

VIRGIN ISLANDS



BY THE GOVERNOR

GENERAL LICENCE [No. 11], 2025  
(payment of reasonable professional legal fees and expenses)

*Authority to grant a relevant sanctions licence*

1. This Licence is granted under the Overseas Territories Sanctions Orders listed in Annex 1 of this Licence.
2. Any act which would otherwise breach the prohibitions in the Overseas Territories Sanctions Orders, as listed in Annex 1 of this Licence, is exempt from those prohibitions to the extent required to give effect to the permissions in this Licence.

*Definitions*

3. In this Licence, including Parts A and B:

|                            |                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| "Designated Person" means  | those individuals or entities designated (or owned or controlled by an individual or entity designated) for the purposes of an asset freeze by the United Kingdom under the Overseas Territories Sanctions Orders, excluding those designated for the purpose of compliance with United Nations obligations.                                                                       |
| "Economic Resources" means | assets of every kind, whether tangible or intangible, movable or immovable, which are not funds but can be used to obtain funds, goods or services                                                                                                                                                                                                                                 |
| "Expenses" means           | charges and disbursements associated with the provision of Legal Services, including but not limited to court filing, photocopying, printing, courier, transcript, translation, fees for expert witnesses, subsistence expenses, legal searches, bank transaction fees, administrative fees necessary for the provision of legal services and travel costs for legal practitioners |
| "Funds" means              | financial assets and benefits of every kind, including (but not limited to) –<br>(a) cash, cheques, claims on money, drafts, money orders and other payment instruments;                                                                                                                                                                                                           |

|                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                 | <p>(b) deposits, balances on accounts, debts and debt obligations;</p> <p>(c) publicly and privately traded securities and debt instruments, including stocks and shares, certificates representing securities, bonds, notes, warrants, debentures and derivative products;</p> <p>(d) interest, dividends and other income on or value accruing from or generated by assets;</p> <p>(e) credit, rights of set-off, guarantees, performance bonds and other Relevant commitments;</p> <p>(f) letters of credit, bills of lading and bills of sale;</p> <p>(g) documents providing evidence of an interest in funds or Relevant resources;</p> <p>(h) any other instrument of export financing</p> |
| "Legal Practitioner" means      | a person qualified and admitted to practice law under the laws of the Virgin Islands, and includes a firm or company of legal practitioners that holds a Trade Licence under the Business Professions and Trade Licence Act (Cap 200) (as amended) and operating in the Virgin Islands.                                                                                                                                                                                                                                                                                                                                                                                                           |
| "Legal Services" means          | any legal work performed by a Legal Practitioner and provided to or for the benefit of a Designated Person, including the provision of legal advice and/or representation in court, whether provided within the Virgin Islands or another jurisdiction, in relation to any matter except claims for Defamation.                                                                                                                                                                                                                                                                                                                                                                                   |
| Non-Virgin Islands Bank Account | <p>means an account at a bank or similar institution, which is a Person subject to supervision by a public authority, in:</p> <p>a) The United Kingdom;</p> <p>b) Canada;</p> <p>c) any Member State of the European Union;</p> <p>d) any Member State of the European Free Trade Association; or</p> <p>e) the United States of America</p>                                                                                                                                                                                                                                                                                                                                                      |

|                                               |                                                                                                                                                                                                                                                     |
|-----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| "Person"                                      | includes a body of persons, corporate or unincorporate, but does not include a Designated Person.                                                                                                                                                   |
| "Professional Legal Fees" means               | fees for Legal Services performed by a Legal Practitioner.                                                                                                                                                                                          |
| "Relevant Institution" means                  | a person licensed under the Banks and Trust Companies Act 1990 (as amended) to carry on banking business.                                                                                                                                           |
| "Overseas Territories Sanctions Orders" means | The sanctions regulations established under the Sanctions and Anti-Money Laundering Act 2018, which have been extended to the Territory of the Virgin Islands by the Overseas Territories Sanctions Orders, as detailed in Annex 1 of this Licence. |

### *Licence*

#### 4. Under this Licence:

4.1 Provided that the conditions in either Part A or Part B of this Licence are satisfied in full, a Legal Practitioner or Relevant Institution may:

- 4.1.1. Receive payments from or on behalf of a Designated Person for Legal Services;
- 4.1.2. Make payments (directly or indirectly) for or on behalf of a Designated Person for Legal Services;
- 4.1.3. Make payments for the benefit of a Designated Person for Legal Services;
- 4.1.4. Process payments which relate to a Designated Person; and
- 4.1.5. Perform any act reasonably necessary to give effect to 4.1.1.- 4.1.4.

