

# Russia Sanctions

## Trade, Transport & Immigration

### Guidance

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**Isle of Man**  
Government

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# 1. Introduction

This should be considered supplementary to the [financial sanctions general guidance which can be found on the website](#).

**This guidance does not represent legal advice.**

If you are unsure about your obligations in a given case, you should consider seeking independent legal advice.

## Understanding the Russia Regulations

This guidance is provided in relation to the Russia (Sanctions) (EU Exit) Regulations 2019 (the "Regulations"). These Regulations have effect in the Island by the Sanctions (Implementation of UK Sanctions) Regulations 2024, made under the Sanctions Act 2024.

The Regulations impose financial, trade, transport and immigration sanctions to encourage Russia to cease actions which destabilise Ukraine, including actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine.

Various amendments to the Regulations have also been published under this regime and should be read alongside this guidance.

The names of designated persons (DP) are not included in the Regulations, but instead appear on [the UK Sanctions List](#). This enables the UK to make immediate publication following a decision to make or amend a designation, limiting the opportunity for asset flight. Where the UK Secretary of State has designated a person, that designation also has effect in the Isle of Man from the same time, and any variation or revocation of the designation will also have effect in the Island.

## Scope of trade, transport and immigration sanctions

The sanctions imposed by these Regulations apply within the territory of the Isle of Man (IOM) and in relation to the conducts of all Island persons wherever they are in the world. Island person includes:

- a) a British citizen, a British overseas territories citizen, a British National (Overseas) or a British overseas citizen who is resident in the Isle of Man;
- b) a person who under the British Nationality Act 1981 (of Parliament)<sup>1</sup> is a British subject who is resident in the Isle of Man;
- c) a British protected person within the meaning of that Act who is resident in the Isle of Man; or
- d) a body incorporated under the law of the Isle of Man.

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## Restrictions and obligations

While there are different types of sanctions outlined in the Regulations, this guidance relates to trade, transport and immigration restrictions.

The maritime enforcement powers contained in Part 10 of the Regulations apply in relation to Manx ships in international or foreign waters, ships without nationality in international waters and foreign ships in international waters.

It is prohibited to intentionally participate in any activities if you know that the object or effect of them is to directly or indirectly circumvent the prohibitions imposed by these Regulations or to enable or facilitate the contravention of those prohibitions.

If you are unclear about any aspects of the Regulations, in particular about whether action you are considering taking could contravene these Regulations, you are advised to seek independent legal advice.

To achieve their purposes, the Regulations impose a number of prohibitions and obligations. The Regulations establish penalties and offences to enforce these, which are set out in detail in the corresponding Russia Penalties and Offences document and is [available on the Russia guidance webpage](#)

## Key definitions

For the purposes of the Regulations:

**1.** A person connected with Russia is defined as:

- an individual who is, or an association or combination of persons who are, ordinarily resident or located in Russia
- a person, other than an individual who is incorporated or constituted under the law of Russia, or domiciled in Russia

**2.** “Government of Russia” means:

- the Presidency of the Russian Federation
- public bodies and agencies subordinate to the President of the Russian Federation, including the Administration of the President of the Russian Federation
- the Chairman of the Government of the Russian Federation and the deputies of the Chairman of the Government
- any Ministry of the Russian Federation
- any other public body or agency of the Government of the Russian Federation, including the armed forces and law-enforcement organs of the Russian Federation
- the Central Bank of the Russian Federation

## **Further guidance**

This guidance details instances involving trade, transport and immigration sanctions only, but there is guidance available on the other types of sanctions restrictions detailed in the Regulations, affecting financial sanctions in respect of Russia.

That additional guidance is published on the Sanctions and Export Control website.

## 2. Trade sanctions

The Regulations include restrictions on the trade of certain goods and technology, namely military goods (e.g. arms), and dual-use goods (i.e. goods that can be used for both a military and a civil purpose), and energy-related goods. There are also prohibitions on the provision of services related to those goods, technology and on the provision of military-related services.

In addition there are restrictive measures on the import of goods from Crimea or Sevastopol, the export of goods related to infrastructure to, or for use in, Crimea or Sevastopol, and the provision of services related to infrastructure and tourism. There are also measures that curtail Russian access to certain specified energy-related equipment and services.

### Prohibitions

The Regulations impose trade prohibitions relating to:

