Golden Leaves
Funeral Plans

Anti-Money Laundering & Counter Terrorist Financing Policy

JULY 2026

Version Control

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Responsible for document management	Head of Regulation

1. Objective

- This policy seeks to ensure that Golden Leaves complies with the obligations and requirements set out by UK legislation, regulations and rules regarding the prevention, identification and reporting of money laundering or terrorist financing. This includes ensuring that we have adequate systems and controls in place to mitigate the risks posed to the company and its customers.
- In approving this policy, the Board of Directors recognises Golden Leaves' obligations in respect of:
    - Proceeds of Crime Act 2002
    - Terrorism Act 2000
    - Counter-Terrorism Act 2008
    - FCA Handbook including in particular APER, COND, PRIN and SYSC
    - FCA Treatment of Politically Exposed Persons for Anti-Money Laundering Purposes (FG17/6)
    - Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017

2. Policy Definitions

- Money laundering is the process through which the true origin and ownership of the proceeds of crime is changed so that the proceeds appear legitimate.
- Terrorist financing is providing or collecting funds, from legitimate or illegitimate sources, to be used to carry out an act of terrorism.

3. Scope

- This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us including appointed representatives, or any of our subsidiaries or their employees, wherever located.

4. Roles and Responsibilities

- The Head of Regulation reports to the CEO and has primary responsibility for maintaining the adequacy and effectiveness of the firm's financial crime controls.

- The Head of Regulation also has the following responsibilities:
  - Monitoring of the effectiveness of Golden Leaves' anti-money laundering controls
  - Overseeing the firm's compliance with the FCA's rules on anti-money laundering systems and controls
  - Ensuring that know your customer standards are compliant with Golden Leaves policy and relevant FCA rules
  - Receiving and reviewing internal disclosures and submitting external reports to NCA
  - Responding promptly to any reasonable request for information made by the FCA or law enforcement
  - Liaising with the FCA, NCA and other external agencies
  - Ensuring that anti-money laundering training is provided, its standards and scope are appropriate and that records are kept
  - Ensuring that the Compliance and Risk Committee is provided with sufficient MI to satisfy itself of the effectiveness of financial crime controls
  - Ensuring appropriate documentation of financial crime risks and mitigating controls in the firm's enterprise-wide risk register

- Staff are responsible for adhering to the requirements of this policy, remaining alert to the warning signs of money laundering and terrorist financing and to making appropriate enquiries.

5. The Money Laundering Process

- Typically, money laundering involves three stages:
  - **Placement**—the process of placing criminal property into the financial system (e.g., paying for a funeral plan in cash).
  - **Layering**—the process of moving money that has been placed in the financial system in order to obscure its criminal origin (e.g., converting the cash payment into a funeral plan)
  - **Integration**—once the origin of the money has been effectively disguised or obscured, the funds are ultimately reimported back into the mainstream financial system as legitimate funds (e.g., by cancelling a funeral plan and using the refund in the bank account for legitimate businesses).

6. Offences

- All employees of Golden Leaves should be aware that the legislation applies to the company and to the employee. Failure to comply with the legislation can result in an individual being subject to prosecution with the threat of a custodial sentence or fine.
- The Proceeds of Crime Act 2002 ("POCA") is the main piece of legislation dealing with individual criminal liability in relation to money laundering. The key offences applicable to our staff include:

a) Tipping Off & Prejudicing an Investigation

- Tipping off is punishable by a maximum penalty of 5 years' imprisonment and an unlimited fine under section 333 of POCA.
- You will commit the offence of "*tipping off*" if you:
  - disclose that you or anyone else has made a Suspicious Activity Report (SAR) to the Head of Regulation (or the National Crime Agency (**NCA**) and
  - your disclosure is likely to prejudice any investigation that might be conducted following the SAR.
- You will commit the offence of "*prejudicing an investigation*" if you disclose that an investigation into a money laundering offence is being contemplated or carried out and that disclosure is likely to prejudice that investigation.
- The existence of these offences does not prevent you from making normal enquiries about a customer's instructions.

b) Failure to Disclose

- It is a criminal offence under sections 330 and 331 of POCA for persons working in the regulated sector not to disclose if they have reasonable grounds to know or suspect, in the course of their employment, that another person is engaged in money laundering, as soon as reasonably practicable after the information comes to their attention. This offence also covers a failure of the Head of Regulation to report a suspicion to NCA without a reasonable excuse.
- Reporting to the Head of Regulation in accordance with Golden Leaves' procedures will satisfy the obligation to report.
- Failure to disclose is punishable by a maximum of 5 years' imprisonment and an unlimited fine.

