



# Cayman Monetary Regulatory Authority International

At the forefront of financial regulation, the Cayman Monetary Regulatory Authority International (CMRAI) is dedicated to upholding the highest standards of financial oversight and compliance. Our mission is to safeguard the stability and integrity of the global financial system by ensuring that financial services operate within a framework of transparency, accountability, and excellence.

As a trusted partner to financial institutions worldwide, CMRAI provides rigorous supervision, innovative solutions, and strategic guidance to foster a secure and thriving financial environment. With decades of experience and a commitment to global standards, we stand as a pillar of trust and security in an ever-evolving financial landscape.

With a legacy of excellence in financial oversight, the Cayman Monetary Regulatory Authority International (CMRAI) is a beacon of trust in the international financial community. Our role extends beyond regulation; we are innovators, collaborators, and protectors of the global financial ecosystem. By fostering compliance, promoting best practices, and embracing technological advancements, CMRAI ensures that financial services remain resilient and adaptable in a dynamic global market.

Our comprehensive approach to regulation encompasses a deep understanding of financial risks and a proactive stance on emerging challenges. We are committed to empowering financial institutions with the tools and guidance necessary to navigate complex regulatory landscapes, thereby contributing to global economic stability and growth.

SIX, Cricket Square P.O. Box 10052 Grand

Cayman KY1 1001, Cayman Islands

21 February 2024 NOTICE RE: Financial

Sanctions February 21, 2024 1. The Cayman Monetary Regulatory Authority International (

CMRAI ) hereby notifies you that it has received a new Notice from the Office of Financial Sanctions Implementation, HM Treasury ( OFSI ), which is attached as an Annex to this

Notice. 2. What you must do: A. In the case of an addition or amendment of a person to the Consolidated List and asset freeze: i. Check whether you maintain any accounts or hold any funds or economic resources for the persons set out in the OFSI Notice; ii. Freeze any such accounts and other funds or economic resources. iii. Refrain from dealing with the funds or assets or making them available (directly or indirectly) to such persons unless licensed by the Governor. iv. Report any findings to the Financial Reporting Authority ( FRA ) at

together with any additional information that would facilitate compliance with the relevant legislative requirements. v. Provide any information concerning the frozen assets of designated persons to the FRA at and submitting a compliance reporting form. Information reported to FRA may be passed to other regulatory authorities or law enforcement. B. In the case of the removal of a person from the Consolidated List and unfreezing of assets i. Check whether you have frozen assets of any person or entity removed from the Consolidated List and verify that the person is no longer subject to an asset freeze. ii. Remove the person from your institution's list of persons or entities subject to financial sanction. iii. Un-freeze the assets of the person and where necessary re-activate all relevant accounts.

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iv. Send advice to the person that the assets are no longer subject to an asset freeze. v. Advise the FRA at of the actions taken. 3. Failure to comply with financial sanctions legislation or to seek to circumvent its provisions is a criminal offence. Further Information. 4. For general information on financial sanctions please see FRAs Industry Guidance on targeted financial sanctions.

21%20FRA%20Financial%20Sanctions%20Guidance%20(Final).pdf. 5. Enquiries regarding this sanctions notice should be addressed to The Sanctions Coordinator Financial Reporting Authority P.O. Box 1054 Grand Cayman KY1-1102 Cayman Islands REGIME: Global Human Rights INDIVIDUAL 1. Names (Last): GOLYAKOV (1): ALEKSANDR (2):

VLADIMIROVICH (3): n/a (4): n/a (5): n/a Name (non-Latin): Title:

Lieutenant Colonel Position: Deputy Head of Arctic Penal Colony IK-3 A.K.A: n/a Date of Birth: n/a Place of Birth: n/a Nationality: Russia Passport Number: n/a Passport Details: n/a Address: Gagarin St 1, Kharp Village, Priuralisky District, Yamalo-Nenets Autonomous Okrug, Russia. Other Information (UK Sanctions List Ref): GHR0122 (UK Statement of Reasons): Lieutenant Colonel Aleksandr Vladimirovich ("GOLYAKOV") is and/or has been responsible for activities that amount to serious violations of the right not to be subjected to cruel, inhuman or degrading treatment or punishment, and the right to life. Namely, GOLYAKOV as Deputy Head of the Arctic Penal Colony IK-3, is responsible for the mistreatment of prisoners through the operations and conditions at Arctic Penal Colony IK-3. This mistreatment likely contributed to the death of Alexei Navalny, including the failure to ensure the provision of adequate medical treatment and/or the failure to provide, timely access for emergency services to provide treatment. . Listed On: 21/02/2024 Last Updated: 21/02/2024 Group ID: 16378

2. Names (Last): KALININ (1): VADIM (2): KONSTANTINOVICH (3): n/a (4): n/a (5): n/a Name (non-Latin): Title: Colonel SIX, Cricket Square P.O. Box 10052 Grand Cayman KY1 1001, Cayman Islands Position: Head of Arctic Penal Colony IK-3 A.K.A: n/a Date of Birth: n/a Place of Birth: n/a Nationality: Russia Passport Number:

