



## **Sanctions Circular No. 100 of 2025**

International sanctions in force in the Virgin Islands are the same as those in force in the UK.

### **Financial Sanctions Notice**

**14 October 2025**

## **Global Human Rights**

### **Introduction**

1. The Global Human Rights Sanctions Regulations 2020 (S.I. 2020/680) (the Regulations) were made under the Sanctions and Anti-Money Laundering Act 2018 (“the Sanctions Act”) and provide for the imposition of financial sanctions, namely the freezing of funds and economic resources of persons who are or have been involved in an activity which, if carried out by or on behalf of a State within the territory of that State, would amount to a serious violation by that State of an individual's right to life, right not to be subjected to torture or cruel, inhuman or degrading treatment or punishment, or right to be free from slavery, not to be held in servitude or required to perform forced or compulsory labour, whether or not the activity is carried out by or on behalf of a State.
2. On 14 October 2025 the Foreign, Commonwealth and Development Office updated the UK Sanctions List on GOV.UK. This list provides details of those designated under regulations made under the Sanctions Act. A link to the UK Sanctions List can be found below.
3. Following the publication of the UK Sanctions List, information on the Consolidated List has been updated.

### **Notice summary**

4. The following entries have been added to the Consolidated List and are now subject to an asset freeze.
  - BYEX EXCHANGE COMPANY LIMITED (Group ID: 17154)
  - CAMBODIAN HEND XIN REAL ESTATE COMPANY LIMITED (Group ID: 17152)
  - Zhi CHEN (Group ID: 17157)
  - GOLDEN FORTUNE RESORTS WORLD COMPANY LIMITED (Group ID: 17148)
  - Chhay Guy (Group ID: 17151)
  - Dara ING (Group ID: 17146)
  - JIN BEI GROUP COMPANY LIMITED (Group ID: 17149)
  - Bo LEI (Group ID: 17150)
  - PRINCE GLOBAL GROUP LIMITED (Group ID: 17156)
  - Wei Ren QIU (Group ID: 17155)
  - UNIMOREGROUP COMPANY LIMITED (Group ID: 17153)
  - Zhongbiao ZHU (Group ID: 17147)

## **What you must do in relation to this Financial Sanctions Notice**

### **5. You must:**

- I. check whether you maintain any accounts or hold any funds or economic resources for the persons set out in the Annex to 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.
6. Failure to comply with financial sanctions legislation or to seek to circumvent its provisions is a criminal offence.
7. For further assistance, persons should refer to the [Virgin Islands Sanctions Guidelines](#). Additionally, a copy of the relevant Overseas Territories Order may be found on the Financial Services Commission's website.
8. The Compliance Reporting Form can be found [here](#).

### **Further Information**

9. Copies of recent notices, UK legislation and relevant guidance can be obtained from the Global Humans Rights financial sanctions page on the GOV.UK [website](#).  
<https://www.gov.uk/government/collections/financial-sanctions-regime-specific-consolidated-lists-and-releases>
10. The Consolidated List can be found [here](#).
11. The UK Sanctions List can be found [here](#).

### **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)

## ANNEX TO NOTICE

### FINANCIAL SANCTIONS: GLOBAL HUMAN RIGHTS

#### THE GLOBAL HUMAN RIGHTS SANCTIONS REGULATIONS 2020 (S.I. 2020/680)

#### ADDITIONS

##### Individuals

### 1. CHEN, Zhi

**Name (non-Latin script):** (1) 陈志 (2) ចិន ធី

**DOB:** 16/12/1987. **POB:** Fujian, China a.k.a: VINCENT **Nationality:** (1) Vanuatu (2)

Cambodia (3) Cyprus **Passport Number:** N00081108 **Passport Details:** Cambodia **National Identification Number:** 10868617 **National Identification Details:** Cambodia **Address:** (1) 68 Kimberley Road, Tsim Sha Tsui, Kowloon, Hong Kong, China.

