

### General Licence – Publication Notice

# General Licence - INT/2025/7323088

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/2025/7323088 under most UK Autonomous Sanctions Regimes (see Annex 1 of the General Licence for the list of regimes covered) which will take effect following the expiry of Legal Services General Licence INT/2024/6160920 on 28 October 2025.

This General Licence permits a UK legal firm or UK counsel who has provided legal advice to a person designated under the UK Autonomous Sanctions Regimes listed in Annex 1 to receive payment from that designated person without an OFSI specific licence, provided that the terms of the General Licence INT/2025/7323088 are met.

Any persons intending to use General Licence INT/2025/7323088 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, INT/2023/2954852, INT/2023/3744968, INT/2024/4671884, INT/2024/5334756 or INT/2025/6160920.

### The main changes are:

- General Licence INT/2025/7323088 now covers most UK Autonomous Sanctions
  Regimes. Please refer to Annex 1 of the General Licence for the table listing the regimes
  covered. This means that law firms, legal advisors, Counsel and providers of Expenses
  (as defined in the GL) may rely on the General Licence to receive fees and/or expenses
  owed by persons designated under one of these regimes, as long as all the conditions
  of the licence are met.
- The GL does not permit payment directly or indirectly to or for the benefit of any person designated for the purpose of compliance with United Nations obligations.

On 17 December 2025, the Legal Services General Licence INT/2025/7323088 was amended to clarify:

• that the definition of "Legal Services" includes legal advice and/or representation in dispute resolution.

This was first clarified in a version of the Legal Services General Licence issued 28 March 2025 (INT/2024/5334756). It was not captured in the subsequent issue of the expired General Licence: INT/2025/6160920 dated 28 April 2025, and although not included in the original version of the current Legal Services General Licence INT/2025/7323088 (due to expire 28 April 2026), this has now been amended.

#### General

The permissions in General Licence INT/2025/7323088 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 UK Autonomous Sanctions Regimes listed in Annex 1, 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/2025/7323088 takes effect from 00:01 on 29 October 2025, expires at 23:59 on 28 April 2026 and may be varied, revoked, or suspended by HM Treasury at any time.

### Reporting requirement

Any payments received for legal services provided to a DP under General Licence INT/2025/7323088 must be reported by <u>online form</u> to HM Treasury within 14 days of the payment being received, with the details and supporting evidence requested in Part A or Part B of the 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