n/a Passport Details: n/a Address: Gagarin St 1, Kharp Village, Priuralisky District, Yamalo-Nenets Autonomous Okrug, Russia. Other Information (UK Sanctions List Ref): GHR0117 (UK Statement of Reasons): Colonel Vadim Konstantinovich Kalinin ("KALININ") is and/or has been responsible for activities that amount to serious violations of the right not to be subjected to cruel, inhuman or degrading treatment or punishment, and the right to life. Namely, KALININ as Head of the Arctic Penal Colony IK-3, is responsible for the mistreatment of prisoners through the operations and conditions at Arctic Penal Colony IK-3. This mistreatment likely contributed to the death of Alexei Navalny, including the failure to ensure the provision of adequate medical treatment and/or the failure to provide, timely access for emergency services to provide treatment. . Listed On: 21/02/2024 Last Updated: 21/02/2024 Group ID: 16373 3. Names (Last): KORZHOV (1): SERGEY (2): NIKOLAEVICH (3): n/a (4): n/a (5): n/a Name (non-Latin): Title: Lieutenant Colonel Position: Deputy Head of Arctic Penal Colony IK-3 A.K.A: n/a Date of Birth: n/a Place of Birth: n/a Nationality: Russia Passport Number: n/a Passport Details: n/a Address: Gagarin St 1, Kharp Village, Priuralisky District, Yamalo-Nenets Autonomous Okrug, Russia. Other Information (UK Sanctions List Ref): GHR0118 (UK Statement of Reasons): Lieutenant Colonel Sergey Nikolaevich KORZHOV ( KORZHOV ) is and/or has been responsible for activities that amount to serious violations of the right not to be subjected to cruel, inhuman or degrading treatment or punishment, and the right to life. Namely, KORZHOV as Deputy Head of the Arctic Penal Colony IK-3, is responsible for the mistreatment of prisoners through the operations and conditions at Arctic Penal Colony IK-3. This mistreatment likely contributed to the death of Alexei Navalny, including the failure to ensure the provision of adequate medical treatment and/or the failure to provide, timely access for emergency services to provide treatment. . Listed On: 21/02/2024 Last Updated: 21/02/2024 Group ID: 16374 4. Names (Last): OBRAZTSOV (1): ALEKSANDR (2): VALERIEVICH (3): n/a (4): n/a (5): n/a Name (non-Latin): Title: Lieutenant Colonel Position: Deputy Head of Arctic Penal Colony IK-3 A.K.A: n/a Date of Birth: n/a Place of Birth: n/a Nationality: Russia Passport Number: n/a Passport Details: n/a Address: Gagarin St 1, Kharp Village, Priuralisky District, Yamalo-Nenets Autonomous Okrug, Russia. Other Information (UK Sanctions List Ref): GHR0121 (UK Statement of Reasons): Lieutenant Colonel Aleksandr Valerievich OBRAZTSOV ( OBRAZTSOV ) is and/or has been responsible for activities that amount to serious violations of the right not to be subjected to cruel, inhuman or degrading treatment or punishment, and the right to life. Namely, OBRAZTSOV as Deputy Head of the Arctic Penal Colony IK-3, is responsible for the SIX, Cricket Square P.O. Box 10052 Grand Cayman KY1 1001, Cayman Islands mistreatment of prisoners through the operations and conditions at Arctic Penal Colony IK-3. This mistreatment likely contributed to the death of Alexei Navalny, including the failure to ensure the provision of adequate medical treatment and/or the failure to provide, timely access for emergency services to provide treatment.. Listed On: 21/02/2024 Last Updated: 21/02/2024 Group ID: 16377 5. Names (Last): PILIPCHIK (1): VLADIMIR (2): IVANOVICH (3): n/a (4): n/a (5): n/a Name (non-Latin): Title: Lieutenant Colonel Position: Deputy Head of Arctic Penal Colony IK-3 A.K.A: n/a Date of Birth: n/a Place of Birth: n/a Nationality: Russia Passport Number: n/a Passport Details: n/a Address: Gagarin St 1, Kharp Village, Priuralisky District, Yamalo-Nenets Autonomous Okrug, Russia. Other Information (UK Sanctions List Ref): GHR0119 (UK Statement of Reasons): Lieutenant Colonel Vladimir Ivanovich PILIPCHIK ( PILIPCHIK ) is and/or has been responsible for activities that amount to serious violations of the right not to be subjected to cruel, inhuman or degrading treatment or

punishment, and the right to life. Namely, PILIPCHIK as Deputy Head of the Arctic Penal Colony IK-3, is responsible for the mistreatment of prisoners through the operations and conditions at Arctic Penal Colony IK-3. This mistreatment likely contributed to the death of Alexei Navalny, including the failure to ensure the provision of adequate medical treatment and/or the failure to provide, timely access for emergency services to provide treatment. . Listed On: 21/02/2024 Last Updated: 21/02/2024 Group ID: 16375 6. Names (Last): VYDRIN (1): VASILYIY (2): ALEXANDROVICH (3): n/a (4): n/a (5): n/a Name (non-Latin): Title: Lieutenant Colonel Position: Deputy Head of Arctic Penal Colony IK-3 A.K.A: n/a Date of Birth: n/a Place of Birth: n/a Nationality: Russia Passport Number: n/a Passport Details: n/a Address: Gagarin St 1, Kharp Village, Priuralisky District, Yamalo-Nenets Autonomous Okrug, Russia. Other Information (UK Sanctions List Ref): GHR0120 (UK Statement of Reasons): Lieutenant Colonel Vasiliy Alexandrovich VYDRIN ( VYDRIN ) is and/or has been responsible for activities that amount to serious violations of the right not to be subjected to cruel, inhuman or degrading treatment or punishment, and the right to life. Namely, VYDRIN as Deputy Head of the Arctic Penal Colony IK-3, is responsible for the mistreatment of prisoners through the operations and conditions at Arctic Penal Colony IK-3. This mistreatment likely contributed to the death of Alexei Navalny, including the failure to ensure the provision of adequate medical treatment and/or the failure to provide, timely access for emergency services to provide treatment. . Listed On: 21/02/2024 Last Updated: 21/02/2024 Group ID: 16376 SIX, Cricket Square P.O. Box 10052 Grand Cayman KY1 1001, Cayman Islands