

UK SANCTIONS DEVELOPMENTS ADDRESSING RUSSIA-UKRAINE CONFLICT

JULY 2025

UPTICK IN UK SANCTIONS DESIGNATIONS

Since the start of 2025, the UK has sanctioned **364** individuals, entities, and ships in response to the conflict in Russia and Ukraine. This comprises **86%** of UK designations in the year to date and **more than the total** UK Russia-Ukraine designations throughout 2024.

Across **eight** sanctions batches, the UK has targeted various aspects of Russia’s war economy – particularly political elites, military supply chains, revenues fuelling Putin’s illegal war, Kleptocrats driving profits for the Kremlin, sanctions evasion networks, and overseas enablers.

Entity Category	Proportion of UK 2025 Designations
Shadow Fleet	179 (49%)
Enablers and Intermediaries	77 (21%)
Priority Industries	43 (12%)
Military Supply Chain	30 (8%)
Cyber and Information Warfare	24 (7%)
Political Officials and Affiliates	11 (3%)

In total, the UK has now sanctioned **over 2,500** individuals, entities and ships under the Russia sanctions regime, **over 2,300** of which have been sanctioned since Putin’s full-scale invasion.

Highlights across the year so far include:

1. **Sanctioning [two Russian oil giants](#)** – Gazprom Neft and PJSC Surgutneftegas – together with the United States. At the time of the designations, these energy companies produced over 1 million barrels of oil per day between them – **worth roughly \$23 billion a year**. Revenues from oil are vital to Russia’s war economy, making up roughly a quarter of Russia’s entire budget in 2023. (10 January 2025)
2. Targeting a **[Russian cybercrime syndicate](#)**, alongside the United States and Australia. The designations target ZSERVERS, a key component of the Russian cybercrime supply chain, and 6 of its members, as well as its UK front company. (11 February 2025)
3. Implementing the **[largest UK sanctions package against Russia since 2022](#)**, targeting **107** individuals, entities, and ships, including:
 - Using **new powers to target foreign financial institutions** supporting Russia’s war machine, sanctioning the Kyrgyzstan-based OJSC Keremet Bank;
 - Sanctioning **14 ‘new kleptocrats’**, some of whom are fronting up strategic sectors of Russia’s economy. Among them are Roman Trotsenko, one of the wealthiest men in Russia, worth £2.2 billion;

- Designating North Korean generals and senior officials **complicit in deploying over 11,000 North Korean forces to Russia**. Putin is using North Korea forces as cannon fodder; North Korea has already suffered over 4,000 casualties; and
 - Targeting **producers and suppliers of advanced technology**, dual-use goods, and machine tools for Russia's military, including Russian-based LLC Grant-Trade (which acquires machine tools from Europe and Asia) as well as companies based in Central Asian states, Turkey, Thailand, India and China. (24 February 2025)
4. Targeting [all levels of the Social Design Agency](#) (UK-sanctioned in 2024) – a **Russian disinformation body** that tried to incite protests in European countries, as well as **46** financial institutions that allegedly **help Russia circumvent sanctions** (including the St. Petersburg Currency Exchange and the Russian Deposit Insurance Agency, which insures Russian banks). (20 May 2025)
 5. Tightening sanctions on [Putin's 'shadow fleet'](#), targeting a total of **179 vessels** (24 February 2025 to 17 June 2025). The UK also targeted facilitators of this network, including [Romarine AS](#) – a Norway-registered company purporting to be a marine insurance provider with a website listing dozens of tankers believed to be part of Russia's shadow fleet. As of 20 May 2025, just over **10%** of the shadow fleet had been sanctioned by members of the international community (the UK alone has sanctioned **289 vessels** in total). Meanwhile, [more than 90%](#) of shadow fleet ships are producing insurance certificates when challenged. Subsequently, the National Crime Agency (NCA) and G7 partners issued a [joint 'Red Alert'](#) advising financial institutions to strengthen their due diligence processes to address [Russia's sanctions evasion and avoidance network](#). (7 July 2025)
 6. Designating [two UK residents](#) - Vladimir Pristoupa and Olech Tkacz – who allegedly operate a network of shell companies that has funnelled more than **\$120 million** worth of high-tech electronics to Russia; as well as Russia's Main Directorate of Deep-Sea Research (GUGI) (17 June 2025). Sanctions are making it more costly for Putin's war machine. Russia pays up to **six times the price** for dual-use items, and the cost of components for the Russian defence sector has risen by **30%** over three years compared to global prices.
 7. Sanctioning [Aleksey Viktorovich Rtishchev and Andrei Marchenko](#) – the head and deputy head of Russia's radiological chemical and biological defence troops – for their role in the transfer and use of **chemical weapons in Ukraine**, as well as The Joint Stock Company Federal Scientific and Production Centre Scientific Research Institute of Applied Chemistry for supplying **RG-Vo riot control agent grenades** to the Russian military. (7 July 2025)