- military goods and military technology (as specified in [Schedule 2 to the Export Control Order 2008](#))
- any thing which falls within Annex I in Part 3, Chapter 93 of the [Goods Classification Table](#), other than military goods
- defence and security goods and defence and security technology (as specified in Schedule 3C)
- dual-use goods and technology (as specified in [Annex I to Council Regulation 428/2009](#) which is retained by the European Union (Withdrawal) Act 2018 ('the Dual-Use Regulation'))
- special materials and related equipment and materials processing (as specified in Parts 1A and 1B of Schedule 2A to the Regulations)
- critical-industry goods and technology (as specified in Schedule 2A to the Regulations)
- quantum computing and advanced materials goods and technology (as specified in Schedule 2E to the Regulations)
- aviation and space goods and technology (as specified in Schedule 2C to the Regulations)
- jet fuel and fuel additives (as specified in Part 8 of Schedule 2A to the Regulations)
- maritime goods and maritime technology (defined by reference to Chapter 4 (Navigation Equipment) and Chapter 5 (Radio-Communication Equipment) of Annex 1 of Merchant Shipping Notice 1874(a))
- infrastructure-related goods (as specified in Part 3 of Schedule 3 to the Regulations)
- energy-related goods (as specified in Part 2 of Schedule 3 to the Regulations) and energy-related services
- oil refining goods and technology (as specified in Schedule 2D to the Regulations)
- luxury goods (as specified in Schedule 3A to the Regulations)
- G7 dependency and further goods (as specified in Schedule 3E to the Regulations)
- goods originating in non-government controlled Ukrainian territory
- iron and steel products (as specified in Schedule 3B to the Regulations) and associated ancillary services

- iron and steel products processed in a third country (as specified in Schedule 3B to the Regulations) and associated ancillary services, from 30 September 2023
- metals (as specified in Schedule 3BA to the Regulations)
- oil and oil products (as specified in Schedule 3F to the Regulations)
- the supply or delivery by ship of oil and oil products under the commodity codes 2709 and 2710 from Russia to and between third countries and related services
- coal and coal products (as specified in Schedule 3H to the Regulations)
- liquefied natural gas (as specified in Chapter 4L to the Regulations)
- gold, gold jewellery and products related to gold (as specified in Schedule 3G to the Regulations)
- diamonds and diamond jewellery (as specified in Schedule 3GA to the Regulations)
- certain diamonds processed in third country
- banknotes denominated in sterling and any official currency of the European Union
- goods which generate significant revenues for Russia (as specified in Schedule 3D and 3DA to the Regulations)
- Russia’s vulnerable goods (as specified in Schedule 3I to the Regulations)
- provision of technical assistance, armed personnel, financial services or funds, or associated brokering services where such provision enables or facilitates the conduct of certain military activities
- services relating to a relevant infrastructure sector in non-government controlled Ukrainian territory
- services relating to tourism in non-government controlled Ukrainian territory
- internet services
- professional and business services (as specified in Chapter 6B of the Regulations)



### **Technical Guidance on interception and monitoring**

There are circumstances (set out in the relevant lists of controlled items) in which certain items are not controlled, for example when body armour or a helmet is accompanying a person for that person’s own protection. Please check the relevant lists as applicable.

Energy-related goods, infrastructure-related goods, aviation and space goods, oil refining goods, G7 dependency and further goods, luxury goods, iron and steel products, revenue generating goods, Russia’s vulnerable goods, coal and coal products, oil and oil products, gold and diamonds are identified by reference to commodity codes in the Goods Classification Table which is published as part of the Tariff of the United Kingdom (“UK Tariff”). The UK Tariff sets out a system for the classification of goods for importers to ascertain the applicable rate of import duty for their goods. It is this system of classification that is used in the Regulations in order to determine whether these goods are within scope of the prohibitions.

This means that where commodity codes are used in the Regulations, the relevant goods are those which would be classified under the relevant commodity code (applying the rules in the UK Tariff) if the goods were being imported to the UK.

Some of the listings of commodity codes in the Regulations have an “ex” before the code. Where this “ex” appears before a commodity code this means the prohibitions in the Regulations do not apply to all of the items under that commodity code. The prohibitions will only apply to those items that (1) would be classified under the commodity code and (2) match the description given next to the relevant “ex” code entry in the Regulations.

Further detail on these trade prohibitions, including key terminology used, is explained below. Please have regard to the relevant legislation which contains full definitions of terms used herein.

## 2.1. Export of goods

The concept of ‘export’ is set out in customs legislation, but is further detailed in the Regulations, which clarifies that “export” means export from the Isle of Man, but does not capture where goods are removed to the United Kingdom from the Isle of Man. For the purposes of Chapters 4JA (gold jewellery and relevant processed gold), the concept of ‘Export’ refers to export from Russia, which is defined within the chapter itself.

The export prohibitions at **regulation 22 (restricted goods)** prohibit the export of certain goods to Russia as well as exports that are for use in Russia. This means that, even if the immediate destination is not Russia, the prohibition may still apply.

**Regulation 30B** prohibits the export of relevant restricted goods to non-government controlled Ukrainian territory.

**Regulation 40** prohibits the export of energy-related goods to, or for use in, Russia.

**Regulation 46B** prohibits the export of luxury goods to, or for use in, Russia. According to Part 2 of Schedule 3A (Luxury Goods), “sales price!” threshold means the sales price of the item or quantity specified excluding value added taxes but including freight/transport costs.

**Regulation 46M** prohibits the export, supply or delivery and making available of sterling or European Union denominated banknotes to, or for use in, Russia or to a person connected with Russia.

