

Your AML obligations

Updated 4 December 2025

Guidance and information

This page contains links to a range of information, guidance and wider supporting materials which will help law firms and solicitors to understand your money laundering obligations and stay compliant.

This includes guidance issued by ourselves and by the Legal Sector Affinity Group (LSAG).

[Open all \[#\]](#)

Legal Sector Affinity Group guidance

The Legal Sector Affinity Group (LSAG) is made up of both regulatory and representative bodies for legal services in the UK. It has produced guidance on the anti-money laundering (AML) regulations, which for firms supervised by the SRA for AML now constitutes official guidance. This guidance has been approved by HM Treasury.

The latest revision of the LSAG Guidance has now been approved by HM Treasury and takes effect from 23 April 2025.

Read the guidance, which is subject to change:

[Legal Sector Affinity Group Anti-Money Laundering Guidance for the Legal Sector 2025 \(PDF 228 pages, 2.4MB\)](#) [<https://www.sra.org.uk/globalassets/documents/solicitors/firm-based-authorisation/lsg-aml-guidance.pdf>]

Amendments are set out in a schedule at the end of the document (p.221 onwards).

Part 2 of LSAG's guidance is divided into sections for specific areas of legal practice:

- [2a is for barristers \(PDF 155 pages, 1.3MB\)](#) [<https://www.sra.org.uk/globalassets/documents/solicitors/lsg-guidance-part-2a-barristers-advocates.pdf?version=49f4bc>]
- [2b is for Trust or Company Service Providers \(PDF 10 pages, 260KB\)](#) [<https://www.sra.org.uk/globalassets/documents/solicitors/lsg-guidance-part-2b-tcpsps.pdf?version=49f50f>], and should be read alongside [our guidance for this group](#) [<https://www.sra.org.uk/solicitors/resources-archived/money-laundering/guidance-support/trust-company-service-provider-guidance/>]
- [2c is for notaries \(PDF 5 pages, 217KB\)](#) [<https://www.sra.org.uk/globalassets/documents/solicitors/lsg-guidance-part-2c-notaries.pdf?version=49f538>]

2b and 2c need to be read alongside the main Part 1 AML guidance, and 2a will not be relevant for firms we supervise.

These Part 2 sections are intended to provide supplementary information which will help those working in specific areas.

Advisory notes for guidance

We have also helped [produce guidance \(PDF 5 pages, 162 KB\)](#) [<https://www.sra.org.uk/globalassets/documents/solicitors/lsg-advisory-note---new-normal.pdf?version=49f551>] to ensure you remain compliant as ways of working change in the medium to longer term.

Chinese underground banking and funds from China

LSAG has produced [guidance](#) [<https://www.sra.org.uk/globalassets/documents/sra/research/chinese-funds-ml-lsg-guidance-5-pages-62kb-pdf.pdf>] for those receiving monies on behalf of clients from China.

The scope of the money laundering regulations

This guidance explains which [activities fall under the scope of the money laundering regulations](#) [<https://www.sra.org.uk/solicitors/resources/money-laundering/scope-money-laundering-regulations/>]. If you provide these activities, you will need to be in compliance with the [broader regulations](#) [<https://www.sra.org.uk/solicitors/resources/money-laundering/what-does-my-firm-need-to-do/>].

Case studies

We have produced [case studies](#) [<https://www.sra.org.uk/solicitors/guidance/money-laundering/>] that help show you how to stay compliant with the regulations as you go about your day-to-day business.



Complying with the UK Sanctions Regime guidance

We have published guidance [\[https://www.sra.org.uk/solicitors/guidance/financial-sanctions-regime/\]](https://www.sra.org.uk/solicitors/guidance/financial-sanctions-regime/) on the financial sanctions regime to help the profession adhere to the fast-changing rules. This helps firms to make sure they understand their obligations and know what they need to do to play their part in keep suspiciously-earned funding out of the UK economy.

Tax advice

The 2020 amendments to the regulations change the definition of tax advice activities. Your firm might be now in scope of the regulations and you should take steps accordingly. We have produced [guidance \[https://www.sra.org.uk/solicitors/resources/money-laundering/tax-adviser-guidance/\]](https://www.sra.org.uk/solicitors/resources/money-laundering/tax-adviser-guidance/) to help you determine your position.