(2) Unit 2002, 20/F Cheung Kong Centre, 2 Queens Road Central, Hong Kong, China. (3) YO2, Street Y02, Village 14, Sangkat Tonle Bassac, Khan Chamkar Mon, Phnom Penh, Cambodia. **Position:** (1) Chairman of Prince Global Group (2) Owner of Prince Global Group (3) Owner of Noble Title Limited (4) Director of Uni More Group Company Limited

(5) Director of Prince Vanguard Development Company Limited (6) Owner of PLI No.2 Limited **Other Information:** (UK Sanctions List Ref): GHR0179. (UK Statement of Reasons): There are reasonable grounds to suspect that CHEN Zhi ("CHEN") is an involved person within the meaning of the Global Human Rights Sanctions Regulations 2020 on the basis of the following grounds: (1) CHEN is or has been responsible for, engaging in, facilitating or providing support for human rights abuses; (2) CHEN is or has been involved in providing financial services or making available funds, economic resources, goods or technology, knowing or having reasonable cause to suspect that those financial services or funds will or may contribute to a human rights abuse; (3) CHEN is or has been involved in profiting financially from human rights abuses. Specifically, CHEN is or has been involved in the operation of scam centres in Cambodia, including through the Prince Group and Jin Bei groups of companies. The treatment of individuals in these scam centres amounts to a serious abuse of the right not to be subjected to cruel, inhuman or degrading treatment or punishment, and of the right to be free from slavery, not to be held in servitude or required to perform forced or compulsory labour. (Gender): Male **Listed on:** 14/10/2025 **UK Sanctions List Date Designated:** 14/10/2025 **Last Updated:** 14/10/2025 17157.

## 2. GUY, Chhay

**DOB:** 09/07/1987. **POB:** Phnom Penh, Cambodia **Nationality:** Cambodia **Passport Number:** N0718897 **Passport Details:** Cambodia **National Identification Number:** 010526344 (01) **National Identification Details:** Cambodia **Address:** 46 Street No. 1, Village Teuk Thla, Sangkat Teuk Thla, Khan Sen Sok, Phnom Penh, Cambodia. **Position:**

(1) Director of Belt Road Capital Management (Cambodia) Company Limited (2) Director of Uni More Group Company Limited **Other Information:** (UK Sanctions List Ref): GHR0171. (UK Statement of Reasons): There are reasonable grounds to suspect that GUY Chhay (“GUY”) is an involved person within the meaning of the Global Human Rights Sanctions Regulations 2020 on the basis of the following grounds: (1) GUY is associated with persons who are or have been involved in human rights abuses, namely CHEN Zhi, ING Dara, Jin Bei, and the Prince Group; (2) GUY has been responsible for engaging in, facilitating or providing support for human rights abuses; (3) GUY is or has been involved in providing goods or technology, knowing that they will contribute to a human rights abuse. Specifically, GUY is or has been involved in the operation of scam centres in Cambodia, including through the Prince Group and Jin Bei groups companies. The treatment of individuals in these scam centres amounts to a serious abuse of the right not to be subjected to cruel, inhumane or degrading treatment or punishment, and of the right to be free from slavery, not to be held in servitude or required to perform compulsory labour. (Gender): Male **Listed on:** 14/10/2025 **UK Sanctions List Date Designated:** 14/10/2025 **Last Updated:** 14/10/2025 **Group ID:** 17151.

## 3. ING, Dara

**DOB:** 04/09/1981. **POB:** Phnom Penh, Cambodia **Nationality:** Cambodia **Passport Number:** N00453333 **Passport Details:** Cambodia **National Identification Number:** 10929329 **National Identification Details:** Cambodia **Address:** 419F, Street Machine Teuk, Village 3, Sangkat Chroy Changvar, Khan Chroy Changvar, Phnom Penh, Cambodia. **Position:** (1) Director of Cambodian Heng Xin Real Estate Company Limited

(2) Director of Yuan Ke Shi Ye Investment (Cambodia) Company Limited (3) Director of Jin Bei Group Company Limited **Other Information:** (UK Sanctions List Ref): GHR0166. (UK Statement of Reasons): There are reasonable grounds to suspect that ING Dara (“ING”) is an involved person within the meaning of the Global Human Rights Sanctions Regulations 2020 on the basis of the following ground: ING is or has been responsible for, engaging in, facilitating or providing support for human rights abuses. Specifically, ING is or has been involved in the operation of scam centres in Cambodia, including through the Jin Bei group of companies and Golden Fortune Resorts World Ltd. The treatment of individuals in these scam centres amounts to a serious abuse of the right not to be subjected to cruel, inhumane or degrading treatment or punishment, and of the right to be free from slavery, not to be held in servitude or required to perform forced or compulsory labour. (Gender): Male **Listed on:** 14/10/2025 **UK Sanctions List Date Designated:** 14/10/2025 **Last Updated:** 14/10/2025 **Group ID:** 17146.

