctions Legislation on Syria allow the UK remit to hold Bashar Al-Assad and his associates accountable for their roles in the oppression of the people of Syria. In response, the UK imposed 348 designations on individuals and entities involved in the former Assad regime. These designations should prevent the misappropriation of Syrian State assets.



Removal of Restrictions on Key Sectors

The UK Government announced amendments under the Syria (Sanctions) (EU Exit) Regulations 2019. The amendments remove UK Restrictions on some sectors, including financial services and energy production, with the aim of facilitating essential investment in Syria's energy infrastructure and supporting the Syrian people. These amendments will help UK businesses engage with certain sectors of the Syrian economy, including finance, trade, energy, and transport (aircraft).



Licences

Despite the revocation of sanctions in multiple sectors, the UK Government has exemplified that UK businesses must conduct due diligence to ensure that they are not in breach of other measures in place, including counter terrorism finance measures and other international sanctions.



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Activity is permissible



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



Activity is not permissible and
should cease immediately

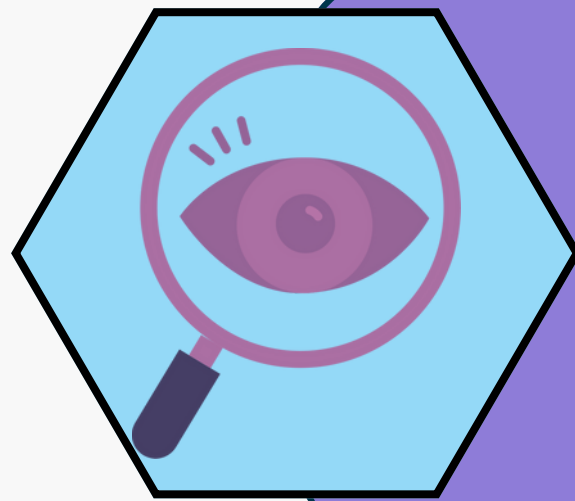
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Practical tips and key takeaways



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.

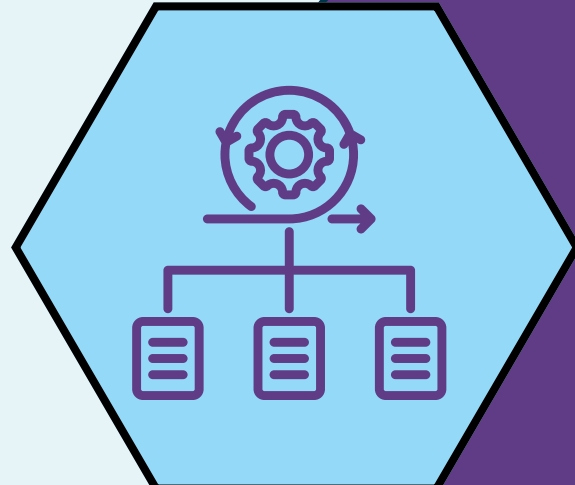
2. Blocking and Freezing

For banks and other financial institutions, it is imperative to immediately freeze any funds associated with the sanctioned individuals and entities in the Syria regime amendments. 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 the amendments and revocations are followed and Syria reengaged with Control Frameworks should be altered to exemplify the changes to the Syria regime. 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 bases. 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.

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