

# White Collar Defense and Investigations



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If you have any questions regarding the matters discussed in this memorandum, please contact the following attorneys or call your regular Skadden contact.

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## UK Sanctions Update: Further Sanctions Against Russia Introduced, More Syria Sanctions Lifted and First UK Prosecution for a Russia Sanctions Violation

The UK's sanctions regimes remain dynamic as they continue to respond to geopolitical changes. In recent weeks, the UK has enhanced its Russia sanctions, despite the uncertain direction of the international sanctions on Russia more generally. The UK's first Russia-related sanctions prosecution also concluded. At the same time, the UK has significantly reduced its sanctions on Syria following the fall of the Assad regime. With the UK's and other jurisdictions' sanctions regimes continuing to change regularly, and with enforcement risks multiplying, companies need to remain vigilant and focused on compliance.<sup>1</sup>

### UK Announces Further Sanctions to Limit Russia's Military Capability

On 24 April 2025, the UK's Russia (Sanctions) (EU Exit) (Amendment) Regulations 2025 (the 2025 Regulations) came into force. The 2025 Regulations contain around 150 further trade sanctions against Russia.<sup>2</sup>

The new measures prohibit the export of a number of items to Russia or a person connected with Russia, including certain chemicals, electronics, machinery, plastics and metals, which builds on the existing trade restrictions under the Russia (Sanctions) (EU Exit) Regulations 2019 (the 2019 Regulations). These new trade restrictions are extensive and include items that Russia has, according to the UK government, used for military purposes, including video game consoles and controllers.

The 2025 Regulations also introduced additional restrictions targeting the direct or indirect transfer or making available of software and technology used in the defense and energy sectors, such as software used to search for new oil and gas wells.<sup>3</sup> This includes restrictions on making such technology available from third countries to Russia, or persons connected with Russia.

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<sup>1</sup> This client alert is for informational purposes only and does not constitute legal advice. Complex assessments often have to be made as to which sanctions regime applies in any given instance, given the multinational touch points of many entities and individuals. In that regard, given the complex and dynamic nature of these sanctions regimes, there may be developments not captured in this summary. Moreover, while the summary was accurate when written, it may become inaccurate over time given developments. For all of these reasons, you should consult with a qualified attorney before making any judgments relating to sanctions, as there are potentially severe consequences of failing to adhere fully to sanctions restrictions.

<sup>2</sup> See, [Russia \(Sanctions\) \(EU Exit\) \(Amendment\) Regulations 2025/504](#)

<sup>3</sup> These are detailed by amendments and additions to the 2019 Regulations in Chapters 4, 4H, 4M, and 4N. See, [Russia \(Sanctions\) \(EU Exit\) \(Amendment\) Regulations 2025/504, Regulations 46Z34 - 46Z38](#).

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Additional restrictions have also been imposed related to the provision of services (e.g., technical, financial, brokering) in connection with such software and technology.<sup>4</sup> This includes, for example, a ban on providing brokering services whose object or effect is to (directly or indirectly) provide, in a non-UK country, technical assistance or certain financial services to a person connected with Russia or for use in Russia.<sup>5</sup> These amendments appear designed to further target sanctions-circumvention-related activity in countries which have been identified by Western governments as potentially involved in such circumvention.

The package also builds on the restrictions in the 2019 Regulations which target the Russian diamond industry. The 2025 Regulations extend the diamond-related restrictions by imposing an import ban on synthetic diamonds that were manufactured in Russia and have been processed in third countries. The 2025 Regulations also prohibit a person from, directly or indirectly, providing certain services (e.g., technical, financial, brokering) in connection with such synthetic diamonds.

These measures represent an expansion of the scope of the existing measures rather than a radical overhaul of the regime and reflect the UK government's intention to align UK sanctions with international partners such as the European Union. On 24 February 2025, in its 16th sanctions package against Russia, the European Union included similar measures to those contained in the 2025 Regulations, including expanding the scope of trade restrictions against Russia and strengthening the EU's anti-circumvention measures. ([Read our analysis on the latest EU Russia sanctions package.](#))<sup>6</sup>

Businesses involved in exporting these prohibited items should ensure that adequate measures are in place to reduce the risk of restricted items being transferred to Russia (including via third countries). For example, these businesses should consider including standard terms and conditions that prevent any re-export of controlled goods or technology to Russia as part of their risk mitigation efforts.<sup>7</sup>

