October 2026

TARGETED FINANCIAL SANCTIONS

OFFICE OF THE DIRECTOR OF PUBLIC PROSECUTIONS BARBADOS

A plain-language citizen's guide to listing, de-listing, review of designations and unfreezing of funds and other assets

Focus: This guide concerns United Nations Security Council sanctions linked to terrorist financing and proliferation financing.

Summary

- Barbados remains firmly committed to combating terrorism, proliferation, and the financing of these activities. To address the associated threats, Barbados has established a robust and coordinated strategy that brings together government agencies and fosters collaboration with commercial entities and private-sector stakeholders.

- As part of Barbados' efforts to combat terrorism, proliferation and their financing, the Director of Public Prosecutions is empowered to make applications for the designation of persons or entities pursuant to the Anti-Terrorism (Amendment) Act, 2019-34. Such designations prohibit persons and entities from dealing with, or providing financial assistance or services to, designated terrorists, in accordance with the Anti-Terrorism and Counter-Proliferation of Weapons of Mass Destruction Act, Cap 158 and its amendments (Anti-Terrorism (Amendment) Act, 2015).

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Please read

This October 2026 edition is the 1st edition of the Office of the Director of Public Prosecution Barbados Public Guide to Targeted Financial Sanctions, and it provides publicly available procedures in everyday language. It is not legal advice and cannot replace the law, a court order or the advice of an attorney-at-law. The Office of the Director of Public Prosecution's policies and procedures are reviewed for consistency with the law, national and sectoral risk, emerging trends and international standards including Committee procedures which can be updated. Refer to the current law and the official UN pages, some of which are linked in this guide, consider speaking to an attorney-at-law.

A. Introduction to Roles & Terms

Who	Their role
Attorney-General (competent authority)	Proposes any addition or removal of the name of a person from a UN sanctions list
Director of Public Prosecutions (DPP)	Applies to the local courts for designation orders and related restraining orders, carries out the legally required periodic review, and applies to the court to vary or set aside an order when the criteria are met.
The High Court of Barbados	Decides applications and appeals, including applications to make, vary or set aside designation and restraining (freezing) orders.
Law-enforcement and intelligence agencies	Provide information that can lawfully be shared to support reviews and identity verification.

What it is	In plain words	What happens
Delisting	A name is removed from a UN sanctions list by the UN Committee (or another authority with the legal power to remove it).	The DPP will apply to a judge of the High Court of Barbados for a de-listing order without delay.
Setting aside a domestic order	A judge of the High Court of Barbados varies or cancels a domestic designation order and its related restraint.	The DPP will immediately publish the order and disseminate it to Supervisors for onward transmission.
Unfreezing	Funds and property are released because the legal reason for the freeze has ended, or an authority has lawfully allowed their release.	Frozen assets are released unless another sanctions measure, court order or lawful freezing ground still applies.
Freezing	Funds and property are restrained.	All persons are prohibited from dealing with frozen funds and property, unless in accordance with exceptions.
Listing	To add a name to a UN sanctions list by the UN Committee (or another authority with the legal power to add it).	The DPP will apply to a judge of the High Court of Barbados for a designation order without delay.

B. Effects of Listings and De-listings

When a person or entity is designated, all funds or assets of that person or entity are frozen and dealings with the designated person or entity and its funds or assets are immediately prohibited.

Upon being delisted, there is no longer a requirement that the person or entity be subjected to the above prohibition and the funds or assets which were frozen can be unfrozen.

C. Exceptions

Authorisation is given to access to frozen funds or other assets which have been determined to be necessary for basic expenses, for the payment of certain types of fees, expenses and service charges, or for extraordinary expenses, in accordance with the procedures set out in United Nations Security Council Resolutions pursuant to amendments to the Proceeds and Instrumentalities of Crime Act.

D. Public Notice of Designations and De-listings

Where a designation or related restraint (freezing) order is made, confirmed, varied or set aside the Director of Public Prosecutions will cause notice of the same to be immediately published electronically, and published in the Official Gazette as well as in daily newspapers as soon as possible.

This publication will contain sufficient particulars to enable any person, including any financial institution and non-financial business entity or professional, who may be affected by the decision to be reliably and adequately informed of the decision.

Upon issuance of the order, it is immediately disseminated to Supervisors for onward transmission to their stakeholders.

Further information may be found on the Guideline on Targeted Financial Sanctions.