### *Authorisation*

- 5. Both Parts A and Part B of this Licence can be used in conjunction by a Person or Designated Person if the provision of Legal Services commenced before the Designated Person was designated and continued after designation, provided that:

5.1. where both Part A and Part B of this Licence are used with regard to the Legal Services and the Professional Legal Fees, paid under both Parts in relation to any Designated Person, do not exceed USD\$4,800,000 in total for the duration of this Licence;

5.2. where both Parts A and Part B of this Licence are used in respect of the payment of Professional Legal Fees, the Expenses paid under both Parts A and B in relation to any Designated Person do not exceed (in total) either;

5.2.1. 10% of the amount payable for the Professional Legal Fees; or

5.2.2. USD\$480,000

Whichever is lower, for all of the Expenses for the duration of this Licence.

6. The Governor, in the exercise of the powers conferred under the Overseas Territories Sanctions Orders set out in Annex 1, with the consent of the Secretary of State, hereby authorises any Legal Practitioner and Relevant Institution to perform the activities outlined in paragraph 4.1.1-4.1.4 herein.
7. This Licence does not authorise any dealing with Funds and Economic Resources for or on behalf of the Designated Person which occurred prior to the date of its issuance, except that this Licence does permit any Legal Practitioner to receive Funds for the payment of Professional Legal Fees and Expenses which are accrued and owing in accordance with an obligation entered into with the Designated Person or on behalf of the Designated Person prior to the date of this Licence.
8. This Licence does not authorise any acts which the Legal Practitioner and Relevant Institution knows or has reasonable grounds for suspecting, will result in Funds and or Economic Resources being made available directly or indirectly to and or for the benefit of the Designated Person in breach of Overseas Territories Sanctions Orders set out in Annex 1 or any other regulation made under the United Kingdom Sanctions and Anti-Money Laundering Act 2018, save as permitted under this Licence.
9. This Licence does not permit payment directly or indirectly to or for the benefit of any person designated for the purpose of compliance with United Nations obligations.
10. This Licence does not authorise any act which results in a breach of Overseas Territories Sanctions Orders set out in Annex 1 or any other regulation made under the United Kingdom Sanctions and Anti-Money Laundering Act 2018, save as permitted under this Licence.
11. Any person or persons acting under the authority of, or otherwise using this Licence should note that the conditions set out in Parts A

and B of this Licence are not capable of being interchanged: the conditions in one Part must be complied with in full for the activities to fall within the terms of this Licence.

12. It is the responsibility of any person or persons using this Licence to ensure that the activities undertaken fall within the terms of this Licence, and that the parties comply with the conditions of this Licence in full. In the event that the conditions of this Licence are not complied with in full, it will not apply to permit activities taken in breach of relevant sanctions and a criminal penalty may be imposed.

***Duration of Licence***

13. This Licence takes effect from the date of issue and shall remain in effect until 23:59 on 28 April 2026 unless sooner revoked by the Governor.
14. The Governor may vary, suspend or revoke this Licence by at any time. Any such variation, suspension or revocation shall be published online on the Virgin Islands Official Gazette and on the official website of the Financial Services Commission.



Signed this [ 3<sup>rd</sup> ] day of [ November ], 2025

Daniel Pruce,  
Governor

**PART A- LEGAL SERVICES BASED ON A PRIOR OBLIGATION**

**CONDITIONS FOR USE OF THIS LICENCE- NOTE THAT ALL OF THE BELOW CONDITIONS MUST BE SATISFIED/ COMPLIED WITH**

1. A payment of:
  - 1.1. Professional Legal Fees; and or
  - 1.2. Expenses,  
must be owed by a Designated Person to a Legal Practitioner or a provider of Expenses.
2. The payment must be in relation to Legal Services which have been provided, or which are being provided to a Designated Person by a Legal Practitioner, or to Expenses.
3. The payment must be owed in accordance with an obligation which was entered into by the Designated Person prior to the date of that Designated Person's designation, or, in the case of Designated Persons which are owned and controlled, entered into by that Designated Person prior to the owner/controller of that Designated Person's designation, either under the Overseas Territories Sanctions Orders, Council Regulation (EU) No 269/2014 or Council Regulation (EC) No 765/2006 (whichever was earlier).
4. The Professional Legal Fees under this Part in relation to any Designated Person shall not exceed USD\$2,400,000 per Legal Practitioner instructed in total for the duration of this Licence.
5. The Expenses paid under this Part in relation to any Designated Person shall not exceed (in total) either:
  - 5.1. Ten percent (10%) of the amount payable for Professional Legal Fees;  
or
  - 5.2. USD\$240,000;  
Whichever is lower, for all of the Expenses for the duration of this Licence;
6. Where a Legal Practitioner has not received Professional Legal Fees from or on behalf of a Designated Person under this licence, Expenses of up to USD\$60,000 may be paid in relation to any Designated Person per Legal Practitioner instructed under this Part for the duration of this licence.
7. If at any point either:

