This briefing provides an overview of recent developments in the UK’s use of targeted sanctions as of 9 May 2024. Our most recent updates from September 2023 and January 2024 can be found here and here.

SUMMARY OF RECENT SANCTIONS DEVELOPMENTS

Since 23 January 2024, the UK Government has imposed 16 targeted sanction packages to respond to serious human rights violations and corruption and published its first ever sanctions strategy in an encouraging step towards increased transparency.

- **OPPOSING IRAN’S TRANSNATIONAL REPRESSION.** On 29 January 2024, the UK and US imposed sanctions on Iranian officials and members of criminal gangs responsible for plotting attacks against Iranian dissidents and opposition activists living in the UK.

- **COMBATING CHINA’S EFFORTS TO UNDERMINE DEMOCRACY.** On 25 March 2024, following reports that China was conducting large-scale espionage campaigns abroad, the UK and the US designated one entity and two individuals affiliated with a Chinese State-sponsored hacking group targeting democratic institutions and electoral processes in the UK and US.

1 Targeted sanctions regimes’ include Global Human Rights Sanctions (GHRS), which address human rights abuses, Global Anti-Corruption Sanctions (GACS), which target corruption anywhere in the world (together known as ‘Magnitsky sanctions’), as well as country-specific sanctions regimes which are used to address specific issues (such as human rights or rule of law issues) in relevant countries. Targeted sanctions can be used against individual persons and entities.
• **ISRAEL GAZA WAR.** On 12 February 2024, following similar action by the US on 1 February 2024, the UK sanctioned “four extremist Israeli settlers who have committed human rights abuses against Palestinian communities in the West Bank.” On 27 March 2024, the UK Government announced asset freezes against two individuals “suspected of providing financial support for Gaza Now – a news agency that promotes the Hamas and Palestinian Islamic Jihad terrorist groups.” Further, in response to Iran’s attack on Israel on 14 April 2024, the UK and US sanctioned leading Iranian military figures and actors within Iran’s unmanned aerial vehicle and missile industries on 18 April 2024, and the UK, US, and Canada announced additional sanctions targeting Iran’s drone and missile industry on 25 April 2024. On 3 May 2024, the UK sanctioned an additional two groups and four individuals responsible for inciting and perpetrating settler violence against Palestinian communities in the West Bank.

• **ADDRESSING REGIONAL INSTABILITY.** On 25 January 2024, the UK and US imposed coordinated sanctions on key figures within the Houthi regime, an Iran-backed rebel group in Yemen, who were involved in coordinating attacks on international shipping in the Red Sea and on 27 February 2024, the UK and US announced sanctions “against those that support, enable or deliver work of the Houthis”. Additionally, on 15 April 2024, the UK sanctioned three businesses—Alkhaleej Bank, Al-Fakher Advanced Works, and Red Rock Mining—supporting the armed groups behind the ongoing armed conflict in Sudan.

• **CONDEMN HUMAN RIGHTS VIOLATIONS IN MYANMAR AND DEMOCRATIC REPUBLIC OF THE CONGO (DRC).** On 1 February 2024, the UK, US, and Australia imposed sanctions to mark the three-year anniversary of the military coup in Myanmar. On 21 February 2024, the UK sanctioned six individuals from the DRC in accordance with UN designations, in part for their involvement in human rights violations or violations of international humanitarian law in the DRC.

• **RUSSIA.** On 21 February 2024, following the death of Russian opposition leader Alexei Navalny, the UK sanctioned six Russian individuals in charge of the Arctic penal colony where Navalny was detained and killed. On 22 February 2024, to mark the two-year anniversary of Russia’s invasion of Ukraine, the UK imposed more than 50 new sanctions targeting actors sustaining Russia’s war machine, including companies linked to munitions manufacturing and key sources of Russian revenue. On 12 April 2024, UK and US issued two new prohibitions on the trade of aluminum, copper, and nickel produced by Russia.

• **CRACKING DOWN ON SERIOUS CORRUPTION IN UGANDA.** On 30 April 2024, the UK sanctioned three high profile Ugandan politicians charged with corruption under the Global Anti-Corruption Sanctions regime.

• **THE UK SANCTIONS STRATEGY.** On 22 February 2024, the UK Government published the first ever sanctions strategy, outlining the UK’s use of sanctions as a foreign policy tool, including to address serious human rights violations and corruption around the world.