## First-Ever UK Prosecution for Russian Sanctions Breaches

On 11 April 2025, for the first time in the UK, two individuals were sentenced for breaches of Russian-linked financial sanctions, receiving 40 months' imprisonment and 15 months' imprisonment, respectively. The defendants were found guilty of eight counts of breaching financial sanctions and two counts of money laundering. Both defendants are Russian nationals.<sup>8</sup>

The first defendant is a designated person subject to UK financial sanctions as a result of senior positions that he held in the Russian Federation. His activities in breach of the sanctions regime included attempting to purchase a car at the cost of £54,000, receiving a transfer of £75,000 from his wife and making funds available to pay private school fees for around £17,000. The second defendant was found guilty of two counts of intentionally participating in activities that knowingly would breach Russian sanctions.<sup>9</sup>

Julius Capon of the Crown Prosecution Service (CPS) said: "We hope this sends a clear message that the CPS and [National Crime Agency] investigators will work closely together to robustly seek the convictions of sanction busters. We will start proceeds of crime proceedings to get back illegally obtained cash and assets."<sup>10</sup>

## UK Rethinks Its Approach to Syria Sanctions

Also on 24 April 2025, the UK lifted sanctions on 12 Syrian entities, including the Syrian Ministry of Defense, Ministry of Interior and media companies.

The UK Office of Financial Sanctions Implementation (OFSI) announced that the entities removed from the list will no longer be subject to an asset freeze and have stated that amending Syria sanctions "will help the people of Syria rebuild their country and economy following the fall of Assad."<sup>11</sup> This announcement builds on the UK government's decision in March to unfreeze the assets of the Central Bank of Syria and 23 other entities, including banks and oil companies.<sup>12</sup>

The UK has also removed restrictions on some sectors, including

<sup>4</sup> *Ibid.*

<sup>5</sup> See, [Russia \(Sanctions\) \(EU Exit\) \(Amendment\) Regulations 2025/504](#), Regulation 46Z38.

<sup>6</sup> See, [Council Regulation \(EU\) 2025/390 of 24 February 2025](#) amending Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine. See also, [Council Regulation \(EU\) 2025/395 of 24 February 2025](#) amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine.

<sup>7</sup> See, the Office of Trade Sanctions Implementation's [No Russia Clause Guidance](#) of 7 January 2025.

<sup>8</sup> See, [Southwark Crown Court Sentencing Remarks of Mrs Justice Cockerill in R v Ovsiannikov and Ovsianniko](#) of 11 April 2025.

<sup>9</sup> *Ibid.*

<sup>10</sup> See, UK Crown Prosecution Service, [Fraud and Economic Crime News Alert of 11 April 2025 "Sentencing: The first ever UK prosecution of Russian sanction breaches"](#).

<sup>11</sup> See, [UK Foreign, Commonwealth & Development Office Press Release](#) of 24 April 2025

<sup>12</sup> See, [UK Foreign, Commonwealth & Development Office Press Release](#) of 6 March 2025

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financial services and energy production, in Syria. The export sanctions that have been revoked include prohibitions relating to:

- the export, supply, delivery, making available and transfer of aviation fuel and aviation fuel additives, as well goods and technology relating to crude oil and natural gas, including ancillary services;
- the export, supply, delivery, making available of bank notes and coinage to or for the benefit of the Central Bank of Syria; and
- the export, supply, delivery and making available of goods relating to electricity production, including ancillary services.<sup>13</sup>

The expectation is that the lifting of these restrictions will help facilitate investment in Syria's economy.<sup>14</sup> Some trade-related prohibitions do however remain in place, for example, relating to luxury goods. It is key that companies continue to conduct careful due diligence given the remaining UK and other international sanctions targeting Syria.

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<sup>13</sup> See, [Syria \(Sanctions\) \(EU Exit\) \(Amendment\) Regulations 2025](#); see also, UK Department for Business & Trade's Notice "NTE 2025/12: amendments to the Syria sanctions and revocation of general trade licence for Syria sanctions - earthquake relief efforts in Syria" of 29 April 2025.

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<sup>14</sup> See, [UK Foreign, Commonwealth & Development Office Press Release](#) of 24 April 2025