

SANCTIONS POLICY

1. OVERVIEW AND PURPOSE

- 1.1 Sanctions are imposed by UK and other governments to prohibit or restrict the transfer of certain items, services and economic resources to designated individuals, organisations and countries. In addition to UK law (which incorporates United Nations and other international obligations), in certain circumstances the University will also have to comply with the sanctions laws of other countries, including US sanctions which apply more broadly than UK measures and can include some persons in the UK.
- 1.2 The purpose of this policy is to ensure that the University complies with sanctions law and fulfils all of its necessary obligations with regard to sanctions.
- 1.3 This policy aims to clarify which University activities are within the scope of sanctions law and which are not, and how such activities will be assessed.
- 1.4 The policy also sets out areas of responsibility for University staff with regard to sanctions and the sources used in the assessment of University activities.

2. SCOPE

- 2.1 This policy applies to any activity with individuals or entities from, or with links to, sanctioned countries. A list of sanctioned countries is available on the University's Sanctions webpages. For the purposes of this policy, sanctioned countries are divided into two categories as determined by the University's banking partners:
 - 2.1.1 **Narrowly Restricted Countries (NRCs):** These countries are subject to closely cast sanctions, the majority of which are focused on the prohibition of activities relating to the trading of weapons.
 - 2.1.2 **Broadly Restricted Countries (BRCs):** These countries are subject to a wide range of sanctions measures with a significant list of individuals and entities subject to sanctions.
- 2.2 Examples of University activities which may be impacted by sanctions include donations, student payments, provision of consultancy services, recruitment partnerships and other strategic partnerships, procurement of goods and services (including engaging new suppliers), research grants and research agreements. Note that this is not an exhaustive list, and sanctions could apply to potentially any University activity.

3. RESPONSIBILITIES

3.1 Council

- 3.1.1 Council has responsibility for approval of the Sanctions policy and for overall sanctions compliance.

3.2 Professional Services (PS) Divisions

- 3.2.1 All PS Directors have a responsibility for the implementation of this policy within their Division including by taking all reasonable steps to ensure that staff in their Divisions are aware of and are compliant with the policy.
- 3.2.2 Certain PS Divisions are responsible for conducting sanctions checks on behalf of their own Divisions or on behalf of Faculty staff as and when checks are required. The Sanctions Assessment Procedure document specifies which PS Division is responsible for running sanctions checks for each relevant area of University activity.
- 3.2.3 The Division of General Counsel, Governance and Compliance, with support from the Finance Division, is responsible for maintaining and updating the policy and the associated Sanctions Assessment Procedure document.

3.3 Executive Deans

- 3.3.1 Executive Deans have a responsibility for the implementation of this policy within their Faculty including by taking all reasonable steps to ensure that staff (including researchers) in their Faculties are aware of and are compliant with the policy.

3.4 All staff¹

- 3.4.1 All members of staff – particularly those who propose to conduct any activity with individuals or entities from, or with links to, sanctioned countries – are responsible for:
- familiarising themselves with this policy;
 - requesting (from the relevant PS Division outlined in the Sanctions Assessment Procedure document) sanctions checks, risk assessments and approvals as required by the policy;
 - providing the necessary advice and guidance to the students that they supervise (where applicable); and
 - complying with sanctions laws, as they apply to any potential transaction² or arrangement³.

4. POLICY

4.1 Sanctions checks

- 4.1.1 Staff members of the University shall not enter any arrangement or transaction which is prohibited by sanctions. Staff members shall therefore carry out sanctions checks and risk assessments as set out in this policy.
- 4.1.2 Guidance on how to conduct sanctions assessments is available in the Sanctions Assessment Procedure document.
- 4.1.3 Where dealings with an individual or entity from, or linked to, a narrowly or broadly sanctioned country are ongoing, entities should be routinely re-checked. Guidance on this process is available in the Sanctions Assessment Procedure document.

¹ **'All staff'** includes senior managers, officers, and directors; employees (whether permanent, fixed-term, temporary, or casual); contract, seconded, and agency staff; volunteers, apprentices, and interns; and others associated with (i.e. performing services for or on behalf of) the University (for example, agents and consultants).

² A **'transaction'** refers to any exchange, transfer or dealing involving funds, financial services, or economic resources.

³ An **'arrangement'** will not necessarily involve a transfer of funds and could include the provision of services, trading goods or intellectual property, working (for a sanctioned entity), providing access to physical assets, etc.

- 4.1.4 Where required, the University will also comply with the procedures required by its banking partners in relation to sanctions.

4.2 Risk assessments and approvals

- 4.2.1 The route of risk assessment and approval differs depending on whether the assessment involves an individual or entity based in, or with links to, a Narrowly Restricted Country (NRC) or a Broadly Restricted Country (BRC).

