



Virgin Islands General Licence No. 11 2025 (Payment of Reasonable Professional Legal Fees & Expenses)

On 3 November 2025, the Governor issued the Virgin Islands General Licence [No. 11], 2025 (Payment of Reasonable Professional Legal Fees & Expenses).

The Governor has reviewed the reported use of the previous General Licences No.3, No.5, No.,6 No.8 and No. 9 (Payment of Reasonable Professional Legal Fees & Expenses) and has taken the decision to issue a new licence aligned with the recent amendments to the United Kingdom's General Licence INT/2025/7323088, which expanded the scope of the general licence to cover a wider range of sanctions regimes in addition to the Russia and Belarus regimes. The replacement, Legal Services General Licence will expire at 23:59 on 28 April 2026.

As with the previous Legal Services General Licence, the new General Licence will mean that a BVI Legal practitioner who has provided legal advice to a person designated under any of the regimes listed in Annex 1 of the licence will not require a specific licence from the Governor to receive payment from that Designated Person (DP), provided that the terms of the General Licence are met. Similarly, if expenses are required for a DP under any of the regimes listed in Annex 1 of the licence, a provider of expenses will not require a specific licence from the Governor to receive payment from that DP, provided that the terms of the General Licence are met.

Anyone wanting to make use of the new General Licence should carefully consider its terms before doing so. While it serves as an extension of the previous General Licence [No. 9], it also includes a number of variations. The key updates made to the General Licence are detailed below:

- Conversion of caps to USD:

As it pertains to the additional expense-related permission where legal fees have not been claimed, additional expenses of up to USD\$60,000 are covered by this general licence (formerly £50,000).

- Expansion of scope:

The Legal Services General Licence previously only applied to the Russia and Belarus regimes, but has now been expanded to apply to the additional regimes as listed in Annex 1 of the licence.

- Prohibition on Payment:

The Legal Services General 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.

Those who intend to use the General Licence must notify the Attorney General prior to undertaking the specified activity. In addition, once the General Licence is utilised, they must report in writing to the Virgin Islands Sanctions Unit, preferably by email to sanctions@gov.vg, using the form on the British Virgin Islands Financial Services Commission General Licence page.

Alternatively, completed forms can be posted to:

Attorney General Chambers
TTT Building, Wickhams Cay I
Road Town, Tortola
British Virgin Islands

Reporting is due within seven (7) days of a payment permitted under the General Licence. Those using the General Licence must keep records of its use for a period of six (6) years.