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பணிப்பாளர் நாயகம்/பதிவாளர் இல
Director Genaral/Registrar
011-2864483

අධ්‍යක්ෂ
பணிப்பாளர்
Director
011-2888424

සහකාර අධ්‍යක්ෂ
உதவி பணிப்பாளர்
Asst. Director
011-2884612

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அலுவலகம்
Office
011 -2877376

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எனது இல
My No. VSSO/REG/ Third Mutual Evaluation/ TFGL/ 01

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Ministry of Rural Development, Social Security and Community Empowerment
கிராமிய அபிவிருத்தி, சமூகப் பாதுகாப்பு மற்றும் சமூக வலுவூட்டுகை அமைச்சு

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அரச சார்பற்ற நிறுவனங்களின் தேசிய செயலகம் – 14ஆம் மாடி, சுஹுருபாய, பத்தரமுல்ல.
National Secretariat for Non-governmental Organizations - 14th Floor, Suhurupaya, Battaramulla.
විද්‍යුත් තැපෑල් ලිපිනය E-mail:ngosecretariat.gov@gmail.com

දිනය
திகதி 22.10.2026
Date

To All Registered Non-Governmental Organizations,

Amendment to The AML/CFT Guidelines for NGOs in Sri Lanka

The National Secretariat for Non-Governmental Organizations hereby informs all registered NGOs that **Annex 6 – Red Flags Indicating Possible Money Laundering or Terrorist Financing** is introduced as an amendment to the existing AML/CFT Guidelines for NGOs in Sri Lanka.

All NGOs are requested to read this **Annex 6** in conjunction with the existing Guidelines and take appropriate measures to strengthen their AML/CFT risk identification and management practices.

The Annex 6 shall be applicable with effect from the date of this letter.

Chandrarathna D. Vithanage
Director General/Registrar (Act.)

Cc:1) Secretary, Ministry of Rural Development, Social Security and Community Empowerment
2) Director, Financial Intelligence Unit (FIU), Central Bank of Sri Lanka
3) All District NGO Coordinators- To facilitate awareness and monitoring at district level

ANTI-MONEY LAUNDERING AND COUNTERING THE FINANCING OF TERRORISM (AML/CFT)

GUIDELINES FOR NON-GOVERNMENTAL ORGANIZATIONS (NGOs) IN SRI LANKA

Issued by: National Secretariat for Non-governmental Organizations of Sri Lanka

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Purpose of the Guidelines

This guideline is designed to help Non-Governmental Organizations (NGOs) in Sri Lanka prevent misuse for **Money Laundering (ML)** and **Terrorist Financing (TF)**. It promotes transparency, accountability, and compliance with international standards (including FATF Recommendation 8), while supporting the operational needs of the NGO sector.

1. Understanding the Risks

NGOs may be vulnerable to ML/TF due to:

- Handling large donations, often in cash.
- Operating in high-risk or remote areas.
- Weak or informal governance and financial systems.

Risks Include:

- Creation of fake NGOs for illicit purposes.
- Diversion of funds to extremist or criminal groups.
- Abuse of NGO platforms for radicalization or promotion of extremist ideologies.
- Trustees, volunteers, or employees using NGO premises or status for unlawful activities.

2. Legal and Regulatory Framework (Sri Lanka Context)

NGOs must comply with:

- Prevention of Money Laundering Act No. 5 of 2006
- Convention on the Suppression of Terrorist Financing Act No. 25 of 2005
- Financial Transactions Reporting Act No. 6 of 2006
- Voluntary Social Service Organizations (Registration and Supervision) Act No 31 of 1980 amended by Act No 8 of 1998
- Instructions issued by the Financial Intelligence Unit (FIU) and NGO Secretariat

Additionally, Non-governmental organizations are required to prepare a Suspicious Transaction Report and submit it to the Financial Intelligence Unit (FIU) of Sri Lanka with a copy forwarded to the NGO Secretariat in cases of suspicion of AML/CFT.

3. Core Principles for NGOs

a. Registration

- All voluntary social service organizations operate in Sri Lanka must be registered under the Voluntary Social Service Organizations (Registration and Supervision) Act.
- Maintain updated information on funding sources, and activities.
- Submit annual/ quarterly reports and audited accounts.

