



General Licence – Publication Notice

General licence - INT/2024/4671884

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/2024/4671884 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”) which will take effect following the expiry of Legal Services General Licence INT/2023/3744968 on 28 April 2024. 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/2024/4671884 are met.

Any persons intending to use General Licence INT/2024/4671884 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 Licences INT/2022/2252300 or INT/2023/2954852 or INT/2023/3744968. The main changes are:

- The professional legal fees 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 (10% of the legal fees up to £50,000 inc. VAT) under Parts A and B of the General Licence.
- The professional legal fees and expenses caps now apply to each Law Firm instructed by the Designated Person to cover all matters on which that law firm is instructed by that DP. This is a change from previous Legal Services General Licences where the fee and expenses caps applied to each DP (i.e., for all the DP’s legal work across all firms they instructed).
- Part B of the General Licence now permits brief fees and refresher fees to be paid to Counsel in the event these are fixed fees and not subject to hourly rates. These fees may now be included in the overall cap of £500,000 for professional legal fees including Counsel’s fees. This is a change from previous Legal Services General Licences where in Part B Counsel fees were subject to a maximum hourly rate of £1,500.
- The definition of Counsel now includes a barrister who is regulated by the Bar Council of Northern Ireland and an advocate who is regulated by the Faculty of Advocates (in Scotland). This is a change from previous Legal Services General

Licences where the definition of Counsel was defined as a barrister who is regulated by the Bar Standards Board.

General

The permissions in General Licence INT/2024/4671884 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/2024/4671884 takes effect from 00:01 on 29 April 2024 and expires at 23:59 on 28 October 2024 and may be varied, revoked, or suspended by HM Treasury at any time.

Reporting requirement

Any payments received under General Licence INT/2024/4671884 must be reported to HM Treasury within 14 days of the payment being received, with the details and supporting evidence requested in Part A or Part B. The reporting forms of General Licence INT/2024/4671884 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