

**OFSI GENERAL LICENCE UNDER THE RUSSIA REGULATIONS AND THE BELARUS
REGULATIONS
INT/2024/5334756**

IT IS THE RESPONSIBILITY OF ANY PERSON OR PERSONS USING THIS LICENCE TO ENSURE THAT THE ACTIVITIES UNDERTAKEN FALL WITHIN THE TERMS OF THIS LICENCE, AND THAT THE PARTIES COMPLY WITH THE CONDITIONS OF THIS LICENCE IN FULL. IN THE EVENT THAT THE CONDITIONS OF THIS LICENCE ARE NOT COMPLIED WITH IN FULL, IT WILL NOT APPLY TO PERMIT ACTIVITIES TAKEN IN BREACH OF RELEVANT SANCTIONS AND A CRIMINAL OR MONETARY PENALTY MAY BE IMPOSED.

1. This licence is granted under regulation 64 of the Russia Regulations and regulation 32 of the Belarus Regulations.
2. The prohibitions in regulations 11-15 and 17A of the Russia Regulations and regulations 11-15 of the Belarus Regulations do not apply to any act necessary to give effect to this licence.
3. In this licence (including Parts A and B):

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| "Counsel" | <p>means:</p> <ul style="list-style-type: none"> • a barrister who is regulated by the Bar Standards Board or by the Bar Council of Northern Ireland; or • an advocate who is regulated by the Faculty of Advocates and who is providing advice in relation to the Legal Services. |
| "DP" | <p>means any individual, or <u>person other than an individual</u> (corporate or unincorporate), designated under the Russia Regulations or the Belarus Regulations and/or <u>any person</u> owned or controlled <u>directly or indirectly by them</u> as determined under the criteria set out in the Russia Regulations or the Belarus Regulations (in particular regulation 7 of and Schedule 1 to each of those Regulations).</p> |
| "Economic Resources" | <p>means assets of every kind, whether tangible or intangible, movable or immovable, which are not funds but can be used to obtain funds, goods or services.</p> |
| "Expenses" | <p>means any fees or expenses associated with the provision of the Legal Services including (but not limited to):</p> <ul style="list-style-type: none"> • fees for expert witnesses; • translation fees; • printing; • travel expenses; • subsistence expenses; • courier expenses; • legal searches; • court transcripts; |

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| | <ul style="list-style-type: none"> • administrative fees necessary to provide legal services (i.e. Home Office fees); and • bank transaction fees, but excluding Counsel’s fees. |
| “Funds” | <p>means financial assets and benefits of every kind, including (but not limited to)—</p> <ul style="list-style-type: none"> (a) cash, cheques, claims on money, drafts, money orders and other payment instruments; (b) deposits, balances on accounts, debts and debt obligations; (c) publicly and privately traded securities and debt instruments, including stocks and shares, certificates representing securities, bonds, notes, warrants, debentures and derivative products; (d) interest, dividends and other income on or value accruing from or generated by assets; (e) credit, rights of set-off, guarantees, performance bonds and other financial commitments; (f) letters of credit, bills of lading and bills of sale; (g) documents providing evidence of an interest in funds or financial resources; (h) any other instrument of export financing. |
| “Law Firm” | <p>means a Person providing legal advice in relation to the Legal Services to a DP. Where one or more Legal Advisers and/or Counsel are employees of a DP, and provide Legal Services to that DP, they shall collectively be deemed to be one “Law Firm”, instructed by that DP, solely for the purposes of the provisions of this licence which express a financial limit to apply ‘per Law Firm’.</p> |
| “Legal Adviser” | <p>means a person who is professionally qualified or is undertaking a professional legal qualification and is providing legal advice in relation to the Legal Services to a DP, including (but not limited to):</p> <ul style="list-style-type: none"> • solicitors; • CILEX practitioners or chartered legal executives; • trainee solicitors; • paralegals; and • legal executives. |
| “Legal Services” | <p>means legal services provided to a DP, including legal advice and/or representation in <u>dispute resolution</u>, whether provided within the UK or another jurisdiction, in relation to any matter except a claim for defamation or malicious falsehood.</p> |
| “Non-UK Bank Account” | <p>means an account at a bank or similar institution, which is a Person subject to supervision by a public authority, in:</p> <ul style="list-style-type: none"> a) Canada; b) any Member State of the European Union; c) any Member State of the European Free Trade Association; or d) the United States. |

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| "Person" | includes a body of persons corporate or unincorporate, but does not include a DP. |
| "professional legal fees" | means fees charged by a Legal Adviser or a Law Firm for the provision of the Legal Services. |
| "Relevant Institution" | means a Person that has permission under Part 4A of the Financial Services and Markets Act 2000 (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. |
| "the Belarus Regulations" | means the Republic of Belarus (Sanctions) (EU Exit) Regulations 2019 (2019/600). |
| "the Russia Regulations" | means the Russia (Sanctions) (EU Exit) Regulations 2019 (2019/855). |

4. Subject to paragraph 6, provided that one (or both) of the sets of conditions in Part A and/or Part B of this licence are complied with in full any Person, Relevant Institution or provider of a Non-UK Bank Account may:
 - 4.1. receive payments from or on behalf of a DP;
 - 4.2. make payments (directly or indirectly) for or on behalf of a DP;
 - 4.3. make payments for the benefit of a DP;
 - 4.4. process payments which relate to a DP;

and

 - 4.5. carry out any other act which is reasonably necessary to give effect to 4.1 – 4.4 above.

