



## **Sanctions Circular No. 133 of 2025**

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

### **Financial Sanctions Notice**

**9 December 2025**

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## **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 09 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](mailto:sanctions@gov.vg)

## **ANNEX TO NOTICE**

### **FINANCIAL SANCTIONS: CYBER**

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

#### **ADDITIONS**

- **Entities**

##### **1. INTEGRITY TECHNOLOGY GROUP INCORPORATED**

**Name (non-Latin script):** 永信至成科技股份有限公司

**a.k.a:** Integrity Tech **Address:** Room 103, Block 6, No. 9, Fenghao East Road, Haidian District, Beijing, China. **Other Information:** (UK Sanctions List Ref): CYB0113. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect that Integrity Technology Group Incorporated (Integrity Tech), formerly Beijing Integrity Technology Group (BITG), has been involved in relevant cyber activity, in that it provided support for and engaged in the commission, planning or preparation of such activity, and supplied technology that could contribute to the commission of relevant cyber activity. Integrity Tech controlled and managed a botnet covert network consisting of over 260,000 compromised devices worldwide and supplied access to this network enabling unauthorised access to and interference with information systems and data which targeted UK public sector IT systems. Such activity that Integrity Tech was involved in, undermined, or was intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom. (Website): <https://www.integritytech.com.cn> **Listed on:** 09/12/2025 **UK Sanctions List Date Designated:** 09/12/2025 **Last Updated:** 09/12/2025 **Group ID:** 17246.

##### **2. SICHUAN ANXUN INFORMATION TECHNOLOGY CO., LTD.**

**Name (non-Latin script):** 四川安洵信息技术有限公司

**a.k.a:** (1) Anxun Information Technology Co., Ltd. (non-Latin script: 安洵信息技术有限公司) (2) i-Soon **Other Information:** (UK Sanctions List Ref): CYB0114. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect that Sichuan Anxun Information Technology Co., Ltd. (i-Soon) has been involved in relevant cyber activity, including being responsible for, engaging in and providing support for malicious cyber activity that resulted in the exploitation of previously unknown vulnerabilities and gaining unauthorised access to over 80 foreign government and private business networks. In addition, i-Soon facilitated and supported a wider ecosystem of China-based information security companies, enabling actual or attempted unauthorised access to and interference with information systems and data, which targeted UK public sector and private industry IT systems through, namely, researching, exploiting and sharing of vulnerabilities. This malicious activity undermined or was intended to undermine the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom. **Listed on:** 09/12/2025 **UK Sanctions List Date Designated:** 09/12/2025 **Last Updated:** 09/12/2025 **Group ID:** 17247.

Office of Financial Sanctions Implementation

HM Treasury

09/12/2025