## 4. LEI, Bo

**Name (non-Latin script):** 雷波

**DOB:** 14/08/1977. **POB:** Chongqing, China **Nationality:** China **Passport Number:**

G42787399 **Passport Details:** China **National Identification Number:** 510214197708143017 **National Identification Details:** China **Other Information:** (UK Sanctions List Ref): GHR0170. (UK Statement of Reasons): There are reasonable grounds to suspect that LEI Bo (“LEI”) is an involved person within the meaning of the Global Human Rights Sanctions Regulations 2020 on the basis of the following grounds: (1) LEI is associated with persons who are or have been involved in human rights abuses, namely CHEN Zhi, ING Dara and the Prince Group; (2) LEI is or has been involved in providing goods or technology, knowing that they will contribute to a human rights abuse; (3) LEI has been involved in profiting financially from human rights abuses. Specifically, LEI is or has been involved in the operation of scam centres in Cambodia, including through the Prince Group and Jin Bei groups of companies. The treatment of individuals in these scam centres amounts to a serious abuse of the right not to be subjected to cruel, inhumane or degrading treatment or punishment, and of the right to be free from slavery, not to be held in servitude or required to perform compulsory labour. (Gender): Male **Listed on:** 14/10/2025 **UK Sanctions List Date Designated:** 14/10/2025 **Last Updated:** 14/10/2025 **Group ID:** 17150.

## 5. QIU, Wei Ren

**DOB:** 28/09/1987. **POB:** China a.k.a: QIU, Dong **Nationality:** (1) Cambodia (2) Cyprus

**Passport Number:** (1) BXJXN (2) N01555697 (3) K00459432 **Passport Details:** (1) Hong

Kong (2) Cambodia (3) Cyprus **Position:** (1) Owner of Unstoppable Bird Limited (2) Director of Prince Vanguard Development Company Limited. (3) Owner of Sky Sailing Limited **Other Information:** (UK Sanctions List Ref): GHR0175. (UK Statement of Reasons): There are reasonable grounds to suspect that QIU Wei Ren (“QIU”) is an involved person within the meaning of the Global Human Rights Sanctions Regulations 2020 on the basis of the following grounds: (1) QIU is associated with persons who are or have been involved in human rights abuses, namely CHEN Zhi and the Prince Group; (2) QIU is acting on behalf of or at the direction of a person who is or has been involved in human rights abuses, namely CHEN Zhi. CHEN Zhi and the Prince Group are or have been involved in the operation of scam centres in Cambodia. The treatment of individuals in these scam centres amounts to a serious abuse of the right not to be subjected to cruel, inhumane, or degrading treatment or punishment, and of the right to be free from slavery, not to be held in servitude or required to perform compulsory labour. (Gender): Male **Listed on:** 14/10/2025 **UK Sanctions List Date Designated:** 14/10/2025 **Last Updated:** 14/10/2025 **Group ID:** 17155.

## 6. ZHU, Zhongbiao

a.k.a: ZHU, Jack **Nationality:** Cambodia **National Identification Number:** 130216182 **National Identification Details:** Cambodia **Address:** Village 4, Sangkat 4, Preah Sihanouk City, Cambodia. **Position:** (1) Director of Jin Bei Group Company Limited (2) Director of Cambodian Heng Xin Real Estate Company Limited **Other Information:** (UK Sanctions List Ref): GHR0167. (UK Statement of Reasons): There are reasonable grounds to suspect that ZHU Zhongbiao (“ZHU”) is an involved person within the meaning of the Global Human Rights Sanctions Regulations 2020 on the basis of the following ground: ZHU is or has been responsible for, engaging in, facilitating or providing support for human rights abuses. Specifically, ZHU is or has been involved in the operation of scam centres in

Cambodia, including through the Jin Bei group of companies. The treatment of individuals in these scam centres amounts to a serious abuse of the right not to be subjected to cruel, inhumane or degrading treatment or punishment, and of the right to be free from slavery, not to be held in servitude or required to perform forced or compulsory labour. (Gender): Male **Listed on:** 14/10/2025 **UK Sanctions List Date Designated:** 14/10/2025 **Last Updated:** 14/10/2025 **Group ID:** 17147.

