

Chinese Firms Sanctioned by British Government

Introduction

In August 2022, the UK government, under the National Security and Investment Act 2021 (NSIA), blocked two deals involving Chinese companies:

1. Beijing Infinite Vision Technology Company Ltd. was prevented from licensing vision-sensing technology from the University of Manchester due to concerns over potential military applications.
2. Super Orange HK Holding Ltd, a Hong Kong-incorporated entity, was blocked from acquiring Pulsic Ltd., a UK electronic design automation company, over similar national security concerns. Super Orange HK is reported to be controlled by a Shanghai-based entity which has Chinese state backing and develops chip design software.

These actions reflect the UK's cautious stance on foreign acquisitions involving sensitive technologies.

Political Viability of Lifting Sanctions

The political viability of lifting UK-imposed sanctions on Chinese firms remains low.

Many of the firms listed above have been sanctioned under Russia (sanctions) (EU Exit) Regulation 2019, with assets frozen in an attempt to target and halter Russian supply chains, mainly as China has been used to circumvent previous sanctions. Russia-China trade reached new heights in 2024, reaching \$237 billion, surging from just \$147 billion in 2021, underpinning its significance in Moscow's military-industrial complex.

UK-China relations are currently in a tricky place. The Conservative party, particularly with Rishi Sunak and his backbenchers, significantly deteriorated relations due to bilateral disputes

over China. These include a 2021 attack on the Electoral Commission, which leaked voter data, and personal attacks allegedly carried out by the APT31 group, on Sir Iain Duncan Smith, Tim Loughton, Lord Alton of Liverpool, and Stewart McDonald, causing the UK to announce sanctions on Wuhan Xiaorui Science and Technology Company, along with two individuals, Zhao Guangzong and Ni Gaobin, who are linked to APT31.

Furthermore, ongoing changes in the United States will also complicate matters, as the UK will continue to appease the US to maintain beneficial trade relations. This dynamic is particularly significant in the light of Trump's new barrage of tariffs, seeing the UK imposed with a 10% baseline, and 25% for cars. Kier Starmer has stated he wants to overturn these US tariffs as part of a wider 'economic deal' with the Trump administration.

Kier Starmer and Rachel Reeves have been seeking to enhance relations with China, as evidenced by her visit to China and subsequent talks with He Lifeng, co-hosting the UKChina Economic & Financial Dialogue. This dialogue aimed to restart discussions on financial and capital markets, building on the 'commitment to explore deeper economic cooperation' between Prime Minister Sir Keir Starmer and President Xi, made during last year's meeting in Brazil. Their government have also backed a new plan for Beijing's new, controversial embassy in London. This could indicate a shift coming.

The most recent wave of sanctions in February 2025 targeted 107 entities in further efforts to disrupt Putin's supply chains. Foreign Secretary David Lammy stated that these sanctions were "the largest in almost three years" and "underscores the UK's commitment to Ukraine". However, this new wave of sanctions comes at a tricky time for the UK, where they seek to balance their drive for economic growth with lingering concerns over China's policy, including their support for Putin. This is further complicated by the US's more confrontational approach to Beijing, especially with the looming rise of another potential prolonged trade war between the two giants.

Kier Starmer came out on 27th March reaffirming that "now is not the right time to lift sanctions against Moscow", maintaining that sanctions will remain in place or increase until the unconditional withdrawal of Russian troops from Ukraine. Any significant change in the sanctions would likely be met with strong backlash from MPs in parliament, especially given the UK's strong stance on Ukraine and their continued support for them. In late February and March 2025, the UK increased their support for Ukraine, including a new £2.26 billion loan to bolster Ukraine's defence capabilities. Any lifting of sanctions on Chinese firms would be counteractive to the UK's continued financial support.