**Regulation 46N** prohibits the export of jet fuel and fuel additives to, or for use in, Russia.

The export prohibitions in Chapter 5 (infrastructure-related goods) prohibit certain exports to and for use in non-government controlled Ukrainian territory. This means that, even if the immediate destination is not non-government controlled Ukrainian territory, the prohibition may still apply.

**Regulation 46Y** prohibits the export, supply or delivery, and making available of G7 dependency and further goods to, or for use in, Russia.

**Regulation 46Z30** prohibits the export of Russia’s vulnerable goods to, or for use in Russia. This measure came into force on 1 January 2023.



Exporters should check the ultimate end use of goods and may apply for a licence or contact the Export Control Joint Unit (ECJU) if they know or think the items may be used in Russia or in non-government controlled Ukrainian territory.



## 2.2. Import of goods

The concept of 'import' is set out in customs legislation, which clarifies in particular that goods removed to the Isle of Man from the United Kingdom are not to be regarded as imported, subject to some exceptions.

The import prohibition in the below regulations, covers goods that are consigned from Russia and goods that originated in Russia. This means that even if the immediate place the goods were shipped from was not Russia, the prohibition may still apply:

- regulation 23 (arms and related material)
- regulations 46D and 46IB (iron and steel products)
- regulation 46IG (metals)
- regulations 46S and 46XB (Schedules 3D and 3DA revenue generating goods)
- regulation 46Z4 (oil and oil products)
- regulation 46Z18 (coal and coal products)
- regulation 46Z16K (diamonds and diamond jewellery), and
- regulation 46Z25 (liquefied natural gas)

The import prohibitions in **regulation 47** cover imports of goods which originated in non-government controlled Ukrainian territory. This means that even if the immediate place the goods were shipped from was not non-government controlled Ukrainian territory, the prohibition may still apply.

The import prohibition in **regulation 46Z11** (Chapter 4J) covers gold (Part 2 of Schedule 3G) that originates in Russia, where this is exported from Russia on or after 21 July 2022. This means that even if the immediate place the goods were shipped from was not Russia, the prohibition may still apply if the Russian origin gold was exported from Russia on, or after, 21 July 2022.

The import prohibition in **regulation 46Z16B** (Chapter 4JA) covers gold jewellery (Part 3 of Schedule 3G) that originates in Russia, where this is exported from Russia on or after 29 October 2022. This means that even if the immediate place the goods were shipped from was not Russia, the prohibition may still apply if the Russian origin gold jewellery was exported from Russia on or after 29 October 2022.

The import prohibition in **regulation 46Z16C** (Chapter 4JA) covers relevant processed gold, defined as gold (Part 2 of Schedule 3G) that has been processed in a third country and incorporates gold that, on or after 21 July 2022, originated in and has been exported from Russia. This means that even if the immediate place the goods were shipped from or processed in was not Russia, the prohibition may still apply if the goods incorporate gold that originated in and has been exported from Russia on or after 21 July 2022.

The import prohibition in **regulation 46IA and 46IB** (Chapter 4CA) on relevant iron and steel products processed in third countries which incorporate relevant iron and steel products of Russian origin applied from 30 September 2023. [Please refer to the Notice for Importers for specific guidance](#) on the scope of the measure, and how businesses can demonstrate compliance.

The import prohibition in **regulation 46Z16R** (Chapter 4JC) on certain diamonds processed in third countries and of Russian origin applies from 1st March 2024 for diamonds larger than or equal to 1 carat or 0.2 grams (or equivalent) in weight. Please refer to the Notice for Importers for specific guidance on the scope of the measure and how business can demonstrate compliance.

Therefore, importers should check the original place goods were consigned or exported from and apply for a licence or contact the UK's [Import Licensing Branch](#) if you think the items may have originated in or have been consigned from Russia or non-government controlled Ukrainian territory.

### 2.3. Supply and delivery of goods

Supply and delivery prohibitions in the Regulations prohibit a person from directly or indirectly supplying or delivering certain goods from a third country to a place in Russia (or to non-government controlled Ukrainian territory in respect of Chapter 5, infrastructure-related goods) or from a place in Russia to a third country and between third countries.

the below, prohibit the direct or indirect supply or delivery from a third country to a place in Russia:

- Regulation 24 (restricted goods),
- regulation 41 (energy related goods),
- regulation 46B (luxury goods),
- regulation 46N (jet fuel and fuel additives),
- regulation 46Y (G7 dependency and further goods), and
- regulation 46Z30 (Russia's vulnerable list).

**Regulation 30C** prohibits the direct or indirect supply or delivery of relevant restricted goods from a third country to a place in non-government controlled Ukrainian territory.

**Regulation 46F** (iron and steel products) prohibits the direct or indirect supply or delivery of certain iron and steel products from a place in Russia to a third country.

**Regulation 46II** (metals) prohibits the direct or indirect supply or delivery of metals from a place in Russia to a third country.

**Regulation 46M** (banknotes) prohibits the direct or indirect supply or delivery or making available of sterling banknotes or any banknotes denominated in any official currency of the European Union to a person connected with Russia. It also prohibits making available such banknotes for use in Russia.