## Entities

### 1. BYEX EXCHANGE COMPANY LIMITED

**Other Information:** (UK Sanctions List Ref): GHR0174. Byex is associated with the following

Ethereum crypto addresses:  
0xD599Ac04A1C786972b81e0Fef6fb0C3e7b52f8A7  
0xAE05eB856CB28c156d9722094F5eEfD5693Bc181

0xAE05eB856CB28c156d9722094F5eEfD5693Bc181 Byex is associated with the following Tron crypto addresses: TDpwBeBt6KPz2HJRzNNXy62gT1yU1MFLTS THGRp6CbGGhDBLGuoTZki5fpoUtR8R54Dx THGRp6CbGGhDBLGuoTZki5fpoUtR8R54Dx (UK Statement of Reasons): There are reasonable grounds to suspect that Byex Exchange Company Limited (“Byex”) is an involved person under Global Human Rights Sanctions Regulations 2020 on the basis of the following grounds: (1) Byex is associated with persons who are or have been involved in human rights abuses, namely Prince Group and Jin Bei; (2) Byex is or has been involved in providing financial services, or makes available funds, economic resources, goods or technology to a person who is or has been involved in human rights abuses, namely the Prince Group and Jin Bei. Prince Group and Jin Bei are or have been involved in the operation of scam centres in Cambodia. The treatment of individuals in these scam centres amounts to a serious abuse of the right not to be subjected to cruel, inhumane, or degrading treatment or punishment, and of the right to be free from slavery, not to be held in servitude or required to perform compulsory labour. (Website):(1) byex.com (2) 100ex.com **Listed on:** 14/10/2025 **UK Sanctions List Date Designated:** 14/10/2025 **Last Updated:** 14/10/2025 **Group ID:** 17154.

### 2. CAMBODIAN HENG XIN REAL ESTATE COMPANY LIMITED

**Other Information:** (UK Sanctions List Ref): GHR0172. (UK Statement of Reasons): There are reasonable grounds to suspect that Cambodian Heng Xin Real Estate Group (“HXRE”) is an involved person within the meaning of the Global Human Rights Sanctions Regulations 2020 on the basis of the following grounds : (1): HXRE is associated with persons who are or have been involved in human rights abuses, namely CHEN Zhi, Prince Group, Jin Bei, ING Dara, and ZHU Jack; (2) HXRE has been responsible for, engaging in, facilitating or providing support for human rights abuses, specifically serious abuses of the right not to be subjected to cruel, inhuman or degrading treatment or punishment, and of the right to be free from slavery, not to be held in servitude or required to perform forced or compulsory labour. Specifically, HXRE is involved in the development and operation of a scam centre

in Cambodia. The treatment of individuals in this scam centre amounts to a serious abuse of the right not to be subjected to cruel, inhumane or degrading treatment or punishment, and of the right to be free from slavery, not to be held in servitude or required to perform compulsory labour. **Listed on:** 14/10/2025 **UK Sanctions List Date Designated:** 14/10/2025 **Last Updated:** 14/10/2025 **Group ID:** 17152.

### 3. GOLDEN FORTUNE RESORTS WORLD COMPANY LIMITED

**Other Information:** (UK Sanctions List Ref): GHR0168. (UK Statement of Reasons): There are reasonable grounds to suspect that GOLDEN FORTUNE RESORTS WORLD COMPANY LIMITED is an involved person within the meaning of the Global Human Rights Sanctions Regulations 2020 on the basis of the following ground: GOLDEN FORTUNE RESORTS WORLD COMPANY LIMITED is or has been responsible for, engaging in, facilitating or providing support for human rights abuses. Specifically, GOLDEN FORTUNE RESORTS WORLD COMPANY LIMITED or has been involved in the operation of the Golden Fortune Science and Technology Park, a scam centre in Cambodia. The treatment of individuals in this scam centre amounts to a serious abuse of the right not to be subjected to cruel, inhumane or degrading treatment or punishment, and of the right to be free from slavery, not to be held in servitude or required to perform forced or compulsory labour. **Listed on:** 14/10/2025 **UK Sanctions List Date Designated:** 14/10/2025 **Last Updated:** 14/10/2025 **Group ID:** 17148.