See the attached **Annex** for a table setting out all UK sanctions in 2025 addressing the conflict in Russia and Ukraine.

Meanwhile, the UK [delisted one individual](#) – Farkhad Akhmedov – from its Russian sanctions list. Mr Akhmedov was first designated on 13 April 2022 on the basis that he was involved in obtaining a benefit from or supporting the Government of Russia by carrying on business in the Russian information, communications and digital technologies sector. In September 2023, the European Union (EU) removed sanctions against Mr. Akhmedov following the [Judgment of the General Court of the Court of Justice of the European Union](#) (which effectively annulled his designation based on a lack of evidence).

PRIORITISING IMPACT MONITORING AND SANCTIONS ENFORCEMENT

The UK has taken further steps to **monitor the impact** of UK and global sanctions designations on Russia's economy. On 13 June 2025, the Foreign, Commonwealth & Development Office (FCDO) [published an analysis](#) estimating that, as of February 2025, global sanctions have **deprived the Russian state of at least \$450 billion** since Russia invaded Ukraine. By one estimate, this is equivalent to around [two more years of funding](#) for the invasion. This (conservative) calculation includes an estimate of direct tax revenue that the state has forgone as a result of the widened discount on Russian crude oil compared to global benchmark oil prices, as well as immobilised Russian sovereign assets in the EU and other G7 institutions. For its part, the Office of Financial Sanctions Implementation (OFSI) [released new data](#) revealing that **over £25 billion of Russian assets had been reported frozen by the UK** since February 2022.

The UK has also **ramped up enforcement action** against those found to be violating Russia sanctions:

- In March 2025, OFSI imposed a [£465,000 penalty](#) against law firm Herbert Smith Freehills' former Moscow subsidiary for completing six transactions that made funds directly available to sanctioned entities.
- In April 2025, the NCA secured the [first UK convictions](#) for breaches of the UK's Russia sanctions. Dmitrii Ovsiannikov - the former Russia-appointed Governor of the illegally annexed Ukrainian city of Sevastopol – was found guilty of circumventing sanctions regulations and money laundering after receiving £76,000 from his wife and a new Mercedes from his brother. His brother was also found guilty of circumventing sanctions regulations, having made economic resources available to Dmitrii. Dmitrii and his brother were [sentenced](#) to 40 months imprisonment and 15 months imprisonment (suspended for 15 months) respectively.

In its [Cross-government review of sanctions implementation and enforcement](#) (15 May 2025), the UK found that its “investment and improvements” in supporting the private sector to understand and comply with sanctions, and robustly tackling failures to comply are “paying off”.

Finally, the UK Parliament also [approved](#) an [amendment to its Russia Sanctions Regulations](#) (14 May 2025), **imposing further trade sanctions** on Russia, including certain dealings in further categories of chemicals, plastics, metals, machinery and electronics, technological information and synthetic diamonds. The FCDO had explained that additional sanctions were needed to address Russian sanctions evasion and avoidance techniques, as well as to build up pressure on Russia over time.