**Regulation 46XD** (Schedule 3DA revenue generating goods) prohibits the direct or indirect supply or delivery of revenue generating goods listed in Schedule 3DA from a place in Russia, to a third country.

**Regulation 46Z9B** (Maritime transportation of certain oil and oil products to and between third countries) prohibits the direct or indirect supply or delivery by ship of oil and oil products under the commodity codes 2709 and 2710 from a place in Russia to a third country or between third countries.

**Regulation 46Z16M** (diamonds and diamond jewellery) prohibits the direct or indirect supply or delivery of diamonds or diamond jewellery from a place in Russia to a third country.

**Regulations 24(4) and 41(4)** specify that for the purposes of those prohibitions a “third country” is a country that is not the UK, Isle of Man or Russia.

**Regulation 49(4)** specifies that for the purposes of that prohibition a “third country” is a country that is not the UK, Isle of Man or non-government controlled Ukrainian territory.

## 2.4. Making available or acquiring goods and technology

Prohibitions in the Regulations (aside from those in Chapter 5) on making certain goods or technology available (e.g. through a sale) include directly or indirectly making them available for use in Russia or to a “person connected with Russia”. Some of the prohibitions also prohibit directly or indirectly acquiring certain goods or technology which originate in Russia or which are located in Russia or from a person connected with Russia.

For Schedule 3D, the direct and indirect acquisition of the below goods, which originate in or are located in Russia, with the intention of those goods entering the Isle of Man is prohibited:

- revenue generating goods (regulation 46T),
- oil and oil products (regulation 46Z5),
- coal and coal products (regulation 46Z19), and
- liquefied natural gas (regulation 46Z26).

For gold (**regulation 46Z12**) and gold jewellery (**regulation 46Z16D**) the direct and indirect acquisition of those goods, which originate in and which are located in, or (in the case of gold jewellery) have been exported after 29 October 2022 from Russia, with the intention of those goods entering the Isle of Man is prohibited.

The direct and indirect acquisition of the below goods, which originate in Russia or are located in Russia is prohibited regardless of whether the person acquiring them intends to bring the goods into the Isle of Man:

- For iron and steel products (regulation 46E)
- metals (regulation 46IH),
- Schedule 3DA revenue generating goods (regulation 46XC), and
- diamonds and diamond jewellery (regulation 46Z16L).

**Regulation 42** prohibits making energy related goods available for use in Russia or to a person connected with Russia.

Prohibitions in Chapter 5 on making infrastructure-related goods available include directly or indirectly making them available for use in non-government controlled Ukrainian territory or to a “person connected with non-government controlled Ukrainian territory”.

**Regulation 21** sets out when a person is to be regarded as “connected with” Russia and when a person is to be regarded as “connected with” non-government controlled Ukrainian territory (and this applies where these terms are used in other trade prohibitions in this Part of the Regulations).

## 2.5. Transfer of technology

Prohibitions in the Regulations on the transfer of certain technology include transfer to a place in Russia or a person connected with Russia.

**Regulation 26** (restricted technology) also prohibits transfer to persons outside the IOM/UK or to a place outside the IOM/UK, where the transfer is from a place in Russia.

The term 'transfer' means a transfer by any means (or combination of means), including oral communication and that transfer of goods on which the technology is recorded or from which it can be derived, other than the export of such goods.

Where restricted technology is contained within a good, that good would be classified, respectively, as a restricted good under the accompanying goods-related provisions. This includes information contained on USB memory devices, laptops, tablets and the like.

## 2.6. Technical assistance

The term "technical assistance" in relation to goods or technology is defined in regulation 21, which states that it means:

- technical support relating to the repair, development, production, assembly, testing, use or maintenance of the goods or technology, or
- any other technical service relating to the goods or technology

Prohibitions apply where the technical assistance relates to certain specified goods or technology.

The prohibitions apply to the direct or indirect provision of such technical assistance in relation to goods covered by an export prohibition

1. to persons "connected with Russia" or
2. for use in Russia,

Except those in Chapter 5 which apply where the provision applies:

1. to persons "connected with non-government controlled Ukrainian territory" or
2. for use in non-government controlled Ukrainian territory.

This means that, even if the person to whom you are providing the relevant technical assistance is not in or "connected with Russia" (or non-government controlled Ukrainian territory, for Chapters 2A and 5), the prohibition may still apply if the goods or technology to which the technical assistance relates are for use in Russia (or non-government controlled Ukrainian territory, for Chapters 2A and 5). Therefore, if you are providing technical assistance you should check whether the goods or technology may be used in Russia or non-government controlled Ukrainian territory, as appropriate, and apply for a licence or contact ECJU if so.

**Regulation 46A** prohibits the direct or indirect provision of technical assistance to or for the benefit of persons designated for the purpose of this regulation, where that assistance relates

to an aircraft or ship. The persons designated for the purposes of this provision are set out in the UK Sanctions List under 'sanctions imposed'.

The prohibition applies in relation to any aircraft or ship. You should carry out your own checks to determine to whom, or for whose benefit, you are providing technical assistance related to aircraft or ships.

