FINANCIAL SANCTIONS POLICY

1. Introduction

The University of Glasgow has a legal obligation to follow sanctions regulations and best practice imposed by the UK Government. Sanctions are restrictions placed upon individuals or entire countries, which limit what sorts of business relationship the University can have with them. For example, the University may not be unable to receive funds from certain people or countries or be unable to send money to a country or individual.

The University is committed to ensuring the highest standards of probity in all of its dealings, financial or otherwise. It will therefore ensure that it has in place proper, robust financial and operational controls so that it can protect its funds and ensure continuing public trust and confidence. Some of those controls are intended to ensure that the University complies in full with obligations in respect of international sanctions.

This policy sets out those obligations, the University's response and the procedures to be followed to ensure compliance.

The introduction of this policy also recognises the fact that the University has grown substantially in terms of size and complexity over the last decade, with significant growth in its international reach. As such, the sanctions risks facing the University have grown and must continue to be assessed to ensure ongoing compliance.

This policy is related and complementary to the University's Export control policy, which details the University's policy on compliance with export control regulations for the export of goods, materials, software and/or technology (including research data, designs, and know how). Sanctions may form part of export control restrictions.

2. What are Sanctions?

Sanctions are restrictions on activity with targeted countries, governments, entities, individuals and industries ('targets') that are imposed by individual governments as well as bodies such as the United Nations (UN) and the European Union (EU) to achieve a specific foreign policy or a national security objective. Sanctions can be any of 1) financial 2) trade (including exports, imports and brokering) 3) immigration and 4) transport. Some sanction regimes may be subject to all of these – for example, the current sanctions imposed against Russia.

Sanctioned countries can be defined as broadly restricted (the whole country) or narrowly restricted (only certain entities or individuals). The most important of these are those considered broadly restricted by one of the major authorities (the US, UK, EU and/or UN). A list of broadly sanctioned countries is found in appendix A,

UK financial sanctions measures can take different forms. Examples of these could be:

1. Targeted asset freezes on specified Targets involved in repressive regimes, crime or terrorism. An asset freeze in effect prohibits any form of business or collaboration with any Target;
2. Restrictions on a wide variety of financial markets and services such as Arms or Military; or
3. Directions to cease all business and engagement activity with a specific person, group sector or country

Due to the different goals sanctions are aimed at achieving, the scope of sanctions vary from target to target, and the legislation and requirements can be complex. Sanctions requirements may change dynamically to adopt government or regulatory guidance.

The risk of current or potential sanctions has to be considered when engaging in activity with any overseas entity.

Targets of sanction legislation can be:
- Countries/governments: There are a number of countries widely sanctioned by the UK government, such as Russia, Iran, Afghanistan and Syria. A full list of sanctioned countries is shown in Appendix A.
- Individuals ("Designated Persons") can be identified by consulting the database at: The UK Sanctions List e.g. the Islamic State (ISIS)

For further information on UK sanctions see: UK sanctions regimes .

In addition to UK law, due to the University's commercial relationships with its bankers and insurers, the University has to also comply with sanctions imposed by the USA. Additional countries caught by US sanctions are also noted in Appendix A.

All Higher Education providers must implement the UK's financial sanctions by checking the UK Sanctions List to avoid accepting tuition fees, donations, or research funding from Designated Persons and their controlled entities. We must also comply with US sanctions by referring to the Office of Foreign Asset Control (OFAC) database.

3. Relevant legislation

The UK imposes financial sanctions through a combination of statutory instruments and primary legislation:

- Sanctions and Anti-Money Laundering Act 2018 (Sanctions Act)
- Counter Terrorism Act 2008 (CTA 2008)
- Anti-Terrorism, Crime and Security Act 2001 (ATCSA 2001)
- Policing and Crime Act 2017 – sets the penalties for non-compliance

The University's approach to complying with legislation mirrors its anti- money laundering policy and is intrinsically linked to it, in that the best approach is a robust "know your customer" procedure, regular training, and an understanding of our key risk areas.

4. Policy

1) **Awareness:** All staff, visiting academics and postgraduate research students engaged in relevant disciplines are made aware of how the regulations may apply to their activities, through the provision of relevant University policies, training and guidance. Questions about this policy can be sent to finance-compliance@glasgow.ac.uk. **Risk assessment**: The risk of breaching sanctions policy should be evaluated as part of any risk assessment process conducted by Schools, Colleges and Departments, when considering engagement with new research funders, partners, projects, collaborations, or other activities.

2) **Due diligence:** Due diligence is conducted on a risk assessed basis. Relevant transactions include but are not limited to research contracts, collaborations, staff/student travel, student recruitment and tuition fee income derived from countries or individuals who are deemed to pose risk. Appendix B sets out a list of transactions and services impacted, the required controls/procedures and the responsible department. The purpose of due diligence is to

establish who the University is proposing to do business with and assess the risk this activity poses to the University.

3) **Further assessment if a country is sanctioned:** if the due diligence conducted identifies that there are any sanctioned countries involved (for example, a partner institute located in or individual who is a national of), then a further assessment of whether the specific transaction is subject to sanctions is required. The Financial Sanctions Review Form is to be completed by the relevant department and sent to finance-compliance@glasgow.ac.uk. This form requires approval by the relevant Head of College and the Executive Director of Finance. An outcome of this assessment may be that a proposed activity that is prohibited by Sanctions does not proceed.