The UK has joined the EU and the US in targeting Chinese firms that supply dual-use goods to Russia, supporting Moscow's military-industrial complex. Given this backdrop, it is unlikely that the UK would unilaterally remove sanctions without a significant policy shift. Lifting sanctions would likely have wider geopolitical effects, putting strain on the UK's relationship with the EU, G7, and G20 partners. This point becomes even more pertinent in the light of Trump's tariffs, as unless Kier Starmer can strike a free trade deal with the US in the coming months, the UK will likely seek to expedite negotiations aimed at resetting their relations with the EU. A summit on the 19th of May 2025 is already set to take place between the EU and the UK, with the goal of establishing a more robust and cooperative post-Brexit framework. A strengthening of relations between the UK and the EU would further reduce the likelihood of lifting sanctions.

It therefore remains the case that for Chinese firms sanctioned by the UK government, the only current way to be delisted is by proving they no longer supply Russia, have cut ties with any previously sanctioned individuals, and/or have undergone an independent audit. In such cases, there may be grounds for reconsideration.

Procedures of Revocation on the UK sanctions list:

Regarding the procedure for removing a company from the UK's sanctions list, designated entities have the right to request a variation or revocation of their designation under Section 23 of the Sanctions Act. The process involves submitting a Sanctions Review Request Form, accompanied by supporting evidence that justifies the request.

You should provide evidence supporting your request, alongside a completed Sanctions Review Request Form. You should only include relevant evidence of the explanation you have set out as to why your designation should be varied or revoked, or why your name should be removed from the relevant UN list.

LLC Synesis's Unsuccessful Delisting Application (March 2023):

A pertinent example is the case of LLC Synesis, a Belarusian technology company that developed surveillance software capable of using CCTV to track people and vehicles. Synesis challenged its designation under the UK's sanctions regime, applying for a ministerial review, which was upheld by the Secretary of State. Synesis then initiated a court review, marking the first judicial review of a sanctions listing under the Sanctions and Anti-Money Laundering Act 2018. The English court upheld the designation, demonstrating the challenges entities face in contesting sanctions. The court's decision highlighted the broad discretion granted to the Secretary of State in assessing information and making designation decisions.

Minerva Marine Inc.'s Delisting by the EU (November 2023):

Minerva Marine Inc., a Greek oil tanker company, was initially listed as an "International Sponsor of War" due to its activities related to Russian oil transportation. After agreeing to cease all Russian trade and publicly condemning Russian aggression, the company was removed from the list in November 2023.

It is worth noting in this case that Ukraine initiated the delisting of this Greek company as part of a strategy to secure Athen's support for the EU's 11th package of sanctions against Russia, whose refusal would have spelt the definitive end to a joint European response to the 11th package.

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Appendix

The following firms have been sanctioned under The Russia (Sanctions) (EU Exit) Regulations 2019, which imposes financial, director disqualification, trade, aircraft, shipping and immigration sanctions for the purposes of encouraging Russia to cease actions which destabilise Ukraine, or undermine or threaten the territorial integrity, sovereignty or independence of Ukraine.

Where applicable, specific information or evidence regarding the firm's dealings or affiliations with Russia is provided.

AUTEL ROBOTICS CO., LTD 道通机器人有限公司

Sanction date: 07/11/2024

UK Sanctions List Ref: RUS2299

Reason: AUTEL ROBOTICS CO., LTD. is an involved person under the Russia (Sanctions) (EU Exit) Regulations 2019 on the following ground: it is or has been involved in destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine, by making available goods or technology that could contribute to destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine, particularly uncrewed aerial vehicle systems and related accessories.

Information: Uncrewed aerial vehicle systems and related accessories.

REDLEPUS TSK VEKTOR INDUSTRIAL (SHENZHEN) CO., LTD 红兔矢量实业深圳有限公司

Sanction date: 07/11/2024

UK Sanctions List Ref: RUS2257

Reason: REDLEPUS TSK VEKTOR INDUSTRIAL (SHENZHEN) CO., LTD (hereafter “REDLEPUS TSK VEKTOR INDUSTRIAL”) is involved in destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine, by making available goods or technology that could contribute to destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine.

Evidence: TSK Vektor has imported numerous shipments from Redlepus into Russia since the beginning of 2024, including electronic and mechanical components with unmanned aerial vehicle applications such as aircraft engines, parts of automatic data processing machines and electrical components. Involved in an effort with AO IEMZ Kupol and TSK Vektor to establish a joint drone research and production centre.

