

On 24 April 2025, the UK government brought into force the Russia (Sanctions) (EU Exit) (Amendment) Regulations 2025 (SI 2025/504), introducing a significant expansion of the UK's existing sanctions framework targeting Russia.

These amendments build on previous measures by broadening the categories of restricted exports and services, reinforcing enforcement mechanisms, and introducing additional import bans. The changes are intended to curtail Russia's access to advanced technologies, industrial inputs and revenue sources that contribute to its war effort in Ukraine.

Among the new trade restrictions is a ban on the export of certain commercial goods that have been identified as having military applications, such as gaming console controllers, which UK authorities have determined are being repurposed by Russian forces to control drones. This reflects a broader shift in the UK's approach toward targeting "dual-use" civilian technologies that are being diverted for military use. These measures are part of a wider package that adds over 150 new goods' classifications to the current list of targeted items.

The amendment introduces four newly defined categories of restricted items into Schedule 3 of the 2019 regulation: energy-related technology; G7 dependency and further technology; Russia's vulnerable technology; and sectoral software and technology. These categories are broadly defined and are designed to capture items that are not already listed under existing UK strategic export. This layered approach avoids duplication while closing critical gaps in coverage, particularly in relation to Russia's reliance on foreign-sourced industrial equipment, precision tools and advanced electronics.

Each new category is subject to prohibitions not only on direct exports and transfers to Russia or persons connected with Russia but also on the transfer of goods or technology from third countries if they are ultimately destined for use in Russia.

The newly established "sectoral software and technology" category is especially notable. It prohibits the transfer and provision of certain types of software, such as enterprise resource planning (ERP) software, industrial design applications, and oil and gas exploration tools, when intended for use in Russia or by Russian-connected entities. These restrictions explicitly extend to intangible transfers, such as downloads and cloud-based services. The provision of associated services (technical assistance, brokering and financial services) in connection with this software is likewise prohibited. The underlying rationale is to prevent Russia from accessing Western expertise and tools that enhance the efficiency and resilience of its sanctioned industries.

In addition to export-related controls, the amendment extends existing import bans to cover synthetic diamonds originating from or processed in Russia, even when routed through third countries. This closes a known loophole in previous restrictions on natural diamonds and aims to prevent circumvention via intermediary jurisdictions. The regulations also introduce a ban on imports of helium and helium-3 from Russia, targeting strategic inputs relevant to aerospace and nuclear sectors, and aiming to deprive Russia of emerging sources of hard currency.

To support compliance, the amendment includes transitional provisions that exempt certain acts carried out under preexisting contracts, provided that the contracts were concluded before 23 April 2025 and that the relevant activities are completed by 22 July 2025. Notification to the secretary of state is required for such transitional use. Exemptions also apply for noncommercial and personal use of software and technology falling under the new sectoral controls.

This package of measures marks a decisive tightening of the UK's sanctions regime, reflecting a policy shift toward the proactive identification and interdiction of dual-use civilian goods and technologies that can be repurposed for Russian military use. Businesses engaged in any form of trade or technical cooperation with Russian counterparties, or with complex supply chains touching Russia, should urgently review their compliance policies, contract inventories, licensing status and risk exposure under the newly expanded rules.

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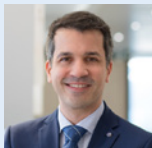
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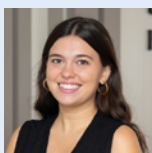
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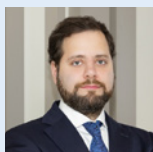
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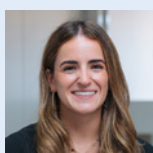
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