

SAR glossary codes for reporters

Money laundering and sanctions note

March 2022

United Kingdom Financial Intelligence Unit (UKFIU)

The NCA has received requests from reporters for a defence against money laundering, concerning entities sanctioned by the UK, US, EU and other overseas jurisdictions.

The Defence Against Money Laundering (DAML) and Defence Against Terrorist Financing (DATF) regime is distinct from the Sanctions regime. Where DAML and DATF interact with the Sanctions regime is when sanctioned entities, and by extension persons not sanctioned but linked to sanction entities, are referred to in DAMLs and DATFs submitted by Suspicious Activity Report (SAR) reporters.

Where DAMLs are submitted, it is for the purpose of reporting a suspicion of money laundering or criminal property; where DATFs are submitted it is for the purpose of reporting terrorist financing. They are not for the purpose of reporting a suspicion of a sanction breach.

The identification of sanctioned entities, or linked non-sanctioned entities, may be made by the reporter and form part of the reasons for submission when submitting a SAR. The NCA cannot tell the reporter what to report within the SAR submission.

In March 2022 the UKFIU introduced a new SARs glossary code for entities associated to sanctioned individuals and companies on the sanctions list.

Use the code **XXSNEXX** where you suspect the activity is consistent with money laundering and is linked to entities sanctioned by the UK, US, EU and other overseas jurisdictions.

To note: the filing of a SAR does not absolve you of your responsibilities to contact the Office of Financial Sanctions Implementation (OFSI) for a license to move the funds for a sanctioned entity or sanctioned individual.