Trust and company service provider work

We have produced specific guidance for [Trust and Company Service Providers \(TCSPs\) \[https://www.sra.org.uk/solicitors/resources/money-laundering/trust-company-service-provider-guidance/\]](https://www.sra.org.uk/solicitors/resources/money-laundering/trust-company-service-provider-guidance/). This is because the process for approvals for TCSPs is different to other areas of work, and because it is at a relatively higher risk of money laundering generally.

Sectoral Risk Assessment

Our [Sectoral Risk Assessment \[https://www.sra.org.uk/sra/how-we-work/archive/reports/aml-risk-assessment/\]](https://www.sra.org.uk/sra/how-we-work/archive/reports/aml-risk-assessment/) is our view of the dangers and issues facing law firms when keeping the proceeds of crime out of the legal profession. It draws on the Government's National Risk Assessment and our experiences as a supervisor and applies this to legal services. Individual firms must take this assessment into account when producing their own firm-wide risk assessment.

Historic high-risk third countries

How do you and your firm stay on top of reviewing high-risk third countries?

A high-risk third country (HRTC) refers to a country deemed to have significant deficiencies in its anti-money laundering measures.

Previously, HRTCs were set out by the European Union. Following the Brexit transition period, the UK began setting out its own list of HRTCs as set out in Schedule 3ZA of the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLR 2017).

From 22 January 2024, the definition of HRTCs was amended to remove schedule 3ZA of the MLR 2017. It was replaced with the following definition:

'a country named on either of the following lists published by the Financial Action Task Force (FATF) as they have effect from time to time:

1. high-risk jurisdictions subject to a call for action
2. jurisdictions under increased monitoring.'

Countries on these lists are considered high-risk for money laundering which trigger the requirement to apply enhanced due diligence under regulation 33 of the MLR 2017. If a client is established in a HRTC, this triggers certain mandatory enhanced due diligence measures under regulation 33(3A).

However, geographical risk is not limited to HRTCs. Regulation 33(6)(c) sets out other matters you must consider when assessing whether a jurisdiction is high risk. These include:

- whether the country is subject to sanctions, embargos or similar measures issued by, for example, the European Union or the United Nations
- whether the country provides funding or support for terrorism
- whether the country has been identified by credible sources as having high levels of corruption or poor AML controls.

Credible sources might include:

- [Transparency International Corruption Perceptions Index \[https://www.transparency.org/en/cpi/2024?gad_source=1&gad_campaignid=15272914516&gclid=EAlalQobChMI2N3Ok6CfkQMVgpdQBh0eKwTJEAAAYASAAEgINN_D_BwE\]](https://www.transparency.org/en/cpi/2024?gad_source=1&gad_campaignid=15272914516&gclid=EAlalQobChMI2N3Ok6CfkQMVgpdQBh0eKwTJEAAAYASAAEgINN_D_BwE)
- [the Basel Institute of Governance AML Index \[https://index.baselgovernance.org/\]](https://index.baselgovernance.org/).

Reviewing previous countries designated as high-risk

Even if a country is no longer considered high-risk, its past designation can indicate vulnerabilities or structural weaknesses when it comes to tackling money laundering.

A historic list of countries considered high-risk can help identify past risks and better understand patterns of financial crime.

An example of this is the Lao People's Democratic Republic (LAO PDR), which was previously designated as high-risk between July 2016 and May 2020. It has subsequently been redesignated as a HRTC as of February 2025. This demonstrates that countries removed from these lists can fall back into non-compliance.

You should consider whether you have previously dealt with any clients/transactions involving LAO PDR and check for any red flags as part of your ongoing monitoring obligations under regulation 28(11) of the MLR 2017. Remember that:

- A country's removal from the list does not automatically mean that previous laundered funds are now legitimate.
- Criminals in these countries may still be active and adapting to new regulations.
- It can take time for previous HRTCs to enforce new regulations.

Best practice

Apply the following best practice rules when you are considering HRTCs:

- Continue monitoring transactions involving previous HRTCs.
- Apply a risk-based approach to transactions with an overseas element.
- Keep your policy updated in line with FATF changes. FATF update their lists of HRTCs every February, June and October.

Following HM Treasury's consultation response to the MLR 2017, the government has agreed to amend the mandatory EDD requirements to countries subject to increased monitoring. However, you will still be required to consider both lists when risk assessing client/matters under regulation 33(6)(c).

The table below contains dates when the UK made changes to HRTCs. This will be updated in line with changes made by FATF.

