



## Sanctions Circular No. 36 of 2026

### Update to the UK Sanctions List: Iran Sanctions Regime

1. Please be advised that an update has been issued to the UK Sanctions List. This notification is provided to ensure that all relevant persons under the jurisdiction of the Virgin Islands are informed promptly of these changes.

#### Details of the Update:

2. On Monday 11 May, the UK Government has designated the following 9 individuals and 3 entities under the Iran Sanctions Regime.

#### Designated Individuals:

Name:	Unique ID:	Sanctions Imposed
Ekrem Abdulkerym OZTUNC	<a href="#">IRN0268</a>	Asset freeze, Travel Ban, Director Disqualification Sanction
Namiq SALIFOV	<a href="#">IRN0269</a>	Asset freeze, Travel Ban, Director Disqualification Sanction
Nihat Abdul Kadir ASAN	<a href="#">IRN0270</a>	Asset freeze, Travel Ban, Director Disqualification Sanction
Reza HAMIDIRAVARI	<a href="#">IRN0271</a>	Asset freeze, Travel Ban, Director Disqualification Sanction
Farhad ZARRINGHALAM	<a href="#">IRN0274</a>	Asset freeze, Director Disqualification Sanction
Fazlolah ZARRINGHALAM	<a href="#">IRN0275</a>	Asset freeze, Director Disqualification Sanction

Mansour ZARRINGHALAM	<a href="#">IRN0278</a>	Asset freeze, Travel Ban, Director Disqualification Sanction
Nasser ZARRINGHALAM	<a href="#">IRN0279</a>	Asset freeze, Travel Ban, Director Disqualification Sanction
Pouria ZARRINGHALAM	<a href="#">IRN0280</a>	Asset freeze, Director Disqualification Sanction

**Designated Entities:**

<b>Name:</b>	<b>Unique ID:</b>	<b>Sanctions Imposed</b>
ZINDASHTI NETWORK	<a href="#">IRN0272</a>	Asset freeze, Director Disqualification Sanction
BERELIAN EXCHANGE	<a href="#">IRN0273</a>	Asset freeze, Director Disqualification Sanction
GCM EXCHANGE	<a href="#">IRN0277</a>	Asset freeze, Director Disqualification Sanction

3. **Link to UK Sanctions List:** <https://www.gov.uk/government/publications/the-uk-sanctions-list>

- **Link to FCDO News:** [Current UK sanctions regimes - GOV.UK](#)
- **Link to Notice (Iran):**  
[https://assets.publishing.service.gov.uk/media/6a01b3078cc72d2f863ea6e9/Sanctions\\_Notice\\_Iran\\_11\\_May\\_2026.pdf](https://assets.publishing.service.gov.uk/media/6a01b3078cc72d2f863ea6e9/Sanctions_Notice_Iran_11_May_2026.pdf)
- **Date of Update:** 11 May 2026

**Asset Freeze: What you must do in relation to this Sanctions Notice**

4. If you know or have ‘reasonable cause to suspect’ that you are in possession or control of, or are otherwise dealing with, the funds or economic resources of a designated person you must:
- i. check whether you maintain any accounts or hold any funds or economic resources for the persons set out in this Notice;
  - ii. **freeze** such accounts, and other funds or economic resources;

- iii. **refrain** from dealing with the funds or assets or making them available (directly or indirectly) to such persons unless licensed by the Virgin Islands Sanctions Unit;
- iv. **report** any findings to the Virgin Islands Sanctions Unit, together with any additional information that would facilitate compliance with the Regulation; and
- v. provide any information concerning the frozen assets of designated persons that the Virgin Islands Sanctions Unit may request. Information reported to the Virgin Islands Sanctions Unit may be passed on to other regulatory authorities or law enforcement.

#### **Revocation and Unfreezing: What you must do in relation to this Sanctions Notice, if applicable**

5. Where a UK Sanctions Notice has been issued, which confirms that a person/entity has been removed from the UK Sanctions List, then the following measures must be undertaken:
  - i. determine whether any of the assets held on account are the assets of any person/entity who has been removed from the Sanctions List and ensure that they are no longer subject to an asset freeze;
  - ii. **remove** the name of the person/entity from the institution's list of persons/entities subject to financial sanction;
  - iii. **unfreeze** the assets of the person/entity (as applicable) and re-activate all relevant accounts;
  - iv. **notify** the person/entity that the assets are no longer subject to an asset freeze; and
  - v. **immediately notify** the FIA and the FSC of the actions which have been undertaken upon completion.
6. Failure to comply with financial sanctions legislation or to seek to circumvent its provisions is a criminal offence.

#### **Dealing with other sanctions on Designated Persons:**

7. The designated individuals, entities and specified ships on the UK Sanctions List may be subject to other sanctions. Please refer to the starter guide to UK sanctions for more details.
  - **Link to Starter Guide to UK Sanctions:** [Starter guide to UK sanctions - GOV.UK](https://www.gov.uk/guidance/starter-guide-to-uk-sanctions)

### **Further Information:**

8. For further assistance, including general guidance on asset freezes and reporting obligations under financial sanctions, persons should refer to the [Virgin Islands Financial Sanctions Guidelines](#):
9. The Compliance Reporting Form can be found [here](#).
10. A copy of the relevant [UK Overseas Territories Order](#) may be found on the Financial Services Commission's website.
11. Copies of recent notices, UK legislation and relevant guidance on Iran Sanctions can be obtained from the Collection of Current UK sanctions regimes on the GOV.UK website: [Current UK sanctions regimes - GOV.UK](#)

### **Enquiries**

12. All enquiries, reports and license applications should be addressed to:

**Virgin Islands Sanctions Unit.**  
Attorney General's Chambers  
TTT Building, Wickham's Cay I  
Road Town, Tortola VG1110  
British Virgin Islands  
[sanctions@gov.vg](mailto:sanctions@gov.vg)