

Sanctions Circular No. _76_of 2025

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

Financial Sanctions Notice

11 September 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 11 September 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 removed from the Consolidated List and is no longer subject to an asset freeze and trust service sanctions:
 - Ilya Borisovich BRODSKIY (Group ID: 15524)

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.
- 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.

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:

- 4. The Consolidated List can be found here.
- 5. Copies of recent notices, UK legislation and relevant guidance can be obtained from the Cyber financial sanctions page on the GOV.UK website, <u>here</u>.
- 6. The UK Sanctions List can be found here.
- 7. The Compliance Reporting Form can be found here.
- 8. For more information, please see our financial sanctions guidance, <u>here</u>.

Enquiries

9. 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)

DELISTING

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

Individual

1. BRODSKIY, Ilya Borisovich

Name (non-Latin script): Илья Борисович Бродский

DOB: 01/07/1972. POB: Moscow, Russia a.k.a: (1) BRODSKI, Ilya, Borisovich (2) BRODSKY, Ilya, Borisovich Nationality: (1) Cyprus (2) Russia Passport Number: K00227238 Passport Details: Cyprus Address: Flat 196, House 3, Akademika Korolyeva Street, Moscow, Russia. Position: (1) Former Member of the Supervisory Board of Sovcombank (2) Former First Deputy Chairman of the Management Board - Director of Corporate Department of Sovcombank Other Information: (UK Sanctions List Ref): RUS1580. Financial sanctions imposed in addition to an asset freeze: Trust services. Date trust services sanctions imposed: 21/03/2023. (UK Statement of Reasons):llya Borisovich BRODSKIY (hereafter BRODSKIY) is an "involved person" under the Russia (Sanctions) (EU Exit) Regulations 2019 on the basis of the following grounds: 1) BRODSKIY has been involved in obtaining a benefit from or supporting the Government of Russia by working as a director or equivalent, through his roles as First Deputy Chairman of the Management Board - Director of Corporate Department and Member of the Supervisory Board, of an entity, SOVCOMBANK, which is or has been carrying on business in a sector of strategic significance to the Government of Russia, namely the financial services sector; and 2) BRODSKIY has been involved in obtaining a benefit from or supporting the Government of Russia by working as a director or equivalent, through his roles as First Deputy Chairman of the Management Board - Director of Corporate Department and Member of the Supervisory Board, of a Government of Russia-affiliated entity, SOVCOMBANK. (Gender): Male Listed on: 26/09/2022 UK Sanctions List Date Designated: 26/09/2022 Last Updated: 23/02/2024 11/09/2025 Group ID: 15524.

Office of Financial Sanctions Implementation HM Treasury

11/09/2025