• **SANCTIONS ENFORCEMENT.** On 22 January 2024, the National Crime Agency arrested the former mayor of Sevastopol and Russian Deputy Minister of Trade and Industry Dmitry Ovsyannikov and charged him with seven counts of circumventing sanctions and two counts of money laundering. From January to March 2024, HM Revenue and Customs issued compound settlement offers to seven UK exporters, relating to unlicensed exports of military listed goods, dual use goods, and related activity, totaling just over GBP £2.3 million.
LEGAL CHALLENGES TO SANCTIONS. On 20 February 2024, the UK High Court rejected Anzhelika Khan’s challenge to her inclusion on the UK Russia sanctions list, concluding that the Secretary of State had struck a fair balance between the rights of Ms. Khan and her family and the interests of the community. On 27 February 2024, the UK Court of Appeal dismissed the appeals of Dalston Project & Sergei Naumenko and Eugene Shvidler, finding the sanctions to be proportional in both instances. Additionally, on 3 May 2024, the UK High Court found that, were it necessary to do so in the case, it would conclude that there is reasonable cause to suspect that A1 is owned or controlled by a designated person.

CONFISCATION OF RUSSIAN SOVEREIGN ASSETS. The EU and US both passed legislation permitting the confiscation and transfer of Russian sovereign assets for the support of Ukraine. On 17 April 2024, the Parliamentary Assembly of the Council of Europe (PACE) unanimously adopted Resolution 2539—Support for the reconstruction of Ukraine (the Resolution) and on 24 April 2024, the US Congress passed the Rebuilding Economic Prosperity and Opportunity for Ukrainians Act (REPO / the Act).

KEY HUMAN RIGHTS AND ANTI-CORRUPTION SANCTIONS DESIGNATIONS

The UK Government has issued sanctions to combat transnational repression, condemn human rights violations, and address ongoing armed conflicts around the world. These designations reflect the UK Government’s stated human rights priorities, including supporting human rights defenders and promoting democracy. In a positive trend in recent months towards increased coordination with international partners, all but three of the 16 targeted sanctions packages issued by the UK to address serious human rights violations and serious corruption since 23 January 2024 were multilateralized:

OPPOSING IRAN’S TRANSNATIONAL REPRESSION: On 29 January 2024, the UK and US took joint action to “to tackle the domestic threat posed by the Iranian regime, which seeks to export repression, harassment and coercion against journalists and human rights defenders.” As part of this action, the UK sanctioned seven individuals and one organisation, including senior Iranian officials who are members of Islamic Revolutionary Guard Corps (IRGC) Unit 840 and members of organised criminal gangs who collaborate with the regime. The Iranian officials targeted were previously exposed by the UK news channel ITV in December 2023 for threatening to kill two Iran International journalists on UK soil. The US imposed similar sanctions on 11 individuals - six of which were also designated by the UK - involved in a criminal network “that targeted Iranian dissidents and opposition activists for assassination at the direction of the Iranian regime”. In conjunction with the sanctions, the US Department of Justice (DOJ) unsealed an indictment of one Iranian and two Canadians charged with conspiracy in a murder-for-hire plot.

Transnational repression poses a serious threat to the safety and security of human rights defenders, journalists, and political opponents living in exile. Regimes such as Iran, China, Eritrea, Rwanda, Russia, and others, are increasingly reaching outside their borders to silence or deter dissent by committing human rights abuses against their own nationals. Targeted sanctions are a welcome step in recognising and combatting this worrying development.

COMBATTING CHINA’S EFFORTS TO UNDERMINE DEMOCRACY: On 25 March 2024, the UK and the US sanctioned a front company as well as two members of China State-affiliated Advanced Persistent Threat Group 31, Guangzong Zhao and Gaobin Ni, for their reported involvement in “two malicious
cyber campaigns targeting democratic institutions and parliamentarians.” Three members of the Inter-Parliamentary Alliance on China, including Sir Iain Duncan Smith, have said that they were among those targeted and had been “subjected to harassment, impersonation and attempted hacking from China for some time”. Coinciding with the announcement, the DOJ also unsealed indictments of Zhao, Ni, and five other defendants charged with computer intrusions targeting perceived critics of China and US businesses and politicians. The sanctions have been viewed as a major departure from UK foreign policy towards China. In fact, the March 2021 sanctions addressing gross human rights violations in Xinjiang are the UK’s only designations targeting Chinese government officials to date.

