



UK Mission
Geneva

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Note Verbal No. 209

The Permanent Mission of the United Kingdom of Great Britain and Northern Ireland presents its compliments to the Office of the United Nations High Commissioner for Human Rights and has the honour to submit its **full** response to communication AL GBR 5 2025, further to the letter dated 9 May 2025 from the Independent Expert on the effects of foreign debt and other related international financial obligations of States on the full enjoyment of all human rights, particularly economic, social and cultural rights; Special Rapporteur on the right of everyone to the enjoyment of the highest attainable standard of physical and mental health and the Special Rapporteur on the negative impact of unilateral coercive measures on the enjoyment of human rights.

The Permanent Mission of the United Kingdom of Great Britain and Northern Ireland avails itself of this opportunity to renew to the Office of the High Commissioner for Human Rights the assurances of its highest consideration.



Geneva, 23 July 2025

Special Procedures Branch
Office of the High Commissioner for Human Rights



UK Mission Geneva

United Kingdom of Great Britain and Northern Ireland

Response to Special Procedure communications AL GBR 05/2025 of 9 May 2025 sent by the Independent Expert on the effects of foreign debt and other related international financial obligations of States on the full enjoyment of all human rights, particularly economic, social and cultural rights, the Special Rapporteur on the right of everyone to the enjoyment of the highest attainable standard of physical and mental health, and the Special Rapporteur on the negative impact of unilateral coercive measures on the enjoyment of human rights

Thank you for your letter of 9 May regarding the impact of UK sanctions.

We acknowledge that [REDACTED] has faced difficulties in accessing his funds for medical treatment. In this case, the UK has now issued a General Licence that is designed to resolve the situation for [REDACTED] and others in a similar situation. I want to assure you that our sanctions are designed to mitigate adverse consequences especially for those not subject to designation and the UK makes every effort to do so. With regards to your specific questions, I would like to take each of these in turn.

1. Please provide any additional information and/or comment(s) you may have on the above-mentioned allegations

On 18 July, the Government's Office of Financial Sanctions Implementation (OFSI) issued General Licence INT/2025/6641960. This General Licence permits non-designated customers with assets at designated brokers (or brokers owned and controlled by a designated person) to transfer their investments to non-designated brokers. This should allow the return of assets that have been frozen at designated brokers to non-designated persons, mitigating the impact of the financial sanctions felt by non-designated individuals. Please note, however, that OFSI General Licences do not compel third parties to undertake transactions, and they are issued subject to the limitations and conditions which they specify. If after reviewing the GL and discussing it with the relevant advisers and financial intermediaries, [REDACTED] has any concerns regarding the scope of the GL, he will be welcome to contact OFSI. The General Licence is publicly available here: [INT/2025/6641960](https://www.ofsi.gov.uk/press-releases/2025/07/18/2025071801)

2. Please provide information on the measures undertaken by your Excellency's Government and competent governmental institutions to ensure the right of [REDACTED] to appeal the encountered financial restrictions as a result of the sanctions designation of the financial institution holding his financial assets

As with all applications, OFSI conducted an assessment of the situation, including on the applicability of Schedule 5 to the Russia (Sanctions) (EU Exit) Regulations 2019. This sets out the grounds under which OFSI may issue specific licences. While OFSI judge that a specific licence is not appropriate in these circumstances, OFSI have

instead issued a General Licence. Further relevant information follows in the answer to question 4.

3. Please clarify whether the asset freeze Otkritie extends to [REDACTED] assets held in a UK financial institution.

OFSI regards the asset freeze on Bank Otkritie as extending to assets held by Otkritie Broker Ltd which it controls. These assets are currently in the sub-custody of Sova Capital, a UK financial institution, which is required to comply with UK sanctions. While Bank Otkritie has since merged with 'BM Bank,' OFSI understands BM Bank to be owned or controlled by VTB Bank, another designated bank. Therefore, the broker and [REDACTED] assets continue to be subject to UK sanctions.

4. Please also explain the available means and procedures for an effective appeal and remedy in similar to [REDACTED] cases, in accordance with due process international law standards and safeguards against collective punishment.

The UK's autonomous sanctions are lawful, transparent, and allow for due process protections and legal challenge. A person affected by an OFSI decision, including [REDACTED], may apply to challenge any aspect of a licence decision, including delay, in the UK courts. Further, for the avoidance of doubt, the General Licence applies to any non-designated persons in similar situations to [REDACTED], mitigating the effect of financial sanctions on those persons.

5. Please explain the explain the reason for the reported absence of any action by the UK Office of Financial Sanctions Implementation (OFSI) and/or the Office of the Chancellor of the Exchequer, despite [REDACTED] numerous communications.

6. Please provide information on any response, if available, by competent UK authorities, to [REDACTED] appeal for accessing his assets. Please provide relevant details about the content and main arguments of such a response. If a response was not provided or not substantiated by evidence, please explain the reason why.

7. Please provide any information on any measures undertaken to address the reported situation experienced by [REDACTED], which adversely affects his rights, including the right to health and the right to life.

On 21 July OFSI referred [REDACTED] to General Licence INT/2025/6641960 on the basis that it appears likely it will apply to his situation.

Prior to referring [REDACTED] to the General Licence, OFSI has corresponded regularly with [REDACTED], to request information where needed and provide updates since October 2023. Since then, OFSI has corresponded with [REDACTED] throughout 2024 and 2025, most recently in June 2025.

We thank you for bringing your concerns to our attention. We are committed to ensuring that regimes remain fit for purpose, and we take continuous action to minimise unintended consequences. This includes careful and rigorous consideration of licence applications such as [REDACTED] application, ensuring there is a proper route for appeal and referring to General Licences where they may apply.