c) Destruction of documents

- It is an offence under section 341 POCA to destroy or dispose of documents that may be relevant to a money laundering investigation.

d) Terrorism offences

- The Terrorism Act 2000 (as amended by the Anti-terrorism, Crime and Security Act 2001) establishes offences related to involvement in facilitating, raising, possessing or using funds for terrorism purposes, failing to report, tipping off or prejudicing an investigation. The Act:
    - Makes it a criminal offence for any person not to report the existence of terrorist property where there are reasonable grounds for knowing or suspecting the existence of terrorist property
    - Makes it a criminal offence for anyone to take any action likely to prejudice an investigation by informing (i.e., tipping off) the person who is the subject of a suspicion report, or anybody else, that a disclosure has been made to a MLRO or to NCA, or that the police or customs authorities are carrying out or intending to carry out a terrorist financing investigation
  - Failure to report is punishable by a maximum penalty of 5 years' imprisonment and a fine. The offence of actual money laundering is punishable by 14 years' imprisonment and a fine.

7. Financial Crime Obligations

- The FCA requires all authorised firms to have systems and controls in place to mitigate the risk that they might be used to commit financial crime, which means:
  - Documenting risk management policies and risk profile in relation to money laundering
  - Identifying customers
  - Understanding your relationship with them
  - Monitoring the way customers use services to identity anything suspicious.
  - Providing appropriate anti money laundering training to employees
  - Providing appropriate management information to senior management in relation to the effectiveness of the anti-money laundering controls.

a) Our Risk Based Approach

- We operate a risk-based policy in order to identify, manage and mitigate the risks associated with the firm being used for money laundering or terrorist financing.

- Golden Leaves only provides products and services to private individuals. We do not provide funeral plans to entities. We divide our customer base into two risk categories: Low and Higher risk, which will in turn reflect the nature of diligence and oversight we will conduct on our customers. Given the nature of our business, we expect the overwhelming majority of our customers to be assessed as low risk.
- Additionally, Golden Leaves has considered the risks attaching to each of its customer recruitment channels. These channels are:
  - Face-to-face via intermediaries (eg funeral directors acting as our appointed representative) or Golden Leaves field agents
  - Web-based distance channels or telesales
- For all current sales channels, we judge the risk attaching to payment for plans by card, bank transfer or direct debit to be low due to traceability of payments to accounts operated by recognised financial institutions. The board continues to review this and will reconsider this assessment if new recruitment channels are adopted in the future.
- Golden Leaves has further considered the risks attaching to the payment methods for its funeral plans. For payments made by instalment or by using a traceable method of payment, the firm judges that the risks are sufficiently low as to not require customer due diligence beyond screening against recognised sanctions lists and registers of Politically Exposed Persons ("PEPs").
- Golden Leaves does not accept payment in cash for its funeral plans, nor does it allow its appointed representatives to do so. The firm judges the money laundering and proceeds of crime risk attaching to cash to be too high to warrant acceptance.
- Golden Leaves does not pay out cash on maturity of a funeral plan. Instead, funds are paid only to funeral directors to whom funerals are allocated by Golden Leaves and only upon provision of legally acceptable and independently certified proof of death of the plan holder.
- Where plans are cancelled, funds will only be refunded to accounts used to purchase plans except where documentary evidence is provided of entitlement where funds are to be repaid to alternative accounts. See section b (plan refunds) below.
- Based on consideration of the nature of Golden Leaves' customers, the channels through which customers are recruited and options available for payment of plans, Golden Leaves judges the risk of financial crime to be extremely low.
- It follows from this that Golden Leaves expects the overwhelming proportion of its customers to be low risk. Only in exceptional cases where customers are positively matched against sanctions lists or PEP registers will customers' low-risk status be reviewed.