**ISRAEL GAZA WAR:** On 12 February 2024, following similar action by the US on 1 February 2024, the UK sanctioned “four extremist Israeli settlers [Moshe Sharvit, Yinon Levy, Zvi Bar Yosef, and Ely Federman] who have committed human rights abuses against Palestinian communities in the West Bank.” The sanctions follow the 14 December 2023 announcement by Foreign Secretary David Cameron that the UK had imposed a travel ban on unnamed Israeli extremist settlers responsible for “targeting and killing Palestinian civilians”, and “undermining security and stability for both Israelis and Palestinians”. On 3 May 2024, the UK sanctioned an additional two groups, Hilltop Youth and Lehava, and four individuals, Noam Federman, Neria Ben Pazi, Eden Levi, and Elisha Yered, responsible for inciting and perpetrating settler violence against Palestinian communities in the West Bank. The new targeted sanctions against named individuals seemingly represent an escalation in response from the UK Government in relation to continuing human rights abuses committed by Israeli citizens in Gaza.

During the reporting period, the UK also took action against individuals and entities linked to Hamas under the domestic counter-terrorism sanctions regime, marking only the second time the legislation has been used since it came into force in 2019. On 27 March 2024, building on three previous coordinated sanctions packages imposed on Hamas and its associates, the UK Government announced, alongside similar designations from the US, asset freezes against two individuals, Aozma Sultana and Mustafa Ayash, “suspected of providing financial support for Gaza Now – a news agency that promotes the Hamas and Palestinian Islamic Jihad terrorist groups.”

The UK also issued two rounds of sanctions in response to Iran’s attack on Israel on 14 April. Accordingly, on 18 April 2024, the UK, in coordination with the US, sanctioned leading Iranian military figures and actors within Iran’s unmanned aerial vehicle and missile industries, including the Armed Forces General Staff, the Khatemolanbia Central Headquarters, multiple Iranian Generals, and senior employees of Aerospace Industries Organisation. Following up on this action, on 25 April 2024, the UK, US, and Canada issued additional sanctions targeting Iran’s drone and missile industry. At the same time, the UK announced “its plan to expand trade sanctions against the regime by introducing new bans on the export of components used in drone and missile production to Iran”.

**ADDRESSING REGIONAL INSTABILITY:** On 25 January 2024, the UK and US imposed coordinated sanctions on four Houthi leaders, including the Commander of the Houthi Naval Forces and the Houthi Defence Minister, “to disrupt their ability to carry out attacks on international shipping in the Red Sea.” Just days later, on 27 February 2024, the UK, alongside the US, targeted two individuals and three entities for providing financial or military support to the Houthis, as well as Undersecretary of the Interior and Commander of the security forces Ali Hussein Badr Al Din Al-Houthi for undermining peace in Yemen by “supporting attacks against shipping in the Red Sea.” All but the latter designation, which sits under the Yemen sanctions regime, come under the new Iran sanctions regime which came into effect in December, as previously reported in our January Quarterly Update.
Similarly, on 15 April 2024, marking one year since the start of the ongoing armed conflict in Sudan, the UK sanctions three businesses which support the Sudanese Armed Forces (SAF) and the Rapid Support Forces (RSF), the two main warring parties. Specifically, the sanctions target Alkhaleej Bank, a financial institution “key to the RSF financing its operations and to it controlling key elements of the Sudanese economy”, Al-Fakher Advanced Works, a holding company used by the RSF to export gold and generate funds to purchase weapons, and Red Rock Mining, a subsidiary of Sudan Master Technology, a UK-sanctioned entity that provides funds to the SAF. The designations supplement the UK’s previous batch of Sudan sanctions imposed on 12 July 2023 against six entities—three associated with the RSF and the SAF respectively.

Despite repeated calls from civil society, including REDRESS, the UK is yet to sanction any individuals responsible for serious human rights violations in Sudan since the October 2021 military coup or in the context of the ongoing armed conflict. Only six individuals have been sanctioned under the UK’s Sudan sanctions regime since 2006 – four individuals designated by the UN Sudan Sanctions Committee and two individuals associated with the Wagner Group’s operations in Sudan. In contrast, since April 2023 the US has sanctioned the deputy leader of the RSF, Abdelrahim Dagalo, and other individuals supporting the warring parties, and has imposed visa restrictions on the RSF’s Abdul Rahman Juma and various unnamed individuals responsible for undermining Sudan’s democratic transition.