The following laws and circulars are applicable.

a. Voluntary Social Service Organizations (Registration and Supervision) Act No. 31 of 1980.
b. Voluntary Social Service Organizations (Registration and Supervision) (Amendment) Act No.8 of 1998.
c. Presidential Secretary's Circular No. RAD/99/01 dated 26/02/1999
d. Special Gazette Notification No.1101/14 and dated 15/10/1999 of the Democratic Socialist Republic of Sri Lanka
e. Director General's Internal Circulars No. 06, 07, 08 and 10

b. Governance & Internal Controls

- A competent Board of Directors/Office Bearers is essential.
- Implement a conflict of interest policy and standard internal approvals.
- Appoint a responsible officer to report to the NGO Secretariat.
- Board must issue an annual declaration on compliance with AML/CFT obligations.

c . Know Your Donor, Beneficiary, Partner & Employee (KYC)

- Screen donors, partners, beneficiaries & employees against the UN Sanctions Lists.
- Conduct due diligence:
    - For donors: identity verification, background checks, ensures no anonymity.
    - For partners/beneficiaries: collect ID/registration documents.
    - For employees: maintain personal data (NIC, address, contact, experience).

(For more information on UN sanctions, please see the FIU website below.)

https://fiusl-screening.web.lk

- Enhanced Due Diligence for:
    - Foreign donors: Identify verifications, source of funds, sanctions screening
    - High-risk areas :sanctioned countries such as North Korea, countries where there are conflicts
    - Cross-border transactions : assessing the source and destination of funds, sanctions screening
    - Politically Exposed Persons : PEP identification ,risk assessment, source of wealth

d. Financial Management & Banking

- Use formal banking channels only.
- Maintain:
    - One designated account for foreign funds
    - Joint signature operation for key accounts
- Avoid handling cash over LKR 100,000.
- Align all spending with declared purposes.
- Document:
    - All transactions
    - Donor agreements
    - Documents must be kept for six (6) years.
- Fund flow statements with AML/CFT declaration.

e. Monitoring, Evaluation & Reporting

- Monitor programs and fund usage continuously.
- Submit audited financials annually.
- Maintain and share internal logs of suspicious activity.
- Submit Suspicious Transaction Reports (STR):
    - In cases of suspicion of Money Laundering (ML) or Terrorist Financing (TF), NGOs should submit STRs (Suspicious Transaction Reports) directly to the FIU, with a copy also sent to the NGO Secretariat.
    - Use the Suspicious Transaction Report (STR) format for NGOs provided in Annex 2.
- Ensure donations are used solely for approved objectives.

f. Transparency & Public Accountability

- Publish annual reports with financial and impact data.
- Disclose:
    - Funding sources
    - Beneficiaries and partners, when appropriate
- Segregate key duties (e.g., no dual roles for payments and approvals).

Use competitive procurement; maintain supplier records.

4. Staff Training & Risk Awareness

- Train all staff, board members/ office bearers and volunteers on AML/CFT risks.
- Conduct annual trainings to refresh the knowledge.
- Hold quarterly AML/CFT review meetings at the Board of Directors/ Office Bearers' level.
- Promote a culture of compliance and integrity.

5. Risk-Based Approach

NGOs are encouraged to:

- Conduct a risk assessment of donors, projects, locations, and partners.
- Use the provided NGO Risk Scoring Template
- Classify risks as Low / Medium / High.
- Apply controls accordingly:
    - Simplified
    - Standard
    - Enhanced
- Review risk assessments annually and maintain documentation.

6. High-Risk Activities to Avoid

In order to minimize ML/TF risks, the NGOs should avoid high risk activities of following nature.

- Working with unknown or unverified foreign partners
- Accepting donations without proper documentation

- Transferring funds without contracts, MoUs, or receipts
- Operating in risk areas without proper oversight

Annex 6 provides an elaborate explanation on Red Flag Indicators for NGOs.

