

**OFFICIAL GAZETTE
OF THE
REPUBLIC OF SURINAME**

**STATE DECREE of April 23, 2025, implementing Article 2 paragraph 1 and Article 4a paragraph 3 of the International Sanctions Act (Official Gazette 2014 no. 54, as last amended by Official Gazette 2024 no. 100).
(Decree Implementing the International Sanctions List 2025)**

DE PRESIDENT VAN DE REPUBLIEK SURINAME,

Considering, that - for the implementation of Article 2 paragraph 1 and Article 4a paragraph 3 of the International Sanctions Act (Official Gazette 2014 no. 54, as last amended by Official Gazette 2024 no. 100) – it is necessary to establish the following;

Having heard the Council of State, has decreed the following State Decree prepared by the Council of Ministers:

Article 1

In this State Decree and the provisions based thereon, the following definitions shall apply:

- a. Security Council: The Security Council of the United Nations;
- b. Resolution 1267: Security Council Resolution 1267 of October 15, 1999;
- c. Resolution 1333: Security Council Resolution 1333 of December 19, 2000;
- d. Resolution 1373: Security Council Resolution 1373 of September 28, 2001;
- e. Resolution 1452: Security Council Resolution 1452 of December 20, 2002;
- f. Resolution 1735: Security Council Resolution 1735 of December 22, 2006;
- g. Resolution 1988: Security Council Resolution 1988 of June 17, 2011;
- h. Resolution 1989: Security Council Resolution 1989 of June 17, 2011;



- i. Resolution 2160: Security Council Resolution 2160 of June 17, 2014;
- j. Resolution 2161: Security Council Resolution 2161 of June 17, 2014;
- k. Resolution 2170: Security Council Resolution 2170 of August 15, 2014;
- l. subsequent resolutions: All related resolutions following Security Council Resolution 1267 of October 15, 2000;
- m. funds: all financial assets and economic benefits of any kind, whether corporeal or incorporeal, tangible or intangible, movable or immovable, however acquired, and legal documents or instruments in any form, including electronic or digital, evidencing title to or interest in such assets; this shall include, but not be limited to, financial assets, economic resources (including oil and other natural resources), property of every kind, whether tangible or intangible, movable or immovable, however acquired, as well as legal documents or instruments in any form, including electronic or digital, evidencing title to or interest in such funds or other assets, including, but not limited to, bank credits, travellers' cheques, bank cheques, money orders, shares, securities, bonds, drafts, or letters of credit, and any interest, dividends or other income on or value accruing from or generated by such funds or other assets, and any other assets which may be used to obtain funds, goods or services, evidence of an interest in funds or financial resources and any other export-financing credit. Funds shall also include registered goods, as registered in all designated public registers;
- n. freezing of funds: preventing any movement, transfer, alteration, use of, or dealing with funds in any way that would result in any change in their volume, amount, location, ownership, possession, character, destination, or other changes that would enable the use, transfer, or registration of said funds, including the management of an investment portfolio;
- o. services: services as referred to in Article 1 paragraph 1 under B of the Anti-Money Laundering and Counter-Terrorist Financing Act (WMTF) (Official Gazette 2022 no. 138, as amended by Official Gazette 2024 no. 99).



Article 2

1. All funds belonging to Al-Qaeda, the Taliban of Afghanistan, ISIL, ANF, as well as all organizations referred to in the resolutions mentioned under Article 1 sub 1, members or representatives of said organizations, as well as other natural or legal persons or other legal constructions associated with said organizations, as referred to in Security Council Resolutions 1267, 1333, 1373, 1452, 1735, 1988, 1989, 2160, 2161, 2170, and subsequent resolutions, shall be frozen.
2. The freezing shall apply mutatis mutandis to:
 - a. funds that are directly or indirectly and wholly or jointly owned or controlled by Al-Qaeda, the Taliban of Afghanistan, ISIL, ANF, as well as all organizations referred to in the resolutions mentioned under Article 1 sub 1, members or representatives of said organizations, as well as other natural or legal persons or other legal constructions associated with said organizations;
 - b. funds derived from or generated by funds or other assets owned or controlled by Al-Qaeda, the Taliban of Afghanistan, ISIL, ANF, as well as all organizations referred to in the resolutions mentioned under Article 1 sub 1, members or representatives of said organizations, as well as other natural or legal persons or other legal constructions associated with said organizations.

