



Sanctions Circular No. 130 of 2025

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

Financial Sanctions Notice

4 December 2025

Cyber

Introduction

1. The Cyber (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/597) ("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 have been involved in cyber activity which undermines, or is intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom; directly or indirectly causes, or is intended to cause, economic loss to, or prejudice to the commercial interests of, those affected by the activity; undermines, or is intended to undermine, the independence or effective functioning of an international organisations or a non-government organisation or forum whose mandate or purposes related to the governance of international sport or the Internet; or otherwise affects a significant number of persons in an indiscriminate manner.
2. On 04 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. The following entries have been added to the Consolidated List and are now subject to an asset freeze:
 - INTEGRITY TECHNOLOGY GROUP INCORPORATED (Group ID: 17246)
 - SICHUAN ANXUN INFORMATION TECHNOLOGY CO., LTD. (Group ID: 17247)

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](#).

Ransomware And Sanctions

9. Making or facilitating a ransomware payment, risks exposing those involved to civil or criminal penalties where such payments are made to designated persons.
10. OFSI, in partnership with other HM Government organisations has published guidance on sanctions and ransomware, which includes information on the impact of ransomware payments, cyber resilience and HM Government's approach to enforcement
11. Guidance on ransomware and sanctions can be found here:
<https://www.gov.uk/government/publications/financial-sanctions-faqs>

Further Information

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

Enquiries

15. 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

ANNEX TO NOTICE

FINANCIAL SANCTIONS: CYBER

THE CYBER (SANCTIONS) (EU EXIT) REGULATIONS 2020 (S.I. 2020/597)

ADDITIONS

- **Individuals**

1. ANTONOV, Boris Alekseyevich

Name (non-Latin script): Борис Алексеевич АНТОНОВ

Nationality: Russia **Address:** Russia. **Other Information:** (UK Sanctions List Ref):CYB0104. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect that as part of Unit 26165, Boris ANTONOV has been involved in relevant cyber activity in that he was responsible for, engaging in, providing support for, or promoting the commission, planning or preparation of relevant cyber activity. Such activity that Boris ANTONOV has been involved in undermines, or is intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom. (Gender): Male **Listed on:** 04/12/2025 **UK Sanctions List Date Designated:** 04/12/2025 **Last Updated:** 04/12/2025 **Group ID:** 17227.

2. BOCHKA, Igor Andreyevich

Name (non-Latin script): Игорь Андреевич БОЧКА

a.k.a: BOCHKA, Igor, Andreevich **Nationality:** Russia **Address:** Russia. **Other Information:** (UK Sanctions List Ref): CYB0106. (UK Statement of Reasons): The Secretary of State considers that there are reasonable groundstosuspect that amember of GRU Unit 26165, Igor Andreyevich BOCHKA has also been involved in relevant cyber activity in that he has been responsible for, engaging in, providing support for, or promoting the commission, planning or preparation of relevant cyber activity. Such activity that Igor Andreyevich BOCHKA has been involved in undermines, or is intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom. (Gender): Male **Listed on:** 04/12/2025 **UK Sanctions List Date Designated:** 04/12/2025 **Last Updated:** 04/12/2025 **Group ID:** 17229.

3. DENISENKO, Denis Igorevich

Name (non-Latin script): Денис Игоревич ДЕНИСЕНКО

Nationality: Russia **Address:** Russia. **Other Information:** (UK Sanctions List Ref): CYB0110. (UK Statement of Reasons): The Secretary of State considers that thereare reasonable grounds to suspect that Russian GRU 29155 Officer Senior Lieutenant Denis Igorevich DENISENKO is or has been responsible for, engaging in, providing support for, or promoting the commission, planning or preparation of relevant cyber activity. Additionally, DENISENKO remains associated with a GRU unit, which is a person who is or has been so involved in such activity. (Gender): Male **Listed on:** 04/12/2025 **UK Sanctions List Date Designated:** 04/12/2025 **Last Updated:** 04/12/2025 **Group ID:** 17233.