The names of persons or entities who have been designated as terrorists may be accessed via the following:

- Designations maintained by the UN Security Council Committee, pursuant to UNSCR 1267, 1989, and 2253: United Nations' ISIL (Da'esh) & Al Qaida Sanctions List ↗(opens in new tab); and UNSCR 1988 ↗(opens in new tab): United Nations Taliban List ↗
- An example of where published orders and notices may also be accessed is via the following: Central Bank of Barbados: designation, counter-proliferation and freezing orders

E. Listing and De-listing Process

Designation Orders made pursuant to the Anti-Terrorism (Amendment) Act, 2019-34.

The Director of Public Prosecutions is responsible for applying to a judge for designations of persons and entities under the **Anti-Terrorism (Amendment) Act, 2019-34.** The Director of Public Prosecutions will apply for a counter-proliferation order where the person is a listed person and will apply for a designation order where:

> the person is included in a list of individuals and entities designated by, or under the authority of, the United Nations Security Council as terrorists or terrorist entities;
>
> the Director of Public Prosecutions has reasonable grounds to believe that the person has committed or participated in the commission of an offence referred to in section 3, 3A or 4 of the **Anti-Terrorism (Amendment) Act, 2019-34;** or
>
> a request to designate a person as a terrorist or terrorist entity is transmitted to Barbados from another country, is supported by reasonable grounds for the designation and is accepted by Barbados.

International UN designations

The Honourable Attorney-General of Barbados is the competent authority of Barbados for the purpose of proposing any addition or removal of the name of a person or entity from a United Nations Security Council list.

When proposing names to the Committee(s) for inclusion on the UN Sanctions List(s), pursuant to UNSC resolutions the procedures and standard forms for listing are followed.

The criteria for designations are[1]:

Security Council resolutions 1267 (1999), 1989 (2011) and their successor resolutions:

(i) any person or entity participating in the financing, planning, facilitating, preparing, or perpetrating of acts or activities by, in conjunction with, under the name of, on behalf of, or in support of; supplying, selling or transferring arms and related materiel to; recruiting for; or otherwise supporting acts or activities of Al Qaida, or any cell, affiliate, splinter group or derivative thereof; or

(ii) or any undertaking owned or controlled, directly or indirectly, by any person or entity designated under subsection (i), or by persons acting on their behalf or at their direction.

Security Council resolutions 1267 (1999), 1988 (2011) and their successor resolutions:

(i) any person or entity participating in the financing, planning, facilitating, preparing, or perpetrating of acts or activities by, in conjunction with, under the name of, on behalf of, or in support of; supplying, selling or transferring arms and related material to; recruiting for; or otherwise supporting acts or activities of those designated and other individuals, groups, undertakings and

[1] UN Designation Criteria as Set Out in the FATF Recommendations (FATF Recommendations, 2012)

entities associated with the Taliban in constituting a threat to the peace, stability and security of Afghanistan;

(ii) or any undertaking owned or controlled, directly or indirectly, by any person or entity designated under subsection (i) of this subparagraph, or by persons acting on their behalf or at their direction.

Security Council resolution 1373 (2001):

(i) any person or entity who commits or attempts to commit terrorist acts, or who participates in or facilitates the commission of terrorist acts;

(ii) any entity owned or controlled, directly or indirectly, by any person or entity designated under subsection (i) of this subparagraph; or

(iii) any person or entity acting on behalf of, or at the direction of, any person or entity designated under subsection (i) of this subparagraph.

F. International UN De-listing & Unfreezing of Funds and/or Assets

Persons and entities designated under the United Nations Security Council **ISIL (Da'esh) and Al-Qaida Sanctions Lis**t may submit a request for de-listing through the Office of the Ombudsperson, an independent and impartial mechanism established by the United Nations Security Council, whose Ombudsperson is appointed by the United Nations Secretary-General.

For further information, refer to the following resources: Office of the Ombudsperson

Persons and entities designated under any other United Nations Security Council List may submit a request for de-listing through the Focal Point for Delisting, established pursuant to the relevant United Nations Security Council resolutions.

For further information, refer to the following resources: UN Security Council Sanctions Materials and Delisting Procedures.

Alternatively, the Competent Authority of Barbados can submit a de-listing request to the relevant Committee at any time. A citizen of Barbados or an entity registered in Barbados requiring a delisting by the Attorney-General must submit written information written information to the Director of Public Prosecutions who will review the request and determine whether the circumstances which led to a designation order being made against a person have changed or no longer exist.

G. Designations under the Anti-Terrorism (Amendment) Act, 2019-34 (including UNSCR 1373 designations)

Where a terrorist designation order is made by a judge of the High Court of Barbados pursuant to section 8 of the **Anti-Terrorism (Amendment) Act, 2019-34** (the Act) or a counter-proliferation order or restraining order is made pursuant to sections 10B or 10C of the Act several protections apply.