Article 3

1. It shall be prohibited for anyone to directly or indirectly provide services to or for the benefit of Al-Qaeda, the Taliban of Afghanistan, ISIL, ANF, as well as all organizations referred to in the resolutions mentioned under Article 1 sub 1, members or representatives of said organizations, as well as other natural or legal persons or other legal constructions associated with said organizations.
2. It shall be prohibited for anyone to directly or indirectly make funds available to Al-Qaeda, the Taliban of Afghanistan, ISIL, ANF, as well as all organizations referred to in the resolutions mentioned under Article 1 sub 1, members or representatives of said



organizations, as well as other natural or legal persons or other legal constructions associated with said organizations.

Article 4

It shall be prohibited for anyone, either through a natural or legal person or other legal construction acting as an intermediary or front, or in any other way, to participate in related activities that directly or indirectly aim at or result in circumventing the prohibition referred to in Article 3.

Article 5

It shall be prohibited for anyone, from or through Suriname or through the intermediary of its residents or with the aid of vessels or aircraft registered in Suriname, to directly or indirectly supply, sell, or deliver to Al-Qaeda, the Taliban of Afghanistan, ISIL, ANF, as well as all organizations referred to in the resolutions mentioned under Article 1 sub 1, members or representatives of said organizations, as well as other natural persons, groups, undertakings, or other legal constructions associated with said organizations, weapons, ammunition, and military materiel or assistance as referred to in paragraph 1, subparagraph c, of Resolution 1988.

Article 6

It shall be prohibited for anyone to engage in any form of direct or indirect trade with Al-Qaeda, the Taliban of Afghanistan, ISIL, ANF, as well as all organizations referred to in the resolutions mentioned under Article 1 sub 1, members or representatives of said organizations, as well as other natural persons, groups, undertakings, or other legal constructions associated with said organizations.



Article 7

It shall be prohibited for any aircraft to take off from Suriname, land on the territory of Suriname, or use Surinamese airspace for overflight, if that aircraft has taken off from or is destined for a location within an area of Afghanistan controlled by the Taliban, as indicated by the UN Sanctions Committee, unless the Committee has previously approved the flight concerned.

Article 8

Members of Al-Qaeda, the Taliban of Afghanistan, ISIL, ANF, as well as all organizations referred to in the resolutions mentioned under Article 1 sub 1, members or representatives of said organizations, as well as other natural persons, groups, undertakings, or other legal constructions associated with said organizations and their family members, shall be prohibited from entering or transiting through Suriname.

Article 9

The sanctions list of members or representatives of Al-Qaeda, the Taliban of Afghanistan, ISIL, ANF, as well as all organizations referred to in the resolutions mentioned under Article 1 sub 1, and the natural or legal persons or other legal constructions associated with said organizations, drawn up and maintained by the UN Sanctions Committees, as well as amendments to the aforementioned sanctions list, shall be published without delay by the Council on its website or sent to the supervisory authorities and the service providers.

Article 10

1. The Minister may, after consulting the Council, nominate natural or legal persons or other legal constructions to the UN Sanctions



Committees for placement on the UN sanctions list.

2. If the Minister, having consulted the Council, is of the opinion that the reasonable grounds or reasonable basis for the natural or legal person or other legal construction referred to in paragraph 1 are no longer in force, he shall submit a request to the UN Sanctions Committee for the de-listing from the UN sanctions list.
3. A reasoned request from a natural or legal person or other legal construction for de-listing from the UN sanctions list shall, after thorough investigation by the Minister, having consulted the Council, be submitted to the UN Sanctions Committee.

Article 11

1. Any natural or legal person or other legal construction or their authorized representative who appears on the UN sanctions list may submit a request for access to their frozen funds or other assets to be granted, *inter alia*, in the following cases for:
 - a. the performance of necessary expenses for living, medical treatment, the fulfillment of long-term financial obligations, or the payment of rent, utilities, and insurance premiums;
 - b. the payment of reasonable fees and reimbursements for legal assistance received;
 - c. the receipt of refunded payments in connection with the provision of legal assistance;
 - d. the payment of fees for the preservation or maintenance of frozen funds or other assets.
2. The request referred to in paragraph 1 shall be submitted to the Minister through the intermediary of the Council. The Minister shall forward this request to the UN Sanctions Committee after advice from the Council.
3. Access to the frozen funds or other assets shall only be granted after obtaining approval from the UN Sanctions Committee.



Article 12

The Minister may, by decree, establish further rules for the implementation of this State Decree.

Article 13

Upon the entry into force of this State Decree, the State Decree of February 29, 2016, implementing Article 2 paragraph 1 of the International Sanctions Act (Official Gazette 2014 no. 54) (Official Gazette 2016 no. 34), shall lapse.

