

Internal Suspicious Activity Report

Guidance Note

This report is made up of several parts.

The main report (pages 1 to 3) must be completed in all instances.

Appendix A for each person identified in connection with the suspected act.
Appendix B for identifying all legal arrangements connected to the suspicion
Appendix C must be completed to identify any vessels or aircraft

The items written in light grey are guidance to help you complete the report and must be deleted, please ensure that the font and the colour are changed.

Do not complete this form if you have not reached reasonable grounds of suspicion. If you have any doubts or need assistance, please seek guidance from the MLRO or Nominated Officer.

Where a committee, team and group of employees reach a mutual suspicion, and they all concur with the statement made in the main report. It is permitted to expand the declaration and signatory so that all persons that have reached a suspicion and fully support the statement may also sign.

What happens next

The MLRO or the NO will acknowledge receipt of the report.

You will not be advised if a disclosure to the FIS is made. The MLRO may request further information or provide feedback in respect of the completeness of the report. This feedback does not mean that your report is being ignored or dismissed.

If you believe that your next action may involve a situation where you must undertake an urgent transaction that is clearly connected with your suspicion, please clearly identify this and the grounds for urgency.

Housekeeping

Do not retain copies of this document, and do not place or retain any copy or draft outside of your personal drive. The subjects of the report have rights under Data Protection Laws, and any documents you may retain, or hold may be discoverable under a Data Subject Access Request ('DSAR') so please ensure that any supporting documentation or notes that you make to help you complete this report are not retained in a manner that may identify the report. For example, creating a SAR folder in your drive or naming a document with 'used in SAR in the title'.

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Internal Suspicious Activity Report

Your Details

If a committee or other fora state, all members who shared the suspicion. All will be required to sign a declaration individually if they all concur with the contents of this report.

Submitted By	Date of submission

Submitted to whom

Money Laundering Reporting Officer

Nominated Officer

Subjects that form part of your suspicion *(Subjects are Clients, person(s) and legal arrangements) If more than one subject of suspicion, please attach a further form per subject*

	Client or External
Date of client take on and date of exit if applicable	

Only identify persons, parties, contracts or legal arrangements that are directly connected to your suspicion. Do not include records details or other client matters that are not connected to evidencing your suspicion. You are required to identify what you believe is the alleged criminality, when you reached this reasoning and how you have reached this conclusion.

Only attach evidence such as statements, invoices or other paperwork that relates directly to your suspicion

What alleged act of criminality do you have suspicions about?

i.e., Bribery and corruption, tax evasion, fraud etc. You can have more than one, refer to the Financial Crime Policy if you need a list of predicate offenses.

What evidence, acts or information led you to forming a suspicion?

i.e. Please attach copies and itemize here. Please explain in context with your suspicion how this supports your rationale.

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When did you reach reasonable grounds of suspicion and what caused this to materialise

i.e. Identify the date and the control that identified it (for example was it because of receiving x document or x was found on the internet)

What control or activity was being undertaken that identified this information?

i.e. Periodic review, updating Source of Wealth, Source of Funds, Open Source information

List number of Subjects and Completed forms for each and itemise all attachments that relate to your suspicion

(Appendix A for Natural Persons or Appendix B for Legal Arrangements)

Declaration

I confirm that I have completed this internal suspicious activity report to the best of my ability and that I am aware of any communication that I have had since I reached reasonable grounds of suspicion, this applies both before and after making this report and this knowledge may place me at 'risk tipping off'. I understand that all communications with any of the subjects identified in this disclosure are subject to 'tipping off' provisions.

I understand that by making this report it does not relieve me of any further reporting obligations or provide any form of consent or approval for me to act in relation to any activity connected with your suspicion.

Signed

Name (full)

Dated

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Appendix B – Legal Arrangements

Please complete for every legal arrangement that is connected to your suspicion, please complete to the best of your abilities understanding that other non-client subjects you may only have access to limited data. Consider the risk of tipping off if requesting further information, especially if you cannot find other reasonable grounds for requesting it.

Subject's full name <i>and any former name</i>		
Legal Arrangement	Trust / Company / Foundation / Partnership	
Jurisdiction/Governing Law		
Jurisdiction of administration		
Is a client?	Yes/No	
(If not a client) How connected to a client arrangement	<i>Identify which client and how connected</i>	
Date of incorporation or settlement	Place of birth	
Registration Numbers <i>Incorporation or registered number, Legal Identifier and/or GIIN</i>		
Addresses <i>(Contact, Registered Office etc.)</i>		
Telephone and email		
Account name <i>(if different from client entity)</i>		
Details of any associated third party <i>i.e. advisor/Lawyer/partner</i>	.	
Assets Held <i>Identify assets, estimated value with an as at date and account numbers and other identifiers</i>		
Other relevant information: <i>e.g. additional details of identification and/or references taken, associated parties, addresses, telephone numbers, etc.</i>		

