



Sanctions Circular No. 134 of 2025

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

Financial Sanctions Notice

9 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.
2. On 9 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

1. The following entries have been added to the Consolidated List and are now subject to an asset freeze and trust service sanctions:
 - Aleksandr Geljevitj DUGIN (Group ID: 17243)

- Mikhail Sergeevich ZVINCHUK (Group ID: 17242)
- CENTER FOR GEOPOLITICAL EXPERTISE (Group ID: 17245)
- EUROMORE (Group ID: 17241)

- FOUNDATION FOR THE SUPPORT AND PROTECTION OF THE RIGHTS OF COMPATRIOTS LIVING ABROAD (Group ID: 17239)
- GOLOS (Group ID: 17240)
- RYBAR LLC (Group ID: 17244)

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 [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

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 [website](#).
8. Further details on the UN measures in respect of Iran can be found on the relevant UN Sanctions Committee [webpage](#).
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. DUGIN, Aleksandr Geljevitj

DOB: 07/01/1962. **POB:** Moscow, Russia **Nationality:** Russia **Other Information:** (UK Sanctions List Ref): RUS3157. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 09/12/2025. (UK Statement of Reasons):Aleksandr Geljevitj DUGIN is an “involved person” under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following ground: DUGIN is or has been involved in destabilising Ukraine by being responsible for, engaging in, providing support for, or promoting any policy or action which destabilises Ukraine or undermines or threatens the territorial integrity, sovereignty or independence of Ukraine. (Gender): Male **Listed on:** 09/12/2025 **UK Sanctions List Date Designated:** 09/12/2025 **Last Updated:** 09/12/2025 **Group ID:** 17243.

2. ZVINCHUK, Mikhail Sergeevich

DOB: 19/07/1991. **POB:** Vladivostok, Russia **Nationality:** Russia **National Identification Number:** INN: 253716334825 **Address:** Block B, 86 Nizhegorodskaya Street, Nizhegorodsky Municipal District, Moscow, Russia, 109052.**Position:** Director General of RYBAR LLC **Other Information:** (UK Sanctions List Ref): RUS3156. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 09/12/2025. (UK Statement of Reasons):Mikhail Sergeevich ZVINCHUK is an “involved person” under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following ground: ZVINCHUK is or has been involved in destabilising Ukraine by working as a director or equivalent of an entity, RYBAR LLC, which is or has been involved in destabilising Ukraine by being responsible for, engaging in, providing support for, or promoting any policy or action which destabilises Ukraine or undermines or threatens the territorial integrity, sovereignty or independence of Ukraine. (Gender): Male **Listed on:** 09/12/2025 **UK Sanctions List Date Designated:** 09/12/2025 **Last Updated:** 09/12/2025 **Group ID:** 17242.

Entities

1. CENTER FOR GEOPOLITICAL EXPERTISE

a.k.a: CGE **Address:** Dinamovskaya Ulitsa, 1A, Moscow, Russia, 109044.**Other Information:** (UK Sanctions List Ref): RUS3159. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 09/12/2025. (UK Statement of Reasons):CENTER FOR GEOPOLITICAL EXPERTISE (CGE) is an “involved person” under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following ground: CGE is or has been involved in destabilising Ukraine by being responsible for, engaging in, providing support for, or promoting any policy or action which destabilises Ukraine or undermines or threatens the territorial integrity, sovereignty or independence of Ukraine. (Business Reg No): INN: 7703259850 **Listed on:** 09/12/2025 **UK Sanctions List Date Designated:** 09/12/2025 **Last Updated:** 09/12/2025 **Group ID:** 17245.

