# FINANCIAL REPORTING AUTHORITY

## (CAYFIN)

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CAYMAN ISLANDS

**Financial Sanctions Notice 18/07/2025**

# 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 non-government 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 18 July 2025 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. 19 entries have been added to the consolidated list and are now subject to an asset freeze. Further information can be found in the Annex to this Notice:

5. The following entries have been amended and are still subject to an asset freeze:

   - MAIN CENTRE FOR SPECIAL TECHNOLOGIES (GTSST) ('SANDWORM') (Group ID: 13911)
   - 85TH MAIN SPECIAL SERVICE CENTRE (GTSSS) (Group ID: 13984)

**What <u>you</u> must do**

6. 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.

7. Information received by the FRA may be disclosed to third parties in accordance with provisions set out in the Information and Records part of the regulations and in compliance with applicable data protection laws.

8. Information regarding a suspected designated person, and funds or economic resources belonging to them, does not need to be disclosed to the FRA where it has previously been reported.

9. Failure to comply with financial sanctions legislation or to seek to circumvent its provisions may be a criminal offence.

**Ransomware and Sanctions**

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

11. 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.

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

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

**Further Information**

13. 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

14. The Consolidated List can be found here:

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

15. The UK Sanctions List can be found here:

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

16. The Compliance Reporting Form can be found here:

    https://fra.gov.ky/forms-documents/#74-91-wpfd-financial-sanctions-forms

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

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

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

    https://fra.gov.ky/guides-to-financial-sanctions/

**Enquiries**

19. 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)**

**ADDITIONS**

**Individuals**

1. **BARANOV, Andrey Eduardovich**
   **Nationality:** Russia **Other Information:** (UK Sanctions List Ref): CYB0092. (UK Statement of Reasons): As a member of GRU Unit 26165, Andrey Eduardovich BARANOV has been involved in relevant cyber activity in that he was responsible for, engaging in, providing support for, or promoting the commissioning, planning or preparation of relevant cyber activity. Such activity that Andrey Eduardovich BARANOV has been involved in, or is intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom. (Gender): Male **Listed on:** 18/07/2025 **UK Sanctions List Date Designated:** 18/07/2025 **Last Updated:** 18/07/2025 **Group ID:** 16996.

2. **BOROVKOV, Vladislav Yevgenyevich**
   **Nationality:** Russia **Other Information:** (UK Sanctions List Ref): CYB0086. (UK Statement of Reasons): Russian GRU 29155 Officer Senior Lieutenant Vladislav Yevgenyevich BOROVKOV, through his membership of, and involvement with, a GRU cyber unit, has been responsible for, engaging in, providing support for, or promoting the commission, planning or preparation of relevant cyber activity. Such activity that BOROVKOV is or has been involved in undermines, or is intended to undermine, the integrity, prosperity or security of United Kingdom or a country other than the United Kingdom. (Gender): Male **Listed on:** 18/07/2025 **UK Sanctions List Date Designated:** 18/07/2025 **Last Updated:** 18/07/2025 **Group ID:** 17005.

3. **DENISOV, Yuriy Federovich**
   **Nationality:** Russia **Other Information:** (UK Sanctions List Ref): CYB0082. (UK Statement of Reasons): Russian GRU 29155 Officer Colonel Yuriy Federovich DENISOV, through his prior involvement with a GRU cyber unit, has been responsible for, engaging in, providing support for, or promoting the commissions, planning or preparation of relevant cyber activity. Such activity that DENISOV is or has been involved in undermines, or is intended to undermine, the integrity, prosperity or security of United Kingdom or a country other than the United Kingdom. (Gender): Male **Listed on:** 18/07/2025 **UK Sanctions List Date Designated:** 18/07/2025 **Last Updated:** 18/07/2025 **Group ID:** 17014.