Country	Current HRTC?	Date added as HRTC	Date removed as HRTC
Afghanistan	No	23 September 2016	26 March 2021
Albania	No	26 March 2021	05 December 2023
Algeria	Yes	25 October 2024	
Angola	Yes	25 October 2024	
The Bahamas	No	01 October 2020	26 March 2021
Barbados	No	01 October 2020	23 February 2024
Bolivia	Yes	13 June 2025	
Bosnia and Herzegovina	No	23 September 2016	09 July 2020
Botswana	No	01 October 2020	02 November 2021
British Virgin Islands	Yes	13 June 2025	
Bulgaria	Yes	05 December 2023	
Burkina Faso	No	26 March 2021	24 October 2025
Cambodia	No	01 October 2020	27 June 2023
Cameroon	Yes	05 December 2023	
Cayman Islands	No	26 March 2021	05 December 2023
Cote D'Ivoire	Yes	25 October 2024	
Croatia	No	05 December 2023	13 June 2025
Democratic republic of Congo	Yes	15 November 2022	
Ethiopia	No	13 February 2018	09 July 2020
Ghana	No	01 October 2020	13 July 2021
Gibraltar	No	12 July 2022	23 February 2024
Guyana	No	23 September 2016	09 July 2020
Haiti	Yes	13 July 2021	
Iran	Yes	23 September 2016	
Iraq	No	23 September 2016	26 March 2021

Jamaica	No	01 October 2020	28 June 2024
Jordan	No	02 November 2021	05 December 2023
Kenya	Yes	23 February 2024 23/09/2016	
LAO PDR	Yes	Re-added on 21 February 2025	09 July 2020
Lebanon	Yes	25 October 2024	
Mali	No	02 November 2021	13 June 2025
Malta	No	13 July 2021	12 July 2022
Mauritius	No	01 October 2020	02 November 2021
Monaco	Yes	28 June 2024	
Mongolia	No	01 October 2020	07 February 2021
Morocco	No	26 March 2021	27 June 2023
Mozambique	No	15 November 2022	24 October 2025
Myanmar	Yes	01 October 2020	
Namibia	Yes	23 February 2024	
Nepal	Yes	21 February 2025	
Nicaragua	No	01 October 2020	15 November 2022
Nigeria	No	05 December 2023	24 October 2025
North Korea	Yes	23 September 2016	
Pakistan	No	22 October 2018	15 November 2022
Panama	No	01 October 2020	05 December 2023
Philippines	No	13 July 2021	21 February 2025
Senegal	No	26 March 2021	25 October 2024
South Africa	No	05 December 2023	24 October 2025
South Sudan	Yes	13 July 2021	
Sri Lanka	No	06 March 2018	09 July 2020
Syria	Yes	23 September 2016	
Tanzania	No	15 November 2022	13 June 2025
Trinidad and Tobago	No	06 March 2018	26 March 2021
Tunisia	No	06 March 2018	09 July 2020
Turkey	No	02 November 2021	28 June 2024
Uganda	No	23 September 2016	23 February 2024
United Arab Emirates	No	29 March 2022	23 February 2024
Vanuatu	No	23 September 2016	26 March 2021
Venezuela	Yes	28 June 2024	
Vietnam	Yes	05 December 2023	
Yemen	Yes	23 September 2016	
Zimbabwe	No	01 October 2020	29 March 2022

Timeline

14 July 2016 to 31 December 2020

High-risk countries were initially set out by the European Union.

1 January 2021 to 21 January 2024

Following the Brexit transition period, the UK began setting out its own list of high-risk third countries as set out in Schedule 3ZA of the MLR 2017.

22 January 2024

Definition of high-risk third countries amended to removed schedule 3ZA and replace with 'a country named on either of the following lists published by the Financial Action Task Force (FATF) as they have effect from time to time

1. high-risk jurisdictions subject to a call for action
2. jurisdictions under increased monitoring'

FATF lists are updated every February, June and October.

Late spring 2025

The definition of high-risk third countries will change to those subject to a call for action only.

Jurisdictions under increased monitoring will still need to be assessed for EDD under regulation 33(6)(c) (i) and (vi), but parties established in them will no longer trigger the mandatory measures at regulation 33(3A).

This list will be updated in line with FATF updates to ensure accuracy.

Firm-wide Risk Assessments

This guidance helps you assess all risks for your firm when it comes to preventing money laundering, including a template to use to create what is a key document in keeping money launderers out of the profession.

