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UK WEEKLY SANCTIONS UPDATE - WEEK OF AUGUST 12, 2024

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In this weekly update, we summarise the most notable updates in the UK sanctions world. If you have any questions in respect of any of the developments set out below, please do not hesitate to contact a member of our London Global and Government Trade team listed above.

1. RUSSIA SANCTIONS

OFSI adds new Russia-related FAQs: On August 15, 2024, the UK's Office of Financial Sanctions
Implementation published 20 new FAQs. FAQs 110-119 under the Russia section of OFSI's FAQs
includes a number of FAQs relating to Regulation 17 of the Russia (Sanctions) (EU Exit) Regulations
2019. (https://www.gov.uk/government/publications/uk-financial-sanctions-faqs/uk-financial-sanctions-faqs).

2. SOMALIA SANCTIONS

 UK updates Somalia sanctions guidance: On August 16, 2024, the UK's updated its guidance on Somalia sanctions to reflect changes following UN Security Council Resolution 2713 (2023). Among other things, the updated guidance notes that a licence may be granted for the export, making available, transfer, supply or delivery of items specified in Annexes A and B of UNSCR 2713 (2023) to certain parties. (https://www.gov.uk/government/publications/somalia-sanctions-guidance/somalia-sanctionsguidance).

3. OTHER SANCTIONS

- UK updates F680 Policy and Guidance: On August 16, 2024, the UK's Export Control Joint Unit published its updated Form 680 Policy and Guidance for UK Companies and UK Government Departments as well as associated FAQs. UK companies must obtain Form 680 approval in order to release information or equipment classified OFFICIAL-SENSITIVE and above to foreign entities. A Form 680 approval is already required before a UK Company released US ITAR material to any foreign entity. (https://assets.publishing.service.gov.uk/media/66be26430a079b65ea323ed5/Form_680_Policy_and_Guidance.pdf; https://assets.publishing.service.gov.uk/media/66bf4e6faa76bec3fccc3863/Form_680_-_FAQs.pdf).
- UK Government updates its existing Ministry of Defence Form 680 (F680) security process: On August 15, 2024, the UK's Export Control Joint Unit published a notice to exporters announcing the that

the UK is adapting its existing Ministry of Defence Form 680 (F680) security process to become the administrative vehicle through which it will review and enable the release of United States International Traffic in Arms Regulations (ITAR) controlled defence articles, including technical data, to foreign persons within or outside of the UK. (NTE2024/17: changes to the MOD form 680 process. - GOV.UK (www.gov.uk)).

• UK Government introduces new Open General Licence allowing use of the Global Combat Air Programme: On August 14, 2024, the UK Government published a new Open General Licence to permit the export of dual-use items or military goods software or technology and trade of military goods for the design, development, production, maintenance, trials and testing or use of the Global Combat Air Programme, subject to certain terms and conditions. An eligibility letter from the UK Ministry of Defence is required in order to use the licence. The UK Government has also published a related guidance note on how to register to use the licence. (Open-General-Licence-Global-Combat-Air-Programme (publishing.service.gov.uk)) (GCAP OGL guidance note - GOV.UK (www.gov.uk)) (NTE2024/16: global combat air programme (GCAP) open general licence and the eligibility letter from the UK Ministry of Defence - GOV.UK (www.gov.uk)).

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