The following Regulations prohibit the direct or indirect provision of technical assistance to specific arrangements:

- Regulation 27 (relating to restricted goods and restricted technology)
- Regulation 30F (relating to relevant restricted goods and relevant restricted technology in relation to non-government controlled Ukraine)
- Regulation 43 (relating to energy-related goods)
- Regulation 46A (relating to aircraft and ships)
- Regulation 46BA (relating to luxury goods)
- Regulations 46G and 46IC (relating to iron and steel products)
- Regulation 46O (relating to jet fuel and fuel additives)
- Regulation 46V (relating to Schedule 3D revenue generating goods)
- Regulation 46XE (relating to Schedule 3DA revenue generating goods)
- Regulation 46Z (relating to G7 dependency and further goods)
- Regulation 46Z7 (relating to oil and oil products)
- Regulation 46Z14 (relating to gold)
- Regulation 46Z16E (relating to gold jewellery)
- Regulation 46Z16F (relating to relevant processed gold)
- Regulation 46Z16H (relating to diamonds and diamond jewellery)
- Regulation 46Z21 (relating to coal and coal products)
- Regulation 46Z27 (relating to liquefied natural gas)
- Regulation 46Z31 (relating to Russia's vulnerable goods)
- Regulation 51 (relating to infrastructure-related goods in relation to non-government controlled Ukraine)

In relation to goods covered by prohibitions on import, [supply and delivery or acquisition], the measures apply to the direct or indirect provision of technical assistance relating to the import, [supply and delivery] or acquisition of the prohibited goods.

## **2.7. Financial services and funds related to goods and technology**

'Financial services' refer to any services of a financial nature in many different forms including insurance and banking. Financial services include payment and money transmission services. The full definition of 'financial services' can be found in [Section 61 of SAMLA](#).

'Funds' means financial assets and benefits of every kind, including cash, securities and interest. The full definition of 'funds' can be found in [Section 60 of SAMLA](#).

Trade sanctions prohibitions on the provision of financial services and funds apply where they relate to certain specified goods or technology.

The prohibitions in the Regulations apply to the direct or indirect provision of financial services, and the direct or indirect making available of funds to persons connected with Russia (or non-government controlled Ukrainian territory, in respect of Chapters 2A and 5).

These prohibitions also prohibit the direct or indirect provision of financial services or funds in pursuance of or in connection with specific arrangements involving Russia (or non-government controlled Ukrainian territory in respect of Chapters 2A and 5).

The following regulations prohibit the direct or indirect provision of financial services to specific arrangements:

- Regulation 28 (relating to restricted goods and restricted technology)
- Regulation 30G (relating to relevant restricted goods and relevant restricted technology in relation to non-government controlled Ukraine)
- Regulation 44 (relating to energy-related goods)
- Regulation 46 (relating to luxury goods)
- Regulations 46H and 46ID (relating to iron and steel products)
- Regulation 46P (relating to jet fuel and fuel additives)
- Regulation 46W (relating to Schedule 3D revenue generating goods)
- Regulation 46XF (relating to Schedule 3DA revenue generating goods)
- Regulation 46Z1 (relating to G7 dependency and further goods)
- Regulation 46Z8 (relating to oil and oil products)
- Regulation 46Z9C (relating to maritime transportation of certain oil and oil products)
- Regulation 46Z15 (relating to gold)
- Regulation 46Z16G (relating to gold jewellery)
- Regulation 46Z16H (relating to relevant processed gold)
- Regulation 46Z16O (relating to diamonds and diamond jewellery)
- Regulation 46Z22 (relating to coal and coal products)
- Regulation 46Z28 (relating to liquefied natural gas)
- Regulation 46Z32 (relating to Russia's vulnerable goods)
- Regulation 52 (relating to infrastructure-related goods in relation to non-government controlled Ukraine)

## 2.8. Brokering services

The definition of 'brokering services' is set out in **regulation 21**, which states that it means any service to secure, or otherwise in relation to, an arrangement, including (but not limited to):

- the selection or introduction of persons as parties or potential parties to the arrangement
- the negotiation of the arrangement
- the facilitation of anything that enables the arrangement to be entered into, and
- the provision of any assistance that in any way promotes or facilitates the arrangement

The Regulations prohibit the direct or indirect provision of brokering services where they relate to specific arrangements. Those arrangements are set out in:

- Regulation 29 (non-IOM activity relating to restricted goods and restricted technology)
- Regulation 30H (non-IOM activity relating to the non-government controlled Ukrainian territory limited goods and non-government controlled Ukrainian territory limited technology)
- Regulation 45 (non-IOM activity relating to energy-related goods and energy-related technology)
- Regulation 46BC (relating to luxury goods)
- Regulations 46I and 46IE (relating to iron and steel products)
- Regulation 46Q (relating to jet fuel and fuel additives)
- Regulation 46X (relating to revenue generating goods)
- Regulation 46XG (relating to Schedule 3DA revenue generating goods)
- Regulation 46Z2 (relating to G7 dependency and further goods)
- Regulation 46Z9 (relating to oil and oil products)
- Regulation 46Z9D (relating to maritime transportation of certain oil and oil products)
- Regulation 46Z16 (relating to gold)
- Regulation 46Z16I (relating to gold jewellery and relevant processed gold)
- Regulation 46Z16P (relating to diamonds and diamond jewellery)
- Regulation 46Z23 (relating to coal and coal products)
- Regulation 46Z29 (relating to liquefied natural gas)
- Regulation 46Z33 (relating to Russia's vulnerable goods)
- Regulation 53 (non-IOM activity relating to infrastructure-related goods and goods from non-government controlled Ukrainian territory)