It is estimated that in any individual case the limits for Professional Legal Fees and Expenses as set out herein will be exceeded; or

  - i. in any individual case the limits for Professional Legal Fees and Expenses are in fact exceeded, this Licence shall not apply to any

further payment of any nature in relation to the entirety of the Legal Services nor to any other act in relation to the provision of Legal Services.

All payments made under this Licence shall:

- 7.1. be paid directly to an account held or maintained in the Virgin Islands with a Relevant Institution by or in the name of a Legal Practitioner or a provider of Expenses;
- 7.2. be paid directly to a Non-Virgin Islands Bank Account held by a branch of a Legal Practitioner regulated by the General Legal Council of the Virgin Islands, which provides Legal Services outside the Virgin Islands; or
- 7.3. be paid on behalf of a Designated Person to a provider of Expenses by or on behalf of a Legal Practitioner to an account held in the Virgin Islands, with a Relevant Institution by a provider of Expenses, either before or after payment is received from, for or on behalf of a Designated Person.

#### ***Reporting Obligations***

8. A Legal Practitioner acting under the authority of this Licence shall report to the Attorney General (by email to [sanctions@gov.vg](mailto:sanctions@gov.vg)) within seven (7) days of receiving payment under this licence) from a Designated Person, or any payments made for or on behalf of a Designated Person, any payments for the benefit of a Designated Person and the processing of any payments which relate to a Designated Person. Any report made to the Attorney General shall include an unredacted letter of engagement or other record which sets out the obligation pursuant to which the payment is made between the Designated Person and the Legal Practitioner, the relevant invoice(s) which are being paid, the actual payment received, a completed "Prior Obligation Legal Fees GL Form" and such other documents as may be requested by the Attorney General.

#### ***Record-Keeping Obligations***

9. A Legal Practitioner shall keep and maintain accurate, complete and readable records either electronically or in hard copy of any and all activities purported to have been performed under the authority of this Licence for a minimum period of six (6) years.

**PART B- LEGAL SERVICES NOT BASED ON A PRIOR OBLIGATION**

**CONDITIONS FOR USE OF THIS LICENCE- NOTE THAT ALL OF THE BELOW CONDITIONS MUST BE SATISFIED/ COMPLIED WITH**

1. A payment of:
  - 1.1. Professional Legal Fees; and or
  - 1.2. Expenses,must be owed by a Designated Person to a Legal Practitioner or provider of Expenses.
2. The payment must be in relation to Legal Services which have been provided, or are being provided by a Legal Practitioner to a Designated Person, or to Expenses.
3. The Professional Legal Fees under this Part shall not exceed USD\$2,400,000 per Legal Practitioner instructed in total for the duration of this Licence.
4. The Expenses under this Part shall not exceed (in total) either:
  - 4.1. Ten percent (10%) of the amount payable for Professional Legal Fees; or
  - 4.2. USD\$240,000;Whichever is lower, for all of the Expenses for the duration of this Licence.
5. Where a Legal Practitioner has not received Professional Legal Fees from or on behalf of a Designated Person under this Licence, Expenses of up to USD\$60,000 may be paid in relation to any Designated Person per Legal Practitioner instructed under this Part for the duration of this Licence.
6. If at any point it is estimated that in any individual case the limits for Professional Legal Fees or Expenses as set out herein will be exceeded; or in any individual case, the limits for Professional Legal Fees or Expenses set out above are in fact exceeded, this Licence shall not apply to any further payment of any nature in relation to the entirety of the Legal Services nor to any other act in relation to the provision of Legal Services.
7. The hourly rates for the provision of the Professional Legal Fees by a Legal Practitioner must not exceed those rates listed in paragraph 12 of Part B of this Licence in any individual case.
8. If at any point any one hourly rate for the provision of Professional Legal Fees by a Legal Practitioner exceeds the hourly rates set out in this Licence, this Licence will not apply to any further payment of any nature in relation to the entirety of the Legal Services nor to any other act in relation to the provision of Legal Services.
9. All payments made under this Licence must either:

