



## General Licence – Publication Notice

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### General licence - INT/2023/2954852

OFSI has the power to issue General Licences for country sanctions regimes under regulations made under the Sanctions and Anti-Money Laundering Act 2018 (“the Sanctions Act”).

OFSI has issued a new Legal Services General Licence INT/2023/2954852 under Regulation 64 of the Russia (Sanctions) (EU Exit) Regulations 2019 (“the Russia Regulations”) and Regulation 32 of the Republic of Belarus (Sanctions) (EU Exit) Regulations 2019 (“the Belarus Regulations”) following the expiry of Legal Services General Licence INT/2022/2252300. This permits a UK legal firm or UK counsel who has provided legal advice to a person designated under either the Russia or Belarus regime to receive payment from that designated person without an OFSI specific licence, provided that the terms of the General Licence INT/2023/2954852 are met.

Any persons intending to use General Licence INT/2023/2954852 should consult the copy of the Licence for full details of the definitions, permissions, and usage requirements as these do not mirror those of General Licence INT/2022/2252300. The main changes are:

The professional legal fees caps and expenses caps have been reset. Users will be able to make use of the legal fees caps (£500,000 inc. VAT) and the expenses caps (5% of legal fees, up to £25,000) under Parts A and B of the General Licence.

General Licence INT/2023/2954852 may be used to pay/receive fees and/or expenses in cases where the total fees and/or expenses exceed the legal fees and/or expenses caps. It also permits the two legal fees caps to be combined, subject to the terms of the licence being met. This means if work is undertaken for a designated person that involves fees for legal work carried out in satisfaction of a prior obligation (£500,000 limit) and work undertaken post-designation (£500,000 limit), up to £1 million (inc. VAT) could be paid. Similarly, if expenses are required for work carried out in satisfaction of a prior obligation (£25,000 limit) and for work undertaken post-designation (£25,000 limit), up to £50,000 (inc. VAT) in expenses could be paid.

Professional legal fees and expenses for cases involving defamation or malicious falsehood are not permitted to be paid under INT/2023/2954852.

#### General

The permissions in General Licence INT/2023/2954852 do not authorise any act which the person carrying out the act knows, or has reasonable grounds for suspecting, will result in funds or economic resources being dealt with or made available in breach of the Russia Regulations, the Belarus Regulations, or any other regulations made under the Sanctions and Anti-Money Laundering Act 2018 save as specifically permitted under this or other licences granted by HM Treasury.

General Licence INT/2023/2954852 takes effect from 00:01 on 29 April 2023 and expires at 23:59 on 28 October 2023 and may be varied, revoked, or suspended by HM Treasury at any time.

### **Reporting requirement**

Any activity conducted under General Licence INT/2023/2954852 must be reported to HM Treasury within 7 days, with the details and supporting evidence requested in Part A or Part B, at the earliest point of either (a) the services being completed; or (b) INT/2023/2954852 coming to an end. The reporting forms of General Licence INT/2023/2954852 may be downloaded from the OFSI website at <https://www.gov.uk/government/publications/legal-services-general-licence> .

### **Record-keeping requirements**

A DP or Person must keep accurate, complete and readable records, on paper or electronically, of any activity purporting to have been permitted under this licence for a minimum of 6 years.

Office of Financial Sanctions Implementation

HM Treasury