

General Licence – Publication Notice

General Licence - INT/2026/11112108

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/2026/11112108 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/2026/9512597 on 28 October 2026.

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/2026/11112108 are met.

Any persons intending to use General Licence INT/2026/11112108 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, INT/2025/6160920, INT/2025/7323088 or INT/2026/9512597.

The main changes are:

General Licence INT/2026/11112108 includes clarifications to the definition of Expenses and the permissions related to Expenses.

Amended definition: "Expenses" means any fees or expenses associated with the provision of the Legal Services including (but not limited to):

- payments to other legal professionals instructed by the Law Firm and/or Counsel for third-party legal assistance.

The related amended permissions are paragraph 8.2.1, permission 5.1, Part A, and permission 4.1, Part B. OFSI has replaced the word "payable" with "paid" in these permissions:

"10% of the amount ~~payable~~ paid for professional legal fees and Counsel's fees; or..."

See the full licence for the complete permissions.

General Licence INT/2026/11112108 updates paragraph 5, which now reads:

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 or are being provided to that DP or to any other DP in the same DP Group.

General Licence INT/2026/11112108 also updates permission 2, Part A, which now reads:

2. The payment must be in relation to Legal Services which have been provided or are being provided to a DP by a Law Firm, Legal Adviser or Counsel, or to Expenses.

General Licence INT/2026/11112108 removes the word "either" from permission 11, Part B:

11. Any payments made under this Part must ~~either~~: ...

General Licence INT/2026/11112108 amends the reporting period to bring it in line with other OFSI General Licences. The reporting condition now reads:

"Within 14 days of the end of each calendar month, any person who has used the licence to receive payment for legal services provided to a DP must send to HM Treasury, by [online reporting form](#): ..."

Please consult the full licence and FAQs for more information.

General

The permissions in General Licence INT/2026/11112108 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 of the Licence, 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/2026/11112108 takes effect from 00:01 on 29 October 2026, expires at 23:59 on 28 April 2027 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/2026/11112108 must be reported by [online form](#) to HM Treasury within 14 days of the end of each calendar month, 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