



## **Guidance Note: For duty holders that are AML/CFT reporting entities**

### **Notifying a customer of an asset freeze or blocked transaction under Russia Sanctions Act**

In circumstances where a duty holder has frozen the assets or blocked transactions of a customer under the Russia Sanctions Act 2022, a duty holder may wish to provide a justification to their customer for their actions.

Informing a customer that this action is taken due to sanctions concerns arising under the Russia Sanctions Act 2022, including disclosing any identified designated person or entity, is not considered a prohibited disclosure under section 46 of the Anti-Money Laundering and Countering Financing of Terrorism Act 2009.<sup>1</sup>

However, a duty holder must be careful not to inform their customer that they are submitting a report about them, or disclose report-related information to anyone who is not required to have access to the report.

#### **For further information:**

If you require further information in relation to your reporting obligations under the AML/CFT Act, please contact your AML/CFT supervisor.

If you require further information in relation to the prohibitions or restrictions on dealing with specified assets or services under the Russia Sanctions Act, please contact the New Zealand Sanctions Unit at the Ministry of Foreign Affairs and Trade on [sanctions@mfat.govt.nz](mailto:sanctions@mfat.govt.nz).

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<sup>1</sup> Section 46 of the AML/CFT Act contains non-disclosure obligations in relation to reports made under the AML/CFT Act.