HAINENG MACHINERY (HONG KONG) CO., LIMITED 海能機械(香港)有限公司

Sanction date: 07/11/2024

UK Sanctions List Ref: RUS2301

Reason: HAINENG MACHINERY (HONG KONG) CO., LIMITED. is an involved person under the Russia (Sanctions) (EU Exit) Regulations 2019 on the following ground: it is involved in destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine, by making available goods or technology that could contribute to destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine.

Information: Machine tools

SINO HOLDINGS GROUP CO., LTD.中国控股有限公司

Sanction date: 07/11/2024

UK Sanctions List Ref: RUS2300

Reason: SINO HOLDINGS GROUP CO., LTD. is an involved person under the Russia (Sanctions) (EU Exit) Regulations 2019 on the following ground: it is or has been involved in destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine by providing financial services, or making available funds, economic resources, goods or technology, to a person who is responsible for, engages in, provides support for, or promotes any policy or action which destabilises Ukraine or undermines or threatens the territorial integrity, sovereignty or independence of Ukraine, namely JSC KAMENSKVOLOKNO, which is a producer of body armour.

Evidence: Mould manufacturer, supplying JSC KAMENSKVOLOKNO, which is a producer of body armour.

ACE ERA CO., LIMITED

Sanction date: 07/11/2024

UK Sanctions List Ref: RUS2284

Reason: ACE ERA CO., LIMITED is an involved person under the Russian (Sanctions) (EU exit) Regulations 2019 because it is or has been involved in destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine through making available funds, economic resources, goods or technology, that could contribute to destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine.

Evidence: Shipped electronic integrated circuits, multilayer ceramic capacitors, and tantalum capacitors to US-designated Russian electronic equipment wholesaler Streloi Ekommerts. Ace Era has sent over \$3 million worth of shipments to Streloi Ekommerts.

XIN QUAN ELECTRONICS (HONG KONG) CO., LIMITED 新全電子(香港)有限公司

Sanction date: 07/11/2024

UK Sanctions List Ref: RUS2253.

Reason: XIN QUAN ELECTRONICS (HONG KONG) CO., LIMITED is an involved person within the meaning of the Russia (Sanctions) (EU Exit) Regulations 2019: because it is or has been destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine, by making available goods or technology, that could contribute to destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine. Financial sanctions imposed in addition to an asset freeze: Trust services.

Evidence: Electronic components distributor in the communications, industrial, military, computer and peripherals, consumer electronics: has made thousands of shipments of high priority goods, including electronic integrated circuits, to Russian company Snabinter, a Russian wholesaler of electronic equipment.

JINHUA HAIRUN POWER TECHNOLOGY CO., LTD 金华市海润动力科技有限公司

Sanction date: 07/11/2024

UK Sanctions List Ref: RUS2249

Reason: JINHUA HAIRUN POWER TECHNOLOGY CO., LTD is involved in destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine, by making available economic resources, goods or technology, that could contribute to destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine.

Evidence: Produces cutting machines, carburettors, and pistons and has made hundreds of shipments to Russia, including engine parts, transmissions, and gear components.

CHENGDU JINGXIN TECHNOLOGY CO. LTD 成都景昕科技有限公司

Sanction date: 07/11/2024

UK Sanctions List Ref: RUS2272

Reason: CHENGDU JINGXIN TECHNOLOGY CO. LTD is an involved person under the Russia (Sanctions) (EU Exit) Regulations 2019 on the following ground: it is or has been involved in destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine, by making available goods or technology that could contribute to destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine.

Evidence: Manufacturer of passive devices (Diplexers, Filters, Power Splitters, Isolators, Circulators, Combiners, Directional Couplers), RF Test Cable and RF Coaxial connectors.

Supply of more than \$3 million worth of CHPL items such as electronic components to Russian customers from April 2023 to at least December 2023, including the US-designated, Russia-based NAUCHNO PROIZVODSTVENNOE PREDPRIYATIE ITELMA.

