



General Licence – Publication Notice

General licence - INT/2025/5787748

OFSI has the power to issue General Licences for country sanctions regimes under the Sanctions and Anti-Money Laundering Act 2018 (“the Sanctions Act”).

On 28 March 2025, OFSI issued General Licence INT/2025/5787748 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”). This General Licence allows persons to make payments to Arbitration Associations and Arbitrators to cover fees and expenses for their arbitration services. The General Licence also permits Arbitrators and Arbitration Associations to direct payment of, receive and use such payments to cover Arbitration Costs.

For the purpose of this General Licence, a “DP” is an individual, or person other than an individual (corporate or unincorporate), designated under the Russia Regulations or the Belarus Regulations and/or any person owned or controlled directly or indirectly by them 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).

For the purpose of this General Licence, “Arbitration Costs” refer to fees and expenses for services provided by Arbitrators and Arbitration Associations in relation to arbitrations.

Under the General Licence, up to a maximum of £500,000 per arbitration:

- Payments may be made to Arbitrators and Arbitration Associations to cover Arbitration Costs, and Arbitrators and Arbitration Associations may direct, receive and use those payments;
- Payments may be made to DP Representatives or Legal Representatives in order to cover Arbitration Costs., and DP Representatives and Legal Representatives may receive those payments for the purpose of paying Arbitration Costs to Arbitrators or Arbitration Associations on behalf of a DP;
- Arbitrators and Arbitration Associations may use funds deposited with them to cover Arbitration Costs; and
- Relevant Institutions may process payments made in accordance with the terms of the General Licence.

For the avoidance of doubt, this General Licence allows Arbitrators and Arbitration Associations to receive and use advance payments or security deposits made by or on behalf of a DP to pay for Arbitration Costs. Where an arbitral decision awards costs and stipulates that Arbitration Costs shall be payable out of the award, the paying party may make a payment to cover Arbitration Costs, or an Arbitration Association holding advance payments or security deposits may use such funds to pay for the Arbitration Costs. This Payment may be made directly to the Arbitrator or Arbitration Association, or to the DP Representative or Legal Representative for the purpose of paying Arbitration Costs. For the avoidance of doubt, the General Licence does not permit any funds being made available to a DP.

The General Licence allows payment for services provided by Arbitrators and Arbitration Associations, and their related expenses. Legal Representatives (law firms and legal advisers) should continue to use the Legal Services General Licence to receive payment for any legal representation and advice provided in relation to arbitrations or any other form of dispute resolution, and for expenses incurred in relation to the provision of those legal services.

Payments made by or on behalf of a person who is party to an arbitration but who is not a DP (“a non-DP party”) are not subject to sanctions and do not require authorisation under this General Licence, unless such payments are made either using a DP’s funds or for the benefit of a DP. A payment made by a non-DP party on behalf of a DP may include, for example, (a) where an arbitration award is made in a DP’s favour, and the non-DP party is required to pay Arbitration Costs on behalf of the DP, or (b) where a non-DP party pays a security deposit or advance payment to an Arbitration Association on behalf of or in lieu of a DP. Such payment must be made in accordance with the terms of this General Licence, and must be reported to OFSI.

The London Court of International Arbitration (LCIA) Costs General Licence INT/2022/1552576 has now been revoked, and payments which were previously permitted under the LCIA Costs General Licence shall now be permitted under the Arbitration Costs General Licence.

The Arbitration Costs General Licence has a financial cap of £500,000 per arbitration. A specific licence application must be submitted to OFSI to make payments for any balance of Arbitration Costs in excess of the £500,000 cap. Where funds are awarded to a DP in an arbitration, such as damages or costs, such funds may not be made available to a DP unless a specific licence has been obtained from OFSI.

Any persons intending to use General Licence INT/2025/5787748 should consult the copy of the General Licence for full details of the definitions, permissions and usage requirements.

Reporting requirement

A person who receives payment under General Licence INT/2025/5787748 must report the payment to HM Treasury within 30 days of receipt of the payment, with the details and supporting evidence requested in the Arbitration Costs General Licence Reporting Form. The Reporting Form for General Licence INT/2025/5787748 may be downloaded from the OFSI website at <https://www.gov.uk/government/publications/ofsi-general-licence-int20255787748>

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 the General Licence for a minimum of 6 years.

On 16 July 2026:

The **reporting requirement** was amended to:

Within 14 days of the end of each calendar month, a Person must report to HM Treasury any payments received under this licence during that calendar month, with details and supporting evidence of:

- the DP party in the arbitration;
- the Group ID of the DP;
- a case description;
- an unredacted engagement letter (if applicable);
- the amount of the payment which this report concerns;
- the date payment was received;
- the payment route used;
- the total Arbitration Costs received to date for this arbitration.

Please use [OFSI's online reporting form](#) to submit your report. The online form linked is replacing the previous downloadable form. A [preview of the online form](#) can be found in OFSI's guidance.

General

The permissions in General Licence INT/2025/5787748 do not authorise any act which will result in a breach of the Russia Regulations, the Belarus Regulations or any other regulations made under the Sanctions Act, including any funds or economic resources being made available to a DP, save as specifically permitted under the General Licence.

General Licence INT/2025/5787748 takes effect from 28 March 2025, and does not have an expiry date, but may be varied, revoked, or suspended by HM Treasury at any time.