**Office of Financial Sanctions Implementation (OFSI)**

**UK ban on the maritime transportation of Russian oil and oil products and associated services and the oil price cap**

**Suspected Breach Reporting Form**

**OVERVIEW**

* This form should be used to report to HM Treasury’s Office of Financial Sanctions Implementation (OFSI) suspected breaches and compliance issues related to implementation of the UK’s ban on the maritime transportation of Russian oil and oil products and associated services and the Oil Price Cap.
* OFSI guidance on the UK maritime services ban and Oil Price Cap is available at: [www.gov.uk/government/publications/russian-oil-services-ban](http://www.gov.uk/government/publications/russian-oil-services-ban).
* General Licences related to the UK ban on the maritime transportation of Russian oil and oil products and associated services can be found on the OFSI website at: [www.gov.uk/government/collections/ofsi-general-licences](http://www.gov.uk/government/collections/ofsi-general-licences) and [www.gov.uk/government/publications/russian-oil-services-ban](http://www.gov.uk/government/publications/russian-oil-services-ban).
* You should consult this guidance and licences first before completing this form.
* For involved persons, there is a legal obligation to report, and not doing so is a criminal offence. Please see the OFSI guidance document on the UK maritime services ban and Oil Price Cap, and the [Russia (Sanctions) (EU Exit) Regulations 2019, 70](https://www.legislation.gov.uk/uksi/2019/855/regulation/70), for more information on the definition of and responsibilities for involved persons.
* A criminal offence may be committed if you intentionally participate in activities knowing that the object or effect of them is to circumvent any of the prohibitions related to trade sanctions or enables or facilitates the contravention of any of those prohibitions.
* Multiple suspected breaches related to one oil transaction or service provision can be reported in one form. Otherwise, use separate forms for different suspected breaches.
* Part A of this form is on reporter information, part B suspected breach details, and part C further information. Please include in your submission, in addition to this form, any relevant supporting evidence.
* Please email completed forms, including any associated documents, to OilPriceCap.OFSI@hmtreasury.gov.uk. The email (header) subject line should read: **“SUSPECTED BREACH: UK MARITIME SERVICES BAN AND OIL PRICE CAP.”** It is important this subject line is followed so that the email and supporting information is processed correctly.
* Alternatively, completed forms can be posted to: Office of Financial Sanctions Implementation (OFSI), HM Treasury, 1 Horse Guards Road, London SW1A 2HQ.
* Please ensure that when completing this form, the facts and information provided are accurate and true to the best of your knowledge. If you are unsure of your compliance or reporting obligations under trade sanctions, you should seek independent legal advice.
* Information provided may be shared for the purpose of facilitating, monitoring or ensuring compliance with sanctions, in accordance with HM Treasury’s information sharing powers and UK data protection legislation.
* Form last updated: 20 December 2023.

**Other related sanctions**

* A ban on imports of Russian oil and oil products into the UK came into effect on 5 December 2022. Guidance on this ban is available at: [www.gov.uk/government/publications/uk-ban-on-russian-oil-and-oil-products](http://www.gov.uk/government/publications/uk-ban-on-russian-oil-and-oil-products).
* OFSI guidance on financial sanctions including reporting and compliance obligations and for entities and individuals operating within the maritime shipping sector is available at: [www.gov.uk/government/publications/financial-sanctions-faqs](http://www.gov.uk/government/publications/financial-sanctions-faqs).
* Information relating to compliance with financial sanctions should be reported to OFSI in a separate form, available at: [www.gov.uk/guidance/suspected-breach-of-financial-sanctions-what-to-do](http://www.gov.uk/guidance/suspected-breach-of-financial-sanctions-what-to-do).

**PART A: REPORTER INFORMATION**

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| 1. **Person submitting this report**
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| 1. Name
 |  |
| 1. Job title / position
 |  |
| 1. Organisation
 |  |
| 1. Nature of business
 |  |
| 1. Address
 |  |
| 1. Contact number
 |  |
| 1. Email address
 |  |
| 1. Tier of business under attestation model (Tier 1, 2, 3, or not known)
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| 1. **Date submitted (DD/MM/YYYY)**
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| 1. **Are you submitting this form on behalf of a third party?** Tick box

e.g. you are a law firm, agent or guardian representing someone  | Yes: complete details of third party below |  |
| No |  |
| 1. Name
 |  |
| 1. Job title / position
 |  |
| 1. Organisation
 |  |
| 1. Nature of business
 |  |
| 1. Address
 |  |
| 1. Contact number
 |  |
| 1. Email address
 |  |
| 1. Tier of business under attestation model (Tier 1, 2, 3, or not known)
 |  |

**PART B: SUSPECTED BREACH DETAILS**

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| --- | --- | --- |
| 1. **Who do you suspect has committed, or has attempted to commit, the suspected breach?** Tick box
 | Self-referral  |  |
| Other person: complete details below |  |
| 1. Name
 |  |
| 1. Job title / position
 |  |
| 1. Organisation
 |  |
| 1. Nature of business
 |  |
| 1. Address
 |  |
| 1. Contact number
 |  |
| 1. Email address
 |  |
| 1. Person’s role in suspected breach
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| 1. Tier of business under attestation model (Tier 1, 2, 3, or not known)
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| 1. **Suspected breach summary: please provide relevant information for the suspected breach**

Multiple breaches related to one oil transaction or service provision can be reported in one form; otherwise, use separate forms for different suspected breaches |
| 1. Date the suspected breach took place (DD/MM/YYYY)
 |  |
| 1. Under which regulation(s) of the Russia (Sanctions) (EU Exit) Regulations 2019 (“the Russia Regulations”) has the suspected breach occurred?

Maritime transportation (regulation 46Z9B (1) and (2)); Financial services and funds (regulation 46Z9C (1) and (2)); and/or Brokering services (regulation 46Z9D (1) and (2)) |  |
| 1. Summary of suspected breach
 |  |
| 1. Oil transaction details for suspected breach including: oil or oil product type with HS Code; purchaser and seller; dates of purchasing contract and last known transaction; unit price paid; shipping and ancillary costs; number of barrels; and total value of shipment (known or estimated)
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| 1. Voyage details for suspected breach including: country and port of origin/loading; date of loading; country and port of destination/unloading; date of unloading; and other known countries and ports visited with dates
 |  |
| 1. Vessel details for suspected breach including: ship IMO; ship name; ship flag state; ship owner; ship operator; ship beneficial owner; and insurance company/P&I Club
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| 1. UK nexus and other relevant service providers for suspected breach including: contact name; company/organisation; nature of business; entity tier; address; and contact email
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| 1. Sanctions evasion red flags for suspected breach including (but not limited to): oil purchased above price cap; falsified documentation and attestations; opaque shipping and ancillary costs; third country enablers and facilitators; complex and irregular corporate structures; flagging concerns; use of a “shadow fleet”; voyage irregularities such as AIS manipulation and suspicious ship to ship transfers; failure to comply with terms of relevant General Licence or attestation requirements; and/or poor or insufficient compliance processes
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**PART C: FURTHER INFORMATION**

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| 1. **Please list all external parties who have been made aware that this information is being passed to OFSI, including any designated persons**
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| 1. **Has this suspected breach been reported to any other authority e.g. regulators in the UK or enforcement authorities in other countries? Please specify who, when, and their contact details**
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| 1. **List of documents referenced in this report and other supporting evidence, to be attached when this form is submitted to OFSI**
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| 1. **Any other relevant information not already captured in this form**
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