Designated for operating or having operated in the technology sector of the Russian Federation economy.

MAKEWELL INDUSTRIAL TRADING CO., LIMITED 麥克維爾工業貿易有限公司
AGU INFORMATION TECHNOLOGY CO LIMITED (AGU INFORMATION) 啊咕信息技術有限公司

(Two names associated with the same entity)

Sanction date: 07/11/2024

UK Sanctions List Ref: RUS2268

Reason: MAKEWELL INDUSTRIAL TRADING CO., LIMITED is an involved person under the Russia (Sanctions) (EU Exit) Regulations 2019 on the following ground: it is or has been involved in destabilising Ukraine or undermining or threatening the territorial integrity,

sovereignty or independence of Ukraine, by making available goods or technology that could contribute to destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine.

Information: Company involved in the supply of more than \$58 million worth of CHPL items such as electronic components to Russian customers between January 2023 and October 2023, including the U.S.-designated, Russia-based EASTERN TRADE LIMITED LIABILITY COMPANY and OOO VNESHEKOSTIL. AGU INFORMATION supplied technology products to EASTERN TRADE LIMITED LIABILITY COMPANY as of January 2024.

DONGGUAN SHENGYIN CNC EQUIPMENT CO., LTD 东莞圣寅数控设备有限公司

Sanction date: 07/11/2024

UK Sanctions List Ref: RUS2303

Reason: DONGGUAN SHENGYIN CNC EQUIPMENT CO., LTD is an involved person under the Russia (Sanctions) (EU Exit) Regulations 2019 because it is or has been involved in destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine by making available funds, economic resources, goods or technology, that could contribute to destabilising Ukraine or undermining or threatening the territorial integrity, sovereignty or independence of Ukraine.

Evidence: Supply of more than \$12 million worth of CHPL items such as CNC machine tools and components to Russian companies from June 2023 to at least April 2024, including the US-designated, Russia-based LIMITED LIABILITY COMPANY I MACHINE TECHNOLOGY. Designated for operating or having operated in the manufacturing sector of the Russian Federation economy:

Asia Pacific Links Limited

Sanction date: 06/12/2023

UK Sanctions List Ref: RUS2037

Evidence: Asia Pacific Links provided 25 percent of semiconductor imports by SMT-iLogic, a Russian company that has diverted millions of dollars' worth of Western-made electronic components to a manufacturer of Russian military drones. Microchips for Russian Drones

FINDER TECHNOLOGY LTD 超達科技有限公司

Sanction date: 22/02/2024

UK Sanctions List Ref: RUS2110

Evidence: Exported 293 shipments of electronic integrated circuits between January 3, 2023, and December 29, 2023, including electronic integrated circuits with UAV applications such as field programmable gate arrays. Finder Technology acted as an intermediary for Russia-based Joint Stock Company Compel (Compel) and exported microelectronics to Compel.

GSK CNC EQUIPMENT CO LT 广州数控设备有限公司

Sanction date: 24/02/25

UK Sanctions List Ref: RUS2430

Information: Industries of CNC machine tool, automatic control and injection-moulded item, etc., GSK provides the users with the whole automatic manufacturing process solutions such as machine tool CNC system, servo drive, servo motor, CNC machine tool chain exhibition, machine tool CNC engineering, automation control system, industrial robot, all-electric precision injection moulding machine and CNC training institute.

HENGSHUI HESHUO CELLULOSE CO., LTD 衡水和硕纤维素有限公司

Sanction date: 13/06/24

UK Sanctions List Ref: RUS2130.

Evidence: shipped large quantities of nitrocellulose to Russian companies. The company also produces nitrocellulose shipped by Hengshui Yuanchem.

HENGSHUI YUANCHEM TRADING LIMITED 衡水元展贸易有限公司

Sanction date:13/06/24

UK Sanctions List Ref: RUS2135

Evidence: Shipped large quantities of nitrocellulose to Russian companies.

