



Global Anti-Corruption

Introduction

1. The Global Anti-Corruption Sanctions Regulations 2021 (S.I. 2021/488) (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 persons who are or have been involved in serious corruption.
2. On 21 November 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:
 - Isabel DOS SANTOS (Group ID: 16694)
 - Dmitry Vasylovych FIRTASH (Group ID: 16699)
 - Lada Pavlovna FIRTASH (Group ID: 16700)
 - Denis Vladimirovich GORBUNENKO (Group ID: 16701)
 - Liga LEMBERGA (Group ID: 16698)
 - Aivars LEMBERGS (Group ID: 16697)
 - Paula Cristina Fidalgo Carvalho Das Neves OLIVEIRA (Group ID: 16696)

- Sarju RAIKUNDALIA (Group ID: 16695)

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 Office of Financial Sanctions Implementation (OFSI) or if an exception applies;
 - iv. report any findings to OFSI, 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 OFSI 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.

Further Information

8. Copies of recent notices, UK legislation and relevant guidance can be obtained from the Global Anti-Corruption financial sanctions page on the GOV.UK website:
<https://www.gov.uk/government/collections/financial-sanctions-regime-specific-consolidated-lists-and-releases>.
9. The Consolidated List can be found here:
<https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets>.
10. The UK Sanctions List can be found here:

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

11. The Compliance Reporting Form can be found here:

<https://www.gov.uk/guidance/suspected-breach-of-financial-sanctions-what-to-do>.

12. For more information please see our financial sanctions guidance:

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

Enquiries

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

Office of Financial Sanctions Implementation
HM Treasury
1 Horse Guards Road
London
SW1A 2HQ
ofsi@hmtreasury.gov.uk.

14. Non-media enquiries about the sanctions measures themselves should be addressed to:
fcdo.correspondence@fcdo.gov.uk.

15. Media enquiries about how financial sanctions are implemented in the UK should be addressed to the Treasury Press Office on 020 7270 5238.

16. Media enquiries about the sanctions measures themselves should be addressed to the Foreign, Commonwealth & Development Office Press Office on 020 7008 3100.

ANNEX TO NOTICE

FINANCIAL SANCTIONS: GLOBAL ANTI-CORRUPTION

THE GLOBAL ANTI-CORRUPTION SANCTIONS REGULATIONS 2021 (S.I. 2021/488)

ADDITIONS

Individuals

1. **DOS SANTOS, Isabel**

DOB: 20/04/1973. **POB:** Baku, Azerbaijan **Nationality:** Angola **Other Information:** (UK Sanctions List Ref):GAC0050. (UK Statement of Reasons):Isabel DOS SANTOS is an involved person within the meaning of the Global Anti-Corruption Regulations 2021 on the basis of the following grounds: DOS SANTOS is or has been involved in (1) being responsible for or engaging in serious corruption; (2) profiting financially or obtaining any other benefit from serious corruption. Specifically, DOS SANTOS, whilst head of Angolan state oil firm Sonangol, misappropriated more than 50 million GBP for her own financial benefit and, whilst director of the Angolan telecoms company Unitel SA, misappropriated more than 300 million GBP for her own financial benefit. (Gender):Female **Listed on:** 21/11/2024 **UK Sanctions List Date Designated:** 21/11/2024 **Last Updated:** 21/11/2024 **Group ID:** 16694.

2. **FIRTASH, Dmitry Vasylovych**

DOB: 02/05/1965. **POB:** Ternopil Oblast, Ukraine **a.k.a:** (1) FIRTASH, Dimitry (2) FIRTASH, Dmytro **Nationality:** Ukraine **Address:** Gloriettegasse 10, Wien, Austria, 1130. **Other Information:** (UK Sanctions List Ref):GAC0055. (UK Statement of Reasons):Dmitry FIRTASH is an involved person within the meaning of the Global Anti-Corruption Sanctions Regulations 2021 on the basis of the following grounds: (1) FIRTASH is or has been involved in being responsible for or engaging in serious corruption. Specifically, FIRTASH has been involved in the bribing of public officials to obtain mining licenses, and FIRTASH has been involved in the misappropriation of property from the gas transport network of Ukraine. (Gender):Male **Listed on:** 21/11/2024 **UK Sanctions List Date Designated:** 21/11/2024 **Last Updated:** 21/11/2024 **Group ID:** 16699.

3. **FIRTASH, Lada Pavlovna**

DOB: 26/06/1972. **POB:** Kashira, Russia **Nationality:** (1) Cyprus (2) Russia (3) Ukraine **Address:** 8 Cottage Place, London, United Kingdom, SW3 2BE. **Other Information:** (UK Sanctions List Ref):GAC0056. (UK Statement of Reasons):Lada FIRTASH is an involved person within the meaning of the Global Anti-Corruption Sanctions Regulations 2021 on the basis of the following grounds: (1) FIRTASH is or has been involved in profiting financially or obtaining any other benefit from serious corruption. Specifically, FIRTASH has profited financially from the corruption of her husband, Dmitry FIRTASH; and (2) FIRTASH is associated with a person who is or has been involved in serious corruption, namely her husband Dmitry FIRTASH. (Gender):Female **Listed on:** 21/11/2024 **UK Sanctions List Date Designated:** 21/11/2024 **Last Updated:** 21/11/2024 **Group ID:** 16700.