## 2.9. Other service provisions

Certain other services are prohibited in the Regulations. These include the provision of certain services which enable or facilitate certain military activities, insurance and reinsurance services, energy-related services, infrastructure-related services, tourism-related services, internet services, other professional and business services, which in the Regulations refers to accounting, advertising, architectural, auditing, business and management consulting, engineering, IT consultancy and design, and public relations services.

### Military activities

As set out in **regulation 30**, the direct or indirect provision of the following services is prohibited where such provision enables or facilitates the conduct of military activities carried on or proposed to be carried on by the Russian military or any other military end-user who is a person connected with Russia:

- a) technical assistance
- b) armed personnel
- c) financial services or funds, or
- d) brokering services in relation to an arrangement whose object or effect is to provide, in a non-IOM country any of the services mentioned in paragraphs (a) - (c).

### Insurance & Reinsurance

Provisions on insurance and reinsurance services are set out in **regulation 29A** and prohibit the direct or indirect provision of insurance and reinsurance services where it relates to aviation and space goods and aviation and space technology.

The prohibitions apply to the direct or indirect provision of insurance and reinsurance services (1) to persons "connected with Russia" or (2) for use in Russia. This means that, even if the person to whom you are providing the relevant insurance or reinsurance service is not in or "connected with Russia" (as defined in **Regulation 21**), the prohibition may still apply if the goods or technology to which the service relates are for use in Russia.

It would not apply where the insurance is for the benefit of the non-Russian owner of the items, rather than their user or operator. Nor does it apply where the items either remain in Russia as the result of the termination of a lease and against the lessor's will; or are being flown out of Russia in the process of returning them to their owner.

The provision of insurance and reinsurance services in respect of a satellite where the only nexus with Russia is that it is orbiting over Russia, or broadcasting to Russia (and where the insurance and reinsurance services will not be provided to a person connected with Russia), would likewise not come within the scope of these prohibitions.



Therefore, if you are providing insurance or reinsurance services you should check whether the goods or technology may be used in Russia, and apply for a licence or contact ECJU if so.

### Energy-related services

Provisions on energy-related services are set out in **regulation 46** and prohibit the direct or indirect provision of "relevant energy services", defined as certain "specified services"



necessary for an “oil or gas exploration or production project” in Russia. The specified services being drilling, well testing, logging and completion services, and the supply of specialised floating vehicles.

### Infrastructure-related services

Provisions on infrastructure-related services and tourism-related services are set out in **regulation 54** and prohibit the provision of services relating to certain specified infrastructure sectors or services relating to tourism in non-government controlled Ukrainian territory.

### Internet Services

Provisions on internet services are set out in **regulation 54A** and require social media companies, and internet service providers, to take reasonable steps to prevent their users from encountering or accessing services or content online directly generated, shared or uploaded by a designated person. Application store providers must also take reasonable steps to prevent users from using their services to download or access internet services provided by a designated person. Designations for the purposes of these measures will be made by the Secretary of State and published on the [UK Sanctions List](#).

Therefore, if you are an internet service provider, or provide a social media service or application store for internet service applications, then you should check whether an entity has been designated by the UK Government for this purpose and take the necessary action to ensure compliance with the prohibitions.

**Regulation 46K** prohibits the provision of interception and monitoring services to, or for the benefit of, the Government of Russia.

### Professional and business services

Prohibitions on the provision of professional and business services (accounting, advertising, architectural, auditing, business and management consulting, engineering, IT consultancy and design, and public relations services) are set out in **regulation 54C**. These prohibit the direct or indirect provision of such services to persons connected with Russia.

Provision of services via any or all of modes of service supply 1, 2, 3, or 4, as defined under the World Trade Organization’s General Agreement on Trade in Services (GATS), to any person connected with Russia is covered by the prohibitions. This would include the cross-border supply of such services by an IOM services provider to another company incorporated under Russian law and the provision of services to Russian residents who are temporarily located in another country, including the IOM.

Please refer to **Schedule 3J** in the Regulations for the definitions of prohibited services. Several of these definitions are presented as references to Central Product Classification (CPC) codes. Where they are presented in this way, it is recommended that you review your activity against the correct version (for example: Provisional, 1.0, 1.1, 2, or 2.1) and individual code numbers (for example, “CPC 8671 – Architectural services”) that correspond to each prohibition. This information will enable you to navigate to the relevant definitions at the following link: [CPC Codes](#).