• CONDEMNING HUMAN RIGHTS VIOLATIONS IN MYANMAR AND DRC: On 1 February 2024, the UK, US, and Australia imposed sanctions to mark the three-year anniversary of the military coup in Myanmar. The UK in particular sanctioned two Myanmar military divisions and two State-owned enterprises “involved in the repression of the civilian population and serious human rights violations in Myanmar.” The sanctions also accompanied a joint statement with international partners condemning the regime’s continued violence against and repression of its own people. CSOs who have consistently urged the UK to sanction the mining sector welcomed the sanctions but noted that Myanmar sanctions to date have been too slow and uncoordinated. For example, the UK Government is yet to sanction other State-owned enterprises providing significant funding to the military, such as the Myanma Oil and Gas Enterprise (MOGE), despite the US and EU having already designated these entities.

Also on 21 February 2024, the UK sanctioned six individuals from the DRC in accordance with UN designations, in part for their role in “planning, directing, committing acts in the DRC that constitute human rights violations,” including sexual violence, forced displacement, and killing of civilians. The UN sanctions, which were proposed by the UK, US, and France, came just as the Special Representative of the Secretary-General in the DRC and Head of the United Nations Organization Stabilization Mission in the DRC, Bintou Keita, reported that hostilities between the 23 March Movement and the Armed Forces of the DRC had intensified dramatically in recent months following the expiration of the ceasefire in December 2023. Keita further warned that the increased violence between the two parties has exacerbated the already dire humanitarian crisis in overcrowded displacement sites and the security vacuum in other territories, with armed groups committing summary executions, abductions, forced displacement, and conflict-related sexual violence.

• CONTINUED FOCUS ON RUSSIA: Following the death of Russian opposition leader Alexie Navalny on 17 February 2024, the UK, on 21 February 2024, sanctioned under the Global Human Rights Sanctions regime six Russian individuals in charge of the Arctic penal colony where Navalny was detained and killed, including Colonel Vadim Konstantinovich, the Head of the Penal Colony, and five Deputy Heads. The UK statement of reasons for these designations specifically noted that each of these individuals
“is responsible for the mistreatment of prisoners through the operations and conditions at Arctic Penal Colony IK-3. This mistreatment likely contributed to the death of Alexei Navalny”. The US, Canada, Australia, and EU followed suit with similar sanctions, demonstrating international condemnation of Navalny’s treatment and death in Russian custody.

Additionally, on 22 February 2024, the UK imposed more than 50 new sanctions to mark the two-year anniversary of Russia’s invasion of Ukraine. The sanctions target “individuals and businesses sustaining Putin’s illegal war in Ukraine”, including companies linked to munitions manufacturing and importing of machine tools, and “key sources of Russian revenue”, including metal, diamond, and oil companies. The US, EU, Canada, and Australia also issued sanctions to mark the anniversary of Russia’s invasion of Ukraine. Building upon this action, on 12 April 2024, UK and US issued two new prohibitions on aluminium, copper, and nickel produced by Russia, “bringing the world’s two largest metal exchanges [the London Metal Exchange and the Chicago Mercantile Exchange] into the scope of the existing bans”.

- CRACKING DOWN ON SERIOUS CORRUPTION IN UGANDA: On 30 April 2024, the UK sanctioned three Ugandan politicians—two former ministers responsible for Uganda’s poorest region, Karamoja, Mary Goretti Kitutu and Agnes Nandutu, and the Speaker of the Parliament of Uganda, Anita Annet Among—under its Global Anti-Corruption Sanctions regime. The three individuals have been charged with corruption at Uganda’s Anti-Corruption Court. The designation announcement alleged that Kitutu and Nandutu stole materials from a Ugandan Government-funded project aimed at housing vulnerable communities and that Among benefited from the proceeds of the theft. The action marks the first time the UK has used the Global Anti-Corruption Sanctions regime to target corruption in Uganda since the regulations came into force in 2021.

INCREASED TRANSPARENCY—UK SANCTIONS STRATEGY

On 22 February 2024, the UK Government published the first ever sanctions strategy—Deter, disrupt and demonstrate—UK sanctions in a contested world—which sets out the UK Government’s approach to sanctions, reflecting several recommendations advocated for by REDRESS. The strategy outlines evolutions in the UK’s use of sanctions and explains how the UK Government intends to make UK sanctions more effective by building coalitions with allies, deepening engagement with civil society, and strengthening sanctions enforcement. It stresses the UK’s commitment to use sanctions to address serious human rights violations and corruption and pursue all lawful routes to use sanctioned Russian assets to support Ukraine. However, the strategy fails to advance a coordinated strategy concerning how the UK Government intends to strengthen its approach towards sanctions enforcement and Parliamentary oversight of the Government’s targeted sanctions decision. A more in-depth analysis of the strategy is available here.

