



**UK Anti-
Corruption
Coalition**

John Glen MP
Economic Secretary to the Treasury
HM Treasury
1 Horse Guards Road
London
SW1A 2HQ

17th November 2020

Dear Mr Glen,

We are writing on behalf of the UK Anti-Corruption Coalition, a group of eighteen UK-based organisations who, through our work, witness the devastating impact of corruption on the UK and around the world.

We are writing to request a meeting with you to discuss various issues that fall within your remit as Economic Secretary at the Treasury, and particularly in light of the recent FinCEN Files leak. The FinCEN Files leak has, yet again, brought unwelcome attention to the UK as a location through which corrupt money is laundered, with a total of 3,282 British companies named in the Files - more than any other country in the world.

The Files have raised serious questions about the effectiveness of the UK's AML supervisory regime, ongoing abuse of the corporate register for corrupt money laundering schemes, and the resourcing of the law enforcement response to illicit finance. Urgent action is needed to address these problems.

We are keen to understand how, as anti-corruption organisations, we can support the following work in Government and work with you to achieve:

1. The UK taking a global leadership role on tackling illicit finance particularly when it takes over the presidency of the G7;
2. Proper resourcing for the fight against corruption and economic crime in the UK, including through ongoing and additional public resource on top of the economic crime levy and other revenue raising options for anti-corruption work both in government and law enforcement;
3. Real effectiveness in the new sanctions regime by the introduction of corruption as a ground for designation, in order to protect the UK's financial integrity, and by ensuring OFSI has the appropriate resources and teeth to enforce sanctions breaches;
4. Improvement to the weaknesses identified in the FATF review of the UK anti-money laundering (AML) regime, including at Companies House, in AML supervision, in the SARs regime, and in the prosecution of high-end money laundering;
5. An effective corporate liability regime to ensure that large economic and financial actors are incentivised to have good corporate governance in place and are deterred from playing any role in economic crime.

The scale of the problem is huge, but failing to address these issues impacts us all, from the world's most vulnerable to its largest companies. Until we address our ongoing role as a safe haven for corrupt funds, the UK will be seen as part of the problem rather than the solution.

We look forward to hearing from you.

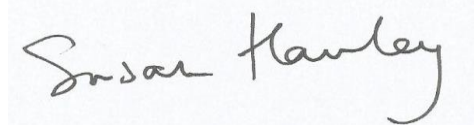
Yours sincerely,

Rachel Davies Teka

A handwritten signature in blue ink, appearing to read 'RD Teka'.

Co-Chair of the UK Anti-Corruption Coalition
Head of Advocacy, Transparency International UK

Susan Hawley

A handwritten signature in black ink, appearing to read 'Susan Hawley'.

Co-Chair of the UK Anti-Corruption Coalition
Executive Director, Spotlight on Corruption

The UK Anti-Corruption Coalition brings together the UK's leading anti-corruption campaigners, including Article 19, Campaign for Freedom of Information, Global Witness, International Lawyers Project, International State Crime Initiative, Natural Resource Governance Institute, ONE, Open Contracting Partnership, Open Ownership, Oxfam, Protect, Publish What You Pay UK, RAID UK, Spotlight on Corruption, the Sussex Centre for the Study of Corruption, The Sentry, and Transparency International UK.