4. **KORCHAGIN, Nikolay Aleksandrovich**
   **Nationality:** Russia **Other Information:** (UK Sanctions List Ref): CYB0083. Date trust services sanctions imposed: 18/07/2025. (UK Statement of Reasons): Russian GRU 29155 Officer Senior Lieutenant Nikolay Aleksandrovich KORCHAGIN, through his membership of, and involvement with, a GRU cyber unit, has been responsible for, engaging in, providing support for, or promoting the commission, planning or preparation of relevant cyber activity. Such activity that KORCHAGIN is or has been involved in undermines, or

is intended to undermine, the integrity, prosperity or security of United Kingdom or a country other than the United Kingdom. (Gender): Male **Listed on:** 18/07/2025 **UK Sanctions List Date Designated:** 18/07/2025 **Last Updated:** 18/07/2025 **Group ID:** 17015.

5. **KOVALEV, Anatoliy Sergeyevich**
**DOB:** 02/08/1991. **Nationality:** Russia **Other Information:** (UK Sanctions List Ref): CYB0088. (UK Statement of Reasons): Anatoliy Sergeyevich KOVALEV is or has been an involved person in relevant cyber activity commissioned by GRU Unit 74455. In this capacity, Anatoliy Sergeyevich KOVALEV is or has been responsible for, engaging in, providing support for, or promoting the commission, planning or preparation of relevant cyber activity. Such activity that Anatoliy Sergeyevich KOVALEV is or has been involved in undermines, or is intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom. (Gender): Male **Listed on:** 18/07/2025 **UK Sanctions List Date Designated:** 18/07/2025 **Last Updated:** 18/07/2025 **Group ID:** 17001.

6. **LUKASHEV, Aleksey Viktorovich**
**Nationality:** Russia **Other Information:** (UK Sanctions List Ref): CYB0090. (UK Statement of Reasons): As a member of GRU Unit 26165, Aleksey Viktorovich LUKASHEV has been involved in relevant cyber activity in that he was responsible for, engaging in, providing support for, or promoting the commissioning, planning or preparation of relevant cyber activity, including the targeting of Yuliya Skripal with X-Agent. Such activity that Aleksey Viktorovich LUKASHEV has been involved in, or is intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom. (Gender): Male **Listed on:** 18/07/2025 **UK Sanctions List Date Designated:** 18/07/2025 **Last Updated:** 18/07/2025 **Group ID:** 16998.

7. **MALYSHEV, Artem Andreyevich**
**Nationality:** Russia **Other Information:** (UK Sanctions List Ref): CYB0095. (UK Statement of Reasons): As a member of GRU Unit 26165, Artem Adreyevich MALYSHEV has been involved in relevant cyber activity in that he was responsible for, engaging in, providing support for, or promoting the commissioning, planning or preparation of relevant cyber activity. Such activity that Artem Andreyevich MALYSHEV has been involved in, or is intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom. (Gender): Male **Listed on:** 18/07/2025 **UK Sanctions List Date Designated:** 18/07/2025 **Last Updated:** 18/07/2025 **Group ID:** 16992.

8. **MIKHAYLOV, Dmitriy Aleksandrovich**
**Nationality:** Russia **Other Information:** (UK Sanctions List Ref): CYB0075. (UK Statement of Reasons): Russian GRU Senior Officer General-Major Dmitriy Aleksandrovich MIKHAYLOV is or has been responsible for, engaging in, providing support for, or promoting the commission, planning or preparation of relevant cyber activity. Additionally, MIKHAYLOV remains associated with, a person who is or has been so involved, by reason of his continuing service in the GRU. The relevant cyber activity in which MIKHAYLOV is or has been involved undermines, or was intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom. **Listed on:** 18/07/2025 **UK Sanctions List Date Designated:** 18/07/2025 **Last Updated:** 18/07/2025 **Group ID:** 17008.

9. **MORENETS, Aleksey Sergeyevich**
**a.k.a:** MORENETS, Aleksei **Nationality:** Russia **Other Information:** (UK Sanctions List Ref): CYB0093. (UK Statement of Reasons): As a member of GRU Unit 26165, Aleksey Sergeyevich MORENETS has been involved in relevant cyber activity in that he was responsible for, engaging in, providing support for, or promoting the commissioning, planning or preparation of relevant cyber activity. Such activity that Aleksey Sergeyevich MORENETS has been involved in, or is intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom. (Gender): Male **Listed on:** 18/07/2025 **UK Sanctions List Date Designated:** 18/07/2025 **Last Updated:** 18/07/2025 **Group ID:** 16995.

