

Sanctions Circular No. <u>129</u> of 2025

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

Financial Sanctions Notice

4 December 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.
- On 04 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 and trust service sanctions:
 - Vladimir LIPCHENKO (Group ID: 17237)

- Yuriy Alekseevich SIZOV (Group ID: 17236)
- Denis Alexandrovich SMOLYANINOV (Group ID: 17238)
- THE MAIN DIRECTORATE OF THE GENERAL STAFF OF THE ARMED FORCES OF THE RUSSIAN FEDERATION (Group ID: 17235)

What you must do in relation to this Financial Sanctions Notice

1. 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.
- 2. Failure to comply with financial sanctions legislation or to seek to circumvent its provisions is a criminal offence.
- 3. For further assistance, persons should refer to the <u>Virgin Islands Sanctions Guidelines</u>.

 Additionally, a copy of the relevant Overseas Territories Order may be found on the Financial Services Commission's website.

Ransomware and Sanctions

- 4. Making or facilitating a ransomware payment risk exposing those involved to civil or criminal penalties where such payments are made to designated persons.
- 5. 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.
- 6. Guidance on ransomware and sanctions can be found here.

Further Information

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

Enquiries

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)

ADDITIONS

Individuals

1. LIPCHENKO, Vladimir

Name (non-Latin script): Владимир ЛИПЧЕНКО

DOB: 28/09/1974. a.k.a: (1) VLODEK (2) WLODEK Nationality: Russia Passport Number: 4015400649 Passport Details: Russian passport number Position: GRU officer Other Information: (UK Sanctions List Ref): RUS3151. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 04/12/2025. (UK Statement of Reasons): Vladimir LIPCHENKO is an involved person under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis that he is or has been destabilising Ukraine or undermining the territorial security and sovereignty of Ukraine by engaging in, providing support for, or promoting actions which destabilise Ukraine or undermine or threaten the territorial integrity, sovereignty or independence of Ukraine, namely the coordination of GRU sabotage operations. (Gender): Male Listed on: 04/12/2025 UK Sanctions List Date Designated: 04/12/2025 Last Updated: 04/12/2025 Group ID: 17237.

2. SIZOV, Yuriy Alekseevich

Name (non-Latin script): Юрий Алексеевич СИЗОВ

DOB: 17/02/1988. POB: St Petersburg, Russia Nationality: Russia National Identification Number: 784805190577 National Identification Details: Tax identification number Position: GRU officer Other Information: (UK Sanctions List Ref): RUS3150. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 04/12/2025. (UK Statement of Reasons): Yuriy Alekseevich SIZOV is an involved person under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis that he is or has been destabilising Ukraine or undermining the territorial security and sovereignty of Ukraine by engaging in, providing support for, or promoting actions which destabilise Ukraine or undermine or threaten the territorial integrity, sovereignty or independence of Ukraine, namely the coordination, from his position as a major in the GRU, of sabotage and terror attacks in Ukraine. (Gender): Male Listed on: 04/12/2025 UK Sanctions List Date Designated: 04/12/2025 Last Updated: 04/12/2025 Group ID: 17236.

3. SMOLYANINOV, Denis Alexandrovich

Name (non-Latin script): Денис Александрович СМОЛЯНИНОВ

Title: Colonel DOB: 26/08/1976. POB: Chelyabinsk, Russia Nationality: Russia National

Identification Number: 672904784466 National Identification Details: Tax identification number Position: GRU officer Other Information: (UK Sanctions List Ref): RUS3152. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 04/12/2025. (UK Statement of Reasons): Denis Alexandrovich SMOLYANINOV (hereafter SMOLYANINOV) is an involved person under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis that: a) SMOLYANINOV is or has been obtaining a benefit from the Government of Russia, and is involved in destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine, through working for Russia's security and intelligence services, with a rank of colonel or higher. b) SMOLYANINOV is or has been destabilising Ukraine or undermining the territorial security and sovereignty of Ukraine by engaging in, providing support for, or promoting actions which destabilise Ukraine or undermine or threaten the territorial integrity, sovereignty or independence of Ukraine, namely the coordination of GRU sabotage operations in Ukraine. (Gender): Male Listed on: 04/12/2025 UK Sanctions List Date Designated: 04/12/2025 Last Updated: 04/12/2025 Group ID: 17238.

Entities

1. THE MAIN DIRECTORATE OF THE GENERAL STAFF OF THE ARMED FORCES OF THE RUSSIAN FEDERATION

Name (non-Latin script): Гла́вное управле́ние Генера́льного шта́ба Вооружённых сил Росси́йской Федера́ции

a.k.a: (1) GRU (2) Main Directorate (3) Main Intelligence Directorate **Address:** Khoroshevskoye Shosse, 76, Moscow, Russia. **Other Information:** (UK Sanctions List Ref): RUS3149. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 04/12/2025. (UK Statement of Reasons): The Secretary of State considers that there are reasonable grounds to suspect THE MAIN DIRECTORATE OF THE GENERAL STAFF OF THE ARMED FORCES OF THE RUSSIAN

FEDERATION (GRU) is an involved person under the Russia (Sanctions) (EU Exit) Regulations 2019 based on the following ground: THE MAIN DIRECTORATE OF THE GENERAL STAFF OF THE ARMED FORCES OF THE RUSSIAN FEDERATION is or has been

involved in obtaining a benefit from or supporting the Government of Russia by carrying on business as a Government of Russia-affiliated entity. **Listed on:** 04/12/2025 **UK Sanctions List Date Designated:** 04/12/2025 **Last Updated:** 04/12/2025 **Group ID:** 17235.

Office of Financial Sanctions Implementation

HM Treasury

04/12/2025