7. Record Keeping

- Retain all records for at least 6 years, including:
    - Donor details
    - Beneficiaries and partners
    - Financial and bank records
    - Cash disbursements
- Maintain digital and physical backups for retrieval during audits.

8. Reporting Obligations

- Submit:
    - In cases of suspicion of Money Laundering (ML) or Terrorist Financing (TF), NGOs should submit STRs (Suspicious Transaction Reports) directly to the FIU, with a copy also sent to the NGO Secretariat.
    - Quarterly/Annual Reports to the NGO Secretariat
- Cooperate with:
    - Investigations by law enforcement or regulators
- Keep internal records of:
    - Suspicious activities
    - AML/CFT compliance logs

9. Sanctions for Non-Compliance

Failure to comply may result in:

1. Written Warning – for minor breaches
2. Project Suspension – new projects halted until compliance
3. Legal Referral – for severe violations
4. Freezing of Accounts or Assets – upon legal action
5. Non-compliant NGOs may also lose donor funding or tax exemptions.

6. Inactive or deregistered NGOs will be published online for public transparency.

10. International and Cross-Border Operations

- Use approved bank channels only.
- Maintain donor correspondence and contracts for all foreign transfers.
- Comply with:
    - Sanctions regimes
    - UN Security Council Resolutions
    - International AML/CFT standards

11. Monitoring & Oversight

- NGO Secretariat will:
    - Require NGOs to notify Secretariat before project commencement

12. Engagement with NGO Umbrella Bodies

When to Engage:

- During roll-out of guidelines
- For training, workshops, and circulars
- To gather feedback on practical challenges
- To share emerging sector risks

How to Engage:

- Hold biannual roundtables
- Create WhatsApp groups and email portals
- Distribute newsletters, and test new formats with umbrella bodies

Annexes:

1. AML/CFT Self-Assessment Checklist for NGOs
2. Suspicious Transaction Report (STR) Format for NGOs
3. Ngo Risk Scoring Template
4. Annual Fund Flow Report
5. Annual Updated Staff Details and Details of Board of Directors / Office Bearers Report
6. Red Flags Indicating Possible Money Laundering or Terrorist Financing

Annex 1

AML/CFT Self-Assessment Checklist for NGOs

(For NGOs in Sri Lanka)

No.	Question	Yes	No	Comments / Action Needed
1. Registration & Governance				
1.1	Is your NGO registered with the NGO Secretariat?	☐	☐	
1.2	Do you have updated records of your Board Members/Office Bearers?	☐	☐	
1.3	Is your NGO submitting annual/quarterly reports to the Secretariat?	☐	☐	

2. Internal Controls

2.1. Do you have a Coordinator Officer for AML/CFT matters?
2.2. Has the Board issued an AML/CFT compliance declaration this year?
2.3. Are there written policies on conflict of interest and approval processes?

3. Know Your Donor, Partner & Beneficiary (KYC)

3.1. Do you collect ID documents from donors, partners, and beneficiaries?
3.2. Do you screen names against UN Sanctions Lists?
3.3. Do you apply extra checks for foreign donors or high-risk individuals?

4. Financial Management

4.1 Are all transactions made through formal bank channels?
4.2 Do you avoid handling cash over LKR 100,000?
4.3 Do you maintain a separate account for foreign funds?
4.4 Do you keep receipts and agreements for all funding and spending?

5. Monitoring & Reporting

5.1 Do you regularly monitor how funds are used in projects?
5.2 Have you submitted Suspicious Transaction Reports (STR) if needed?
5.3 Do you keep a log of any suspicious activity or compliance issues?

6. Training & Awareness

6.1 Have staff and board members received AML/CFT training this year?
6.2 Do you hold regular AML/CFT review meetings?
6.3 Are staff aware of how to report suspicious activity?

7. Risk Assessment

7.1 Have you conducted a risk assessment of your donors and projects?
7.2 Do you use a risk scoring template to classify Low / Medium / High risk?
7.3 Is your risk assessment updated at least once a year?

8. Record Keeping

8.1 | Are all records (donors, transactions, beneficiaries) kept for 6 years?
8.2 | Do you have both physical and digital backups of records?

