## Gambling Fact Sheet #44

## Russia Sanctions Act 2022

### **What is the Russia Sanctions Act 2022?**

The Russia Sanctions Act 2022 (the Act) came into force on 12 March 2022 and takes swift action against Russia aligning with the actions of the international community. We are joining the international community in applying tougher sanctions to severely limit the Putin regime’s ability to continue the invasion of Ukraine.

### **What does the Russia Sanctions Act and Regulations mean for the gambling sector?**

The Russia Sanctions Regulations 2022 stipulates that a New Zealand person, including an entity, must not unless otherwise stipulated;

* Deal with any assets, including located outside New Zealand, if it would result in a sanctioned person or associate owning or controlling the asset or otherwise benefitting; or
* Deal with services provided by, to or for the benefit of a sanctioned person. This affects the entire gambling sector.

In addition, the Act recognises casino operators and TAB NZ as duty holders. [Section 15](https://www.legislation.govt.nz/act/public/2022/0006/latest/whole.html#LMS652952) states that Duty holders having formed a reasonable suspicion that they are in control of the assets of, or are dealing in services to, sanctioned or associated persons, have a duty to report it to the Police within 3 working days. Reports should be made on the [501 non-emergency form](https://www.police.govt.nz/use-105). There are [criminal enforcement](https://www.legislation.govt.nz/act/public/2022/0006/latest/whole.html#LMS652962) actions if there is a failure to identify or report breaches to the police.

The [Russia Sanctions Regulations 2022](https://www.legislation.govt.nz/regulation/public/2022/0074/16.0/whole.html) provides clear guidance for what constitutes ‘working with or for’ sanctioned or associated persons.

The [Act](https://www.legislation.govt.nz/act/public/2022/0006/latest/whole.html#LMS654617) also provides Government agencies power to use and disclose information supplies or obtained under the Gambling Act 2003 and the Racing Industry Act 2020.

### **How to identify sanctioned or associated persons within your organisation?**

A list of all sanctioned persons can be found in the  [Schedule](https://www.legislation.govt.nz/regulation/public/2022/0074/16.0/whole.html#LMS659655) to the Russia Sanctions Regulations 2022 and on the [Ministry of Foreign Affairs website](https://www.mfat.govt.nz/en/countries-and-regions/europe/ukraine/russian-invasion-of-ukraine/sanctions/). These lists can be used to identify sanctioned and associated persons within your organisation; it is your duty to execute effective due diligence processes.

Please make sure you check these lists of sanctioned persons frequently as it could be updated.

### **Regulation and useful information**

[MFAT Website – Russia Sanctions](https://www.mfat.govt.nz/en/countries-and-regions/europe/ukraine/russian-invasion-of-ukraine/sanctions/)

[Russia Sanctions Act 2022](https://www.legislation.govt.nz/act/public/2022/0006/latest/whole.html)

[Russia Sanctions Regulations 2022](https://www.legislation.govt.nz/regulation/public/2022/0074/16.0/whole.html)

If you suspect a breach of sanctions, you must make a [105 Police Non-Emergency report](https://www.police.govt.nz/use-105)