10. **MORGACHEV, Sergey Aleksandrovich**
**Nationality:** Russia **Other Information:** (UK Sanctions List Ref): CYB0094. (UK Statement of Reasons): As a member of GRU Unit 26165, Sergey Aleksandrovich MORGACHEV has been involved in relevant cyber activity in that he was responsible for, engaging in, providing support for, or promoting the commissioning, planning or preparation of relevant cyber activity. Such activity that Sergey Aleksandrovich MORGACHEV has been involved in, or is intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom. (Gender): Male **Listed on:** 18/07/2025 **UK Sanctions List Date Designated:** 18/07/2025 **Last Updated:** 18/07/2025 **Group ID:** 16993.

11. **NETYKSHO, Viktor Borisovich**
**Nationality:** Russia **Other Information:** (UK Sanctions List Ref): CYB0078. (UK Statement of Reasons): Russian GRU Senior Officer General-Major Viktor Borisovich NETYKSHO is or has been responsible for, engaging in, providing support for, or promoting the commission, planning or preparation of relevant cyber activity. Additionally, NETYKSHO remains associated with, a person who is or has been so involved, by reason of his continuing service in the GRU. The relevant cyber activity in which NETYKSHO is or has been involved undermines, or was intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom. **Listed on:** 18/07/2025 **UK Sanctions List Date Designated:** 18/07/2025 **Last Updated:** 18/07/2025 **Group ID:** 17011.

12. **OCHICHENKO, Artem Valeryvich**
**DOB:** 08/11/1992. **Nationality:** Russia **Other Information:** (UK Sanctions List Ref): CYB0074. (UK Statement of Reasons): Artem Valeryvich OCHICHENKO is or has been an involved person in relevant cyber activity commissioned by GRU Unit 74455. In this capacity, Artem Valeryvich OCHICHENKO is or has been responsible for, engaging in, providing support for, or promoting the commission, planning or preparation of relevant cyber activity. Such activity that Artem Valeryvich OCHICHENKO is or has been involved in undermines, or is intended to undermine, the integrity, propsperity or security of the United Kingdom or a country other than the United Kingdom. (Gender): Male **Listed on:** 18/07/2025 **UK Sanctions List Date Designated:** 18/07/2025 **Last Updated:** 18/07/2025 **Group ID:** 17002.

13. **OSADCHUK, Aleksandr Vladimirovich**
**DOB:** 17/11/1962. **Nationality:** Russia **Other Information:** (UK Sanctions List Ref): CYB0076. (UK Statement of Reasons): Aleksandr Vladimirovich OSADCHUK is or has been an involved person in relevant cyber activity commissioned by GRU Unit 74455. In this capacity, Aleksandr Vladimirovich OSADCHUK is or has been responsible for, engaging in, providing support for, or promoting the commission, planning or preparation of

relevant cyber activity. Such activity that Aleksandr Vladimirovich OSADCHUK is or has been involved in undermines, or is intended to undermine, the integrity, propsperity or security of the United Kingdom or a country other than the United Kingdom. (Gender):Male **Listed on:** 18/07/2025 **UK Sanctions List Date Designated:** 18/07/2025 **Last Updated:** 18/07/2025 **Group ID:** 17009.

14. **SEREBRIAKOV, Yevgeniy Mikhaylovich**
**DOB:** 26/07/1981. **a.k.a:** SEREBRYAKOV, Yevgeniy, Mikhaylovich **Nationality:** Russia **Other Information:** (UK Sanctions List Ref):CYB0073. (UK Statement of Reasons): Yevgeniy Mikhaylovich SEREBRIAKOV is a member of GRU Unit 74455. In this capacity, Yevgeniy Mikhaylovich SEREBRIAKOV is or has been involved in relevant cyber activity through his leadership and oversight of GRU Unit 74455, in which SEREBRIAKOV is or has been responsible for, engaging in, providing support for, or promoting the commission, planning or preparation of relevant cyber activity. Such activity that Yevgeniy Mikhaylovich SEREBRIAKOV is or has been involved in undermines, or is intended to undermine, the integrity, propsperity or security of the United Kingdom or a country other than the United Kingdom. (Gender): Male **Listed on:** 18/07/2025 **UK Sanctions List Date Designated:** 18/07/2025 **Last Updated:** 18/07/2025 **Group ID:** 17000.

