



Financial Sanctions

The University must comply with UK and international sanctions laws. Non-compliance could lead to fines, withdrawal of funding, and reputational damage.

Financial Sanctions are enforced by the UK government and prohibit UK organisations from carrying out transactions with individuals, entities and countries facing sanctions. The [UK Government Website](#) is regularly updated with the latest information and lists of individuals facing financial sanctions.

The University must comply with the requirements imposed on it by the bank that it has an established relationship with. It must also comply with bank policies with respect to any financial transactions with sanctioned/ high risk countries, business entities or individuals.

Forbidden	Business relationship is forbidden.	Cuba, Iran, North Korea, Syria, Venezuela, Crimea/Sevastopol
Higher Risk	Any work that is planned with the governments, government agencies or government owned entities may be subject to enhanced Know Your Customer checks.	Afghanistan, Belarus, Burundi, Central African Republic, Democratic Republic of Congo, Egypt, Republic of Guinea, Republic of Guinea-Bissau, Iraq, Lebanon, Libya, Mali, Myanmar (Burma), Nicaragua, Russia, Somalia, South Sudan, Sudan, Tunisia, Ukraine, Yemen, or Zimbabwe

Brunel University London is fully committed to and has a legal obligation to comply with these sanctions. Payments to or receipts from countries, business entities or individuals that are subject to sanctions will present problems as all transactions are subject to bank clearance or approval.

The following activities require consideration:

1. Recruitment of students;
2. Formal research collaborations;
3. Informal collaborations;

It is important that problems are prevented from arising by being aware of the application of any sanctions BEFORE any obligation to pay or receive funds from/ to a sanctioned country. As such, it is vitally important that checks are undertaken before any agreement, or

contract has been signed or agreed verbally in instant preventing students to register to the study who intends to make a payment from a sanction country or Origin of fund is from sanction country

Always consult Income & Credit Control when any activities relating to sanctioned countries are initially discussed. Any request to commence business relationships or process payments relating to sanctioned countries will be assessed on a case by case basis by the University Senior Management to ensure all risks are assessed and compliance issues addressed.

Forbidden Countries

The University must not maintain relationships, process payments to or from, or undertake commercial transactions with entities or individuals based in the countries listed as 'Forbidden'.

Transactions flagged despite prior warnings from Forbidden Sanctioned Countries should be referred to Income & Credit Control Department immediately. The department will then submit this information to the University bankers.

Higher Risk Countries

The University must undertake a risk assessment prior to entering into relationships with entities or individuals based in the countries listed as 'Higher Risk', especially information captured from Students at point of admission offer.