HK HENGBANGWEI ELECTRONICS LIMITED 香港恒邦微电子有限公司

Sanction date:13/06/24

UK Sanctions List Ref: RUS2142

Evidence: Hundreds of shipments of foreign-origin microelectronics to Russia. Exported 94 shipments of export-controlled items with UAV and other military applications.

JUHANG AVIATION TECHNOLOGY(SHENZHEN) CO., LIMITED 巨航航空科技（深圳）有限公司

Sanction date: 22/02/24

UK Sanctions List Ref: RUS2111

Information: Items for UAV production such as propellers, signal jammers, sensors, and UAV engines.

NEWAY CNC EQUIPMENT (SUZHOU) CO LTD 纽威数控装备

Sanction date: 24/02/25

UK Sanctions List Ref: RUS2424

Evidence: Facilitated the illicit procurement network of microelectronic components.

NINGBO BLIN MACHINERY CO., LTD. 宁波贝宁机床有限公司

Sanction date: 24/02/25

UK Sanctions List Ref: RUS2392

Information: CNC turning machine, CNC Milling Machine, CNC Drilling& Tapping Machine.

NINGBO OTURN MACHINERYCO., LTD 宁波欧腾机械有限公司

Sanction date: 24/02/25

UK Sanctions List Ref: RUS2393

Evidence: Supplied machine tools to the Russian defence sector.

POLY TECHNOLOGIES, INC 保利科技有限公司

Sanction date: 24/02/25

UK Sanctions List Ref: RUS2493

Evidence: Company and exporter of defence equipment that has supplied common high priority goods and dual-use technology to the Russian defence sector, including radar and radio navigation equipment.

PREMERA(H.K.) INTERNATIONAL CO, LIMITED 普萊米樂 (香港) 國際貿易有限公司

Sanction date: 24/02/25

UK Sanctions List Ref: RUS2427

Evidence: Company that has supplied microelectronics to sanctioned Russian entities.

SHVABE OPTO-ELECTRONICS 诗瓦贝光电梅州有限公司

Sanction date: 24/02/25

UK Sanctions List Ref: RUS2425

Evidence: Thousands of shipments to its parent company, U.S.-sanctioned Joint Stock Company Production Association Ural Optical and Mechanical Plant Named After E.S. Yalamov (JSC PA UOMP), including hundreds of shipments of foreign-origin microelectronics. JSC PA UOMP is a Russian defence entity that develops instruments for Russia's combat aircraft, helicopters, and naval ships.

SINNO ELECTRONICS CO., LIMITE 信諾電子科技有限公司

Sanction date: 06/12/23

UK Sanctions List Ref: RUS2038

Evidence: Semiconductor, longtime supplier of microelectronics to Russian defence procurement companies. Having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of Radioavtomatika LLC.

SINO MACHINERY CO., LTD

Sanction date:13/06/24

UK Sanctions List Ref: RUS2145

Evidence: Shipped technological equipment and machine tools to Russia, including remote controls and metal-working machines. Technology sector of Russian economy.

SUZHOU PARSUN POWER MACHINE CO., LTD 苏州百胜动力机器股份有限公司

Sanction date: 24/02/25

UK Sanctions List Ref: RUS2396

Evidence: China-based mechanical and electrical maritime equipment producer that has been supplying equipment and components to the Russian defence sector.

TKT-1997 RAZVOJ LIMITED

Sanction date: 24/02/25

UK Sanctions List Ref: RUS2428

Evidence: Industrial materials supplier that has exported common high priority goods, including microelectronics, to Russia.

WUHAN TONGSHENG TECHNOLOGY CO., LTD

Sanction date: 13/06/25

UK Sanctions List Ref: RUS2137

Evidence: Numerous shipments of high-priority technology to Russia and, in October 2023, attended a state security technology exposition in Moscow that was hosted with the support of the Russian Ministry of Defence.

XINGHUA CO., LIMITED 興華國際股份有限公司

Sanction date: 06/12/23

UK Sanctions List Ref: RUS2036

Evidence: Sanctioned for supplying goods used by Russia to conduct its war on Ukraine.

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