SANCTIONS ENFORCEMENT

- CRIMINAL PROSECUTION: In the first Russia sanctions breach charges in the UK, former mayor of Sevastopol and Russian Deputy Minister of Trade and Industry Dmitry Ovsyannikov was arrested in London by the National Crime Agency on 22 January 2024 and charged with seven counts of circumventing sanctions and two counts of money laundering. He was sanctioned by the UK in 2020 and the EU in 2017, and is accused of relatively small-scale offenses, from modest amounts of
cash being deposited in UK bank accounts to licensing arrangements for the use of a car. In March, Ovsyannikov’s wife, Ekaterina Ovsiannikova, and reported brother-in-law, Alexei Owsjanikow, were also charged with sanctions evasion, with their cases recently joined. The case, which is scheduled to go to trial in March 2025, will be an important test case for prosecution of sanctions evasion in the UK.

- **CIVIL PENALTIES:** HM Revenue and Customs (HMRC) issued compound settlement offers to seven UK exporters, relating to unlicensed exports of military listed goods, dual use goods, and related activity, totaling just over GBP £2.3 million. However, HMRC did not name any of the companies or provide any details of the breaches, raising concerns about the effectiveness of enforcement without transparency as deterrent against breaching sanctions when entities do not face the reputational damage of being ‘named and shamed’.

### RECENT SANCTIONS CHALLENGES

On 20 February 2024, the UK High Court rejected Anzhelika Khan’s challenge to her inclusion on the UK Russia sanctions list. Khan was designated under the UK’s Russian Sanctions Regulations as a person ‘associated with’ an involved person because she is married to and has obtained “a financial benefit or other material benefit” from a sanctioned person, Russian billionaire German Khan. She challenged her designation, in part arguing that the designation is a “disproportionate interference with her rights under Article 8 and Article 1, Protocol 1 (“A1P1”) of the European Convention on Human Rights (“ECHR”).” The Court rejected the argument that the designation disproportionately interfered with these rights when weighed against the potential effect of the sanctions and the fact that the Secretary of State had concluded that no less intrusive measures would be equally effective.

On 27 February 2024, the UK Court of Appeal dismissed the appeals of Dalston Project & Sergei Naumenko and Eugene Shvidler in its first judgment considering “the proper approach to sanctions challenges in the UK, in particular on proportionality grounds.” In the first instance, Naumenko challenged the detention of ‘Phi’, a superyacht which he beneficially owned and which the Secretary of State for Transportation detained pursuant to the Russia Sanctions Regulations as a ship owned by “persons connected with Russia”. The Court found that the detention was a proportional interference with the appellant’s rights under Article 1 Protocol 1 of the ECHR. In the second matter, Shvidler, business associate of Russian oligarch Roman Abramovich, appealed the Administrative Court’s dismissal of his designation challenge. In rejecting the complaint, Lord Justice Singh, stated— “I would accept that these sanctions are both severe and open-ended. But this does not meet the fundamental point that sanctions often have to be severe and open-ended if they are to be effective.” Shvidler’s lawyer announced that Shvidler intends to seek permission to appeal to the Supreme Court, arguing that the Court of Appeal’s decision makes it ‘virtually impossible’ for anyone to challenge their designation.

On 3 May 2024, the UK High Court dismissed the application for declarations as to whether A1, a Russian litigation funder and subsidiary of Russia’s Alfa Group owned by sanctioned individuals Mikhail Fridman, German Khan, and Alexey Kuzmichev, is owned or controlled by UK-sanctioned individuals within the meaning of the Russia sanctions regulations. The application was made in the course of long-running litigation between Georgy Bedzhamov, former co-owner of Russian bank Vneshprombank (VPB) convicted of large-scale fraud resulting in estimated losses of £1.34 billion, and VPB, funded by A1. Though the Court did not decide whether A1 was in fact owned or controlled by designated persons, the judgment stated that “were it necessary to do so we would conclude that there is reasonable cause to suspect that... A1 is owned or controlled by a designated person.”
CONFISCATION OF RUSSIAN SOVEREIGN ASSETS