Suspicious Transaction Report (STR) Format for NGOs

SUSPICIOUS TRANSACTION REPORT							
a. This report is made pursuant to the requirement to report suspicious transactions under the Financial Transaction Reporting Act, No. 6 of 2006 b. Under Section 12 of the Act, no civil, criminal or disciplinary proceedings shall be brought against a person who makes such report in good faith.							
PART A - DETAILS OF REPORT							
1	Date of Sending Report						
2	Is this replacement to an earlier report ?	Yes		No			
PART B - INFORMATION ON SUSPICION							
3	Name in Full *(Individual or registered name of organization)*						
4	Residential / Registered Address						
5	NIC No. / Passport No. / Business Registration No.						
6	Gender (if individual)	Male		Female			
7	Country of Residence and Nationality (if an individual)						
8	Business/ Employment Type						
9	Occupation/ Principal Activity (For organizations: nature of operations)						
10	Name of Employer/ Organization (where applicable)						
11	Contact Details						
PART C - DESCRIPTION OF SUSPICIOUS TRANSACTION / ACTIVITY							
12 Details of Transaction / Activity *(Include date, amount, currency, method, frequency, and location)* Date(s) of Transaction: …… Amount(s) Involved: …… Currency: ☐ LKR ☐ USD ☐ EUR ☐ Other: .....… Mode of Transaction: ☐ Cash ☐ Bank Transfer ☐ Cheque ☐ Other: .....… Bank / Financial Institution (if applicable): …… Intended Purpose of Funds / Activity: Any Other Details:							

13	Ground / Reasons for Suspicion *(Tick where applicable and elaborate below)* ☐Unusually large or unexplained donation ☐ Repeated cash transactions inconsistent with NGO activities ☐ Source of funds unclear or unverifiable ☐ Funds received from / sent to high-risk jurisdictions ☐ Mismatch between stated purpose and actual use of funds ☐ Refusal or reluctance to provide identification / documents ☐ Transaction lacks economic or lawful justification ☐ Possible links to prohibited, terrorist, or extremist activities ☐ Other (please specify): ……
14	**Detailed Explanation of Suspicion** *(Narrative description of events, behavior patterns, and reasons for suspicion. Additional documents may be attached.)*
PART D – ATTACHMENTS (IF ANY)	
	☐ Identification documents
	☐ Bank records / deposit slips
	☐ Agreements / correspondence
	☐ Project documents
	☐ Other supporting material: ……
PART E – DETAILS OF REPORTING PERSON	
15	Date of Reporting
16	Name of Reporting Person
17	NIC Number
18	Designation / Occupation
19	Name of Reporting NGO & Registration No
20	Address
21	Contact Details
22	Signature

NGO RISK SCORING TEMPLATE

(By NGOs)

SECTION 1: Basic Information

Field	Details
Name of NGO	
Date of Assessment	
Name of Person Completing This Form	

SECTION 1: Risk Categories

For each question below, tick the appropriate risk level and add the score.

No.	Risk Area	Risk Description	Low (1)	Medium (2)	High (3)
1	**Donor Type**	Is the donor local or foreign?	☐	☐	☐
2	**Donor Verification**	Are proper documents and ID provided?	☐	☐	☐
3	**Funding Source**	Is the money coming via bank or cash?	☐	☐	☐
4	**Project Location**	Is the location low or high risk (e.g., conflict area)?	☐	☐	☐
5	**Partner Organization**	Is the partner known and registered?	☐	☐	☐
6	**Beneficiary Checks**	Are beneficiaries verified and documented?	☐	☐	☐
7	**Type of Project**	Is the project in a sensitive area (e.g., religious/political)?	☐	☐	☐
8	**Transaction Type**	Are funds handled through traceable methods?	☐	☐	☐
9	**PEP Involvement**	Is a Politically Exposed Person involved?	☐	☐	☐
10	**Previous Concerns**	Has this donor/partner had past issues?	☐	☐	☐

SECTION 2: Scoring

Total Score = _____ out of 30

Total Score	Risk Level	Action Required
10–15	**Low Risk**	Basic checks; proceed normally
16–22	**Medium Risk**	Standard due diligence; monitor regularly
23–30	**High Risk**	Enhanced due diligence; consider reporting or rejecting

SECTION 3: Comments & Action Plan

Use this space to explain any issues.