[Guidance - Firm risk assessments](https://www.sra.org.uk/solicitors/guidance/firm-risk-assessments/) (<https://www.sra.org.uk/solicitors/guidance/firm-risk-assessments/>)

AML guidance - reporting breaches

This guidance is about your obligations for [reporting serious breaches of the Money Laundering and Terrorist Financing \(Amendment\) Regulations 2019 to us](https://www.sra.org.uk/solicitors/resources/money-laundering/reporting-breaches/) (<https://www.sra.org.uk/solicitors/resources/money-laundering/reporting-breaches/>).

Suspicious activity reports

If you have a suspicion that your firm is being used to launder money, your Money Laundering Reporting Officer (MLRO) must submit a suspicious activity report (SAR) to the National Crime Agency (NCA). It's important that everyone understands their responsibilities under the Proceeds of Crime Act 2002 and Terrorism Act 2000 and their firm's processes.

The NCA have expressed concerns about the number and quality of SARs being submitted by law firms, and have produced guidance to help you, including:

- [Chapter 1: Using the SAR Portal](https://www.nationalcrimeagency.gov.uk/who-we-are/publications/774-ukfiu-chapter-1-using-the-sar-portal/file) (PDF 23 pages, 976KB) (<https://www.nationalcrimeagency.gov.uk/who-we-are/publications/774-ukfiu-chapter-1-using-the-sar-portal/file>).
- [Chapter 2: Submitting a SAR](https://www.nationalcrimeagency.gov.uk/who-we-are/publications/775-ukfiu-chapter-2-submitting-a-sar/file) (PDF 37 pages, 454KB) (<https://www.nationalcrimeagency.gov.uk/who-we-are/publications/775-ukfiu-chapter-2-submitting-a-sar/file>).
- [Chapter 3: Understanding DAMLs and DATFs](https://www.nationalcrimeagency.gov.uk/who-we-are/publications/776-ukfiu-chapter-3-understanding-damls-and-datfs/file) (PDF 34 pages, 575KB) (<https://www.nationalcrimeagency.gov.uk/who-we-are/publications/776-ukfiu-chapter-3-understanding-damls-and-datfs/file>).

Further information can be found in the [UK Financial Intelligence Unit's Guidance Library](https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/money-laundering-and-illicit-finance/suspicious-activity-reports) (<https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/money-laundering-and-illicit-finance/suspicious-activity-reports>) - (<https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/money-laundering-and-illicit-finance/suspicious-activity-reports#UKFIUGuidanceLibrary>).

Proceeds of Crime Act - guidance

We have published guidance on how your obligations under the money-laundering regulations differ compared to your obligations under the [Proceeds of Crime Act](https://www.sra.org.uk/solicitors/guidance/proceeds-crime-guidance/) (<https://www.sra.org.uk/solicitors/guidance/proceeds-crime-guidance/>).

Video guidance

We have produced regular videos over the years to support our AML work. You can catch up with those videos on our [YouTube channel](https://www.youtube.com/user/SRASolicitors) (<https://www.youtube.com/user/SRASolicitors>).

Events

- [Compliance Officers Conference 2022: Complying with sanctions and financial crime regulations](https://www.youtube.com/watch?v=shl57aD28Ko) (<https://www.youtube.com/watch?v=shl57aD28Ko>)
- [Compliance Officers Conference 2021: AML – Anti-money laundering compliance for professions](https://www.youtube.com/watch?v=SHzh5LvEOVs&list=PLIZ7vxfo3EV1D2WbxcG0RNBK_ozYKvxD4) (https://www.youtube.com/watch?v=SHzh5LvEOVs&list=PLIZ7vxfo3EV1D2WbxcG0RNBK_ozYKvxD4)
- [Compliance Officers Conference 2021: Anti-money laundering – a look to the future](https://www.youtube.com/watch?v=ToxMILTGE1g&list=PLIZ7vxfo3EV1D2WbxcG0RNBK_ozYKvxD4&index=11) (https://www.youtube.com/watch?v=ToxMILTGE1g&list=PLIZ7vxfo3EV1D2WbxcG0RNBK_ozYKvxD4&index=11).
- [Compliance Officers Conference 2020: AML – what you need to know](https://www.sra.org.uk/news/events/on-demand-events/compliance-conference-2020/#heading_7c3d) (https://www.sra.org.uk/news/events/on-demand-events/compliance-conference-2020/#heading_7c3d)
- [Compliance Officers Conference 2020: AML – practical tips for managing risks](https://www.sra.org.uk/news/events/on-demand-events/compliance-conference-2020/#heading_32a4) (https://www.sra.org.uk/news/events/on-demand-events/compliance-conference-2020/#heading_32a4)



