



25 March 2024

## **NOTICE**

### **RE: Financial Sanctions**

1. The Cayman Islands Monetary Authority ("CIMA") hereby notifies you that it has received a new Notice from the Office of Financial Sanctions Implementation, HM Treasury ("OFSI"), which is attached as an Annex to this Notice.
2. **What you must do:**
  - A. In the case of an addition or amendment of a person to the [Consolidated List](#) and asset freeze:
    - i. Check whether you maintain any accounts or hold any funds or economic resources for the persons set out in the OFSI Notice;
    - ii. Freeze any such accounts and other funds or economic resources.
    - iii. Refrain from dealing with the funds or assets or making them available (directly or indirectly) to such persons unless licensed by the Governor.
    - iv. Report any findings to the Financial Reporting Authority ("FRA") at [financialsanctions@gov.ky](mailto:financialsanctions@gov.ky) together with any additional information that would facilitate compliance with the relevant legislative requirements.
    - v. Provide any information concerning the frozen assets of designated persons to the FRA at [financialsanctions@gov.ky](mailto:financialsanctions@gov.ky) and submitting a compliance reporting form. Information reported to FRA may be passed to other regulatory authorities or law enforcement.
  - B. In the case of the removal of a person from the [Consolidated List](#) and unfreezing of assets
    - i. Check whether you have frozen assets of any person or entity removed from the Consolidated List and verify that the person is no longer subject to an asset freeze.
    - ii. Remove the person from your institution's list of persons or entities subject to financial sanction.
    - iii. Un-freeze the assets of the person and where necessary re-activate all relevant accounts.
    - iv. Send advice to the person that the assets are no longer subject to an asset freeze.

- v. Advise the FRA at [financialsanctions@gov.ky](mailto:financialsanctions@gov.ky) of the actions taken.
3. Failure to comply with financial sanctions legislation or to seek to circumvent its provisions is a criminal offence.

**Further Information.**

4. For general information on financial sanctions please see FRAs Industry Guidance on targeted financial sanctions.  
<https://fra.gov.ky/guides-to-financial-sanctions/>.
5. Enquiries regarding this sanctions notice should be addressed to  
The Sanctions Coordinator  
Financial Reporting Authority  
P.O. Box 1054  
Grand Cayman KY1-1102  
Cayman Islands  
[FinancialSanctions@gov.ky](mailto:FinancialSanctions@gov.ky)

**REGIME: Cyber**

**INDIVIDUAL**

1. **Names (Last):** NI (1): GAOBIN (2): n/a (3): n/a (4): n/a (5): n/a

**Name (non-Latin):** 倪高彬

**Title:** n/a

**Position:** n/a

**A.K.A:** n/a

**Date of Birth:** 27/10/1985

**Place of Birth:** Jingzhou Municipality

**Nationality:** China

**Passport Number:** n/a **Passport Details:** n/a

**Address:** Hubei Province, China.

**Other Information** (UK Sanctions List Ref): CYB0046 (UK Statement of Reasons): NI Gaobin, a member of Advanced Persistent Threat Group 31 (APT31), is, or has been, involved in relevant cyber activity, including being responsible for, engaging in, or providing support for the commission, planning, or preparation of relevant cyber activity. This included the preparation for, and/or the provision of support to, sophisticated cyber activity, including spear-phishing campaigns and information systems interference which resulted in the unauthorised access to, and exfiltration of, sensitive data. Such campaigns included cyber activities targeting officials, government entities and parliamentarians conducted by APT31 against such individuals in the UK and internationally. As such, NI Gaobin, is a member, and an involved person in the activity of the APT31 group operating on behalf of the Chinese Ministry of State Security (MSS) as part of the PRC's state-sponsored apparatus and himself has engaged in relevant cyber activity, in support of malicious cyber activity that targeted officials, government entities and parliamentarians. This action undermined, or was intended to undermine, the integrity, prosperity and security of UK and international organisations and individuals engaged in political and democratic processes..

**Listed On:** 25/03/2024

**Last Updated:** 25/03/2024

**Group ID:** 16462

2. **Names (Last):** ZHAO (1): GUANGZONG (2): n/a (3): n/a (4): n/a (5): n/a

**Name (non-Latin):** 赵光宗

**Title:** n/a

**Position:** n/a

**A.K.A:** n/a

**Date of Birth:** 12/11/1985

**Place of Birth:** Jingzhou Municipality

**Nationality:** China

**Passport Number:** n/a **Passport Details:** n/a

**Address:** Hubei Province, China.

**Other Information** (UK Sanctions List Ref): CYB0045 (UK Statement of Reasons): ZHAO Guangzong, a member of Advanced Persistent Threat Group 31 (APT31), is, or has been, involved in relevant cyber activity, including being responsible for, engaging in, or providing support for the commission, planning, or preparation of relevant cyber activity. This included the preparation for, and/or the provision of support to, sophisticated cyber activity, including spear-phishing campaigns and information systems interference which resulted in the unauthorised access to, and exfiltration of, sensitive data. Such campaigns included cyber activities targeting officials, government entities and parliamentarians conducted by APT31 against such individuals in the UK and internationally. As such, ZHAO Guangzong, is a member, and an involved person in the activity of the APT31 group operating on behalf of the Chinese Ministry of State Security (MSS) as part of the PRC's state-sponsored apparatus and himself has engaged in relevant cyber activity, in support of malicious cyber activity that targeted officials, government entities and parliamentarians. This action undermined, or was intended to undermine, the integrity, prosperity and security of UK and international organisations and individuals engaged in political and democratic processes..

**Listed On:** 25/03/2024

**Last Updated:** 25/03/2024

**Group ID:** 16461

## ENTITY

1. **Name:** WUHAN XIAORUIZHI SCIENCE AND TECHNOLOGY COMPANY LIMITED

**A.K.A:** n/a

**Other Information** (UK Sanctions List Ref): CYB0044 (UK Statement of Reasons): WUHAN XIAORUIZHI SCIENCE AND TECHNOLOGY COMPANY LIMITED is associated with Advanced Persistent Threat Group 31 (APT31) and is, or has been, involved in relevant cyber activity, including being responsible for, engaging in, or providing support for the commission, planning, or preparation of relevant cyber activity on behalf of the Chinese State. This included the preparation for, and/or the provision of support to, sophisticated cyber activity, including spear-phishing campaigns and information systems interference which resulted in the unauthorised access to, and exfiltration of, sensitive data. Such campaigns included cyber activities targeting officials, government entities and parliamentarians conducted by APT31 against such individuals in the UK and internationally. As such, WUHAN XIAORUIZHI SCIENCE AND TECHNOLOGY COMPANY LIMITED, is an associated person in the activity of the APT31 group operating on behalf of the Chinese Ministry of State Security (MSS) as part of the PRC's state-sponsored apparatus and itself has engaged in relevant cyber activity, in support of

malicious cyber activity that targeted officials, government entities and parliamentarians. This action undermined, or was intended to undermine, the integrity, prosperity and security of UK and international organisations and individuals engaged in political and democratic processes..

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**Group ID:** 16460