



HIGH VALUE DEALERS AND ART MARKET PARTICIPANTS FACTSHEET

What are financial sanctions?

Financial sanctions are restrictive measures imposed on individuals, institutions and sectors help the UK meet its foreign policy and national security aims, as well as protecting the integrity of its financial system. Financial sanctions are used to respond to a range of threats, from terrorism and nuclear proliferation to internal repression and human rights abuses.

How do I comply with financial sanctions?

For those operating in the luxury, arts and high value goods sectors it is important to be aware of the wide-reaching scope of UK financial sanctions and the due diligence you should be undertaking to remain compliant. You should read the relevant regulations and consult OFSI's general and sectoral guidance.

OFSI's guidance is available from GOV.UK and covers:

- Good due diligence
- Circumvention risks
- Reporting obligations
- Enforcement and penalties
- Ownership and control

Scan here to
read the guidance



From 14 May 2025, High Value Dealers and Art Market Participants are legally required to comply with reporting obligations in the UK.

Circumvention

This sector has a high risk for exploitation by those who wish to evade financial sanctions. The following are some examples of methods of circumvention:

The movement of assets - sale of high value assets on behalf of those associated with a designated person

Unclear sources of payments - intermediaries and shell companies are often used to buy or sell high value goods

Alternative investment options - wines and spirits from specific geographic regions and vintages, provide investment options for those subject to financial restrictions

Manipulation of prices - the subjectivity of the value of luxury goods can hide their true values

Digital assets - cryptocurrencies can be difficult to trace and can be used in a transaction for an asset then redeemed to a fiat currency