



Sanctions Circular No. 60 of 2025

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

Financial Sanctions Notice

12 August 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 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 nongovernment 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 12 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 entries have been removed from the Consolidated List as they were duplicate entries:
 - Aleksey Sergeyevich MORENETS (Group ID: 16995)
 - Yevgeniy Mikhaylovich SEREBRIAKOV (Group ID: 17000)

The original entries for the listings, 13906 and 13907, remain subject to an asset freeze:

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.

Ransomware And Sanctions

8. Making or facilitating a ransomware payment, risks exposing those involved to civil or criminal penalties where such payments are made to designated persons.
9. 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
10. Guidance on ransomware and sanctions can be found here:
<https://www.gov.uk/government/publications/financial-sanctions-faqs>

Further Information

Copies of recent notices, UK legislation and relevant guidance can be obtained from the Cyber financial sanctions page on the GOV.UK website:

11. The Consolidated List can be found [here](#).
12. Copies of recent notices, UK legislation and relevant guidance can be obtained from the Cyber financial sanctions page on the GOV.UK website, [here](#).
13. The UK Sanctions List can be found [here](#).
14. The Compliance Reporting Form can be found [here](#).
15. For more information, please see our financial sanctions guidance, [here](#).

Enquiries

16. 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)

DELISTINGS

Individuals

1. MORENETS, Aleksey Sergeyevich

a.k.a: MORENETS, Aleksei **Nationality:** Russia **Other Information:** (UK Sanctions List Ref): CYB0093. (UK Statement of Reasons): As a member of GRU Unit 26165, Aleksey Sergeyevich MORENETS has been involved in relevant cyber activity in that he was responsible for, engaging in, providing support for, or promoting the commissioning, planning or preparation of relevant cyber activity. Such activity that Aleksey Sergeyevich MORENETS has been involved in, 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:** 18/07/2025 **UK Sanctions List Date Designated:** 18/07/2025 **Last Updated:** ~~18/07/2025~~ 12/08/2025 **Group ID:** 16995.

2. SEREBRIAKOV, Yevgeniy Mikhaylovich

DOB: 26/07/1981. **a.k.a:** SEREBRYAKOV, Yevgeniy, Mikhaylovich **Nationality:** Russia **Other Information:** (UK Sanctions List Ref): CYB0073. (UK Statement of Reasons): Yevgeniy Mikhaylovich SEREBRIAKOV is a member of GRU Unit 74455. In this capacity, Yevgeniy Mikhaylovich SEREBRIAKOV is or has been involved in relevant cyber activity through his leadership and oversight of GRU Unit 74455, in which SEREBRIAKOV is or has been responsible for, engaging in, providing support for, or promoting the commission, planning or preparation of relevant cyber activity. Such activity that Yevgeniy Mikhaylovich SEREBRIAKOV 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:** 18/07/2025 **UK Sanctions List Date Designated:** 18/07/2025 **Last Updated:** ~~18/07/2025~~ 12/08/2025 **Group ID:** 17000.

AMENDMENTS

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

Individuals

1. ~~MORENETS, Aleksei Sergeyevich~~ MORENETS, Aleksey Sergeyevich

~~**a.k.a:** MORENETS, Aleksei **DOB:** 31/07/1977. **POB:** Moermanskaya Oblast, Russia **Nationality:** Russia **Passport Number:** 100135556 **Address:** Moscow, Russia. **Position:** Cyber Operator (GRU) **Other Information:** (UK Sanctions List Ref): CYB0006. (UK Statement of Reasons): Aleksei Sergeyevich Morenets was part of a team of intelligence officers of the Russian General Staff Main Intelligence Directorate (GRU) unit known as field post number 26165 that attempted to gain unauthorised access to the information systems of the Organisation for the Prohibition of Chemical Weapons (OPCW) in April~~

2018. The Netherlands authorities disrupted the cyber attack before it was successful. This attempted relevant cyber activity was intended to undermine the independence or effective functioning of an international organisation. As a member of GRU Unit 26165, Aleksey Sergeyevich MORENETS has been involved in relevant cyber activity in that he was responsible for, engaging in, providing support for, or promoting the commissioning, planning or preparation of relevant cyber activity. Such activity that Aleksey Sergeyevich MORENETS has been involved in, 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: 31/07/2020 UK Sanctions List Date Designated: 31/12/2020 Last Updated: 31/12/2020 12/08/2025 Group ID: 13906.

2. **SEREBRIAKOV, Evgenii Mikhaylovich** SEREBRIAKOV, Yevgeniy Mikhaylovich
DOB: 26/07/1981. a.k.a: SEREBRYAKOV, Yevgeniy, Mikhaylovich ~~POB: Koersk, Russia~~
Nationality: Russia ~~Passport Number: 100135555~~ ~~Address: Moscow, Russia.~~ ~~Position: Cyber Operator (GRU)~~ Other Information: (UK Sanctions List Ref): CYB0007. (UK Statement of Reasons): ~~Evgenii Mikhaylovich Serebriakov was part of a team of intelligence officers of the Russian General Staff Main Intelligence Directorate (GRU) unit known as field post number 26165 that attempted to gain unauthorised access to the information systems of the Organisation for the Prohibition of Chemical Weapons (OPCW) in April 2018. The Netherlands authorities disrupted the cyber attack before it was successful. This attempted relevant cyber activity was intended to undermine the independence or effective functioning of an international organisation~~ Yevgeniy Mikhaylovich SEREBRIAKOV is a member of GRU Unit 74455. In this capacity, Yevgeniy Mikhaylovich SEREBRIAKOV is or has been involved in relevant cyber activity through his leadership and oversight of GRU Unit 74455, in which SEREBRIAKOV is or has been responsible for, engaging in, providing support for, or promoting the commission, planning or preparation of relevant cyber activity. Such activity that Yevgeniy Mikhaylovich SEREBRIAKOV 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: 31/07/2020 UK Sanctions List Date Designated: 31/12/2020 Last Updated: 31/12/2020 12/08/2025 Group ID: 13907.

Office of Financial Sanctions Implementation

HM Treasury

12/08/2025