2. EUROMORE

Address: Avenue Ariane 5, Brussels, Belgium, 1200. **Other Information:** (UK Sanctions List Ref): RUS3155. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 09/12/2025. (UK Statement of Reasons): The Secretary of State considers there are reasonable grounds to suspect that EUROMORE is an “involved person” under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following grounds: 1) EUROMORE is or has been involved in destabilising Ukraine by being responsible for, engaging in, providing support for, or promoting any policy or action which destabilises Ukraine or undermines or threatens the territorial integrity, sovereignty or independence of Ukraine; and 2) EUROMORE 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 which otherwise obtains a financial benefit or other material benefit from the Government of Russia. (Phone number): +32 (2) 781-03-01 (Website): Euromore.eu (Email address): News@euromore.eu **Listed on:** 09/12/2025 **UK Sanctions List Date Designated:** 09/12/2025 **Last Updated:** 09/12/2025 **Group ID:** 17241.

3. FOUNDATION FOR THE SUPPORT AND PROTECTION OF THE RIGHTS OF COMPATRIOTS LIVING ABROAD

Name (non-Latin script): Фонд поддержки и защиты прав соотечественников, проживающих за рубежом

a.k.a: (1) FUND FOR THE LEGAL PROTECTION AND SUPPORT OF RUSSIAN FEDERATION COMPATRIOTS (2) PRAVFOND **Address:** Arbat Street, 55/32, Moscow, Russia, 119200. **Other Information:** (UK Sanctions List Ref): **RUS3153**. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 09/12/2025. (UK Statement of Reasons): The Secretary of State considers there are reasonable grounds to suspect that the FOUNDATION FOR THE SUPPORT AND PROTECTION OF THE RIGHTS OF COMPATRIOTS LIVING ABROAD (hereafter PRAVFOND) is an “involved person” under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following grounds: 1) PRAVFOND 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 by being owned or controlled by the Government of Russia; and 2) PRAVFOND is or has been involved in destabilising Ukraine by making available funds that could contribute to destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine through funding the media outlets Euromore and Golos. (Phone number): +7 499 244-44-10 (Website): <https://www.pravfond.ru/> (Business Reg No): INN: 7704278982 **Listed on:** 09/12/2025 **UK Sanctions List Date Designated:** 09/12/2025 **Last Updated:** 09/12/2025 **Group ID:** 17239.

4. GOLOS

Address: Avenue Ariane 5, Brussels, Belgium, 1200. **Other Information:** (UK Sanctions List Ref): RUS3154. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 09/12/2025. (UK Statement of Reasons): The Secretary of State considers there are reasonable grounds to suspect that GOLOS is an “involved person” under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following grounds: 1) GOLOS is or has been involved in destabilising Ukraine by being responsible for, engaging in, providing support for, or promoting any policy or action which destabilises Ukraine or undermines or threatens the territorial integrity, sovereignty or independence of Ukraine; and 2) GOLOS 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 which otherwise obtains a financial benefit or other material benefit from the Government of Russia. (Phone number): +32 (2) 781-03-01 (Website): golos.eu **Listed on:** 09/12/2025 **UK Sanctions List Date Designated:** 09/12/2025 **Last Updated:** 09/12/2025 **Group ID:** 17240.

5. *RYBAR LLC*

Address: Block B, 86 Nizhegorodskaya Street, Nizhegorodsky Municipal District, Moscow, Russia, 109052. **Other Information:** (UK Sanctions List Ref): RUS3158. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 09/12/2025. (UK Statement of Reasons): RYBAR LLC is an “involved person” under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following ground: RYBAR LLC is or has been involved in destabilising Ukraine by being responsible for, engaging in, providing support for, or promoting any policy or action which destabilises Ukraine or undermines or threatens the territorial integrity, sovereignty or independence of Ukraine. (Website): rybar.ru; restmedia.io (Email address): Info@rybar.ru (Business Reg No) : (1) INN: 7720891730 (2) KPP: 772201001 **Listed on:** 09/12/2025 **UK Sanctions List Date Designated:** 09/12/2025 **Last Updated:** 09/12/2025 **Group ID:** 17244.

Office of Financial Sanctions Implementation

HM Treasury

09/12/2025