4) **Reporting of breaches:** Any suspected breaches which do occur are reported immediately to finance-compliance@glasgow.ac.uk. The Financial Controls, Compliance and Insurance team will review, obtain legal advice if necessary and if confirmed as a breach of sanctions, report to the Office of Financial Sanctions Implementation (OFSI) following their guidelines as well as any other third parties, such as Police Scotland and the National Crime Agency depending on the circumstances.

5) **Internal reviews and audits**: Funders, External Auditors and Internal Audit may perform reviews or audits of the controls and due diligence procedures performed by departments listed in Appendix B.

5. Application and responsibilities

This Policy applies to all staff, students and associated persons of the University. It shall be made generally available and published on the University website. This policy also applies to all University of Glasgow subsidiaries and the University of Glasgow Trust.

Every member of staff and associated person who acts on behalf of, or provides services to, the University is responsible for ensuring that they comply at all times with this Policy.

The Executive Director of Finance is responsible for ensuring that this Policy is implemented and updated regularly.

Heads of School, College and Department are responsible for ensuring that staff within their School/College/Department are made aware of this Policy and follow it. If there is an uncertainty training can be provided or specific advice requested from the financial compliance or due diligence team.

Boards of Directors of University subsidiaries and spin out companies are responsible for ensuring that this policy is followed by the relevant company.

6. Penalties for non-compliance

Breaches of financial sanctions are a serious criminal offence. Offences under sanctions legislation carry maximum penalties of:

- Seven years imprisonment
- Penalties of 50% of the value of the breach or £1m, whichever is greater

7. Other related policies

This policy should be read in conjunction with other relevant policies, including:

- Export control policy
- Financial Regulations

8. Who to contact for more information

For further assistance, please contact: finance-compliance@glasgow.ac.uk

Document control

	By:	Date:
Prepared	Research Assurance	September 2025
Approved	Executive Director of Finance	October 2025

APPENDIX A: Sanctioned Country List

The following list is a combined list of countries which are treated as sanctioned by the University. This list is regularly updated by the Finance Compliance Team but sanctions can change at any time. The most up to date lists of sanctions are at the following links and staff are advised to refer to these:

- UK sanctioned regimes is included in the "Geographic" Section UK sanctions regimes - GOV.UK (www.gov.uk)
- US sanctions is https://ofac.treasury.gov/sanctions-programs-and-country-information

Note that it is possible for nationals of other countries to be sanctioned – the following databases include all individuals and entities which are sanctioned by the UK or US.

- OFSI Consolidated List Search (hmtreasury.gov.uk)
- Office of Foreign Asset Control (OFAC) database.

Countries widely subject to Sanctions
The following are comprehensively sanctioned countries: • Belarus • Iran • North Korea • Russia • Ukraine – Crimea, Donetsk, Luhansk and other occupied territories **The following are also widely sanctioned:** • Afghanistan • Bosnia and Herzegovina • Burundi • Central African Republic • Chechnya • Cuba • Democratic Republic of the Congo • Guinea • Haiti • Iraq • Lebanon • Libya • Mali • Myanmar (Burma) • Nicaragua • Niger • Republic of Guinea-Bissau • Somalia • South Sudan • Sudan • Syria • Venezuela • Yemen • Zimbabwe

APPENDIX B: Transactions and Departments with specific Sanctions responsibilities

Transactions impacted	Department	Contact	Responsibilities
Research Funding	All Colleges or University Services	Research Assurance Officer	• Due diligence on funders, research partners and research service providers • Management of sanctioned countries flagged on Agresso and Research Management Portal
Consultancy / Royalties	Academic Consultancy Service	Research Assurance Officer	
Student recruitment	Student services	Deputy Director of Recruitment and International Relations Finance Operations Manager	• Country level risk assessment and Due Diligence checks on source of tuition fee income for international students where applicable ○ Credit management policy ○ Refunds policy
PGR student recruitment	All PGR supervisors and Graduate Schools	All PGR supervisors and Graduate Schools Finance Operations Manager	• Application in conjunction with banking providers of verification of source of tuition fee income for international students ○ Payments policy ○ Credit management policy ○ Refunds policy
Donations	External Relations	Head of Planning and Development Operations	• Due Diligence checks on source of donations by Gift Acceptance Committee [link to Procedure: University of Glasgow - MyGlasgow - Governance at the University - Corporate Governance at the University - University Level - Gift Acceptance Committee]
Goods & services New suppliers	Procurement	Head of Procurement	• Due Diligence checks on Suppliers responding to tenders, and New Suppliers
Exports	All Colleges	Research Governance and Integrity Team	• Due Diligence checks on proposed exports of goods, software or technology [link to Policy/Procedure: https://www.gla.ac.uk/research/strategy/ourpolicies/exportcontrol/
International Travel	All	Finance – Insurance Team	• Additional insurance approval process for travel to sanctioned countries [link to Procedure: University of Glasgow - MyGlasgow - Finance: Insurance - Travel Insurance - Travel Insurance - Additional Information]