

General Licence – Publication Notice

General licence - INT/2025/6160920

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/2025/6160920 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/2024/5334756 on 28 April 2025. 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/2025/6160920 are met.

Any persons intending to use General Licence INT/2025/6160920 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, INT/2024/4671884 or INT/2024/5334756. 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 (£2,000,000 inc. VAT) and the expenses caps (10% of the legal fees up to £200,000 inc. VAT) under Parts A and B of the General Licence.
- Where a Law Firm, Legal Adviser or Counsel has not received professional legal fees and/or Counsel fees from or on behalf of a DP under the General Licence, Expenses of up to £50,000 may be paid in relation to any DP per Law Firm (or per Counsel, if engaged under direct instruction) under each Part for the duration of the General Licence.
- The non-UK bank accounts permission has been amended to include Counsel.

General

The permissions in General Licence INT/2025/6160920 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/2025/6160920 takes effect from 00:01 on 29 April 2025, expires at 23:59 on 28 October 2025 and may be varied, revoked, or suspended by HM Treasury at any time.

Reporting requirement

Any payments received under General Licence INT/2025/6160920 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/2025/6160920 may be downloaded from the OFSI website.

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