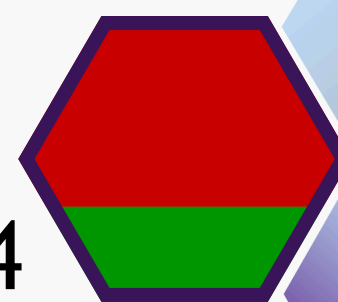


# UK Sanctions Update

## Belarus

20 May 2024: Updated 16 May 2024



### UK Legal documents and announcement

UK Government announcement: <https://www.gov.uk/government/publications/republic-of-belarus-sanctions-guidance/the-republic-of-belarus-sanctions-guidance>

Based on the following UK Statutory Instrument: <https://www.gov.uk/government/publications/republic-of-belarus-sanctions-guidance/the-republic-of-belarus-sanctions-guidance>

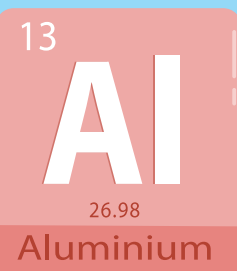
#### Why does the UK have sanctions on Belarus?



The UK has had sanctions on Belarus since 2013, however the current regime was introduced with Brexit under SAMLA on the 31 December 2020. The regime is aimed at encouraging the Government of Belarus to: respect democratic principles and institutions and encourage the separation of powers and the rule of law in Belarus. The regime also aims to encourage Belarus to refrain from actions, policies and activities which repress civil society within the country. The regime also aims to encourage Belarus to properly investigate and institute criminal proceedings against the persons responsible for the disappearances of Yury Zakharenka, Viktor Hanchar, Anatol Krasouski and Dzimitry Zavadski. Additionally, for Belarus to comply with international human rights law and respect human rights. Finally to cease actions destabilising Ukraine, or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine, including by supporting Russia and to refrain from any action that undermines or threatens race, security or stability in Europe.

#### Aluminium Ban

The amendment on 16 May 2024 to the existing Belarus sanctions regime amended the trade measures of the regime, by prohibiting the import of aluminium. It also prohibits the acquisition and supply and delivery, directly or indirectly of aluminium and the provision of technical assistance, financial services and funds, and brokering services related to aluminium.



#### Regulation 27I

Prohibits the import of aluminium, arms and related material, iron and steel products, mineral products, potash, gold and gold jewellery, relevant processed gold, rubber, cement and wood.



#### Trade Sanctions Licences

When considering the import of any prohibited goods/materials, and where there is no exception that applies, a licence is needed. This must be managed through the Department of Business and Trade's (DBT) Import Licencing Branch's Import Case Management System (ICMS). You can register on ICMS, if you do not have an account, and submit an importer access request. Please the contact Import Controls at [importcontrols@businessandtrade.gov.uk](mailto:importcontrols@businessandtrade.gov.uk) with details of your proposed activity for further instruction.

Regarding aluminium, the import, acquisition and supply and delivery, directly or indirectly may be granted if it related to the execution of obligations arising from contracts concluded before 16 May 2024.

The provision of technical assistance, brokering services or funds relating to aluminium if it relates to the obligations arising from contracts concluded before 16 May 2024.



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#### Exceptions

The Belarus Sanctions Regulations also set out exceptions to the trade prohibitions. Regulations applying in certain defined circumstances are: Regulation 30A for the Channel Islands, Isle of Man, or any British Overseas Territory. Regulation 31, as a matter of national security. For more please look at: <https://www.gov.uk/government/publications/notice-to-importers-2952-belarus-import-sanctions/nti-2952-republic-of-belarus-import-sanctions>



Activity is permissible



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



Activity is not permissible and should cease immediately

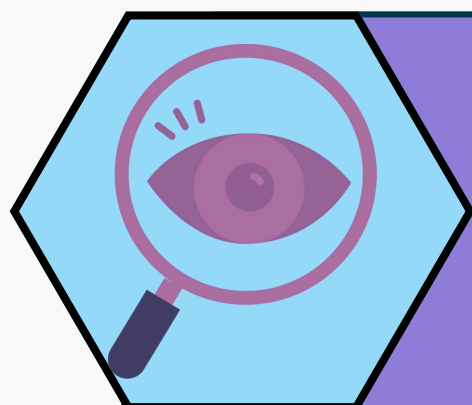
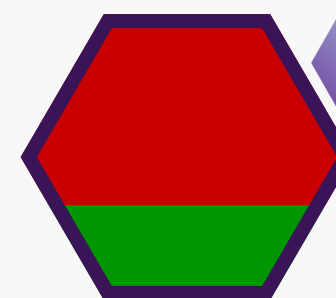
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# UK Sanctions Update

## Belarus

### Practical tips and key takeaways

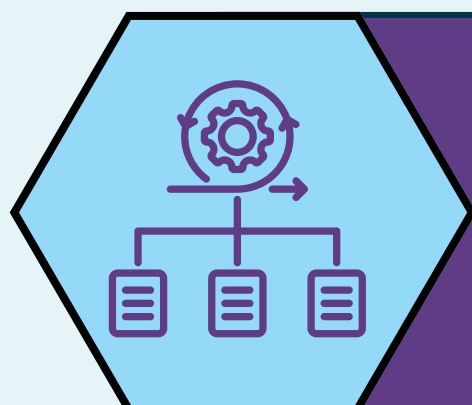


#### 1. Screening

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 Belarusian aluminium trade 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 aluminium industry 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:



[enquiries@sanctionssos.com](mailto:enquiries@sanctionssos.com)



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