



Department for
Business & Trade

General Trade Licence Russia Sanctions – Sectoral Software and Technology

October 2025

GENERAL TRADE LICENCE

General Trade Licence (Russia Sanctions – Sectoral Software and Technology) dated 16 October 2025 granted by the Secretary of State.

The Secretary of State, in exercise of powers conferred by the Russia (Sanctions) (EU Exit) Regulations 2019 (“the Regulations”) and in particular Regulation 65 (Trade licences) with reference to: Chapter 4N relating to sectoral software and technology hereby grants the following General Trade Licence:

Licence

1. Subject to the exclusions, conditions and requirements set out below, this Licence authorises:
 - a. the transfer of technology of business enterprise software and technology;
 - b. the making available of business enterprise software and technology;
 - c. ancillary services relating to business enterprise software and technology;as otherwise prohibited by Chapter 4N of the regulations, by a provider:
 - a. to multinational clients headquartered outside of Russia, with global subsidiaries and affiliates, including in Russia;
 - b. where that software or technology is provided in satisfaction of an obligation arising under a contract concluded before 23rd April 2025, or an ancillary contract necessary for the satisfaction of such a contract; and
 - c. where the business enterprise software and technology and ancillary services relating to that software and technology is only for non-predominant use by a subsidiary established in Russia.

Exclusions

2. This Licence does not apply:
 - a. where the business enterprise software and technology or ancillary services relating to that software and technology is for a predominant use by a subsidiary established in Russia;
 - b. if the activity undertaken by the Provider is prohibited by any provision of the Regulations other than in Chapter 4N of the Regulations;
 - c. where the Provider, at the time of act, has been served with a notice which suspends or revokes their ability to use this Licence, unless the period of suspension or revocation has expired.

Conditions and Requirements

3. The authorisation in paragraph 1 is subject to the following conditions:
 - a. Within 20 calendar days of the first use of this licence, the Provider must provide details to the Secretary of State of the name and address at which records are kept in relation to this licence through registration of such details on SPIRE:
(<https://www.spire.trade.gov.uk/spire/fox/espire/LOGIN/login>).
 - b. The provisions of Regulation 76 (General trade licences: records) of the Regulations apply to any act under the authority of this licence.
 - c. In accordance with the applicable legislation, the records required by this licence must be kept for a period of 4 years beyond the end of the calendar year in which the record was created and the Provider must permit them to be inspected and copied by any person authorised by the Secretary of State or the Commissioners.
 - d. Without prejudice to Part 9 (Enforcement) of the Regulations, failure to comply with any condition may result in the Provider's use of this licence being revoked or suspended. The Provider will be notified in writing of any such suspension or revocation.

Interpretation

4. For the purpose of this licence:
 - a. "Provider" means any legal or natural person including financial institutions or other financial services providers located in or operating from within the UK or which is a United Kingdom person as defined in regulation 2 of the Regulations operating anywhere in the world engaging in any activity authorised at paragraph 1;
 - b. "business enterprise software and technology" is defined in Schedule 3IA of the Regulations; and
 - c. unless the context otherwise requires, any other expression used in this Licence shall have the meaning it bears in the Regulations.

Entry into Force

5. This licence shall come into force on 16 October 2025.
6. This licence is valid until 17 April 2026.
7. The General Trade Licence (Russia Sanctions – Sectoral Software and Technology) dated 21 July 2025 is hereby revoked

An Official of the Department for Business and Trade, authorised to act on behalf of the Secretary of State

This publication is available from www.gov.uk/dbt

Any enquiries regarding this publication should be sent to:

Department for Business and Trade

Export Control Joint Unit

Old Admiralty Building

London

SW1A 2BL

United Kingdom

If you require this publication in an alternative format, email exportcontrol.help@businessandtrade.gov.uk, or call 020 7215 4594.