Article 14

1. This State Decree shall be cited as: Decree Implementing the International Sanctions List 2025.
2. It shall be promulgated in the Official Gazette of the Republic of Suriname.
3. It shall enter into force on the day following that of its promulgation.
4. The Ministers of Foreign Affairs, International Business and International Cooperation, of Finance and Planning, and of Justice and Police are charged with the implementation of this State Decree.

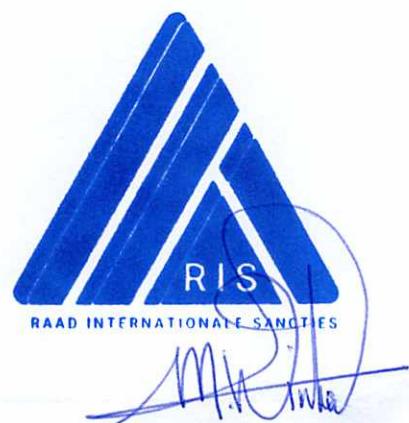
Given in Paramaribo, the 23rd of April 2025

CHANDRIKAPERSAD SANTOKHI

Issued in Paramaribo, the 28th of April
2025

The Minister of Home Affairs,

DELANO LANDVREUGD.





STATE DECREE of April 23, 2025, implementing Article 2 paragraph 1 and Article 4a paragraph 3 of the International Sanctions Act (Official Gazette 2014 no. 54, as last amended by Official Gazette 2024 no. 100).

(Decree Implementing the International Sanctions List 2025)

EXPLANATORY MEMORANDUM

GENERAL

Following the terrorist attacks of September 11, 2001, in the United States of America, the fight against terrorism was launched on several fronts. An important part of the fight against terrorism has focused on the adoption of various laws, treaties, and resolutions against terrorism at a global level. For example, the United Nations Security Council has adopted various resolutions over the years containing obligations for member states to implement international sanctions in their laws and regulations. Among other things, member states are expected to implement regulations concerning the freezing of funds and other assets, as well as the imposition of arms, trade, and air embargoes.

Since 1999, international sanctions have been in force against Osama Bin Laden, Al-Qaeda, the Taliban of Afghanistan, and related organizations and individuals. These international sanctions find their legal basis in the resolutions of the United Nations Security Council. In order to ensure that the implementation of international sanctions, as contained in various resolutions of the United Nations, is carried out, UN Sanctions Committees have been established on the basis of Security Council

Resolutions 1267, 1988, and 1989.

Resolution 1267, as adopted on October 15, 1999, by the UN Security Council, entailed the establishment of the Security Council Sanctions Committee. Pursuant to this resolution, a limited air and financial embargo was imposed against the Taliban (as designated by the Committee). In accordance with the provisions of Resolution 1267, member states were obliged to: refuse permission for aircraft owned,



leased, or operated by or on behalf of the Taliban to take off from or land in their territory, and to freeze capital and other financial resources, including funds derived from property directly or indirectly controlled by the Taliban. Resolution 1988 of June 17, 2011, expanded the sanctions to all individuals and entities of the Taliban and those who have relationships with the Taliban. At the same time, pursuant to Resolution 1989, also of June 17, 2011, the freezing of all assets, travel ban, and arms embargo were ordered with respect to all individuals and entities included on the Al-Qaeda sanctions list. Due to international developments in the field of terrorism, the United Nations, most recently in Resolution 2170, further expanded the circle against whom the measures should be directed to include ISIL (Islamic State in Iraq and the Levant), a splinter movement of Al-Qaeda, and ANF (Al-Nushrah Front).

In Suriname, laws and treaties in this area have also been approved by the National Assembly. By the Act of July 29, 2011 (Official Gazette 2011 no. 96), amending the Penal Code, the Firearms Act, and the Unusual Transactions Reporting Act, terrorist offenses and the financing of terrorism were criminalized. By the Act of May 20, 2014 (Official Gazette 2014 no. 54), the Act containing rules in connection with the implementation of international sanctions (International Sanctions Act) was approved. This Act has since been amended by Official Gazette 2024 no. 100. The present State Decree serves to implement Article 2 paragraph 1, as well as Article 4a paragraph 3 of the aforementioned Act.

One of the international sanctions includes the obligation for member states to proceed with, among other things, the freezing of all funds belonging to natural or legal persons or other legal constructions designated by the UN Sanctions Committees. The freezing of funds is understood to mean the prohibition of any alteration, transfer, correction, use of, or dealing with funds in any way that results in changes in the volume, amount, location, owner, possession, distinguishing characteristics, destination, or other changes, whereby the use of said funds, including the management of an investment portfolio, is made possible.