### 4. JIN BEI GROUP COMPANY LIMITED

**Other Information:** (UK Sanctions List Ref): GHR0169. (UK Statement of Reasons): There are reasonable grounds to suspect that JIN BEI GROUP COMPANY LIMITED is an involved person within the meaning of the Global Human Rights Sanctions Regulations 2020 on the basis of the following ground: JIN BEI GROUP COMPANY LIMITED is or has been responsible for, engaging in, facilitating or providing support for human rights abuses. Specifically, JIN BEI GROUP COMPANY LIMITED is or has been involved in the operation of scam centres in Cambodia. The treatment of individuals in these scam centres amounts to a serious abuse of the right not to be subjected to cruel, inhumane or degrading treatment or punishment, and of the right to be free from slavery, not to be held in servitude or required to perform forced or compulsory labour. **Listed on:** 14/10/2025 **UK Sanctions List Date Designated:** 14/10/2025 **Last Updated:** 14/10/2025 **Group ID:** 17149.

### 5. PRINCE GLOBAL GROUP LIMITED

**Address:** Vistra Corporate Services Centre, Wickhams Cay II, Road Town, Tortola, British Virgin Islands. **Other Information:** (UK Sanctions List Ref): GHR0178. (UK Statement of Reasons): There are reasonable grounds to suspect that PRINCE GLOBAL GROUP LIMITED ("PRINCE GROUP") is an involved person under Global Human Rights Sanctions Regulations 2020 on the basis of the following grounds: (1) PRINCE GROUP is or has been responsible for, engaging in, facilitating or providing support for human rights abuses; (2) PRINCE GROUP is or has been involved in providing financial services or making available funds, economic

resources, goods or technology, knowing or having reasonable cause to suspect that those financial services or funds will or may contribute to a human rights abuse; (3) PRINCE GROUP is or has been involved in profiting financially from human rights abuses. Specifically, PRINCE GROUP and its subsidiaries are or have been involved in the operation of scam centres in Cambodia. The treatment of individuals in these scam centres amounts to a serious abuse of the right not to be subjected to cruel, inhuman or degrading treatment or punishment, and of the right to be free from slavery, not to be held in servitude or required to perform forced or compulsory labour. (Subsidiaries): Prince Group Holdings Limited **Listed on:** 14/10/2025 **UK Sanctions List Date Designated:** 14/10/2025 **Last Updated:** 14/10/2025 **Group ID:** 17156.

## 6. UNI MORE GROUP COMPANY LIMITED

a.k.a: Prince Huan Yu Real Estate (Cambodia) Group Company Limited **Other Information:** (UK Sanctions List Ref): GHR0173. (UK Statement of Reasons): There are reasonable grounds to suspect that Uni More Group Company Limited (“Uni More Group”) is an involved person within the meaning of the Global Human Rights Sanctions Regulations 2020 on the basis of the following grounds: (1) Uni More Group is associated with persons who are or have been involved in human rights abuses, namely CHEN Zhi, Jin Bei, Golden Fortune Resorts World Ltd., and the Prince Group; (2) Uni More Group is or has been involved in providing goods or technology, knowing that they will contribute to a human rights abuse. Specifically, Uni More Group was involved in the development of Golden Fortune Science and Technology Park, a scam centre in Cambodia. The treatment of individuals in this scam centre amounts to a serious abuse of the right not to be subjected to cruel, inhumane or degrading treatment or punishment, and of the right to be free from slavery, not to be held in servitude or required to perform compulsory labour. (Parent company): Prince Group **Listed on:** 14/10/2025 **UK Sanctions List Date Designated:** 14/10/2025 **Last Updated:** 14/10/2025 **Group ID:** 17153.

Office of Financial Sanctions Implementation

HM Treasury

14/10/2025