- [Compliance Officers Conference, 2019, Tackling Money Laundering](https://youtu.be/oQYYIjcNuoc) [https://youtu.be/oQYYIjcNuoc]
- [Compliance Officers Conference 2019, AML get it right for your firm](https://www.sra.org.uk/solicitors/resources/money-laundering/guidance-support/) [https://www.sra.org.uk/solicitors/resources/money-laundering/guidance-support/]
- [LegalEx 2019 – Tackling Money Laundering](https://youtu.be/yzlj4KxEtGs) [https://youtu.be/yzlj4KxEtGs]

Webinars

- [\[https://www.youtube.com/watch?v=_G-Brfex6_YI September 2023 -](https://www.youtube.com/watch?v=_G-Brfex6_YI) [AML enforcement trends](https://www.youtube.com/watch?v=_G-Brfex6_YI) [https://www.youtube.com/watch?v=_G-Brfex6_YI]
- [\[https://www.sra.org.uk/news/events/on-demand-events/government-sanctions-regime-stay-compliant/\] May 2023](https://www.sra.org.uk/news/events/on-demand-events/government-sanctions-regime-stay-compliant/) [\[https://www.sra.org.uk/news/events/on-demand-events/government-sanctions-regime-stay-compliant/\]](https://www.sra.org.uk/news/events/on-demand-events/government-sanctions-regime-stay-compliant/) - [Government sanctions regime, how all firms can stay compliant](https://www.sra.org.uk/news/events/on-demand-events/government-sanctions-regime-stay-compliant/) [https://www.sra.org.uk/news/events/on-demand-events/government-sanctions-regime-stay-compliant/]
- [\[https://www.sra.org.uk/news/events/on-demand-events/aml-firm-wide-risk-assessment/\] June 2022](https://www.sra.org.uk/news/events/on-demand-events/aml-firm-wide-risk-assessment/) [\[https://www.sra.org.uk/news/events/on-demand-events/aml-firm-wide-risk-assessment/\]](https://www.sra.org.uk/news/events/on-demand-events/aml-firm-wide-risk-assessment/) - [How to do a firm-wide risk assessment](https://www.sra.org.uk/news/events/on-demand-events/aml-firm-wide-risk-assessment/) [https://www.sra.org.uk/news/events/on-demand-events/aml-firm-wide-risk-assessment/]
- [\[https://www.sra.org.uk/news/events/on-demand-events/aml-officers-what-they-need-know/\] February 2022](https://www.sra.org.uk/news/events/on-demand-events/aml-officers-what-they-need-know/) [\[https://www.sra.org.uk/news/events/on-demand-events/aml-officers-what-they-need-know/\]](https://www.sra.org.uk/news/events/on-demand-events/aml-officers-what-they-need-know/) - [AML officers, what they need to know](https://www.sra.org.uk/news/events/on-demand-events/aml-officers-what-they-need-know/) [https://www.sra.org.uk/news/events/on-demand-events/aml-officers-what-they-need-know/]
- [May 2020 - What your firm needs to know](https://youtu.be/IO8DZdEimEo) [https://youtu.be/IO8DZdEimEo]
- [February 2021 - what tax advisers need to know](https://www.sra.org.uk/news/events/on-demand-events/aml-tax-advisers/) [https://www.sra.org.uk/news/events/on-demand-events/aml-tax-advisers/]
- [March 2021 - what we learnt from law firm visits](https://www.sra.org.uk/news/events/on-demand-events/aml-law-firm-visits/) [https://www.sra.org.uk/news/events/on-demand-events/aml-law-firm-visits/]

AML Training - Thematic Review

We have produced a [downloadable checklist \(PDF 6 pages, 370KB\)](https://www.sra.org.uk/globalassets/documents/sra/research/aml-training-checklist.pdf?version=4ab28e) [https://www.sra.org.uk/globalassets/documents/sra/research/aml-training-checklist.pdf?version=4ab28e] to help you deliver training. This has been developed following our [thematic review of anti-money laundering training](https://www.sra.org.uk/sra/research-publications/thematic-review-aml-training/) [https://www.sra.org.uk/sra/research-publications/thematic-review-aml-training/]. You can download this form and use as you see fit.

AML information for your clients

We provide [information for consumers](https://www.sra.org.uk/consumers/choosing/aml/) [https://www.sra.org.uk/consumers/choosing/aml/] to help explain why identity and financial checks are required under the Money Laundering Regulations. You can share this with clients who want to understand why solicitors are required by law to carry out checks before providing certain legal services.