



## **Sanctions Circular No 147 of 2025**

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

## **Financial Sanctions Notice**

**19 December 2025**

### **Russia**

#### **Introduction**

1. The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) ("the Russia Regulations") were made under the Sanctions and Anti-Money Laundering Act 2018 (the Sanctions Act) and provide for the imposition of financial sanctions, including asset freezes and other financial and investment restrictions, on persons who are or have been involved in destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine; or obtaining a benefit from or supporting the Government of Russia.
2. On 19 December 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. 1 entry has been amended on the Consolidated List and is still subject to an asset freeze. Further information can be found in the Annex to this Notice.
  - **LIMITED LIABILITY COMPANY RESPONSIBILITY OF "RBRU SPECIALIZED DEPOSITORY" (Group ID: 16924)**

#### **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 Russia 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: RUSSIA  
THE RUSSIA (SANCTIONS) (EU EXIT) REGULATIONS 2019 (S.I. 2019/855)**

**AMENDMENTS**

Deleted information appears in strikethrough. Additional information appears in italics and is underlined.

**Entity**

1. LIMITED LIABILITY COMPANY RESPONSIBILITY OF "RBRU SPECIALIZED DEPOSITORY"  
**a.k.a:** LLC "RBRU SD" **Other Information:** (UK Sanctions List Ref): RUS2682. Financial sanctions imposed in addition to an asset freeze: Correspondent banking relationships etc. The prohibition on correspondent banking relationships etc. measure was imposed on 19/12/2025. Trust services. Date trust services sanctions imposed: 20/05/2025. (UK Statement of Reasons): ~~Limited Liability Company responsibility of "RBRU Specialized depository" is an "involved person" under the Russia (Sanctions) (EU Exit) Regulations 2019 because it is or has been involved in obtaining a benefit from or supporting the Government of Russia by carrying on business in sectors of strategic significance to the Government of Russia, namely the Russian financial services sector. The Secretary of State considers that there are reasonable grounds to suspect that Limited Liability Company responsibility of "RBRU Specialized depository" is an "involved person" under the Russia (Sanctions) (EU Exit) Regulations 2019 because it is or has been involved in obtaining a benefit from or supporting the Government of Russia by carrying on business in sectors of strategic significance to the Government of Russia, namely the Russian financial services sector.~~ (Business Reg No): 9704154155 **Listed on:** 20/05/2025 **UK Sanctions List Date Designated:** 20/05/2025 **Last Updated:** ~~20/05/2025~~ 19/12/2025 **Group ID:** 16924.

Office of Financial Sanctions Implementation

HM Treasury

19/12/2025