Customers' risk profiles are assessed as follows:

Low Risk:

- Private individuals residing in the United Kingdom who are taking out a funeral plan for themselves or another individual who is also residing in the United Kingdom and pay via cheque, card, bank transfer or direct debit.
- Private individuals residing in Spain, Portugal or Cyprus making payments for funeral plans by cheque, card, bank transfer or direct debit.
- Individuals identified as Politically Exposed Persons (but see section 9 below)

Higher Risk:

- Any individual who is matched on the UK Government sanctions list.

b) Plan Refunds

Any refund of funds that is requested within 2 days of plan purchase and where the plan was paid for on a credit or debit card will be refunded immediately to the card used to make the purchase. For all other refunds, anti-money laundering requirements are set out below.

Refunds will usually only be paid to accounts controlled by and in the name of plan purchasers. All payments are by electronic bank transfer. An electronic check is carried out before refund payments to ensure that an account exists in the name of the plan purchaser and to validate account and sort code details.

Where receiving accounts are not verified in the name of the plan purchaser or payment to an unconnected account is requested, the following are required:

- **Name change following marriage, divorce, civil partnership, deed poll or other legal process** – documentary proof of name change is required and evidence retained to show entitlement.

- **Entitlement to act on behalf of others** – documentary evidence of court deputyship, power of attorney, executorship of wills or other legally valid evidence is required and retained to show entitlement.

In both scenarios, name, account and sort code details of receiving accounts are verified before payment is made. Where documentary evidence cannot be provided, refunds will not be made.

Management information evidencing refund controls is provided monthly to the Compliance and Risk Committee. Internal audit also tests and reports on effectiveness of refund procedures.

c) Risk Assessment and documentation

- Financial crime risk is documented in Golden Leaves' risk register, where relevant risks are listed and controls are summarised. Risks are assigned control owners whose responsibility includes documenting controls in place to manage exposure. This risk register is reviewed every six months. Financial crime risks attaching to product, distribution or payment method changes are considered as part of six-monthly review.
- In support of this risk documentation, relevant guidance to staff is set out in this policy.

8. Customer Due Diligence

- CDD means identifying and verifying the customer's identity and maintaining appropriate records in relation to that customer.
- These measures are designed to make it harder for the financial services industry to be used to launder money or fund terrorism.
- We will apply CDD measures when we set up a funeral plan for a customer. The extent of customer due diligence is described in this policy.

a) CDD – new customers

- To the extent that this policy and our risk assessments require this, Golden Leaves will ensure that it has completed appropriate customer due diligence prior to entering into a legally binding agreement with the customer to undertake regulated business.
- Details of all plan applicants will be screened against PEP registers and sanctions lists by the Head of Regulation.

b) CDD - existing customers

If a customer has already been identified by Golden Leaves, no additional information needs to be obtained subsequently unless:

- o Golden Leaves has reason to suspect that the identity of the customer has changed;
- o transactions take place which are not reasonably consistent with the firm's knowledge of the customer;

  - other matters occur which might affect the firm's assessment of risk presented by that customer (such as adverse media reports of legal/regulatory sanction, re-categorisation of the customer and /or any beneficial owner such as a PEP etc.).

c) Politically Exposed Persons (PEPs)

- A PEP is defined as an individual who is entrusted with prominent public functions and an immediate family member or known close associate of such a person. The risks of Politically Exposed Persons (PEPs) are that they may handle proceeds of corruption and/or may offer, be offered or expect or demand bribes. A PEP is defined as the following and their family members:
  - Heads of state, heads of government, ministers and deputy or assistant ministers
  - Members of Parliament (MPs)
  - Members of the governing bodies of political parties
  - Judges of the UK Supreme Court
  - Members of courts of auditors or of the boards of central banks
  - Ambassadors, chargés d'affaires and high-ranking officers in the armed forces (defined as anyone at the rank of Vice Admiral, Lieutenant General or Air Marshal or above)
  - Members of administrative, management or supervisory boards of state-owned enterprises (defined as a for-profit enterprise where state ownership of share capital exceeds 50% or where the state can reasonably be said to have control)
  - Directors, deputy directors and members of the board (or equivalent function) of an international organisation (defined as NATO or the UN and not including international sporting federations)
- Family members are defined as the spouse of civil partner of a PEP; their children and *their* spouses or civil partner; brothers and sisters of a PEP; and the parents of a PEP.
- When taking on new customers we screen against publicly available PEP lists in order to determine if they are politically exposed.
- Where a match against PEP lists is made, assessment is carried out by the Head of Regulation as set out in section 9 (a) below.

d) Sanctions Lists

The Head of Regulation screens new plan applicants against UK Government sanctions lists. In the event of a possible match, Golden Leaves is required to notify the Office of Financial Sanctions Implementation (OFSI) as soon as practicable if it knows or reasonably suspects that a plan applicant is a designated person or has committed an offence under financial sanctions regulations.

