



# FINANCIAL SERVICES COMMISSION

25 March 2024

## **Financial Sanction Notice**

### **Directions from Financial Services Commission**

Please be informed that 3 entries have been added to the Cyber financial sanctions regime.

On 25 March 2024, the Foreign, Commonwealth and Development Office updated the UK Sanctions List on Gov.Uk. This list provides details of those details designated under regulations made under the Sanctions Act.

3 entries have been added to the Cyber financial sanctions regime and are now subject to an asset freeze.

The consolidated list of asset freeze targets has been updated to reflect these changes.

The notice will also be placed on our website at [www.fscmontserrat.org](http://www.fscmontserrat.org) (<http://www.fscmontserrat.org>) under the heading "Sanctions" for your future reference.

Please be guided accordingly.



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## Financial Sanction Notice

### 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 25 March 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 entries have been added to the Consolidated List and are now subject to an asset freeze:
  - Gaobin NI (Group ID: 16462)
  - Guangzong ZHAO (Group ID: 16461)
  - WUHAN XIAORUIZHI SCIENCE AND TECHNOLOGY COMPANY LIMITED (Group ID: 16460)

## **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 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 Governor, together with the information or other matter on which the knowledge or suspicion is based. Where the information relates to funds or economic resources, the nature and quantity should also be reported.
6. Information received by the Governor 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.
7. Failure to comply with UK financial sanctions legislation or to seek to circumvent its provisions may be a criminal offence.

## **Ransomware and Sanctions**

8. Making or facilitating a ransomware payment risk 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 obtained from the Cyber financial sanctions page on the GOV.UK website:  
<https://www.gov.uk/government/collections/financial-sanctions-regime-specific-consolidated-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. The Compliance Reporting Form can be found here:  
<https://www.gov.uk/guidance/suspected-breach-of-financial-sanctions-what-to-do>.
15. For more information please see our financial sanctions guidance:  
<https://www.gov.uk/government/publications/financial-sanctions-faqs>.

### **Enquiries**

16. Non-media enquiries about the implementation of financial sanctions in the UK should be addressed to:

**Her Excellency, the Governor  
The Governor's Office  
#8 Farara Plaza  
Brades, MSR 1110  
E-Mail: [lisa.walkden@fcdo.gov.uk](mailto:lisa.walkden@fcdo.gov.uk)**

## ANNEX TO NOTICE

### FINANCIAL SANCTIONS: CYBER

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

#### ADDITIONS

##### Individuals

##### 1. NI, Gaobin

**Name (non-Latin script):** 倪高彬

**DOB:** 27/10/1985. **POB:** Jingzhou Municipality, China **Nationality:** China **National Identification Number:** 421003198510272917 **Address:** Hubei Province, China. **Other Information:** (UK Sanctions List Ref):CYB0046. (UK Statement of Reasons):NI Gaobin, a member of Advanced Persistent Threat Group 31 (APT31), is, or has been, involved in relevant cyber activity, including being responsible for, engaging in, or providing support for the commission, planning, or preparation of relevant cyber activity. This included the preparation for, and/or the provision of support to, sophisticated cyber activity, including spear-phishing campaigns and information systems interference which resulted in the unauthorised access to, and exfiltration of, sensitive data. Such campaigns included cyber activities targeting officials, government entities and parliamentarians conducted by APT31 against such individuals in the UK and internationally. As such, NI Gaobin, is a member, and an involved person in the activity of the APT31 group operating on behalf of the Chinese Ministry of State Security (MSS) as part of the PRC's state-sponsored apparatus and himself has engaged in relevant cyber activity, in support of malicious cyber activity that targeted officials, government entities and parliamentarians. This action undermined, or was intended to undermine, the integrity, prosperity and security of UK and international organisations and individuals engaged in political and democratic processes. (Gender):Male **Listed on:** 25/03/2024 **UK Sanctions List Date Designated:** 25/03/2024 **Last Updated:** 25/03/2024 **Group ID:** 16462.

##### 2. Zhao, Guangzong

**Name (non-Latin script):** 赵光宗

**DOB:** 12/11/1985. **POB:** Jingzhou Municipality, China **Nationality:** China **National Identification Number:** 421003198511121539 **Address:** Hubei Province, China. **Other Information:** (UK Sanctions List Ref):CYB0045. (UK Statement of Reasons):ZHAO Guangzong, a member of Advanced Persistent Threat Group 31 (APT31), is, or has been, involved in relevant cyber activity, including being responsible for, engaging in, or providing support for the commission, planning, or preparation of relevant cyber activity. This included the preparation for, and/or the provision of support to, sophisticated cyber activity, including spear-phishing campaigns and information systems interference which resulted in the unauthorised access to, and exfiltration of, sensitive data. Such campaigns included cyber activities targeting officials, government entities and parliamentarians conducted by APT31 against such individuals in the UK and internationally. As such, ZHAO Guangzong, is a member, and an involved person in the activity of the APT31 group operating on behalf of the Chinese Ministry of State Security (MSS) as part of the PRC's state-sponsored apparatus and himself has engaged in

relevant cyber activity, in support of malicious cyber activity that targeted officials, government entities and parliamentarians. This action undermined, or was intended to undermine, the integrity, prosperity and security of UK and international organisations and individuals engaged in political and democratic processes. (Gender):Male **Listed on:** 25/03/2024 **UK Sanctions List Date Designated:** 25/03/2024 **Last Updated:** 25/03/2024 **Group ID:** 16461.

## Entity

### 1. WUHAN XIAORUIZHI SCIENCE AND TECHNOLOGY COMPANY LIMITED

**Name (non-Latin script):** 武汉晓睿智科技有限责任公司

**Address:** 2nd Floor, No. 16, Huashiyuan North Road, East Lake New Technology Development Zone, Hubei Province, Wuhan, China. **Other Information:** (UK Sanctions List Ref):CYB0044. (UK Statement of Reasons):WUHAN XIAORUIZHI SCIENCE AND TECHNOLOGY COMPANY LIMITED is associated with Advanced Persistent Threat Group 31 (APT31) and is, or has been, involved in relevant cyber activity, including being responsible for, engaging in, or providing support for the commission, planning, or preparation of relevant cyber activity on behalf of the Chinese State. This included the preparation for, and/or the provision of support to, sophisticated cyber activity, including spear-phishing campaigns and information systems interference which resulted in the unauthorised access to, and exfiltration of, sensitive data. Such campaigns included cyber activities targeting officials, government entities and parliamentarians conducted by APT31 against such individuals in the UK and internationally. As such, WUHAN XIAORUIZHI SCIENCE AND TECHNOLOGY COMPANY LIMITED, is an associated person in the activity of the APT31 group operating on behalf of the Chinese Ministry of State Security (MSS) as part of the PRC's state-sponsored apparatus and itself has engaged in relevant cyber activity, in support of malicious cyber activity that targeted officials, government entities and parliamentarians. This action undermined, or was intended to undermine, the integrity, prosperity and security of UK and international organisations and individuals engaged in political and democratic processes. (Type of entity):Company **Listed on:** 25/03/2024 **UK Sanctions List Date Designated:** 25/03/2024 **Last Updated:** 25/03/2024 **Group ID:** 16460.

Financial Services Commission

25/03/2024