4. **GORBUNENKO, Denis Vladimirovich**

DOB: 09/12/1973. **POB:** Donetsk Oblast, Ukraine **a.k.a:** (1) GORBUNENKO, Denis, Vlodymyrovich (2) HORBUNENKO, Denis **Nationality:** Ukraine **Other Information:** (UK

Sanctions List Ref):GAC0057. (UK Statement of Reasons):Denis GORBUNENKO is an involved person within the meaning of the Global Anti-Corruption Sanctions Regulations 2021 on the basis of the following grounds: (1) Denis GORBUNENKO has been involved in engaging in serious corruption. Specifically, Denis GORBUNENKO engaged in serious corruption for the benefit of Dmitry FIRTASH while in a controlling position at Rodovid Bank; (2) GORBUNENKO is or has been involved in transferring or converting, or facilitating the transfer or conversion of, any profit or proceeds from serious corruption. Specifically, GORBUNENKO has been involved in facilitating the transfer or conversion of the profit or proceeds of Dmitry FIRTASH's serious corruption; and (3) GORBUNENKO is acting on behalf of a person who is or has been involved in serious corruption, namely Dmitry FIRTASH. (Gender):Male **Listed on:** 21/11/2024 **UK Sanctions List Date Designated:** 21/11/2024 **Last Updated:** 21/11/2024 **Group ID:** 16701.

5. LEMBERGA, Liga

DOB: --/07/1976. **POB:** Latvia **Nationality:** Latvia **Other Information:** (UK Sanctions List Ref):GAC0054. (UK Statement of Reasons):Liga LEMBERGA is an involved person under the Global Anti-Corruption Sanctions Regulations 2021 on the basis of the following grounds: LEMBERGA is or has been involved in (1) facilitating or providing support for serious corruption; (2) profiting financially or obtaining any other benefit from serious corruption. Specifically, LEMBERGA has been involved in the bribery and misappropriation of her father, Aivars Lembergs. (Gender):Female **Listed on:** 21/11/2024 **UK Sanctions List Date Designated:** 21/11/2024 **Last Updated:** 21/11/2024 **Group ID:** 16698.

6. LEMBERGS, Aivars

DOB: 26/09/1953. **POB:** Jēkabpils, Latvia **Nationality:** Latvia **Address:** Ventspils, Latvia. **Other Information:** (UK Sanctions List Ref):GAC0053. (UK Statement of Reasons):Aivars LEMBERGS is an involved person under the Global Anti-Corruption Sanctions Regulations 2021 on the basis of the following grounds: LEMBERGS is or has been involved in (1) being responsible for or engaging in serious corruption Specifically, LEMBERGS, whilst mayor of Ventspils, has been responsible for or has engaged in serious corruption by way of bribery and the misappropriation of property. (Gender):Male **Listed on:** 21/11/2024 **UK Sanctions List Date Designated:** 21/11/2024 **Last Updated:** 21/11/2024 **Group ID:** 16697.

7. OLIVEIRA, Paula Cristina Fidalgo Carvalho Das Neves

Nationality: (1) Angola (2) Portugal **Other Information:** (UK Sanctions List Ref):GAC0052. (UK Statement of Reasons):Paula OLIVEIRA is an involved person within the meaning of the Global Anti-Corruption Sanctions Regulations 2021 on the basis of the following grounds: OLIVEIRA is or has been involved in (1) providing support for or facilitating serious corruption; or (2) profiting financially or obtaining any other benefit from serious corruption; or (3) in transferring or converting, or facilitating the transfer or conversion of, the profits or proceeds from serious corruption. Specifically, OLIVERIA has been involved in the misappropriation of property by Isabel DOS SANTOS from the Angolan state oil firm Sonangol. **Listed on:** 21/11/2024 **UK Sanctions List Date Designated:** 21/11/2024 **Last Updated:** 21/11/2024 **Group ID:** 16696.

8. RAIKUNDALIA, Sarju

Nationality: Portugal **Address:** United Arab Emirates. **Other Information:** (UK Sanctions List Ref):GAC0051. (UK Statement of Reasons):Sarju RAIKUNDALIA is an involved person within the meaning of the Global Anti-Corruption Sanctions Regulations 2021 on the basis of the following grounds: RAIKUNDALIA is or has been involved in (1)

being responsible for or engaging in serious corruption; (2) providing support for or facilitating serious corruption; (3) transferring or converting or facilitating the transfer or conversion of, the profits or proceeds from serious corruption; (4) profiting financially or obtaining any other benefit from serious corruption. Specifically, RAIKUNDALIA has been involved in the misappropriation of property by Isabel Dos Santos from the Angolan state oil firm Sonangol. (Gender):Male **Listed on: 21/11/2024 UK Sanctions List Date Designated: 21/11/2024 Last Updated: 21/11/2024 Group ID: 16695.**

Office of Financial Sanctions Implementation

HM Treasury

21/11/2024