Legal advisory services provided (directly or indirectly) by (1) foreign or UK persons in the UK; or (2) UK persons worldwide: to any non-UK person in relation to, or in connection with an activity occurring outside of the UK, which, had it occurred in the UK or involved UK persons, would have breached the Russia Regulations.

Legal advisory services includes any of the following:

- The application or interpretation of law
- Commercial transactions, negotiations or any other dealings with a third party
- Preparing, executing or verifying legal documents

PROHIBITED

unaffected by the General Licence.

This is the essence of the legal advisory services prohibition and is It requires an understanding of the types of activities prohibited by the Russia Regulations, and affects, in particular, lawyers advising on commercial transactions.





Legal advisory services as to whether an act or a proposed act complies with, or could trigger punitive measures (which includes administrative penalties) in relation to, restrictive measures (including sanctions, export and import controls) on or concerning Russia or Russia-controlled Ukrainian territory imposed by any jurisdiction.

Legal advisory services in relation to or in connection with compliance with, or addressing the risk of punitive measures (which includes administrative penalties) in relation to: (i) restrictive measures (including sanctions, export and import controls) on or concerning Russia or Russia-controlled Ukrainian territory, **imposed by any jurisdiction** (ii) any laws of Russia that have as their object or effect the frustration of any laws specified at (i) (including any sanctions, export or import controls or other restrictive measures imposed by Russia), or (iii) any criminal law **imposed by any jurisdiction**.

Any act done by a person in satisfaction of a **prior obligation** arising under a contract concluded before 30 June 2023 (or an ancillary contract necessary for the satisfaction of such a contract) provided that the act is carried out before the end of **29 September 2023** and the person notifies the Secretary of State of the provision of services before or after the act is carried out by the end of 29 September 2023.

PERMITTED Paragraphs 1(a) and (b) of the Licence

PERMITTED

Regulation 60DB(4) of the Russia Regulations