Though the accounting and auditing services definitions are based on CPC codes, they are defined in Schedule 3J for clarity, given the differences in exceptions and licensing which apply

to these two sectors. The definition of accounting services is based on the Provisional Central Product Classification (CPC) Codes 1991 and includes CPC 86212 Accounting Review Services, CPC 86213 Compilation of Financial Statements services, CPC 86219 Other Accounting Services and CPC 86220 Bookkeeping Services, except tax returns. The definition of auditing services is also based on the Provisional CPC Code 1991, CPC 86211 Financial Auditing Services.

The definitions of business and management consulting and public relations services are not based on CPC codes, but instead on Extended Balance of Payments Services classification (EBOPS) 2010 and includes EBOPS 10.2.1.3 – (Business and management consulting and public relations services includes advisory, guidance and operational assistance services provided to businesses for business policy and strategy, and the overall planning, structuring and control of an organization.)



For general guidance on export controls and trade sanctions, visit the [Export Control Joint Unit](#) website (the Isle of Man imposes the same export and trade controls as the UK).

## 2.10. Trade sanctions enforcement

Breaches of trade sanctions are a serious criminal offence. Any breach of the prohibitions relating to the trade sanctions contained in the Regulations is triable either way and carries a maximum sentence of 10 years' imprisonment or a fine (or both). Any breach of the trade licensing provisions is also triable either way and carries a maximum sentence on indictment of 2 years' imprisonment or a fine (or both).

In addition, further details on offences and penalties can be found in the [Russia Penalties and Offences Guidance](#).

The Treasury is responsible for enforcing the trade prohibitions and investigating suspected offences.

The Treasury works with other parts of government, supervisory bodies and regulators to consider all cases reported to it, sharing relevant information accordingly.



If you discover that you have breached any of the trade prohibitions, you should report the irregularity to the FIU as soon as possible.

You should provide:

- details of the export or transaction, including dates
- any relevant documents, such as export documentation and commercial invoices
- details of how the breach was discovered, why it occurred and what steps you have put in place to ensure it does not happen again.

Communications and Utilities Regulatory Authority ("CURA") is responsible for monitoring compliance with trade sanctions in relation to internet services, and for assessing suspected breaches. It has the power to impose monetary penalties for breaches of these sanctions.

Where appropriate and where permitted by law, CURA may share relevant information with parts of government, supervisory bodies and regulators.

More detailed information on the Treasury's approach to [compliance and enforcement can be found in the Guidance section of the sanctions website](#).

## 3. Transport sanctions

The Regulations impose transport prohibitions relating to aircraft and shipping.

### 3.1. Shipping sanctions

The Regulations prohibit Russian ships, and other ships specified by the Secretary of State, from entering ports in the Isle of Man. The Regulations also confer powers on the Secretary of State and harbour authorities to issue port barring directions to the master or pilot of a specified ship. The Regulations provide the Secretary of State with a power to control the movement of Russian ships or specified ships by requiring them to leave or enter specified ports, proceed to a specified place or remain where they are.

#### Specification of ships

The Regulations provide that the Secretary of State may specify a ship for the purposes of shipping sanctions if the ship is, has been, or is likely to be, involved in a relevant activity (as defined in **regulation 57F**).

The Regulations also provide that the Secretary of State must specify a ship by its International Maritime Organization number or, where it is not reasonably practicable to identify it by that number, by any other means that the Secretary of State considers appropriate.

The [UK Sanctions List](#) provides details of the ships specified under the Regulations, and details of the sanctions in respect of which they have been specified.

#### Registration of ships

The Regulations prohibit the registration of ships owned, controlled, chartered or operated by designated persons or persons connected with Russia on the Isle of Man Ship Register and confer powers on the Secretary of State to direct the Isle of Man Ship Registrar to terminate the registration of such ships.

The Regulations also confer powers on the Secretary of State and harbour authorities to detain Russian ships or specified ships at ports or anchorages.



'Russian ship' is not a term used in the Regulations. However, it is used in this shipping section of the guidance to aid understanding and readability. It means a ship which is:

- owned, controlled, chartered or operated by a designated person
- owned, controlled, chartered or operated by persons connected with Russia
- registered in Russia, or
- flying the flag of Russia

These sanctions do not apply to other ships originating from or destined for Russian ports; ships carrying cargo to or from Russia are not within scope of the transport sanctions unless they fall within the definition of a Russian ship or specified ship as above. These Regulations do not apply to ships (that are not otherwise included in the Regulations) with Russian crews or Masters, unless they are a designated person.

The Regulations also provide the Secretary of State with the power to issue directions in relation to the movement of British cruise ships, preventing them from entering any ports located in Crimea, or in the non-government controlled areas of the Donetsk and Luhansk oblasts. Such a direction can be given to any master or pilot of a British ship which is a cruise ship (defined as a ship which is providing cruise services).

### 3.2. Aircraft sanctions

The Regulations prohibit a Russian aircraft which is owned, chartered or operated by persons connected with Russia or designated persons from overflying the Isle of Man or landing in the Isle of Man.