Publication of this State Decree contributes to service providers checking the extent to which the natural or legal persons or other legal constructions mentioned in the annex to this State Decree appear in their records and acting accordingly to the given instruction for freezing pursuant to Article 2 paragraph 1.

The general objective of the freezing is to make access to and/or availability of funds that could be used to support terrorism impossible in any way. To achieve this, it must be ensured that no funds of any kind will be accessible and/or available to those subject to the period of validity of this sanctions decree. The freezing of funds does not mean that there will be a confiscation or transfer of ownership of the funds.

When a name is removed from the sanctions list by the UN Sanctions Committee, all funds of the person concerned that were previously frozen as a result of being placed on the UN sanctions list will no longer be subject to freezing. However, with the application of the provisions of paragraph 57 of Resolution 2161, the unfreezing of assets that were frozen as a result of the listing of Osama Bin Laden must have the prior approval of the UN Sanctions Committee. Insofar as a member state makes such a request, the guarantee must also be given that the frozen funds will not be directly or indirectly transferred to another individual, group, undertaking, or other legal construction that appears on the UN sanctions list or may otherwise be used in a manner that would be contrary to the provisions of Resolution 1373. An additional condition for the release of the funds is that no objection thereto must have been made by a member of the UN Sanctions Committee within 30 days after receipt of the request



ARTICLE-BY-ARTICLE EXPLANATION**Article 1**

To combat international terrorism, the United Nations Security Council has adopted several resolutions. In accordance with UN Resolutions 1267 and 1373, member states are obliged to adopt adequate legislation to freeze financial assets and other assets of persons, undertakings, or institutions designated by the Al-Qaeda, Osama Bin Laden, or the Taliban Sanctions Committee of the United Nations. As previously mentioned, as a result of further developments in the fight against terrorism, the United Nations, in Resolution 2170, further expanded the circle against whom the measures should be directed to include ISIL (Islamic State in Iraq and the Levant), a splinter movement of Al-Qaeda, and ANF (Al-Nushrah Front).

The constant development in the fight against terrorism necessitates that we include all resolutions after 2170 and any future resolutions related to Resolution 1267 under sub 1.

Article 1 of this State Decree includes in the definitions section what exactly is to be understood by the freezing of funds. In addition, the terms "funds" and "services" are also defined. Furthermore, UN Security Council Resolution 1373 of September 29, 2001, in Article 1, paragraph c, imposes the obligation to "freeze without delay" the funds of persons or organizations who commit terrorism or facilitate terrorists (the principle of "freeze without delay"). To guarantee the dissemination of the UN sanctions list at the national level, in accordance with paragraph 13 of Resolution 2161 (2014), which calls upon member states to promote the dissemination of the UN sanctions list, especially among the private sector, to ensure effective implementation of the measures, it is published on the Council's website and sent to all service providers if necessary. It is the intention that all service providers regularly screen their client databases. The prohibition as included in Article 2 of this State Decree is directed at financial and non-financial service providers, but also applies to all other legal persons and natural persons in Suriname



Article 2 paragraph 1 stipulates that all assets and other funds belonging to natural persons or legal persons or other legal constructions as referred to in Resolutions 1267, 1333, 1373, 1452, 1735, 1988, 1989, 2160, 2161, 2170, and subsequent resolutions shall be frozen. The provisions of this paragraph are directly related to the internationally binding obligation to combat the financing of terrorism and to freeze the assets, other financial assets, or other economic resources of persons and organizations engaged in terrorist activities.

Due to developments in the field of terrorism and the financing of terrorism on the one hand, and the approach to and combating thereof on the other hand, subsequent resolutions relating to Resolution 1267 have also been included in paragraph 1. As a result, future organizations and associated natural or legal persons or other legal constructions also fall under the scope of this implementing decree.

To ensure that it concerns the intended natural or legal persons or other legal constructions on the sanctions list, identification data must be used. This can prevent persons or organizations with similar names from being wrongly implicated. This concerns natural persons, insofar as possible including date and place of birth, current and former nationalities, addresses, passport details, identification numbers, and residential addresses. For groups, legal persons, or other legal constructions, the intention is that the information in particular includes the following data: full statutory name as well as trade name, principal place of business, addresses of establishment, place of registration of the registered office, date and number of registration, branches, etc. These requirements as mentioned in Article 2 of the National Sanctions List Decree 2025 (Official Gazette 2025 no. 53) apply mutatis mutandis to the placement on the sanctions list in this case.