In recent weeks, the EU and US have taken significant steps to permit the confiscation and transfer of Russian sovereign assets for the support of Ukraine. On 17 April 2024, the Parliamentary Assembly of the Council of Europe (PACE) unanimously adopted Resolution 2539—Support for the reconstruction of Ukraine (the Resolution). The Resolution acknowledges that Russia has the obligation under international law to “provide full compensation for the damage, loss and injury caused by its wrongful acts.” However, recognising the unlikelihood that Russia will voluntarily fulfil this obligation and that countries are currently holding approximately USD $300 billion in Russia sovereign assets, PACE called for the creation of an international compensation mechanism and urged States holding Russian State assets to “co-operate and transfer them to an international compensation mechanism.” To facilitate this future mechanism, the Resolution further called upon all eligible States to join the Register of Damage, which has already begun recording Ukrainian damages in preparation for an international claims process. Additionally, on 8 May 2024, ambassadors from EU countries agreed to use an estimated EUR €3 billion in windfall profits from Russian sovereign assets frozen in the EU to purchase arms for Ukraine and support the country’s reconstruction.

In the US, the Rebuilding Economic Prosperity and Opportunity for Ukrainians Act (REPO / the Act) was signed into law on 24 April 2024, granting the President the power to seize, confiscate, transfer, or vest Russian sovereign assets subject to the jurisdiction of the United States for the purpose of supporting Ukraine. REPO established the ‘Ukraine Support Fund’, a fund that will consist of assets seized under the Act to be used by the Secretary of State to provide assistance to Ukraine. REPO specifically permits these assets to be used to make “contributions to an international body, fund, or mechanism... charged with determining and administering compensation or providing assistance to Ukraine.”

This new legislation is a significant political development and will likely have a broader impact on the international legal landscape on asset confiscation. In addition, these new authorities could pave the way for significant sums of money to be made available as reparation for victims in Ukraine. The UK Government is yet to enact any legal or policy reforms to enable profits derived from violations of human rights and humanitarian law to be repurposed as reparations to victims, despite repeated calls from civil society.

UPDATES FROM THE GLOBAL MAGNITSKY SANCTIONS COALITION

• As reported in the January Quarterly Update, on 9 November 2023, REDRESS submitted evidence to an inquiry by the House of Lords’ European Affairs Committee into ‘the implications of Russia’s invasion of Ukraine for UK-EU relations’. On 31 January 2024, the Committee published ‘The Ukraine Effect: The impact of Russia’s invasion of Ukraine on the UK– EU relationship’, echoing REDRESS’ recommendations for the UK Government to take decisive action to address sanctions circumvention and to work closely with allies to use frozen assets, including from the sale of the Chelsea Football Club, to support reconstructions efforts in Ukraine.

• On 21 February 2024, a coalition of 60 Ukrainian and international organisations and individuals, including REDRESS, published an open letter to Rishi Sunak, calling upon his Government to resolve the deadlock over the proceeds of the £2.5 billion sale of the Chelsea FC and fulfil the commitment it made two years ago to use the funds to help victims of the war in Ukraine.
• On 12 March 2024, the European Democracy Hub published an article authored by Tinatin Tsertsvadze—Sharpening the EU’s Global Human Rights Sanctions Regime—assessing the EU’s use of targeted sanctions in response to human rights violations and democratic backsliding. The article identifies four key issues—impartiality, impact, networks, and coordination—that the EU must consider to make sanctions a more effective tool for promoting its human rights policies.

• REDRESS submitted written evidence on 26 March 2024 and provided oral evidence on 30 April 2024 to the Treasury Committee inquiry into the UK’s financial sanctions on Russia. The submission primarily urged the UK to 1) develop law and policy to repurpose profits derived from human rights violations and corruption; 2) prioritise victims’ right to reparation for victims in Ukraine; and 3) strengthen enforcement of sanctions.

• On 29 April 2024, 47 campaigners and organisers, published an open letter to Secretary of State Lord Cameron, urging the UK Government to take urgent action in response to the politically motivated imprisonment of Dr. Gubad Ibadoghlu, a Senior Visiting Fellow at the London School of Economics and renowned Azerbaijani anti-corruption scholar and activist who has been detained in Azerbaijan since July 2023. The letter calls upon Lord Cameron to (1) meet with Dr. Ibadoghlu’s family to assess how the UK can provide support; (2) make direct appeals to the Azerbaijani Government, demanding Dr. Ibadoghlu’s immediate release and access to independent medical treatment; and (3) consider all appropriate measures to promote accountability for those responsible for Dr. Ibadoghlu’s continued detention, including sanctions.