Reporting to OFSI is by completion of a Compliance Reporting Form made available for firms' use online and which should be emailed to ofsi@hmtreasury.gov.uk

Where a potential match is notified, the Head of Regulation will consider (and will report to OFSI if required in respect of) the information on which knowledge or suspicion is based and by which the person can be identified. This may include:

- Name
- Address
- Date of birth

In the event that the Head of Regulation is satisfied that no positive match is made, no further action is required. A record of the basis for this decision will be retained. If potential matches exist, the Head of Regulation will consult (and act upon) relevant guidance available at

https://www.gov.uk/government/publications/financial-sanctions-general-guidance/uk-financial-sanctions-general-guidance

In the event that reasonable cause exists to suspect that funds may belong to or be controlled by a designated person, Golden Leaves will freeze funds and report as required to OFSI.

9. Conducting CDD: Core Requirements

- Golden Leaves will screen all applicants for plans against recognized sanctions lists and registers of politically exposed persons ("PEPs").

- Golden Leaves does not carry out further due diligence on customers. This is because the firm judges that:

  - The risk attaching to any customer making payment via a recognized financial institution and thereby providing traceability of accounts is sufficiently low that this removes the need for Golden Leaves to carry out further identification and verification.
  - Holders of accounts operated by recognized financial institutions will have undergone due diligence at time of account opening on which Golden Leaves believes it is reasonable to rely, thereby rendering further due diligence unnecessary in the context of the sector in which Golden Leaves operates.

a) Politically Exposed Persons – Risk Assessment and Due Diligence

The Head of Regulation will carry out a risk assessment of any individual flagged as a potential PEP. Where positively identified, Golden Leaves considers the following risk indicators:

Product Type – Golden Leaves judges the risk that its plans are used for financial crime purposes to be low.

Geographical – the FCA has determined that a UK-based PEP should be treated as lower risk unless other risk factors not linked to their position signify a higher risk.

Jurisdiction – FATF has judged that in the UK, Spain, Portugal and Cyprus (the only markets in which Golden Leaves' plans are promoted) the risk of financial crime is low. All are required to enact legislation and financial sector procedures in accordance with the EU 4th, 5th and 6th Money Laundering Directives.

Payment – all methods of payment currently accepted by Golden Leaves require use of recognised financial institutions with traceable transactions and where appropriate due diligence is required for account opening. Risk attaching to payment for plans is judged to be low.

Value – the relatively low cost of Golden Leaves' plans renders it unlikely that purchases might be used to launder money or otherwise profit from the proceeds of crime.

Absent any indicators to the contrary, PEPs will be assigned low-risk status, to be documented by the Head of Regulation, with the effect that:

- No further enquiries will be made by the Head of Regulation except where it is judged necessary to establish whether an applicable relationship exists.
- Source of Funds and Source of Wealth enquiries are not required.
- No further enquiries regarding source of funds will be made beyond using information known to Golden Leaves such as payment method.
- Approval at board level is not required.

10. Monitoring

MI relating to the following is reported to the CRC each month:

- Status of PEP/sanctions checks (Head of Regulation)
- Refund patterns and behaviours, including to accounts not linked to original payments (Head of Finance)
- Compliance with this policy (Head of Audit)

11. Suspicious Activity Reports (SAR)

a) Obligation to Report

- Every member of Golden Leaves' staff is required to make a formal report to the Head of Regulation if, in the course of their employment, they know, suspect, or have reasonable grounds for either knowing or suspecting money laundering or terrorist financing. A duty to report a suspicion of money laundering exists even if a potential customer does not conduct any business through Golden Leaves.
- A person could be found guilty of a failure to report even if they did not actually suspect but ought to have suspected money laundering. The test is whether an honest and reasonable person, working within the financial services industry, would have formed a suspicion based on the facts available at the time.
- The report must be made as soon as possible. By submitting a report you will discharge your individual responsibility under s330 POCA 2002, thus protecting yourself from criminal prosecution for the offence of a failure to disclose.