Pursuant to paragraph 2 sub 2, future funds also fall under the freezing measure.



Article 3

This article lays down a general prohibition on the provision of services (directly or indirectly) to and/or the making available of funds to the mentioned persons and organizations associated with Al-Qaeda, the Taliban of Afghanistan, ISIL, ANF, as well as all organizations referred to in the resolutions mentioned under Article 1 sub 1, members or representatives of said organizations, as well as other natural or legal persons or other legal constructions associated with said organizations as referred to in Article 2.

Article 4

The provisions of this article aim to prevent bona fide natural or legal persons or other legal constructions from being misused to provide (financial) services and/or to raise funds for persons and organizations engaged in terrorist activities.

Article 5

This article concerns the implementation of the arms embargo. The aforementioned matter is regulated in the relevant resolutions, as regards the Taliban et al., most recently Resolution 2160, paragraph 1, subparagraph c; as regards Al-Qaeda et al., most recently Resolution 2161, paragraph 1, subparagraph c; and as regards ISIL/ANF et al., Resolution 2170, paragraphs 10 and 19.

Article 6

This article concerns the implementation of the trade embargo. The aforementioned matter finds its legal basis in Resolution 2161 in paragraph 1 under c and Resolution 2170 in paragraph 10 under the chapter "Foreign Terrorist Fighters". Member states are urged to strictly adhere to the aforementioned resolutions, in which any form of direct or indirect trade with Al-Qaeda, the Taliban of Afghanistan, ISIL, ANF, and related groups is condemned.



Article 7

Originally, paragraph 4, subparagraph a, of Resolution 1267 prescribed in principle a ban on take-off, landing, and overflight for aircraft owned by or operated under the control of the Taliban. This measure was explicitly terminated by the United Nations in Resolution 1390. Nevertheless, the ban on take-off, landing, and overflight of paragraph 11 of Resolution 1333 for flights to and from areas within the territory of Afghanistan, insofar as still controlled by the Taliban, has remained in force.

Article 8

Member states are obliged, through certain aforementioned resolutions, to prohibit persons affiliated with Al-Qaeda, the Taliban of Afghanistan, ISIL/AFN from traveling to or through their country. See in this context paragraph 1, subparagraph b, of Resolution 2160 concerning persons associated with the Taliban; paragraph 1, subparagraph c, of Resolution 2161 concerning persons affiliated with Al-Qaeda; and paragraph 19 of Resolution 2170 concerning persons affiliated with ISIL/ANF mentioned in the Annex to that resolution. The present article implements this.

Article 9

This article describes the obligation of the Council to publish the sanctions list drawn up and maintained by the UN Sanctions Committees without any delay (immediately) on its website and, if necessary, to send it to the supervisory authorities and service providers.

Article 10

The Minister may, on the advice of the Council, nominate natural or legal persons or other legal constructions for placement on the UN sanctions list. The persons or legal constructions concerned must, of course, first have been placed on the national sanctions list of Suriname. Likewise, the request to the UN Sanctions Committees will take place if the Minister is



2025

No. 54

of the opinion that the reasonable grounds or reasonable basis for placement no longer apply, for de-listing from the international sanctions list.

Paragraph 3 describes the possibility for the natural or legal person or other legal construction placed on the international sanctions list to submit a request to the UN Sanctions Committee for de-listing through the Minister. This request must be reasoned and will only be forwarded by the Minister after a thorough investigation



Article 11

Natural or legal persons or other legal constructions who appear on the UN sanctions list and against whom freezing measures have been taken may submit a request for access to the frozen funds for urgent and necessary expenses. The Minister must notify the UN Sanctions Committee of this request. Only after obtaining permission from the UN Sanctions Committee can the request be granted.

Article 12

The Minister may, by decree, establish further rules for the implementation of this State Decree. Thus, among other things, the various procedures for listing and de-listing as a result of the UN sanctions list, freezing and unfreezing, and access to frozen funds through the intermediary of the UN Sanctions Committee will be elaborated upon by ministerial decree.

Article 13

The State Decree of February 29, 2016, Official Gazette 2016 no. 34, has been completely rewritten, partly due to the amendment of the International Sanctions Act (Official Gazette 2024 no. 100), as a result of which it was decided to completely repeal the earlier implementing decree.

Paramaribo, April 23, 2025,

CHANDRIKAPERSAD SANTOKHI



