



General Licence – Publication Notice

General licence - INT/2022/2009156

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

On 22 July 2022, OFSI issued General Licence INT/2022/2009156 under all UK Autonomous Sanctions Regulations listed in Annex I of this notice. This allows only those individuals or entities designated under the UK Sanctions Regimes to make payments to UK insurers for insurance premiums and broker commissions relating to the provision of building and engineering insurance cover provided to UK properties. This licence is not applicable to those also sanctioned by the United Nations. This licence also permits UK insurers to make payments to UK Designated Persons due as a result of a successful claim made against an insurance policy provided by the UK Insurer or refunds due as a result of any over payments made pursuant to this licence. A Person or Relevant Institution can carry out any activity reasonably necessary to effect the permissions set out in this licence. Any persons intending to use General Licence INT/2022/2009156 should consult the copy of the Licence on this page for full details of the permissions and usage requirements.

For the purposes of General Licence INT/2022/2009156 buildings insurance means:

- Insurance covering the cost of repairing damage to the structure of a property.

For the purposes of General Licence INT/2022/2009156 engineering insurance means:

- Insurance against risks associated with erection, resting and working of any machinery, plant or equipment in commercial properties.

A Person is an individual, a body of persons corporate or unincorporate, any organisation or any association or combination of persons; and a Relevant Institution is:

- A person that has permission under Part 4A of the Financial Services and Markets Act 2000(3) (permission to carry on regulated activity);
- A person that is authorised or registered under Part 2 of the Payment Services Regulations (SI 2017/752);
- A person that is authorised or registered under Part 2 of the Electronic Money Regulations (SI 2011/99);
- A person that is a “recognised clearing house”, “third country central counterparty”, “recognised CSD” or “third country CSD” for the purposes of s.285 of the Financial Services and Markets Act 2000; or
- A person that is an operator of a recognised payment system (or that is a service provider in relation to recognised payment systems) for the purposes of Part 5 of the Banking Act 2009.

On 17 August 2022 this licence was amended to include the following:

- Terrorism Insurance, which for the purpose of this licence means insurance covering the cost of repairing damage to the structure of a property as a result of an act of terrorism
- Property Owners' Liability Insurance, which for the purpose of this licence means insurance covering claims made against landlords and property owners in respect of their legal liability for personal injury or property damage suffered by third parties and arising from the policyholder's ownership of the property; and
- Claims Preparation Costs Insurance, which for the purpose of this licence means insurance covering the cost of appointing a professional claims handler to deal with any claims made against an insurance policy permitted under this licence.

On 15 December 2023 this licence was amended such that:

- A definition of UK Insurance Brokers has been added;
- The definition of UK DP now includes individuals or entities owned or controlled by a designated person;
- Motor insurance, which for the purpose of this licence means a contract of insurance within the motor vehicle liability or land vehicle class, is now a Permitted Payment;
- Persons acting on behalf of UK DPs may: i) make Permitted Payments to UK Insurers, ii) be repaid by UK DPs for the same amount as that Permitted Payment;
- UK Insurers may make a Return Payment to a Person who has made a Permitted Payment where that amount is a refund due as a result of an overpayment;
- UK DPs and Persons, where they are acting on behalf of DPs, may make Permitted Payments to UK Insurance Brokers;
- UK Insurance Brokers may transfer funds received to UK Insurers;
- UK Insurance Brokers may receive from UK Insurers Return Payments due to UK DPs and transfer these funds to a UK DPs frozen bank account;
- UK Insurance Brokers may make Return Payments to a Person who has made a Permitted Payment to them under paragraph 6.2 where that amount is a refund due as a result of an overpayment; and
- General Licence INT/2022/2009156 was amended to also permit activity that would otherwise breach the prohibitions in Regulation 17A.

On 06 February 2024 this licence was amended such that:

- Permitted Payments can only be made for UK properties and UK vehicles;
- Insurance Brokers may make all types of Return Payments to a DP's frozen bank account including payments due from successful claims;
- The language in 5.2 and 6.5 has been clarified;
- The definition of Return Payments was expanded to include other types of refunds;
- The reporting and record-keeping requirements also apply to Insurance Brokers;
- Those reporting must now report to HM Treasury within 10 working days.

In order to determine if a UK bank account is frozen, OFSI would advise UK Insurers or UK Insurance Brokers to request that the DP provides a letter from their bank confirming that the account in question is frozen according to the requirements set out in UK Autonomous Sanctions Regulations.

On 15 February 2024 this licence was amended such that:

- Reference to frozen UK bank accounts has been removed from Permissions 4.1, 4.3.1, and 6.1 to make clear that payments by DPs are not restricted to those made from frozen funds; and
- The language in permission 5.1 and 6.6 has been clarified.

General

The permissions in General Licence INT/2022/2009156 do not authorise any act which will result in funds or economic resources being made available in breach of the relevant UK autonomous sanctions Regulations, save as permitted under a licence granted under those Regulations.

General Licence INT/2022/2009156 takes effect from 22 July 2022 and is of indefinite duration.

Office of Financial Sanctions Implementation

HM Treasury