15. **SHEVCHENKO, Vitaly Aleksandrovich**
**Nationality:** Russia **Other Information:** (UK Sanctions List Ref): CYB0081. (UK Statement of Reasons): Russian GRU 29155 associate Vitaly Aleksandrovich SHEVCHENKO, through his prior involvement with a GRU cyber unit, has been responsible for, engaging in, providing support for, or promoting the commissions, planning or preparation of relevant cyber activity. Such activity that SHEVCHENKO is or has been involved in undermines, or is intended to undermine, the integrity, prosperity or security of United Kingdom or a country other than the United Kingdom. (Gender): Male **Listed on:** 18/07/2025 **UK Sanctions List Date Designated:** 18/07/2025 **Last Updated:** 18/07/2025 **Group ID:** 17013.

16. **SHIKOLENKO, Yuriy Leonidovich**
**Nationality:** Russia **Other Information:** (UK Sanctions List Ref): CYB0079. (UK Statement of Reasons): Russian GRU Senior Officer Colonel Yuriy Leonidovich SHIKOLENKO is or has been responsible for, engaging in, providing support for, or promoting the commission, planning or preparation of relevant cyber activity. Additionally, SHIKOLENKO remains associated with, a person who is or has been so involved, by reason of his continuing service in the GRU. The relevant cyber activity in which SHIKOLENKO is or has been involved undermines, or was intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom. **Listed on:** 18/07/2025 **UK Sanctions List Date Designated:** 18/07/2025 **Last Updated:** 18/07/2025 **Group ID:** 17012.

17. **VASYUK, Sergey Sergeyevich**
**Nationality:** Russia **Other Information:** (UK Sanctions List Ref): CYB0091. (UK Statement of Reasons): As a member of GRU Unit 26165, Sergey Sergeyevich VASYUK has been involved in relevant cyber activity in that he was responsible for, engaging in, providing support for, or promoting the commissioning, planning or preparation of relevant cyber activity. Such activity that Sergey Sergeyevich VASYUK has been involved in, or is intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom. (Gender): Male **Listed on:** 18/07/2025 **UK**

**Sanctions List Date Designated:** 18/07/2025 **Last Updated:** 18/07/2025 **Group ID:** 16997.

18. **YERMAKOV, Ivan Sergeyevich**
**Nationality:** Russia **Other Information:** (UK Sanctions List Ref): CYB0089. (UK Statement of Reasons): As a member of GRU Unit 26165, Ivan Sergeyevich YERMAKOV has been involved in relevant cyber activity in that he was responsible for, engaging in, providing support for, or promoting the commissioning, planning or preparation of relevant cyber activity, including the targeting of Yuliya Skripal with X-Agent. Such activity that Ivan Sergeyevich YERMAKOV has been involved in, or is intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom. (Gender): Male **Listed on:** 18/07/2025 **UK Sanctions List Date Designated:** 18/07/2025 **Last Updated:** 18/07/2025 **Group ID:** 16999.

**Entities**

1. **161ST SPECIALIST TRAINING CENTRE (TSPS)**
**a.k.a:** GRU Unit 29155 **Other Information:** (UK Sanctions List Ref): CYB0097. (UK Statement of Reasons): The 161st Specialist Training Centre (TsPS) (Unit 29155) of the Russian General Staff of the Armed Forces of the Russian Federation (GRU), is involved in relevant cyber acitivty in that it has been responsible for, engaging in, providing support for, or promoting the commission, planning or preparation or relevant cyber acitivty, including information system and data interference such as hacking and leaking of sensitive information, defacement of websites, espionage through the collection of data, and sabotage through the destruction of data, including by deploying WhisperGate malware. These activities undermine, or are intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom. **Listed on:** 18/07/2025 **UK Sanctions List Date Designated:** 18/07/2025 **Last Updated:** 18/07/2025 **Group ID:** 16991.

