BCL Solicitors LLP

Sanctions: Fortnightly Summary



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Welcome to BCL's latest sanctions round-up, highlighting the key developments in UK and EU sanctions between 9 November to 22 November 2026.

This edition covers, among other developments, the use of the new Global Human Rights and International Humanitarian Law Sanctions Regulations 2026 to designate entities said to be involved in the illegal expansion of settlements in the West Bank, amendments to UK sanctions lists, and the creation of the new EU Sanctions Office.

UK Developments

UK Sanctions List updates

Global Human Rights and International Humanitarian Law Sanctions Regulations 2026

- The UK's Foreign, Commonwealth, and Development Office ('FCDO') has imposed sanctions on 9 entities under the new Global Human Rights and International Humanitarian Law Sanctions Regulations 2026 (the "Regulations"), targeting construction and property development firms involved in the expansion of illegal settlements in the West Bank, as well as an activist group said to be responsible for blocking aid to Gaza. These are the first designations by the FCDO under the new, expanded Regulations, which target the violation of international humanitarian law.

- The construction and property developments firms sanctioned by the FCDO include:
  - Har Hevron Development Company Ltd,
  - Hemdat Shomron Ltd;
  - S.A.G. (Velvel) Construction and Development Ltd;
  - Lev HaHar Yazamut Ltd;
  - Harey Zahav;
  - Ariel Residential Judea & Samaria Ltd;
  - Ami Gvirtzman Architects 2021 Ltd; and
  - Z.F. Building Company Ltd.

- The FCDO says the above entities (seven Israeli developers and contractors, and one architectural firm) 'initiate, plan, design, build and market' housing, public buildings and infrastructure in settlements and outposts across the occupied West Bank, **in violation of Article 49(6) of the Fourth Geneva Convention** and international humanitarian law. The above entities are now all subject to an asset freeze and director disqualification sanctions.

- Alongside the above entities, the UK government has sanctioned a protest organisation, Tzav 9, an "Israeli activist movement whose stated mission has been to stop humanitarian aid entering the Gaza Strip, and which has organised and carried out blockades of crossings, ports and roads used by humanitarian aid convoys bound for Gaza." It is now also subject to an asset freeze and director disqualification sanctions.

- The new Regulations came into force on 15 October 2026, revoking and replacing the Global Human Rights Sanctions Regulations 2020. Their stated purpose is to target serious violations of international humanitarian law, obstructions of humanitarian assistance, and serious violations to the right to liberty and security of a person, enabling "the UK to designate individuals and companies involved in serious violations of international humanitarian law anywhere in the world" or within the United Kingdom (provided that they are not a United Kingdom national nor constituted or incorporated within the British Islands or

British overseas territories).

- The FCDO press release also referred to a statement made by the Foreign Secretary, Ed Miliband, in September 2026, in which it was announced that the FCDO is developing separate legislation for trade sanctions banning the import of settlement goods and the provision of advertising services for settlement properties in the UK. Ed Miliband said that new sanctions legislation would be in place within 6 to 9 months. **[FCDO notice]**; **[FCDO press release]**; **[Foreign Secretary oral statement]**

Russia (Sanctions) (EU Exit) Regulations 2019

- On 12 November, the FCDO designated 9 entities and 11 ships under the Russia (Sanctions) (EU Exit) Regulations 2019 (the "Russia Regulations") ahead of the European Political Community (EPC) summit in Dublin. The sanctions package targets Russia's 'shadow fleet' vessels, said to be "involved in the transport of Russian oil and LNG [liquefied natural gas], major coal companies, and Rosneft's flagship Arctic oil and gas project LLC Vostok Oil". The FCDO has also designated Slavneft, an oil and gas company that explores, produces and refines crude oil, making the UK "the first country in the world to have sanctioned all of Russia's top ten oil producers".

- The FCDO has previously designated several Russian oil companies, including:

  - Gazprom Neft and Surgutneftegas, designated in January 2025 **[FCDO press release]**;
  - Rosneft and Lukoil, designated in October 2025 **[FCDO press release]**;
  - Tatneft, Russneft, NNK-Oil and Rusneftegaz Group, designated in December 2025 **[FCDO press release]**; and
  - Zarubezhneft, designated in October 2026 **[FCDO press release]**.

- The focus of these designations on Russia's oil companies aims to target its energy revenue chain across the oil and gas sectors "including producers, trading networks, supply chains, and vessels".

- Some of the other entities designated as part of this sanctions package include Forteza Trading DMCC, Patera FZCO, Novus Energy DMCC and Altrum Group FZCO, entities which are "carrying on business [in the] Russian energy sector" and are based in the United Arab Emirates. The vessels designated are LNG tankers or oil tankers **[FCDO notice]**; **[FCDO press release]**

Revocations

- On 20 November, the FCDO revoked the designation of an LNG tanker, LNG SOARS (IMO9307205). The vessel is no longer subject to UK sanctions under the Russia regulations following "an official decision-making process".

- The tanker was originally designated on 24 February 2026, alongside approximately 50 other vessels. The FCDO's statement of reasons, stated that "LNG SOARS is, has been or is likely to be involved in carrying a good from a place in Russia to a third country that could contribute to destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine."

- The designation was part of the a "landmark sanctions package" under the Starmer government on the four-year anniversary of Russia's full-scale invasion of Ukraine, which, amongst other sectors, targeted Russia's LNG industry. **[FCDO notice]** **[FCDO press release, 24 February 2026]**

Amendments under the Russia Regulations

- On 10 November, the statements of reasons in respect of designations made under the Russia Regulations were varied for an entity, ALT Capital PTE Ltd, and two individuals, Narmina Dadashova and Vladislav Gromov.