Annex 4

Annual Fund flow Report

(1) Name of the NGO:

(2) Reg. No:

(3) Applicable Period (Last calendar Year):

(4) Balance carried forward from the previous year Rs …….

Fund Inflow						Fund outflow					Actual Amount Spent (Rs)
Fund Receipt Date	Funding source			Bank Account No.	Amount	Details					
	Local	Foreign	Name of the Funding Source			Serial No.	Name of the Project	GS Division	Divisional Secretariat Division	District	
Total (Rs)											

We hereby certify that the funds reported in this Fund Flow Statement were received from lawful sources and utilized solely for the approved objectives and activities of the organization. We further confirm that reasonable due diligence and sanctions screening have been carried out, and that the organization has not knowingly received, held, or disbursed funds linked to money laundering, terrorist financing, or sanctioned individuals, entities, or jurisdictions, in accordance with applicable laws of Sri Lanka.

I certify that information and actual expenditure given above is true and correct.

Name of the Head of the NGO:
Signature:
Date:
Official Seal

Name of the Secretary/Finance Manager of the NGO:
Signature:
Date:
Official Seal

Confidential

Annex 5

Annual Updated Staff Details and Details of Board of Directors / Office Bearers Report

(1) Name of the NGO:

(2) Registration No:

Please provide the following details of expatriates and local staff who are being employed and proposed to be employed in your organization. You may use separate sheet of paper if you need more space.

(3) Foreign Staff

S/No	Name of Expatriate	Address		P.P. No	Nationality	Position in the Organization	Highest Relevant Qualifications	Type of Visa	Visa Period		Administrative District Where the Expatriate is Employed	Alternative Working Areas	No of Years in Service
		Foreign (Permanent)	Local (Current)						Date of Issue	Date of Expiry			

(4) Local staff

S/No	Name of Staff	Address		NIC No.	Contact Details		Position in the Organization	Highest Relevant Qualifications	No of Years in Service
		Permanent	Current		T.P. No.	E-mail			

(5) Board of Directors

S/No	Name With Initials	Designation / Post	Address		Contact Details		NIC Number	No of Years in Service
			Permanent	Current	TP No:	E- mail		
1.								
2.								
3.								
4.								
5.								

*Please mention the updated staff details and details of office bearers or names of Board of Directors in this format.

We hereby confirm that an AML/CFT compliance declaration has been obtained from the Board of Directors for the current reporting year and that reasonable due diligence has been applied to Board members and key officers of the organization. To the best of our knowledge, none of such persons are linked to money laundering, terrorist financing, or are subject to applicable sanctions under the laws of Sri Lanka or relevant United Nations Security Council resolutions.

I do hereby certify that the above details are true and correct to the best of my knowledge.

(5) Name of the Head of the Organization: ……

Signature: ……

Date: ……

Official Seal

(6) Name of the Secretary/Director of the NGO:……..

Signature: ……...

Date: …….

Official Seal

Red flags indicating possible money laundering or terrorist financing

Purpose and use of red flags

The following red flags are intended to assist NGOs in identifying circumstances that may warrant closer examination for possible money laundering or terrorist financing. **The presence of a red flag does not, by itself, establish wrongdoing or necessarily require a suspicious transaction report.** Each indicator should be assessed in context, taking account of the NGO's purposes, normal activities, operating environment, available explanations and relevant supporting information. A combination of indicators may heighten concern, although a single serious indicator may warrant immediate escalation.

The list is illustrative and not exhaustive. Its application should be proportionate to the identified risks and should not unnecessarily obstruct legitimate charitable or humanitarian activities. Foreign funding, lawful advocacy or operations in conflict-affected areas should not, on their own, be treated as evidence of money laundering or terrorist financing.

Where a red flag is identified, the NGO should document the concern and refer it promptly to its designated responsible officer for assessment and appropriate action. Where suspicion arises, applicable reporting requirements should be followed without waiting for proof of a criminal offence. The absence of a listed red flag should not prevent the reporting of an otherwise suspicious transaction or activity.

