FINANCIAL REPORTING AUTHORITY

(CAYFIN)

Delivery Address:
133 Elgin Ave, 4th Floor
Government Administrative Building
Grand Cayman
CAYMAN ISLANDS
Direct Tel No. (345) 244-2394
Tel No. (345) 945-6267
Fax No. (345) 945-6268
Email: financialsanctions@gov.ky

Mailing Address:
P.O. Box 1054
Grand Cayman KY1-1102
CAYMAN ISLANDS

Financial Sanctions Notice **23/01/2024**

Cyber

Introduction

1. The Cyber (Sanctions) (EU Exit) Regulations 2020 (S.I. 2020/597) ("the Regulations") were made under the Sanctions and Anti-Money Laundering Act 2018 ("the Sanctions Act") and provide for the imposition of financial sanctions, namely the freezing of funds and economic resources of persons who are have been involved in cyber activity which undermines, or is intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom; directly or indirectly causes, or is intended to cause, economic loss to, or prejudice to the commercial interests of, those affected by the activity; undermines, or is intended to undermine, the independence or effective functioning of an international organisations or a nongovernment organisation or forum whose mandate or purposes related to the governance of international sport or the Internet; or otherwise affects a significant number of persons in an indiscriminate manner.

2. On 23 January 2024 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 entry has been added to the Consolidated List and are now subject to an asset freeze:

    - Aleksandr Gennadievich ERMANOV (Group ID: 16345)

What <u>you</u> 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 and any entities owned or controlled by them;

ii. freeze such accounts, and other funds or economic resources;

iii. refrain from dealing with the funds or economic resources or making them available directly or indirectly to or for the benefit of designated persons unless licensed by the Governor or if an exception applies;

iv. report any findings to the FRA at financialsanctions@gov.ky, together with the information or other matter on which the knowledge or suspicion is based by completing and submitting a Compliance Reporting Form (CRF). Where the information relates to funds or economic resources, the nature and quantity should also be reported.

6. Information received by the FRA may be disclosed to third parties in accordance with the Regulation and in compliance with applicable data protection laws.

7. Failure to comply with financial sanctions legislation or to seek to circumvent its provisions is a criminal offence.

Ransomware and Sanctions

8. Making or facilitating a ransomware payment risks exposing those involved to civil or criminal penalties where such payments are made to designated persons.

9. OFSI, in partnership with other HM Government organisations has published guidance on sanctions and ransomware, which includes information on the impact of ransomware payments, cyber resilience and HM Government's approach to enforcement.

10. Guidance on ransomware and sanctions can be found here:

    https://www.gov.uk/government/publications/financial-sanctions-faqs

Further Information

11. Copies of recent notices, UK legislation and relevant guidance can be found obtained from the Cyber financial sanctions page on the Gov.UK website:

    https://www.gov.uk/government/collections/financial-sanctions-regime-specificconsolidated-lists-and-releases

12. The Consolidated List can be found here:

    https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets

13. The UK Sanctions List can be found here:

    https://www.gov.uk/government/publications/the-uk-sanctions-list

14. For more information please see OFSI's guide to financial sanctions:

    https://www.gov.uk/government/publications/uk-financial-sanctions-guidance

15. 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

Enquiries

16. 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: CYBER

THE CYBER (SANCTIONS) (EU EXIT) REGULATIONS 2020 (S.I. 2020/597)

ADDITION

Individual

1. **ERMAKOV, Aleksandr Gennadievich**
   Name (non-Latin script): Александр Геннадьевич Ермаков
   DOB: 16/05/1990. **POB**: Russia **a.k.a:** (1) BLADE_RUNNER (2) ERMAKOV, Aleksandr, Gennadyevich (non-Latin script: Александр Геннадьевич Ермаков) (3) GISTAVEDORE (4) GUSTAVEDORE (5) JIMJONES **Nationality**: Russia **Address**: Moscow, Russia. **Other Information:** (UK Sanctions List Ref):CYB0043. (UK Statement of Reasons): Aleksandr ERMAKOV is or has been involved in relevant cyber activity, including being responsible for, engaging in, providing support for, malicious cyber activity that resulted in unauthorised access and exfiltration of sensitive data. The action compromised Medibank Private Limited, one of Australia's largest private health insurance providers, and the resulting leak of millions of personal and medical records undermined the integrity, prosperity and security of Australia. (Gender):Male **Listed on:** 23/01/2024 **UK Sanctions List Date Designated:** 23/01/2024 **Last Updated:** 23/01/2024 **Group ID:** 16345.