    - ALT Capital PTE Ltd is a Singapore-incorporated fintech company operating an online financial trading platform said to have facilitated payments to sanctioned exports. Its statement of reasons has been updated to include an assertion that it has been making available "funds [and] economic resources" (as well as the previously specified "goods or technology") that contribute to "destabilising Ukraine…". The entity is also designated in the **EU** and **US** sanctions lists.

    - Narmina Dadashova was previously designated for "owning or controlling directly or indirectly, or working as a director, trustee, or other manager or equivalent of ALT Capital PTE Ltd". The statement of reasons for her designation has been updated to include that she has "been involved in obtaining a benefit from or supporting the Government of Russia through working as a manager of an entity (Mechel Carbon Pte Ltd)" involved in Russia's extractives sector.

    - Vladislav Gromov is a said to be an "involved person" as a result of "managing" ALT Capital PTE Ltd. His statement of reasons was updated to assert that ALT Capital PTE Ltd also are making "funds [and] economic resources" available which contribute to destabilising Ukraine (as above). **[FCDO notice]**

    - On 17 November, the statement of reasons in respect of a sanctioned LNG Tanker, NELEUS (IMO9958315), was updated to correct the administrative entry of the vessel to AEOLUS (IMO9958298), operated by IOB Co Ltd and sailing under the flag of Panama. AEOLUS has been and remains designated under the Russia Regulations from 11 November 2026 as it "is likely to be involved in carrying liquefied natural gas that originated in Russia from a place in Russia to a third country." **[FCDO notice]**

- On 20 November, the statement of reasons in respect of a designation made under the Russia Regulations, concerning Avet Mirakyan, was updated to say that "The Secretary of State has reasonable grounds to suspect" that Avet Mirakyan "has been [previously 'is or has been'] involved in obtaining a benefit from or supporting the Government of Russia by owning or controlling an entity, Insight Investment Group", which is carrying business in the Russian financial services sector.

Amendment under the DRC Regulations

- On 12 November, the UK government amended the designation of the Congo River Alliance, designated under the Democratic Republic of the Congo (Sanctions) (EU Exit) Regulations 2019 (the DRC Regulations) following an amendment made by the UN Security Council Sanctions Committee pursuant to Resolution 1533 (2004) on 11 November.

- The purpose of the amendment was to add another "Name type" to the designated entity, as "Front pour la Refondation de la Nation (FRN)" alongside its other known names, as "Alliance Fleuve Congo" and "Congo River Alliance". Additionally, the designation is amended to include the fact that the Congo River Alliance was established in 2023. The substance of the grounds for designation remain unaltered. **[FCDO notice]**; **[UN press release]**

Sanctions Guidance

OFSI issues sanctions factsheet for overseas businesses

- On 12 November, OFSI issued a 'factsheet' on UK financial sanctions, and how they affect and intersect with overseas businesses.

- The stated purpose of the factsheet is to consolidate OFSI guidance to help UK overseas businesses understand their obligations under UK sanctions (regardless of whether they are operating abroad) and to identify potential sanctions risks. It includes a checklist to help businesses consider measures to mitigate sanctions risks.

- OFSI says in its guidance that businesses should:
  - Screen relevant stakeholders and beneficial owners against UK sanction lists (not just the entity, which may not directly appear on a sanctions list);
  - Understanding the source of funds for a given transaction;
  - Conduct ongoing due diligence and monitoring of business relationships to identify any changes in sanctions exposure; and
  - Check for licence requirements.

- The factsheet also includes QR codes for easier navigation to submit confidential reports and to sign up for UK sanctions alerts. **[OFSI factsheet]**

OFSI issues reminder for Frozen Assets Reporting 2026

- OFSI conducts an annual frozen assets review, which applies to any person that holds or controls funds or economic resources owned, held or controlled by a designated person (and, in some cases, to those who have reported frozen assets to OFSI previously).

- Who must report:
  - Current holders: Any person that holds or controls funds or economic resources of a designated person;
  - Last year's filers who no longer hold the assets: If you filed a report last year (except a nil return) and since the report you no longer hold those assets, you must file a nil return.

- Other information for reporting to OFSI:
  - All funds and economic resources frozen in the UK as well as overseas where the funds or economic resources are subject to UK financial sanctions legislation;
  - A GBP valuemust be given to funds or economic resources relating to shares, securities, or other debt or payment instruments (even if those are denominated in a foreign currency);
  - Information needs to be sent to OFSI, via email, and completed on a downloadable template form;

- The report to OFSI must include the value of all such assets as at close of business on Wednesday 30 September 2026;
- The deadline to submit the frozen assets review to OFSI falls on Monday 30 November 2026. **[Financial Sanctions Notice]**

EU Developments

EU Commission announce a new EU Sanctions Office

- On 19 November, the EU Commission announced the creation of the EU Sanctions Office, from 16 January 2027.

- The Commission created the EU Sanctions Office to bring together sanctions expertise across "the entire sanctions lifecycle, from policy design to implementation, enforcement, and anti-circumvention, including outreach to and engagement with third countries."

- The press release indicates that the purpose of the new EU Sanctions Office is to "support Member States with faster compliance guidance, data sharing, and economic and technical analysis to ensure harmonised implementation and enforcement of [the EU's] sanctions".

- Spurred by the EU Commission's adoption of its 21st package of sanctions against Russia and the increasing scale and complexity of sanctions measures, it is envisaged that the new Office will strengthen the Commission's capacities across all of the EU's sanctions regimes.

- The new Office will support the EU Sanctions Envoy, whose role involves the prevention of circumvention and work with third countries to reduce that risk. **[Press release, Ukraine delegation of EU]**

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