



Sanctions Circular No. 121 of 2025

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

Financial Sanctions Notice

19 November 2025

Russia

Introduction

1. The Russia (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/855) (“the Russia Regulations”) were made under the Sanctions and Anti-Money Laundering Act 2018 (the Sanctions Act) and provide for the imposition of financial sanctions, including asset freezes and other financial and investment restrictions, on persons who are or have been involved in destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine; or obtaining a benefit from or supporting the Government of Russia.
2. On 19 November 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 entry has been added to the Consolidated List and is now subject to an asset freeze and trust service sanctions:
 - AEZA GROUP LLC (Group ID: 17224)

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.

Further Information

8. Copies of recent notices, UK legislation and relevant guidance can be obtained from the Iran (Nuclear) financial sanctions page on the GOV.UK [website](#).
9. Further details on the UN measures in respect of Iran can be found on the relevant UN Sanctions Committee [webpage](#).
10. The UN Consolidated List can be found [here](#).
11. The Consolidated List can be found [here](#).
12. The UK Sanctions List can be found [here](#).
13. The Compliance Reporting Form can be found [here](#).
14. For more information, please see our financial sanctions [guidance](#).

Enquiries

1. 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: RUSSIA

THE RUSSIA (SANCTIONS) (EU EXIT) REGULATIONS 2019 (S.I 2019/855)

ADDITION

Entity

1. AEZA GROUP LLC

Name (non-Latin script): ООО АЕЗА ГРУПП

Other Information: (UK Sanctions List Ref): RUS3148. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 19/11/2025. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect that AEZA GROUP LLC is an “involved person” under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following ground: AEZA GROUP LLC is or has been involved in destabilising Ukraine by making available technology that could contribute to destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine through the provision of “bulletproof hosting services” to the Social Design Agency (SDA). (Phone number): 8 800 200-60-13 (Website): Aeza.ru (Email address): support@aeza.ru (Subsidiaries): (1) Aeza International Ltd (2) Hypercore Ltd (Business Reg No): (1) 1217800095248 - OGRN (2) 7813654490 - TIN **Listed on:** 19/11/2025 **UK Sanctions List Date Designated:** 19/11/2025 **Last Updated:** 19/11/2025 **Group ID:** 17224.

Office of Financial Sanctions Implementation

HM Treasury

19/11/2025