



Department for
Business & Trade

General Trade Licence

Russia sanctions - Legal

Advisory Services

11 August 2023

GENERAL TRADE LICENCE

General Trade Licence (Russia Sanctions – Legal Advisory Services) dated 11 August 2023 granted by the Secretary of State.

The Secretary of State, in exercise of powers conferred by the Russia (Sanctions) (EU Exit) Regulations 2019 (the "Regulations") and in particular Regulation 65 (Trade licences) with reference to: Regulation 54D (Legal Advisory Services), hereby grants the following General Trade Licence:

Licence

1. Subject to the exclusions, conditions and requirements set out below, this licence authorises the direct or indirect provision of legal advisory services specified in sub-paragraphs (a) to (c), so far as otherwise prohibited by Regulation 54D of the Regulations, to any person:
 - (a) as to whether an act or a proposed act complies with, or could trigger punitive measures (which includes administrative penalties) in relation to, restrictive measures, including sanctions, export and import controls on or concerning Russia or the non-government controlled Ukrainian territory, imposed by any jurisdiction; and/or
 - (b) in relation to, or in connection with compliance with, or addressing the risk of punitive measures (which includes administrative penalties) in relation to, (i) restrictive measures, including sanctions, export and import controls on or concerning Russia or the non-government controlled Ukrainian territory, imposed by any jurisdiction; (ii) any laws of Russia that have as their object or effect the frustration of any laws specified at (i), including sanctions, export and import controls or other restrictive measures imposed by Russia; (iii) or any criminal law imposed by any jurisdiction; and/or
 - (c) where the legal advisory services are provided in relation to the discharge of or compliance with UK statutory or regulatory obligations.

Exclusions

2. This licence does not apply where the Provider, at the time of act, has been served with a notice which suspends or revokes their ability to use this licence, unless the period of suspension or revocation has expired.

Conditions and Requirements

3. The authorisation in paragraph 1 above is subject to the following conditions:
 - (a) Within 30 calendar days of the first use of this Licence, the Provider must provide details to the Secretary of State of the name and address at which records are kept in relation to this Licence through registration of such details on SPIRE:
(<https://www.spire.trade.gov.uk/spire/fox/espire/LOGIN/login>).
 - (b) The provisions of Regulation 76 (General trade licences: records) of the Regulations apply to any act under the authority of this licence.
 - (c) In accordance with the applicable legislation, the records required by this Licence must be kept for a period of 4 years beyond the end of the calendar year in which the record was created and the Provider must permit them to be inspected and copied by any person authorised by the Secretary of State or the Commissioners. There are no additional record keeping requirements for this licence other than those set out in the Regulations. Providers may wish to consult the statutory guidance for more information.
 - (d) Without prejudice to Part 9 (Enforcement) of the Regulations, failure to comply with any condition may result in the Provider's use of this licence being revoked or suspended. The Provider will be notified in writing of any such suspension or revocation.

Prohibitions not affected by this Licence

4. Nothing in this Licence affects any prohibition or restriction other than Regulation 54D of the Regulations.

Interpretation

5. For the purpose of this licence:

- (a) "Provider" means any legal or natural person located in or operating from within the United Kingdom or which is a United Kingdom person as defined in Regulation 2 of the Regulations operating anywhere in the world engaging in any activity authorised at paragraph 1;
- (b) unless the context otherwise requires, any other expression used in this licence shall have the meaning it bears in the Regulations.

Entry into Force

6. This licence shall come into force on 11 August 2023.

An Official of the Department for Business and Trade, authorised to act on behalf of the Secretary of State.

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