4.2.2 Narrowly Restricted Countries (NRCs)

- 4.2.2.1 For any proposed transaction or arrangement between a staff member or the University and an individual or entity based in, or with links to, a Narrowly Restricted Country (NRC), a nominated member of the responsible Professional Services (PS) Division should complete a sanctions check in accordance with the Sanctions Assessment Procedure document.

- 4.2.2.2 If it is identified that there **are** sanctions which apply to the proposed transaction or arrangement, then no such transaction or arrangement may take place and the case should be escalated to the relevant Executive Dean or Professional Services Director, who shall notify the Chief Financial Officer and the General Counsel and Director of Governance and Compliance.

- 4.2.2.3 If it is determined that there **are no** sanctions which apply to the proposed transaction or arrangement, the check can be signed off by the Line Manager (or equivalent) of the PS staff member who completed the check.

4.2.3 Broadly Restricted Countries (BRCs)

- 4.2.3.1 For any proposed transaction or arrangement between a staff member or the University and an individual or entity based in, or with links to, a Broadly Restricted Country (BRC), a nominated member of the responsible Professional Services (PS) Division should complete a sanctions check in accordance with the Sanctions Assessment Procedure document.

- 4.2.3.2 If it is identified that there **are** sanctions which apply to the proposed transaction or arrangement, then no such transaction or arrangement may take place and the case should be escalated to the relevant Executive Dean or Professional Services Director, who shall notify the Chief Financial Officer and the General Counsel and Director of Governance and Compliance.

- 4.2.3.3 If it is determined that there **are no** sanctions which apply to the proposed transaction or arrangement, the check must be escalated to a panel which includes the relevant Executive Dean or Professional Services Director, the Chief Financial Officer, and the General Counsel and Director of Governance and Compliance. Depending on the nature of the proposal, it may be necessary to include other appropriate staff on the panel, for example, the Director of Research and Innovation for research collaborations.

- 4.2.3.4 If the panel decide to approve the assessment, they should consider whether any appropriate mitigating actions need to be put in place to ensure that the proposed activity does not, and is not likely to, fall within the scope of sanctions. This could include a requirement that the relevant

team reports on any changes in scope of activity or on any changes in personnel at the University's counterparty.

4.3 **US sanctions**

4.3.1 US sanctions apply more broadly than UK sanctions and can sometimes apply to persons in the UK. All US persons, wherever located in the world, are obligated to comply with US sanctions. In addition, US sanctions apply to companies and other entities organised under US law, all branches of US companies and other entities throughout the world, and certain US-origin goods and technology. Therefore, checks for US sanctions are incorporated into the University's sanctions checking process (see Sanctions Assessment Procedure document) and are complied with where applicable.

4.4 **Storing assessments**

4.4.1 Evidence of sanctions checks and approvals must be stored appropriately, and the central Sanctions register must be updated.

4.4.2 Detailed guidance on storing assessments is available in the Sanctions Assessment Procedure document.

4.5 **In the event of a breach**

4.5.1 A suspected breach of sanctions laws, must be immediately reported to all of the following:

- The relevant approver/s of the risk assessment.
- The Finance Director
- General Counsel and Director of Governance and Compliance

4.5.2 The Finance team will subsequently report the breach, if it is confirmed as such, to:

4.5.2.1 In respect of financial sanctions, the Office of Financial Sanctions Implementation (OFSI);

4.5.2.2 In respect of trade sanctions: HM Revenue and Customs (HMRC);

4.5.2.3 Relevant external stakeholders e.g. Barclays bank;

4.5.2.4 The school or division which holds the arrangement; and

4.5.2.5 The individual(s) involved.

5. **LEGISLATION AND GOOD PRACTICE**

5.1 **United Kingdom**

5.1.1 The Sanctions Act and Anti-Money Laundering Act 2018:
<https://www.legislation.gov.uk/ukpga/2018/13/contents/enacted>

5.1.2 UK financial sanctions general guidance: [UK financial sanctions general guidance - GOV.UK](#)

5.1.3 UK trade sanctions general guidance: [Trade sanctions, arms embargoes, and other trade restrictions - GOV.UK](#)

- 5.1.4 UK sanctions by regime: <https://www.gov.uk/government/collections/uk-sanctions-regimes-under-the-sanctions-act>
 - 5.1.5 UK proscribed organisations: <https://www.gov.uk/government/publications/proscribed-terror-groups-or-organisations--2>
 - 5.1.6 UK Dept of Trade Goods Checker: [OGEL and Goods Checker Tools](#)
- 5.2 **United States of America (USA)**
- 5.2.1 Department of Commerce List of Parties of Concern: <https://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern>
 - 5.2.2 Office of Foreign Assets Control – Sanctions Programs and Information: <https://www.treasury.gov/resource-center/sanctions/>

Review / Contacts / References

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Related internal policies, procedures, guidance:	Sanctions webpage
Division:	Finance Division / Division of General Counsel, Governance and Compliance
Policy Owner:	Chief Financial Officer (Finance Division)
Point of Contact:	Governance and Compliance Manager (Division of General Counsel, Governance and Compliance)