Red flags indicating possible money laundering or terrorist financing

How to use the list

A red flag is a circumstance warranting closer examination; it is not, by itself, proof of wrongdoing. Consider the NGO's purposes, normal activities, operating environment, available explanations and any combination of indicators. The list is non-exhaustive. A single serious indicator may justify immediate escalation; several minor administrative weaknesses may instead call for improved controls.

It is to be noted that foreign funding, lawful advocacy, or humanitarian operations in conflict/disaster affected areas are not, by themselves, evidence of ML/TF.

A. Donations and donor conditions

1. A substantial or unusual donation comes from a source whose identity or background cannot reasonably be verified.
2. A donation or loan is conditional on the NGO passing the money to a specified third party, without being able to verify its intended use.
3. A donor requires the return of the principal shortly afterwards, allowing the NGO to retain a fee or interest.
4. A donor requests repayment in a different currency without a credible explanation.
5. A donation is conditional on using a particular contractor or partner about whom credible concerns remain unresolved.
6. A familiar donor unexpectedly pays through an unrelated person or unusual payment arrangement and cannot explain why.

B. Movement of funds and use of accounts

7. Numerous small donations are followed by a request for one large refund to an overseas account.
8. A partner provides several foreign accounts for the same recipient without explaining their operational purpose.
9. A partner insists on receiving substantial cash outside banking channels without a credible operational explanation.

C. Identity, financial records and expenditure

10. A donor, partner or representative supplies false, contradictory or unverifiable identification information.
11. The people actually controlling a partner organisation are concealed or cannot be established.
12. A payment done by a partner organisation has no apparent connection with the NGO's programmes or stated objectives.
13. An employee withdraws unusually large amounts of cash without supporting programme expenditure.
14. Partners submit apparently fabricated, inflated or otherwise suspicious invoices.
15. Accounts and project records contain material discrepancies, leaving the final use of funds unexplained.

D. Partners and delivery of assistance

16. A partner repeatedly prevents reasonable checks on project delivery without explaining genuine security or access constraints.
17. Reported activities or distributions cannot be reconciled with expenditure or independently verified.
18. Funds or supplies are passed to an undisclosed intermediary whose role and ultimate recipients remain unexplained.
19. Credible complaints indicate that intended beneficiaries did not receive assistance recorded as delivered.
20. Those responsible for a project obstruct scrutiny of unexplained losses or diversion of resources.

E. Indicators more directly connected with terrorist abuse

21. Credible information indicates that an implementing partner or its representative is acting for a terrorist organisation.
22. Funds or supplies intended for charitable purposes are diverted to a terrorist organisation or its intermediary by a partner.
23. Premises, vehicles, equipment or programmes are used to facilitate terrorist recruitment, training or logistical support by a partner.
24. A fundraising appeal falsely invokes the NGO's name or humanitarian mission to collect resources for terrorist purposes.
25. A purported charitable partner appears to be a front concealing terrorist fundraising or operational activity.

F. Sanctions, concealment and digital payments

26. Screening of donors, partners and beneficiaries produces a potential match to a person or entity designated under sanctions applicable in Sri Lanka; identifying particulars require prompt verification.
27. Following a blocked transfer, someone proposes concealing the recipient or rerouting the payment to circumvent the restriction.
28. Digital-asset transactions done by donors, partners and beneficiaries use services designed to obscure their origin or destination, without a credible explanation.
29. Purchases of goods are inconsistent with the stated project or intended recipient.

What staff should do when a red flag arises

As an operational procedure, staff should:

- Record the facts, relevant transactions and supporting documents.
- Refer the concern promptly to the designated / responsible officer, with an alternative route if that officer is implicated.
- Seek proportionate clarification where appropriate, without alerting a suspected wrongdoer or prejudicing an inquiry.
- Record the assessment and reasons for the action taken.
- Where reasonable suspicion remains after assessment, NGOs should submit a Suspicious Transaction Report (STR) to the Financial Intelligence Unit (FIU), with a copy to the National Secretariat for NGOs, in accordance with the AML/CFT Guidelines. (Annex 2).