

4.24 FINANCIAL SANCTIONS POLICY

1 INTRODUCTION

- 1.1 Virtus is committed to ethical standards of business conduct and adopts a zero-tolerance approach to financial misconduct. The purpose of this policy is to ensure that Virtus complies with sanctions laws and regulations issued by the UK and US governments.
- 1.2 Sanctions are imposed by the UK and other governments to uphold international peace and security. Sanctions prohibit or restrict the transfer of certain items, services and economic resources to designated individuals, organisations and countries. In addition to UK law, Virtus may also have to comply with certain US sanctions, which often apply more restrictions than UK measures.
- 1.3 This policy aims to clarify which activities are within the scope of sanctions law and which are not. It outlines how Virtus will assess activities so that it can make informed decisions about which activities it can undertake.
- 1.4 Virtus is legally required to comply with sanctions as determined by UK and, in certain cases, US law. Non-compliance could lead to fines, withdrawal of funding, and reputational damage. Compliance with US sanctions are not a legal requirement, but as an international organisation, in practice we must take these into account. In practice this means we cannot make payments to or receive funds from countries and individuals named on the US sanctions list.

2 SCOPE

- 2.1 This policy is relevant to all Virtus and officers who propose to conduct any activity with individuals or entities ('person') in, from or with links to sanctioned countries. No substantive contacts with such persons may proceed without prior written approval from the Executive Director.
- 2.2 A list of sanctioned countries is available below. These are divided into two categories: Broadly and Narrowly Restricted Countries.
 - i) **A Narrowly Restricted Country** is subject to closely cast sanctions targets, the majority of which are focused on the prohibition of activities related to the trading of weapons. For all proposed activities with persons in or from to an narrowly restricted country, an assessment must be completed using the [financial sanctions assessment template](#). This assessment screens countries against the UK and US sanctions lists. Any decision to continue to work with a person from a narrowly restricted country must be approved by the Executive Director.
 - ii) **A Broadly Restricted Country** is subject to a wide range of sanctions measures with a significant list of individuals who are subject to sanctions. For all proposed activities with persons in or from a broadly restricted country an assessment must be completed using the [financial sanctions assessment template](#). This assessment screens countries against the UK and US sanctions lists. Any decision to continue to work with a person from a broadly restricted country must be approved by the Executive Director and ratified by the Governing Board. Virtus will conduct



enhanced checks on the proposed organisation or individual. If the proposal is approved, then assessments will be routinely repeated in case they become newly subject to sanctions. If work with a sanctioned person is approved, then enhanced compliance measures may need be followed, including a regular review of activity and associated risk.

3 AFFECTED COUNTRIES

- 3.1 A list of affected countries is provided in Appendix 1 below.
- 3.2 All activities with any individual or organisation from or based in these countries must be referred to the Executive Director in advance of any agreement being signed.
- 3.3 Whilst these countries may be accepted into Virtus membership and participate in competition – in line with international sport – this can only be done under very strict criteria including:
 - i) Waiver of any membership and/or athlete fees – Virtus cannot accept fees by bank transfer or other means from these countries
 - ii) Entry to competition is subject to the laws that exist within the host country. Any competition fees are strictly and entirely subject to agreement between the host and the nation concerned.

4 RESPONSIBILITY

- 4.1 The Virtus Finance Committee will be responsible for amendments to the country list and any changes to the assessment template and the procedures for its submission and review.
- 4.2 A sanctions check must be performed where a transaction is proposed with any individual who is a national of or is based in a broadly or narrowly restricted country or any organisation operating from a base within or registered in a broadly or narrowly restricted country. A transaction in this case refers to contracting with a third party which may give rise to a payment or a receipt of money. In every instance Virtus must conduct a check on the third-party payer/recipient or rely upon a check performed by another organisation such as a financial service provider. This includes all athlete coming from a narrowly or broadly restricted country and they will check against the [Office of Financial Sanctions Implementation](#) and the [Office of Foreign Assets Control - Sanctions Programs and Information](#)
- 4.3 Assessments are undertaken by the Executive Director and approved by the Finance Committee.
- 4.4 If dealings with a person based in or working with a BRC are approved, the Executive Director will support the relevant department undertake an assessment review, this should take place at a minimum of every two years (depending on risk) of such a person.
- 4.5 In the event of a suspected breach of applicable sanctions laws, whoever uncovered it will report this immediately to the Executive Director or Chair of the Virtus Finance Committee. If a breach is found to have occurred, it will be reported to the Office of



Financial Sanctions Implementation (OFSI) following OFSI guidelines: [Reporting information to OFSI – what to do - GOV.UK[(www.gov.uk) - In respect of trade sanctions: [HM Revenue and Customs following HMRC guidelines](#)

Policy Updated 1.12.2025

Appendix 1: Financial sanctions country list

In line with the [UK Sanctions List](#):

1. Broadly restricted countries (BRCs)

- Cuba
- Crimea, Donetsk, Luhansk, Kherson & Zaporizhzhya (Ukraine)
- Iran
- North Korea
- Syria
- Sudan
- Venezuela

2. Narrowly restricted countries (NRCs)

(Subject to trade restrictions and/or limited Sanctions on specific government agencies, officials etc.)

- | | |
|--------------------------------------|-------------------|
| • Afghanistan | • Mali |
| • Belarus | • Myanmar (Burma) |
| • Burundi | • Nicaragua |
| • Central African Republic | • Somalia |
| • Democratic Republic of the Congo | • South Sudan |
| • Guinea & Republic of Guinea-Bissau | • Tunisia |
| • Iraq | • Yemen |
| • Lebanon | • Zimbabwe |
| • Libya | |



Appendix 2: Financial sanctions assessment template

Sanctions review approval form	
Prepared by	
Requested by (name and position)	
Full name and address of person/entity being assessed	
Supporting documents (if applicable)	
Strategic context	
Governance	Contracts and other agreements are governed by UK and international sanctions law, international financial regulations and Virtus policy.
Level 1 - recommendation	<p>I confirm that the checks performed do/ do not reveal any sanctions restrictions relating to this person/entity [delete as appropriate] Further comments (if any):</p> <p>Signature:</p> <p>[name of Prepared by...] [Role of Prepared by...]</p>
Level 2 - approval	<p>I approve/ do not approve/ pass for further review [delete as appropriate] Further comments (if any):</p> <p>Signature:</p> <p>[name of Prepared by...] [Role of Prepared by...]</p>
Level 3 - special approval	<p>I approve/ do not approve engaging with this person/entity [delete as appropriate] Further comments (if any):</p> <p>Signature:</p> <p>[name of Prepared by...] [Role of Prepared by...]</p>



Sanctions review detailed assessment		
Sanctions register ref number		
Person/Entity full name		
Person/Entity address		
Person/Entity country/ies based in		
Date of request		
Date of checks		
Date of review		
Cleared for use?		
Detailed information		
Is/are the country/ies in which the person/entity is based a country on Virtus' list of sanctioned countries?		<i>[comment if needed]</i>
Is the person/entity itself on any sanctioned list?		<i>[comment if needed]</i>
For entities based in BRCs only: Are any controlling parties on any sanctions list?		<i>[comment if needed]</i>
Checks carried out (insert more rows as needed)		
Name	United Kingdom	USA

Controlling parties hold more than 50% of the beneficial ownership of the entity.