b) Consultation with you Line Manager

- It is acceptable to discuss your suspicion with your line manager. However, if after consulting your line manager you remain suspicious, it is your responsibility to ensure that a report is submitted to the Head of Regulation
- To reduce the risk of inadvertently tipping off a customer the case should be discussed with as few people as possible.

c) Continuous Obligation to Report

- Making a report does not remove the need to notify the Head of Regulation of further suspicions that may arise with the same or different customer. If further suspicions arise additional reports must be made.

d) After Submission of a Report

- Until the Head of Regulation informs you that no report to NCA is to be made, any further transactions or activity in respect of the suspected customer must be reported as soon as they arise.

e) Head of Regulation's Determination

- The Head of Regulation will consider the report and surrounding circumstances and decide whether or not to submit an external report to NCA. If required, they must do this as soon as practicable.
- The Head of Regulation will record all internal enquiries made in relation to the report of a suspicion and the basis for their decision to make or not to make a report to NCA.
- A failure to make a report when there are reasonable grounds for a suspicion may constitute assistance under ss.327-329 POCA 2002.

f) Pre-Transaction Reporting to NCA

- If a pre-transaction report is made by the Head of Regulation to NCA in relation to AML, no business may be conducted with or for a customer until you receive consent from NCA. NCA has 7 working days, from the working day following the day of the disclosure, in which to respond. Dealing with or advising a customer before receiving consent from NCA may constitute one of the offences under ss.327-329 POCA 2002, that is concealing, arrangements or acquisition, use and possession.
- If a report is made to the NCA under the Terrorism Act no related transaction or activity is allowed to proceed until Golden Leaves have been contacted by NCA or a law enforcement agency.
- The Head of Regulation will inform you whether NCA consents to you dealing with the customer or not. Please liaise directly with the Head of Regulation who will provide guidance on what information may be provided to a customer or potential customer.

g) Post-Transaction Reporting to NCA

- Since NCA cannot provide consent after a transaction or activity has already occurred, it will provide an acknowledgment of receipt of a report to the Head of Regulation. In the absence of an indication to the contrary from the Head of Regulation, you may deal with the customer as normal. However, you must inform the Head of Regulation of every interaction with the customer and seek guidance on how to deal with that customer.

h) Contact with the customer and third parties

- Any contact from the customer questioning the delay in processing their transaction needs to be handled very carefully. In these circumstances, please liaise closely with the Head of Regulation.

- Whether or not NCA allows you to proceed with a transaction, you must not tip off the customer that a disclosure to the authorities has been made.
- Unless specifically authorised to do so, you must not discuss any reports of suspicions of money laundering with third parties. Any requests for information from third parties, such as the Police or Customs, must be immediately referred to the Head of Regulation.

i) Court Orders

- Any evidence to be presented in Court will be obtained under a court order. The following are the types of order that may be served on Golden Leaves as part of an investigation.
    - Production order
    - Disclosure order
    - Customer information order
    - Account monitoring order
    - Search and seize warrant
    - Order for financial information under Terrorism Act
- All such orders should be passed to the Head of Regulation immediately who will liaise with Golden Leaves' legal advisers as appropriate.

j) Failure to Make a Report

- In addition to the sanctions under the POCA 2002, Golden Leaves will take disciplinary action against any member of staff who fails to report a suspicion without a reasonable excuse.

k) Form of Reporting

- Please make your report to the Head of Regulation on the Suspicious Transaction Reporting Form (Money Laundering) attached in Appendix 1. Please give as much information on this form as possible.

l) Examples of Suspicious Activity

- Below is a list of activities that <u>may</u> give rise to a suspicion of money laundering or terrorist financing. This is not an exhaustive list of circumstances; neither will they necessarily give rise to a suspicion.

- The customer cancels their fully paid funeral plan within the cooling off period and requests that the payment to be made to someone else.
- Where a refund to is requested to an account which is not in the plan purchaser's name and Golden Leaves is either unable to validate the account to which funds should be paid or is unable to satisfy itself that the intended receiver has legitimate entitlement to the funds.
- Transactions with no apparent purpose or that make no economic sense
- The customer refuses to provide information requested.

12. Ongoing Relationships with Suspicious Customers

- Golden Leaves' policy is not to maintain relationships if the firm believes that we may be used for money laundering. Where a customer has been involved in a suspicious transaction, the Head of Regulation together with the CEO will make a decision regarding the ongoing relationship with that customer.

