

FINANCIAL REPORTING AUTHORITY

(CAYFIN)



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CAYMAN ISLANDS

Financial Sanctions Notice

07/07/2022

Belarus

Introduction

1. The Republic of Belarus (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/600) were made under the Sanctions and Anti-Money Laundering Act 2018 (the Sanctions Act) and provide for the freezing of funds and economic resources of certain persons, entities or bodies reasonably suspected of involvement in conduct enabling or facilitating the disappearances of four people or the failure to investigate properly or institute criminal proceedings against the persons responsible for those disappearances; the commission of serious human rights violations in Belarus; the repression of civil society or democratic opposition in Belarus; or other actions, policies or activities which undermine democracy or the rule of law in Belarus.
2. On 7 July 2022 the Foreign, Commonwealth and Development Office updated the UK Sanctions List on GOV.UK. This list provides details of those designated under regulations made under the Sanctions Act. A link to the UK Sanctions List can be found below.
3. Following the publication of the UK Sanctions List, information on the Consolidated List has been updated.

Notice summary

4. The following entries have been amended and are still subject to an asset freeze:
 - LLC SYNESIS (Group ID: 14039)

What you must do

5. You must:
 - i. check whether you maintain any accounts or hold any funds or economic resources for the persons set out in the Annex to this Notice;
 - ii. freeze such accounts, and other funds or economic resources and any funds which are owned or controlled by persons set out in the Annex to the Notice;
 - iii. refrain from dealing with the funds or assets or making them available (directly or indirectly) to such persons unless licensed by the Governor;
 - iv. report any findings to the FRA at financialsanctions@gov.ky, together with any additional information that would facilitate compliance with the Regulation;
 - v. provide any information concerning the frozen assets of designated persons to the FRA at financialsanctions@gov.ky by completing and submitting a Compliance Reporting Form (CRF). Information reported to FRA may be passed on to other regulatory authorities or law enforcement.
6. Where a relevant institution has already reported details of accounts, other funds or economic resources held frozen for designated persons, they are not required to report these details again.
7. Failure to comply with financial sanctions legislation or to seek to circumvent its provisions is a criminal offence.

Further Information

8. Copies of recent notices, UK legislation and relevant guidance can be obtained from the Belarus financial sanctions page on the Gov.UK website:
<https://www.gov.uk/government/collections/financial-sanctions-regime-specific-consolidated-lists-and-releases>
9. The Consolidated List can be found here:
<https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets>
10. The UK Sanctions List can be found here:
<https://www.gov.uk/government/publications/the-uk-sanctions-list>
11. For more information please see OFSI's guide to financial sanctions:
<https://www.gov.uk/government/publications/uk-financial-sanctions-guidance>

12. For general information on financial sanctions please see our Financial Sanctions Guidance

<http://fra.gov.ky/app/webroot/files/FRA%20Financial%20Sanctions%20Guidance%20updated%20December%2029%202021%202.pdf>

13. **Enquiries**

Enquiries regarding this Financial Sanctions Notice should be addressed to:

The Sanctions Coordinator
Financial Reporting Authority
P.O. BOX 1054
Grand Cayman KY1-1102
Cayman Islands
financialsanctions@gov.ky

ANNEX TO NOTICE

FINANCIAL SANCTIONS: BELARUS

THE REPUBLIC OF BELARUS (SANCTIONS) (EU EXIT) REGULATIONS 2019 (S.I. 2019/600)

AMENDMENT

Deleted information appears in strikethrough. Additional information appears in italics and is underlined.

Entity

1. JSC-SYNESIS LLC SYNESIS

Name non-latin script: ООО "Синезис"

Address: (1) 20B Platonova street, Minsk, Belarus, 220005 (2) Mantulinskaya 24, Moscow, Russia, 123100 Other Information: (UK Sanctions List Ref):BEL0065 (UK Statement of Reasons):JSC Synesis provides the 'Kipod' video surveillance system to the Republican System for Monitoring Public Safety. This system is utilised by the Ministry of Internal Affairs, including by security and police units. JSC Synesis therefore bears responsibility for providing support and technology to the Ministry of Internal affairs that enhances the capacity of the Lukashenko regime to carry out human rights violations and repress civil society following the protests in the aftermath of the August 9 elections. LLC Synesis ("Synesis"), including through its former wholly-owned subsidiary, LLC 24x7 Panoptes ("Panoptes"), has supplied the Kipod Technology ("Kipod") to the Republic of Belarus for use with the "Republican System for Monitoring Public Safety" ("RSMPS"), which is a video surveillance and monitoring system. The RSMPS is used by the Belarus Ministry of Internal Affairs, as the State body authorised to coordinate the use of the RSMPS, and law enforcement agencies, including by security and police units. Kipod is a key part of the RSMPS. The RSMPS, relying on Kipod, has provided the Ministry of Internal Affairs and law enforcement agencies with the capability inter alia, to track down civil society and pro-democracy activists, in order to repress them. Further, that capability has been so used. For example, following the elections on 9 August 2020, Nikolay Dedok, a civil society activist who was in hiding was tracked down by the RSMPS using the Kipod system. He was subsequently detained and tortured. Synesis has therefore been involved in the commission of a serious human rights violation or abuse in Belarus and/or the repression of civil society or democratic opposition in Belarus as Synesis has been responsible for and/or has provided support for, either or both such activities; and/or that Synesis has been involved in the supply to Belarus of technology which could contribute to either or both such activities. (Phone number):00375 1 72 40 36 50 (Website): <https://synesis.partners> (Email address): S@synesis.y (Type of Entity): Software Company (Business Reg No): (1) (УНН/ИНН): 190950894 (Belarus), (2) 7704734000/770301001 (Russia) Listed on: 18/12/2020 UK Sanctions List Date Designated: 31/12/2020 Last Updated: 31/12/2020 07/07/2022 Group ID: 14039.

Financial Reporting Authority

Portfolio of Legal Affairs

07/07/2022