Periodic review

The Director of Public Prosecutions in accordance with section 9 of the **Anti-Terrorism (Amendment) Act, 2019-34** must carry out periodic reviews in accordance with section 9 of the Act for every terrorist designation order, counter-proliferation order. Where pursuant to a review or from information received, the Director of Public Prosecutions determines that the circumstances which led to such an order being made against a person have changed or no longer exist, the Director of Public Prosecutions shall, in a timely manner, apply to a judge in Chambers for the variation or setting aside, as may be appropriate, of the terrorist designation order; or counter-proliferation order and any related restraining (freezing) order.

An interested party or his representative may write to the Director of Public Prosecutions providing information in support of a review:

The Director of Public Prosecutions
The Office of the Director of Public Prosecutions
4th Floor, Frank Walcott Building,
Culloden Road, St Michael, BB14018
Tel: 1-246-535-0500

To facilitate an assessment of such information, the designated person or their authorised representative should provide to the extent that is reasonably possible, the following details with supporting documentation:

Addressee**:** The caption of the submission should be "Anti-Terrorism Designation De-Listing Request".

Particulars of the designated person: Provide the designated person's or entity's full name, identifying particulars (such as date of birth and registration number), and contact details, including email address, telephone number and registered address.

Authorised representative (where applicable): Where the request is submitted on behalf of a designated person, provide the representative's full name, identifying particulars such as date of birth, contact details, including email address, telephone number, address, and details of their relationship to the designated person. The request should also include a signed statement, submitted as a scanned or physical copy, from the designated person confirming that the representative is authorised to act on their behalf in connection with the review of the designation.

Grounds for the request: Set out the reasons supporting the request for de-listing and provide any relevant supporting documentation or other evidence.

Appeal

Under section 8(5) of the Act, an appeal can be brought to the Court of Appeal within 60 days, with at least 14 days' notice to the Director of Public Prosecutions.

Upon an appeal, the Court of Appeal shall hear:

any evidence or other information that may be presented by the Director of Public Prosecutions and may, at the request of the Director of Public Prosecutions, hear all or part of that evidence or information in the absence of the person concerned or any attorney-at-law representing the person, where the court is of the opinion that the

disclosure of the evidence or information would be prejudicial to national security or endanger the safety of any person;

provide the person concerned with a statement summarizing the evidence or information available to the court in order to reasonably inform the person of the reasons for the making of the terrorist designation order, without disclosing any evidence or information the disclosure of which would, in the opinion of the court, be prejudicial to national security or endanger the safety of any person;

provide the person concerned with a reasonable opportunity to be heard; and

direct the judge to make, confirm, vary or set aside the terrorist designation order, as the court considers appropriate.

H. Frozen by mistake (false positive)

Where a person is erroneously matched to a designated person or entity because of similar names and where funds or assets are retrained (frozen) for that reason, the procedures set out on page seven (7) of the Guideline on Targeted Financial Sanctions should be followed.

For UN sanctions, the UN Focal Point for Delisting has a specific role in handling mistaken-identity communications. See also the following resource for further information which may be found on its mistaken-identity page.

I. Plain-language glossary

Term	Meaning
Domestic designation order	A Barbados court order that designates a person or entity for sanctions purposes.
DNFBPs	Designated Non-Financial Business Entities or Professionals set out in the amendment to the Money Laundering and Financing of Terrorism (Prevention and Control) Act, 2011.
False positive	A wrong match between a name of a person or entity and a listed person or entity, usually caused by the same or similar name.
UN sanctions regime	A sanctions framework created by the UN Security Council and overseen by a sanctions committee or other UN body.
Ombudsman	The UN official that receives delisting petitions for the ISIL (Da'esh) and Al-Qaida list.
Focal Point for Delisting	The UN contact point that receives delisting petitions for many other sanctions lists (but not the ISIL/Al-Qaida list).
Supervisors	Competent authorities which supervise financial institutions and/or DNFBPs

J. Official resources

Further information may be found in the following resources:

United Nations Security Council

Resource
1267/1989 Committee: Procedures for Delisting
1267/1989 Member State request form (PDF)
Office of the Ombudsperson: Procedure
Security Council resolution 2734 (2024)
1988 Committee: Procedures for Delisting
1988 Committee request form (editable Word)
UN Focal Point for Delisting: procedures
Focal Point: mistaken identities
Focal Point for Delisting: overview
Security Council resolution 2744 (2024)

Barbados

Resource
Consolidated Laws of Barbados
Central Bank of Barbados: designation, counter-proliferation and freezing orders
Financial Services Commission: legislation and guidelines

About this guide

This guide was prepared by the ODPP and does not create any power to designate, delist, restrain or release assets. It is general information, not legal advice.