EU MAINTAINS STRONG MOMENTUM BUT DROP IN US DESIGNATIONS

The EU has similarly taken significant steps to maintain its momentum on Russia-Ukraine sanctions, designating at least **224 individuals and entities** so far in 2025 (compared with 185 in the UK), as well as **hundreds** of shadow fleet vessels. The EU has targeted a broad range of actors involved in the conflict, including those supporting the Russian military complex and active in sanctions circumvention, as well as Russian crypto asset exchanges. The most recent designations, announced on 15 July 2025, target [five members of the Russian judiciary](#) who played a key role in the persecution of the activist Alexei Gorinov, as well as [nine individuals and six entities](#) in response to Russia's hybrid threats.

A [recent statement](#) by the European Commission's High Representative/Vice-President Kallas, together with President von der Leyen, indicates that the upcoming batch of EU sanctions against Russia – which was recently [delayed by Slovakia](#) – will focus on reducing Russia's energy revenues, targeting its shadow fleet of oil tankers, lowering the oil price cap, sanctioning the Nord Stream pipelines, and expanding restrictions on the banking and military sectors, including companies in third countries. (10 June 2025, 16 July 2025)

The United States has, since Trump's inauguration, taken a **lighter touch** and at times unpredictable approach to Russia-Ukraine sanctions, compared to its strong role under the Biden administration. In the final days under Biden, the United States announced [sweeping rounds of sanctions](#), with the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) designating **hundreds** of entities, individuals, and ships, including Russian oil producers, insurance companies, energy officials, shadow fleet vessels, and actors facilitating sanctions evasion.

Whereas the Biden administration placed, on average, [over 170 new sanctions a month](#) on entities linked to Russia from 2022 to 2024, Trump's regime has been **significantly less proactive**, only [designating Russian cybercrime actor ZSERVERS and two connected Russian nationals](#) (see above) as well as a [network of Houthi financial facilitators procuring weapons and commodities from Russia](#). Under Trump, the White House has, at various stages, reportedly considered lifting sanctions on [Russian energy assets](#) and [agriculture and fertilizer exports](#), [ruled out further sanctions](#) to avoid jeopardising peace negotiations, and [threatened 'very significant' new Russia sanctions](#). At present, a new bipartisan U.S. sanctions package has been prepared that would also expand the grounds on which individuals and entities can be sanctioned for supporting Russia. However, Senate Majority Leader John Thune has said that he would [hold off](#) on advancing it after Trump claimed he was prepared to impose 100% tariffs on Russian goods as well as secondary sanctions on other countries that buy its exports.

While new designations have so far been limited under Trump, the United States has shown the early signs of its **continued leadership on sanctions enforcement**. On 12 June 2025, OFAC [announced](#) the assessment of a **\$215,988,868 civil monetary penalty** against GVA Capital Ltd for violations of Russia sanctions and related reporting failings. The penalties stem from allegations that GVA Capital knowingly managed an investment for sanctioned Russian oligarch, Suleiman Kerimov, while aware of his blocked status and that GVA Capital also failed to comply with an OFAC subpoena during its investigation into the matter.

APPG LEADERSHIP ON REPURPOSING ASSETS FOR REPARATION

The All-Party Parliamentary Group on Magnitsky Sanctions and Reparation (APPG) continues to take a leading role advocating for the UK Government to take more robust action towards **repurposing immobilised funds** and related revenues to **finance individual reparation for victims** of the conflict in Ukraine.

The APPG has raised the profile of this issue among parliamentarians, including by:

- Leading a **parliamentary event** advocating for the repurposing of funds towards reparation (25 February 2025). In 2025, the UK's regulators and enforcement agencies generated **near £50 million** at least in part from sanctions penalties, seizures, and forfeitures. REDRESS and the APPG Members have advocated for a portion of these funds to be **repurposed to provide reparation** for survivors and victims of the underlying conduct which led to the UK Russia Sanctions Regime. See [REDRESS' January 2025](#)

[briefing paper](#) for further details. The event was well attended, including by **seven prominent parliamentarians**.

