



## **Sanctions Circular No. 71 of 2025**

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

### **Financial Sanctions Notice**

**28 August 2025**

## **Chemical Weapons**

### **Introduction**

1. The Chemical Weapons (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/618) 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 a prohibited activity related to chemical weapons.
2. On 28 August 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 entry has been amended and is still subject to an asset freeze:
  - Andrei Viktorovich MARCHENKO (Group ID: 16978)

### **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 Chemical Weapons financial sanctions page on the GOV.UK website: [Chemical weapons sanctions: guidance - GOV.UK](#)
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: CHEMICAL WEAPONS THE CHEMICAL WEAPONS (SANCTIONS) (EU EXIT) REGULATIONS 2019

#### AMENDMENT

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

#### Individual

1. ~~MARCHENKO, Andrei~~ *MARCHENKO, Andrei Viktorovich*

**Title:** Major General **DOB:** 11/12/1968. **POB:** Russia **Nationality:** Russia **Address:** Russia. **Position:** Deputy Head. Radiological, Chemical and Biological Defence Troops **Other Information:** (UK Sanctions List Ref): CHW0031. (UK Statement of Reasons): Andrei MARCHENKO is an involved person under the Chemical Weapons (Sanctions) (EU Exit) Regulations 2019 on the basis of the following grounds: (1) MARCHENKO is or has been responsible for, engaging in, providing support for, or promoting prohibited activity related to chemical weapons; (2) MARCHENKO is a member of, or associated with, an entity, namely the Radiological, Chemical and Biological Defence Troops of the Ministry of Defence of the Russian Federation, which is or has been responsible for, engaging in, providing support for, or promoting prohibited activity related to chemical weapons. Specifically, MARCHENKO is Deputy Head of the Radiological, Chemical and Biological Defence Troops, which has been involved in the transfer and use of chemical weapons in Ukraine. (Gender): Male **Listed on:** 07/07/2025 **UK Sanctions List Date Designated:** 07/07/2025 **Last Updated:** ~~07/07/2025~~ 28/08/2025 **Group ID:** 16978.

Office of Financial Sanctions Implementation

HM Treasury

28/08/2025