5. Subject to paragraph 6, provided that one (or both) of the sets of conditions in Part A and/or Part B of this licence are complied with in full, a DP may pay professional legal fees, Counsel's fees, and/or Expenses to a Law Firm, a Legal Adviser, Counsel or a provider of Expenses for Legal Services which have been provided to that DP.

6. The permissions in this licence do not authorise any act which results in Funds or Economic Resources being made available (directly or indirectly) to any DP.

7. Both Part A and Part B of this licence can be used in conjunction by a Person or DP if the provision of Legal Services commenced before the DP was designated and continued after designation provided that:

- 7.1. where both Part A and Part B of this licence are used with regard to the Legal Services, any professional legal fees and any Counsel's fees, paid under both Parts in relation to any DP do not exceed £4,000,000 (including VAT where applicable) per Law Firm (or per Counsel, if engaged under a direct instruction) instructed in total for the duration of this licence;
 - 7.2. where both Part A and Part B of this licence are used with regard to the Legal Services, the Expenses paid under both Parts in relation to any DP do not exceed (in total) either:
 - 7.2.1. 10% of the amount payable for professional legal fees and Counsel's fees; or
 - 7.2.2. £400,000.00whichever is lower, for all of the Expenses per Law Firm (or per Counsel, if engaged under a direct instruction) instructed for the duration of this licence;
 - 7.3. Part A is only used to pay for individual matters within the Legal Services which were commenced before the DP was designated; and
 - 7.4. with regard to the provision of Legal Services under Part B, the hourly rates do not exceed those set out in paragraphs 7 and 12 of Part B.
8. The permissions in this licence do not authorise any act which results in a 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 licence.
 9. Any Person, Relevant Institution or DP acting under the authority of, or otherwise using this licence should note that the conditions set out in Parts A and B of this licence are not capable of being interchanged: the conditions in one Part must be complied with in full for the activities to fall within the terms of this licence.
 10. Information provided to HM Treasury in connection with this licence shall be disclosed to third parties only in compliance with the UK General Data Protection Regulation and the Data Protection Act 2018.
 11. This Licence takes effect from 00:01 on 29 October 2024 to 23:59 on 28 April 2025. Licence INT/2024/4671884 expires at 23:59 on 28 October 2024.
 12. HM Treasury may vary, revoke or suspend this licence at any time.
 13. HM Treasury will publicise any variations, suspensions or revocations of this licence online at www.gov.uk/government/collections/ofsi-general-licences.

Signed:



Office of Financial Sanctions Implementation

HM Treasury

25 October 2024

Amended 28 March 2025.

PART A - LEGAL SERVICES BASED ON A PRIOR OBLIGATION

CONDITIONS FOR USE OF THIS PART OF THE LICENCE- NOTE THAT ALL OF THE BELOW CONDITIONS MUST BE SATISFIED/ COMPLIED WITH.

1. A payment of:
 - 1.1. professional legal fees; and/ or
 - 1.2. Counsel's fees; and/ or
 - 1.3. Expenses,must be owed by a DP to a Law Firm, a Legal Adviser, Counsel or a provider of Expenses.
2. The payment must be in relation to Legal Services which have been provided, or which are being provided to a DP by a Law Firm, Legal Adviser or Counsel, or to Expenses.
3. The payment must be owed in accordance with an obligation which was entered into by the DP prior to the date of that DP's designation, or in the case of DPs which are owned and controlled, the owner/ controller of that DP's designation, either under the Russia Regulations, the Belarus Regulations, Council Regulation (EU) No 269/2014 or Council Regulation (EC) No 765/2006 (whichever was earlier).
4. Any professional legal fees and any Counsel's fees paid under this Part in relation to any DP must not exceed £2,000,000.00 (including VAT if applicable) per Law Firm (or per Counsel, if engaged under a direct instruction) instructed in total for the duration of this licence.
5. The Expenses (including VAT if applicable) paid under this Part in relation to any DP must not exceed (in total) either:
 - 5.1. 10% of the amount payable for professional legal fees and Counsel's fees; or
 - 5.2. £200,000.00;whichever is lower, for all of the Expenses per Law Firm (or per Counsel, if engaged under a direct instruction) instructed under this Part for the duration of this licence.
6. If at any point the limits for the professional legal fees, Counsel's fees or Expenses set out above are in fact exceeded, Part A of this licence will not apply to any payment of any nature above those limits nor to any other act in relation to the provision of the Legal Services.
7. Any payments made under this Part must:
 - 7.1. be paid directly to an account held in the UK with a Relevant Institution by a Law Firm, Legal Adviser, Counsel or a provider of Expenses;
 - 7.2. be paid directly to a Non-UK Bank Account held by a branch, of a Law Firm regulated by the Solicitors Regulation Authority, the Law Society of Scotland or the Law Society of Northern Ireland, which provides Legal Services outside the United Kingdom; or

- 7.3. be paid on behalf of a DP to a provider of Expenses by a Law Firm, Legal Adviser or Counsel, to an account held in the UK with a Relevant Institution by a provider of Expenses, either before or after payment from, for or on behalf of the DP is received.