- 9.1. be paid to an account held or maintained in the Virgin Islands, with a Relevant Institution by or in the name of a Legal Practitioner or a provider of Expenses;
- 9.2. be paid directly to a Non-Virgin Islands Bank Account held by a branch of a Legal Practitioner regulated by the General Legal Council of the Virgin Islands, which provides Legal Services outside the Virgin Islands; or
- 9.3. be paid on behalf of a Designated Person to a provider of Expenses by a Legal Practitioner to an account held in the Virgin Islands with a Relevant Institution by a provider of Expenses, either before or after payment is received from a Designated Person.

**Reporting**

10. A Legal Practitioner acting under the authority of this Licence shall report to the Attorney General (by email to [sanctions@gov.vg](mailto:sanctions@gov.vg)) within seven (7) days of receiving payment under this Licence from a Designated Person, or any payment made for or on behalf of a Designated Person, any payment for the benefit of a Designated Person and the processing of any payment which relate to a Designated Person. Any report to the Attorney General shall include an unredacted letter of engagement or other record which sets out the obligation pursuant to which the payment is made between the Designated Person and Legal Practitioner, details of the name, employment, experience and the years of post-qualification experience of the Legal Practitioner, the relevant invoice(s) which are being paid, the actual payment received, a completed "Post-Designation Legal Fees GL Form" and such other documents as may be requested by the Attorney General.

**Record-Keeping**

11. A Legal Practitioner shall keep and maintain accurate, complete and readable records either electronically or in hard copy of any and all activities purported to have been performed under the authority of this Licence for a minimum period of six (6) years.

**Hourly Rates**

**12. LEGAL PRACTITIONERS**

| Fee Earner                                                                 | Hourly Rate  |
|----------------------------------------------------------------------------|--------------|
| Legal Practitioner with over eight (8) years post qualification experience | USD\$1500.00 |

|                                                                           |             |
|---------------------------------------------------------------------------|-------------|
|                                                                           |             |
| Legal Practitioner with over four (4) years post qualification experience | USD\$700.00 |
| Other Legal Practitioners                                                 | USD\$500.00 |

## Annex 1 – Overseas Territories Sanctions Orders Schedule

| Regime                                                                           | Relevant Order in Council                                                                            | Relevant Prohibitions | Relevant Licensing Authorisation Regulations |
|----------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|-----------------------|----------------------------------------------|
| The Republic of Belarus (Sanctions) (EU Exit) Regulations 2019                   | The Republic of Belarus (Sanctions) (Overseas Territories) Order 2020 (as amended)                   | Regulations 11 to 15  | Regulation 64                                |
| The Bosnia & Herzegovina (Sanctions) (EU Exit) Regulations 2020                  | The Bosnia and Herzegovina (Sanctions) (Overseas Territories) Order 2020                             | Regulations 11 to 15  | Regulation 20                                |
| The Central African Republic (Sanctions) (EU Exit) Regulations 2020              | The Central African Republic (Sanctions) (Overseas Territories) Order 2020                           | Regulations 12 to 16  | Regulation 33                                |
| The Chemical Weapons (Sanctions) (EU Exit) Regulations 2019                      | The Chemical Weapons (Sanctions) (Overseas Territories) Order 2020                                   | Regulations 11 to 15  | Regulation 20                                |
| The Cyber (Sanctions) (EU Exit) Regulations 2020                                 | The Cyber (Sanctions) (Overseas Territories) Order 2020 (as amended)                                 | Regulations 11 to 15  | Regulation 20                                |
| The Democratic People's Republic of Korea (Sanctions) (EU Exit) Regulations 2019 | The Democratic People's Republic of Korea (Sanctions) (Overseas Territories) Order 2020 (as amended) | Regulations 13 to 17  | Regulation 88                                |
| The Democratic Republic of the Congo (Sanctions)                                 | The Democratic Republic of                                                                           | Regulations 12 to 16  | Regulation 33                                |