**AMENDMENTS**

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

**Entities**

1. ~~**MAIN CENTRE FOR SPECIAL TECHNOLOGIES (GTSST) OF THE MAIN DIRECTORATE OF THE GENERAL STAFF OF THE ARMED FORCES OF THE RUSSIAN FEDERATION (GU/GRU) ('SANDWORM')**~~ ***MAIN CENTRE FOR SPECIAL TECHNOLOGIES (GTSST) ('SANDWORM')***
**a.k.a:** (1) BlackEnergy Group (2) ~~Field Post Number~~ ~~74455~~ *GRU Unit 74455* (3) Olympic Destroyer (4) Quedagh (5) Sandworm Team (6) Telebots (7) Voodoo Bear Address: 22 Kirova Street, Moscow, Russia.**Other Information:** (UK Sanctions List Ref): CYB0009. (UK Statement of Reasons): ~~The Main Centre for Special Technologies (GTsST) of the Russian General Staff Main Intelligence Directorate (GRU), also known by its field post number '74455' and "Sandworm" by industry, was responsible for cyber attacks which disrupted critical national infrastructure in Ukraine, cutting off the electricity grid. The perpetrators were directly responsible for relevant cyber activity by carrying out information system interference intended to undermine integrity, prosperity and security of the Ukraine. These cyber attacks originated in Russia and were unauthorised (Type of entity): Department within Government/Military Unit~~ *The Main Centre for Special Technologies*

*(GTsST) (Unit 74455) of the Russian General Staff Main Intelligence Directorate (GRU) is involved in relevant cyber activity in that it is or has been responsible for, engaging in, providing support for, or promoting the commission, planning or preparation of relevant cyber activity, including the deployment of multiple variations of Industroyer malware and NotPetya malware. These activities undermine, or are intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom or directly or indirectly causes, or is intended to cause, economic loss to, or prejudice to the commercial interests of, those affected by the activity.* (Parent company): Russian Ministry of Defence **Listed on:** 31/07/2020 **UK Sanctions List Date Designated:** 31/12/2020 **Last Updated:** ~~31/12/2020~~ *18/07/2025* **Group ID:** 13911.

2. ~~**GRU 85TH MAIN SPECIAL SERVICE CENTRE (GTSSS) (APT 28)**~~
**a.k.a:** (1) APT28 (Advanced Persistent Threat) (2) ~~Fancy Bears~~ *Fancy bear* (3) Iron Twilight (4) Pawn Storm (5) Sednit (6) Sofacy Group (7) ~~Stronitium~~ *Strontium* (8) Threat Group-4127/Iron Twilight (9) Tsar Team Address: Komsomol'skiy Prospekt, 20 Moscow, Russia, 119146.**Other Information:** (UK Sanctions List Ref): CYB0012. (UK Statement of Reasons): ~~The 85th Main Centre for Special Technologies (GTsSS) of the Russian General Staff of the Armed Forces of the Russian Federation (GRU) - also known by its field post number '26165' and industry nicknames: APT28, Fancy Bear, Sofacy Group, Pawn Storm, Strontium - was involved in illegally accessing the information systems of the German Federal Parliament (Deutscher Bundestag) without permission in April and May 2015. The military intelligence officers of the 85th controlled, directed and took part in this activity, accessing the email accounts of MPs and stealing their data. Their activity interfered with the parliament's information systems affecting its operation for several days, undermining the exercise of parliamentary functions in Germany~~. *The 85th Main Special Services Centre (GTsSS) (Unit 26165) of the Russian General Staff of the Armed Forces of the Russian Federation (GRU), is involved in relevant cyber activity in that it has been responsible for, engaging in, providing support for, or promoting the commission, planning or preparation or relevant cyber activity, including the deployment of X-Agent malware. These activities undermine, or are intended to undermine, the integrity, prosperity or security of the United Kingdom or a country other than the United Kingdom.* (Type of entity): Department within Government (Parent company): Russian Ministry of Defence **Listed on:** 23/10/2020 **UK Sanctions List Date Designated:** 31/12/2020 **Last Updated:** ~~31/12/2020~~ *18/07/2025* **Group ID:** 13984.

Financial Reporting Authority

Portfolio of Legal Affairs

18/07/2025