- **Co-sponsoring** a parliamentary event addressing how the UK can support reparations for Ukraine. The event was chaired by APPG Chair Sir Iain Duncan Smith MP and Alex Sobel MP. Olivia Dehnavi – Advocacy Officer at REDRESS (APPG Secretariat) – intervened as a speaker, raising awareness of routes to repurpose Russian sovereign assets and forfeited property connected to sanctions violations, as well as calling on the UK Government to act **swiftly to resolve the [impasse](#)** over the **£2.5 billion sale of Chelsea Football Club** and fulfil the commitment it made to use the proceeds to help victims of the war in Ukraine.
- **Advocating for law reform** in the UK to make it easier for assets forfeited through sanctions enforcement proceedings to be used for reparation for Ukraine.

The Chelsea Football Club funds have received **significant parliamentary attention** so far in 2025, following several years of coordinated engagement and advocacy by the APPG and REDRESS on this issue. There has been a plethora of parliamentary questions and debate on the topic, including Alistair Carmichael [citing the work of Lyra Nightingale, REDRESS' Senior Legal Advisor](#), before the House of Commons. On 2 June 2025, Rachel Reeves MP (Chancellor of the Exchequer) and David Lammy MP (Secretary of State for Foreign, Commonwealth and Development Affairs) made a [joint statement](#) reflecting on their frustration that it has not been possible to reach an agreement on the issue with former owner Roman Abramovich, and threatening to take Abramovich to court if required “to ensure people suffering in Ukraine can benefit from these proceeds as soon as possible”. Alongside continuing to advocate for the immediate use of the frozen sale proceeds themselves to fund reparation, REDRESS and the APPG are exploring opportunities to repurpose the interest generated by the proceeds, as well as the tax generated by that interest.

THE ONGOING DEBATE REGARDING RUSSIAN STATE ASSETS

Beyond the above cases specifically, State-level discussions remain ongoing regarding the **outright seizing of Russian assets** (rather than only using the interest and other revenues that they generate). In recent parliamentary debates:

- [David Lammy MP](#) said that the UK is “engaged particularly with European colleagues who are more exposed than we are. It has been right to allow new Governments in Europe to take their place and consider these issues, because they require some technical understanding, but we continue to press this issue, and it will be a topic at the NATO summit later today [24 June 2025].” In response to a follow-up question, he added that “[t]he way forward must be to pool those assets so that all of us bear joint liability, as it were. The discussions continue apace.” The NATO summit [concluded](#) the following day, though no material developments were reported on this issue.
- [Prime Minister Kier Starmer KC MP](#) described the current situation as “complicated”, noting that “allies are in different places on this, but we will continue to discuss it.” During the debate, Ed Davey MP called on Starmer to discuss with Estonian officials their proposals to facilitate more timely asset seizure (26 June 2025) – on which, see below.

The seizure and use of frozen Russian assets was further discussed during the recent 2025 Ukraine Recovery Conference in Rome, having been raised by Ukrainian President Volodymyr

Zelenskyy and others. During the event, Ukraine's [then](#)-Prime Minister issued a [statement](#) "insist[ing] on the full confiscation of frozen [R]ussian state assets."

Estonian law on asset seizure and repurposing

On 30 May 2024, the Estonian President approved a [law](#) which allows the Estonian Government to **confiscate frozen Russian assets** belonging to sanctioned individuals and entities where: (i) damage has been caused by a wrongful act; and (ii) the damage has been proved and must be compensated for under international law.

In this scenario, the relevant assets can be confiscated and used effectively as an **advanced compensation payment** for the damage. To confiscate the assets, a connection must be demonstrated between the relevant individual or entity and the State that has committed the unlawful act (Russian aggression against Ukraine). Resulting funds are to be directed to the "affected foreign state, an international organisation, or an internationally acknowledged compensation mechanism."

Subsequently, in February 2025, [Estonian officials sent a discussion paper to EU Member States](#), socialising an analysis that, in their view, would **enable the seizure and use** of frozen Russian assets to help Ukraine. In a recent interview, Estonia's Foreign Minister stated that "[w]e have \$240 billion in Russian frozen assets. And we are pushing heavily, as Estonia, to seize them and confiscate them to finance Ukraine. It's a lot of money for investments in the defense industry, as well as for buying Ukraine new stuff, like air defense systems. But we are not still there." It is not clear whether Estonia's proposal specifically envisages that a portion of such funds may also be used to **finance reparation** – as advocated by the APPG and REDRESS.