|                                                                                      |                                                                                                       |                      |               |
|--------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|----------------------|---------------|
| (EU Exit) Regulations 2019                                                           | Congo (Sanctions) (Overseas Territories) Order 2020                                                   |                      |               |
| The Global Anti-Corruption Sanctions Regulations 2021                                | The Global Anti-Corruption Sanctions (Overseas Territories) Order 2021                                | Regulations 11 to 15 | Regulation 21 |
| The Global Human Rights Sanctions Regulations 2020                                   | The Global Human Rights Sanctions (Overseas Territories) Order 2020                                   | Regulations 11 to 15 | Regulation 20 |
| The Global Irregular Migration and Trafficking in Persons Sanctions Regulations 2025 | The Global Irregular Migration and Trafficking in Persons Sanctions (Overseas Territories) Order 2025 | Regulations 14 to 18 | Regulation 26 |
| The Guinea (Sanctions) (EU Exit) Regulations 2019                                    | The Guinea (Sanctions) (Overseas Territories) Order 2020                                              | Regulations 11 to 15 | Regulation 20 |
| The Republic of Guinea-Bissau (Sanctions) (EU Exit) Regulations 2019                 | The Republic of Guinea-Bissau (Sanctions) (Overseas Territories) Order 2020                           | Regulations 11 to 15 | Regulation 20 |
| The Iran (Sanctions) (Nuclear) (EU Exit) Regulations 2019                            | The Iran (Sanctions) (Nuclear) (Overseas Territories) Order 2020                                      | Regulations 12 to 17 | Regulation 40 |
| The Iran (Sanctions) Regulations 2023                                                | The Iran (Sanctions) (Overseas Territories) Order 2023                                                | Regulations 15 to 19 | Regulation 60 |
| The Libya (Sanctions) (EU Exit) Regulations 2020                                     | The Libya (Sanctions) (Overseas                                                                       | Regulations 12 to 16 | Regulation 48 |

|                                                        |                                                                          |                       |               |
|--------------------------------------------------------|--------------------------------------------------------------------------|-----------------------|---------------|
|                                                        | Territories)<br>Order 2021<br>(as<br>amended)                            |                       |               |
| The Mali (Sanctions) (EU Exit) Regulations 2020        | The Mali (Sanctions) (Overseas Territories) Order 2020                   | Regulations 12 to 16  | Regulation 22 |
| The Myanmar (Sanctions) Regulations 2021               | The Myanmar (Sanctions) (Overseas Territories) Order 2021                | Regulations 11 to 15  | Regulation 44 |
| The Nicaragua (Sanctions) (EU Exit) Regulations 2020   | The Nicaragua (Sanctions) (Overseas Territories) Order 2020 (as amended) | Regulations 11 to 15  | Regulation 20 |
| The Russia (Sanctions) (EU Exit) Regulations 2019      | The Russia (Sanctions) (Overseas Territories) Order 2020 (as amended)    | Regulations 11 to 17A | Regulation 64 |
| The Somalia (Sanctions) (EU Exit) Regulations 2020     | The Somalia (Sanctions) (Overseas Territories) Order 2020                | Regulations 12 to 16  | Regulation 47 |
| The South Sudan (Sanctions) (EU Exit) Regulations 2019 | The South Sudan (Sanctions) (Overseas Territories) Order 2020            | Regulations 12 to 16  | Regulation 33 |
| The Sudan (Sanctions) (EU Exit) Regulations 2020       | The Sudan (Sanctions) (Overseas Territories) Order 2020                  | Regulations 12 to 16  | Regulation 34 |
| The Syria (Sanctions) (EU Exit) Regulations 2019       | The Syria (Sanctions) (Overseas Territories) Order 2020 (as amended)     | Regulations 11 to 15  | Regulation 61 |
| The Venezuela (Sanctions) (EU Exit) Regulations 2019   | The Venezuela (Sanctions) (Overseas                                      | Regulations 11 to 15  | Regulation 35 |

|                                                               |                                                                           |                         |               |
|---------------------------------------------------------------|---------------------------------------------------------------------------|-------------------------|---------------|
|                                                               | Territories)<br>Order 2020                                                |                         |               |
| The Yemen (Sanctions)<br>(EU Exit) (No.2)<br>Regulations 2020 | The Yemen<br>(Sanctions)<br>(Overseas<br>Territories)<br>Order 2020       | Regulations 12<br>to 16 | Regulation 33 |
| The Zimbabwe<br>(Sanctions) (EU Exit)<br>Regulations 2019     | The<br>Zimbabwe<br>(Sanctions)<br>(Overseas<br>Territories)<br>Order 2020 | Regulations 11<br>to 15 | Regulation 33 |