In addition, they provide a power for the Department of Enterprise to refuse to register an aircraft or for the Secretary of State to direct the Department of Enterprise to terminate the registration of an aircraft that is owned or operated by a designated person or chartered by a designated person.

They confer direction making powers for the Secretary of State, an air traffic control unit and airport operators regarding aircraft movements in Isle of Man airspace and at the airport. The Regulations also provide a power for the Secretary of State to direct an airport operator to secure the detention of a Russian aircraft at an airport or to secure the movement of a Russian aircraft to a specified airport.



Russian aircraft is defined as an aircraft:

- owned, chartered or operated by a designated person, or a person connected with Russia, or
- registered in Russia

The Department for Infrastructure is ultimately responsible for the implementation of these transport sanctions.

### 3.3. Transport sanctions enforcement

Any breach of the prohibitions relating to the transport sanctions is triable either way and carries a maximum sentence of 7 years' imprisonment or a fine (or both).

In addition, further details on offences and penalties can be found in the [Russia Penalties and Offences Guidance](#).

The offence of failing to comply with a detention direction in relation to a ship is triable either way and carries a sentence or a fine.

A breach of the transport sanctions relating to the movement of aircraft includes:

- the failure of an operator or pilot of a Russian aircraft to comply with the prohibition on overflying the United Kingdom or landing in the United Kingdom
- the failure of an airport operator, without reasonable excuse, to comply with a direction given by the Secretary of State
- the failure of an operator or pilot in command of a Russian aircraft to comply with a direction given by air traffic control or an airport operator

All of which are offences that are triable either way and carry a maximum sentence of 7 years' imprisonment or a fine (or both).

The Secretary of State may notify a person that the existence or content of a port barring, entry or movement direction and any direction relating to the movement of aircraft, or anything done under such directions, is to be treated as confidential. Disclosure of confidential information carries a maximum sentence of 6 months' imprisonment on summary conviction or a fine (or both).

The Department for Infrastructure is ultimately responsible for the implementation of these transport sanctions.

## **4. Immigration sanctions**

The effect of the Regulations is to impose a travel ban on persons who are designated by the UK Secretary of State for the purposes of being made subject to immigration sanctions. Such persons are excluded persons for the purposes of section 8B of the Immigration Act 1971 (as that has effect in the Isle of Man).

This means that those individuals will be refused leave to enter or remain in the UK/IOM. Any applications they make for a visa to travel to the UK/IOM, including for transit purposes, will be refused. Any foreign national who is subject to a travel ban under the Regulations, and who is currently in the UK/IOM, will have their permission to stay in the UK/IOM cancelled and steps will be taken to remove them.

If you are the subject of an immigration sanction and try to travel to the UK/IOM, carriers are required to deny you boarding.

## 5. Information and record keeping

**Part 8 of the Regulations** places obligations on relevant firms (the definition of which is set out in the Regulations) to report information to the Treasury about known or suspected designated persons or about persons who may have committed an offence under specified provisions of the Regulations.

Reports must be made to the Financial Intelligence Unit (FIU), via [THEMIS](#).

It also grants powers to the Treasury to request information from, amongst others, a designated person, including powers to request the production of documents. It also establishes offences for failing to comply with these requests (including providing false information in respect of licences).

Part 8 also establishes information powers and record-keeping responsibilities in relation to the trade sanctions contained in the Regulations. It provides for offences for failing to comply with any of those requirements or intentionally obstructing an official in the exercise of those powers.



If you have obligations or responsibilities under Part 8 of these Regulations, it is important that you familiarise yourself with them. If you are unclear of your obligations or responsibilities, you are advised to seek independent legal advice.



## 6. Further Information

Sign up to receive [Notices to Exporters](#) for updates on trade sanctions.

To receive an email alerting you to any changes to the UK Sanctions List, you can subscribe to the Sanctions and Export Control news feed. Visit the Sanctions and Export Control website for more information on how to do this.

[Financial Sanctions Evasion Typologies: Russian Elites and Enablers Red Alert document](#) issued by the National Economic Crime Centre (NECC) is devised with the aim of promoting awareness and bringing about preventative action. We recommend you use this Alert to complement existing knowledge and support on-going improvements to your business processes and procedures.

### 6.1. Contact details for enquiries

Enquiries concerning this Notice may be made by –

Email [sanctions@gov.im](mailto:sanctions@gov.im)

Telephone 01624 648109

### 6.2. Privacy Notice

The Treasury collects information about you in order to administer taxation and carry out other functions for which it is responsible (e.g. National Insurance, customs and excise duties, property rates, social security benefits, state pensions and legal aid etc.), and for the detection and prevention of crime.

Whilst that information will primarily be provided by you, where the law allows we may also get information about you from other organisations, or give information about you to them. This may be to check the accuracy of the information provided, prevent or detect crime or protect public funds in other ways. These organisations may include other government departments, the police and other agencies.

To find out more about how we collect and use personal information, contact any of our offices or visit our website at:

<https://www.gov.im/about-the-government/departments/the-treasury/privacy-notice/>