Reporting

8. Within 14 days of receiving payment under this licence any Person who has used the licence must send to HM Treasury, by email to ofsi@hmtreasury.gov.uk:
 - 8.1. The relevant unredacted letter of engagement between the DP and the Legal Adviser, Law Firm or Counsel;
 - 8.2. Any other document, communication or other record which sets out the obligation pursuant to which payment is made;
 - 8.3. The relevant invoice(s) which are being paid; and
 - 8.4. A completed "OFSI Prior-Obligation Legal Fees GL form".

Record-keeping Requirements

9. 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.

PART B - LEGAL SERVICES NOT BASED ON A PRIOR OBLIGATION

CONDITIONS FOR USE OF THIS PART OF THIS LICENCE- NOTE THAT ALL OF THE BELOW CONDITIONS MUST BE SATISFIED/ COMPLIED WITH.

1. A payment of:
 - 1.1. professional legal fees; and/ or
 - 1.2. Counsel's fees; and/ or
 - 1.3. Expenses,must be owed by a DP to a Law Firm, a Legal Adviser, Counsel or a provider of Expenses.
2. The payment must be in relation to Legal Services which have been provided, or are being provided by the Law Firm, Legal Adviser or Counsel to a DP, or to Expenses.
3. Any professional legal fees and any Counsel's fees paid under this Part in relation to any DP must not exceed £2,000,000.00 (including VAT if applicable) per Law Firm (or per Counsel, if engaged under a direct instruction) instructed in total for the duration of this licence.
4. The Expenses (including VAT if applicable) paid under this Part in relation to any DP must not exceed (in total) either:
 - 4.1. 10% of the amount payable for professional legal fees and Counsel's fees; or
 - 4.2. £200,000.00,

whichever is lower, for all of the Expenses per Law Firm (or per Counsel, if engaged under a direct instruction) instructed under this Part for the duration of this licence.

5. If at any point the limits for professional legal fees, Counsel's fees or Expenses set out above are in fact exceeded, Part B of this licence will not apply to any payment of any nature above those limits nor to any other act in relation to the provision of the Legal Services.
6. The hourly rates for provision of the professional legal fees by a Legal Adviser must not exceed those rates listed in paragraph 12 of this Part of the licence in any individual case.
7. The hourly rates to be charged by Counsel must not exceed the rate of £1,500 per hour (including VAT).
8. Paragraph 7 does not apply to brief fees or refresher fees in the event that these are fixed fees and not subject to hourly rates.
9. If at any point any one hourly rate, for either a Legal Adviser or Counsel exceeds the hourly rates set out in this licence, Part B of this licence will not apply to any payment of any nature applying those hourly rates which exceed the rates set out in this licence nor to any other act in relation to the provision of the Legal Services.
10. Any payments made under this Part must either:
 - 10.1. be paid directly to an account held in the UK with a Relevant Institution by a Law Firm, Legal Adviser, Counsel or a provider of Expenses;
 - 10.2. be paid directly to a Non-UK Bank Account held by a branch, of a Law Firm regulated by the Solicitors Regulation Authority, the Law Society of Scotland or the Law Society of Northern Ireland, which provides Legal Services outside the United Kingdom; or
 - 10.3. be paid on behalf of a DP to a provider of Expenses, by a Law Firm, Legal Adviser or Counsel to an account held in the UK with a Relevant Institution by a provider of Expenses, either before or after payment from, for or on behalf of the DP is received.

Reporting

11. Within 14 days of receiving payment under this licence any Person who has used this licence must send to HM Treasury, by email to ofsi@hmtreasury.gov.uk:
 - 11.1. The relevant unredacted letter of engagement between the DP and the Legal Adviser, Law Firm or Counsel;
 - 11.2. Details of the name, employment, experience and the years of post-qualification experience of any Legal Adviser;
 - 11.3. Details of the name, employment, experience and the years of call of any Counsel;
 - 11.4. The relevant invoice(s) which are being paid; and
 - 11.5. A completed "OFSI Post-Designation Legal Fees GL form".

Record-keeping Requirements

11. 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.

Hourly rates (excluding VAT)

12. LEGAL ADVISERS

| Grade | Fee earner | London 1 | London 2 | London 3 | National 1 | National 2 |
|--------------|---|---------------------|---------------------|---------------------|-----------------------|-----------------------|
| A | Solicitors and legal executives with over 8 years' experience | £896 | £653 | £494 | £457 | £446 |
| B | Solicitors and legal executives with over 4 years' experience | £609 | £506 | £406 | £382 | £382 |
| C | Other solicitors or legal executives and fee earners of equivalent experience | £473 | £427 | £324 | £312 | £310 |
| D | Trainee solicitors, paralegals and other fee earners | £326 | £243 | £226 | £221 | £221 |