4. *GOLOSHUBOV, Dmitriy Yuryevich*

Name (non-Latin script): Дмитрий Юрьевич ГОЛОШУБОВ

Nationality: Russia **Address:** Russia. **Other Information:** (UK Sanctions List Ref): CYB0111. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect that Russian GRU 29155 Officer Dmitriy Yuryevich GOLOSHUBOV is or has been responsible for, engaging in, providing support for, or promoting the commission, planning or preparation of relevant cyber activity. Additionally, GOLOSHUBOV remains associated with a GRU unit, which is a person who is or has been involved in such activity. The activity that GOLOSHUBOV is or has been involved in undermines, or is intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom. (Gender): Male **Listed on:** 04/12/2025 **UK Sanctions List Date Designated:** 04/12/2025 **Last Updated:** 04/12/2025 **Group ID:** 17234.

5. *ISTOMIN, Anatoliy Vladimirovich*

Name (non-Latin script): Анатолий Владимирович ИСТОМИН

Nationality: Russia **Address:** Russia. **Other Information:** (UK Sanctions List Ref): CYB0105. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect that as part of Unit 26165, Anatoliy ISTOMIN has been involved in relevant cyber activity in that he was responsible for, engaging in, providing support for, or promoting the commission, planning or preparation of relevant cyber activity. Such activity that Anatoliy Vladimirovich ISTOMIN has been involved in undermines, or is intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom. (Gender): Male **Listed on:** 04/12/2025 **UK Sanctions List Date Designated:** 04/12/2025 **Last Updated:** 04/12/2025 **Group ID:** 17228.

6. *KOZACHEK, Nikolay Yuryevich*

Name (non-Latin script): Николай Юрьевич КОЗАЧЕК

Nationality: Russia **Address:** Russia. **Other Information:** (UK Sanctions List Ref): CYB0109. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect that as part of Unit 26165, Nikolay Yuryevich KOZACHEK has been involved in relevant cyber activity in that he has been responsible for, engaging in, providing support for, or promoting the commission, planning or preparation of relevant cyber activity. Such activity that Nikolay Yuryevich KOZACHEK has been involved in undermines, or is intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom. (Gender): Male **Listed on:** 04/12/2025 **UK Sanctions List Date Designated:** 04/12/2025 **Last Updated:** 04/12/2025 **Group ID:** 17232.

7. *UMETS, Aleksey Andreyevich*

Name (non-Latin script): Алексей Андреевич УМЕЦ

Nationality: Russia **Address:** Russia. **Other Information:** (UK Sanctions List Ref): CYB0107. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect that a member of GRU Unit 26165, Aleksey Andreyevich UMETS has also been involved in relevant cyber activity in that he has been responsible for, engaging in, providing support for, or promoting the commission, planning or preparation of relevant cyber activity. Such activity that Aleksey Andreyevich UMETS has been involved in undermines, or is intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom. (Gender): Male **Listed on:** 04/12/2025 **UK Sanctions List Date Designated:** 04/12/2025 **Last Updated:** 04/12/2025 **Group ID:** 17230.

8. *YERSHOV, Pavel Vyacheslavovich*

Name (non-Latin script): Павел Вячеславович ЕРШОВ

Nationality: Russia **Address:** Russia. **Other Information:** (UK Sanctions List Ref): CYB0108. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect that as part of Unit 26165, Pavel Vyacheslavovich YERSHOV has been involved in relevant cyber activity in that he has been responsible for, engaging in, providing support for, or promoting the commission, planning or preparation of relevant cyber activity. Such activity that Pavel Vyacheslavovich YERSHOV has been involved in undermines, or is intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom. (Gender): Male **Listed on:** 04/12/2025 **UK Sanctions List Date Designated:** 04/12/2025 **Last Updated:** 04/12/2025 **Group ID:** 17231.

Office of Financial Sanctions Implementation

HM Treasury

04/12/2025