- Where a customer has been the subject of a referral to NCA by the Head of Regulation, he/she must be informed before any action is taken to exit the relationship. In such circumstances the Head of Regulation will consult NCA to obtain permission to terminate the customer relationship.

13. AML & CTF Awareness & Training

- It is our policy to ensure that all employees are aware and kept up to date with money laundering developments. This policy serves as the basis for awareness within Golden Leaves. It will be supplemented with additional material as and when necessary.
- Golden Leaves requires that relevant staff complete training upon recruitment and on an annual basis.

16. Record Keeping

- The following material must be kept:
  - Customer information, including evidence of identification (5 years from the end of the relationship)
  - Details of all transactions made on behalf of each customer (5 years from the end of the relationship)
  - Internal and external reports of suspicion (5 years from date of report)
  - Information not acted upon (5 years from date of report)

- o Training and competence records (as per records retention policy)

17. Annual Review

- This policy will be reviewed by Head of Regulation every year to ensure its alignment to appropriate legal and regulatory requirements as well as best practice compliance standards and its continued relevance to Golden Leaves' current and future operations.
- Any changes to the policy will be approved by the Board.

Appendix 1: Suspicious Transaction/Activity Reporting Form (Money Laundering)

Name of Person Reporting a Suspicion

Job Title or Responsibility

☐ **PERSONAL CUSTOMER**

Account Number (if applicable)

Name: ……………………………………………………………………………………………

Address: …………………………………………………………………………………………

Contact/Tel: ……………………………………….

Nationality (if known): ………………………………

Date of Birth: ……………………………

Other Verification Evidence:

(If applicable) ………………………………………………………………………………………

CONNECTED ACCOUNTS (please provide account name, number and the nature of the relationship)

………

………

Details of Event(s) Giving Rise to a Suspicion (use a separate sheet of paper if necessary)

Details of Supporting Evidence Attached (if any)

This report is being made **PRE** or **POST** transaction (delete as applicable)

☐ A separate sheet of paper is attached (tick if applicable)

Signed

Dated

ONCE COMPLETED PLEASE PASS THIS FORM TO THE HEAD OF REGULATION IMMEDIATELY. PLEASE RETAIN A COPY OF THIS REPORT FOR YOUR OWN RECORDS.

[redacted]

To be completed by the Head of Regulation

Customer name

Date Received

Date Review Completed

Comments Regarding the Suspicion

I have reviewed the report and have concluded:

Reported to NCA?

☐ **Yes** copy of NCA report attached.

If disclosure is prior to an event, have the appropriate measures been taken to ensure the transaction cannot proceed for the next 7 working days?

I have decided that the suitable action is:

☐ **No** basis for non-disclosure is included in comments above

Signed

Position

Dated

HEAD OF REGULATION USE:
Reference……….
Date received: …………. Time received: …………..
Pre-advised activity consent report? ………………. **Yes / No**
NCA advised? Yes/No Date:……. ……………….Time:…………………..
NCA Reference: …………………..
NCA consent received/denied/assumed.……………..Date:……………………

Appendix 4: Post-Transaction Review Form

Year:

Quarter:

I acknowledge that during the past quarter:

EITHER

☐

No accepted, declined or potential business done with of for customers or potential customers of Golden Leaves has given rise to a reasonable suspicion of money laundering, terrorist financing or fraud. In making this assessment I have considered all information which is or has become available to me before, after or at the time of any such business.

OR

☐

I have carefully reviewed suspicious activity reports submitted to me by Golden Leaves' staff and either made a formal report to the National Crime Agency; or documented my reasons for not making such a report.

Name

Job Title

Signature

Date

Appendix 5: Useful Links

National Crime Agency (NCA)

www.NCA.gov.uk

NCA Disclosure Form

NCA has prepared a standard disclosure form. Both this form and guidance on completing it are available at www.NCA.gov.uk/financialIntel/disclosure.html#forms.. NCA prefers reports to be delivered electronically and the details of how to register can be found at https://www.ukciu.gov.uk/saronline.aspx.

Transparency International Corruption Perception Index
https://www.transparency.org/

Home Office Proscribed Organisations List

http://www.homeoffice.gov.uk/security/terrorism-and-the-law/terrorism-act/proscribed-groups?version=1

HM Treasury Sanctions List

https://www.gov.uk/government/publications/the-uk-sanctions-list