

**FINANCIAL INTELLIGENCE UNIT  
GUIDELINE**

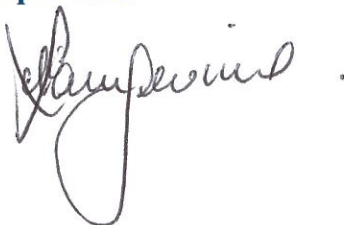
**PREVENTION OF MONEY LAUNDERING AND TERRORIST  
FINANCING FOR NON-PROFIT ORGANIZATIONS**

**A RISK-BASED APPROACH**

**Guideline issued by the Financial Intelligence Unit under Section 9(4)(iv) of the  
Anti-Money Laundering Countering the Financing of Terrorism  
Act No. 13 of 2009**

**Issued: April 2023**

**Signed**

A handwritten signature in black ink, appearing to be 'K. Rajaratnam', written over a light blue background.

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**TABLE OF ACRONYMS**

AML	Anti-Money Laundering
AML/CFT	Anti-Money Laundering & Countering the Financing of Terrorism
CCDO	Chief Cooperatives & Development Officer
CDD	Customer Due Diligence
CFATF	Caribbean Financial Action Task Force
CFT	Countering the Financing of Terrorism
CO	Compliance Officer
DNFBPs	Designated Non-Financial Businesses or Professions
EDD	Enhanced Due Diligence
FATF	Financial Action Task Force
FIU	Financial Intelligence Unit
FSRB	FAFT Styled Regional Body
FT	Financing of Terrorism
ML	Money Laundering
NGO	Non-Governmental Organisation
NPO	Non-Profit Organisation
PEP	Political Exposed Person
RBA	Risk Based Approach
RE	Reporting Entity
RFS	Registrar of Friendly Societies
SA	Supervisory Authority
STR	Suspicious Transaction Report
TPR	Terrorist Property Report

## INTRODUCTION

A Non-Profit Organization (NPO), in the context of this guideline, refers to a legal person or arrangement or organization that primarily engages in raising or disbursing of funds for purposes such as charitable, religious, cultural, educational, social or fraternal purposes, or for the carrying out of other types of “good works”<sup>1</sup>.

The role of NPOs globally is undoubtedly very important as they provide much needed support and services to communities. For centuries NPOs have enjoyed a high level of public trust, confidence, and goodwill. This perception is appreciated and must be allowed to continue without hinderance. While there is not enough evidence to support a finding that the Money Laundering or Terrorist Financing risk of the NPO sector in Guyana is high, it is important to ensure measures are in place to prevent the NPO sector locally from being abuse for terrorist financing or money laundering purposes.

Research has shown that there have been circumstances where NPOs were directly or indirectly involved in providing relief to high-risk communities abroad including in conflict zones<sup>2</sup>. The diverse structure, purpose and reach of NPOs contribute to their vulnerability as some may be operating internationally making them knowingly or unknowingly accessible to terrorist organizations who may seek to use their charitable services for illegal purposes.

The abuse of NPOs may take many forms and may be for various purposes<sup>3</sup> including:

- I. To create the appearance of being a legitimate charitable entity (sham NPOs);
- II. To exploit legitimate entities to raise funds for Terrorist Financing (TF),
- III. To misuse legitimate charitable entities to avoid asset freezing measures; or
- IV. To conceal or obscure funds intended for legitimate purposes, but which is diverted for terrorist financing purposes.

Moreover, it must be noted that the NPO sector may not only be vulnerable to abuse for TF purposes, but also for money laundering (ML). For example, an NPO may be established as a shell or sham to receive illicit funds or properties, which is then intermingled or with legitimate funds. The illicit funds may be from tax evasion, drug trafficking, corruption, etc., and the use of the NPO to launder the funds may be to disguise the source of the funds or assets and conceal the beneficial owners of the funds and the entity.

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<sup>1</sup> FATF Glossary//www.fatf-gafi.org.

<sup>2</sup> CTN Electronic Journal Preventing the Abuse of Non-Profit Organizations Profit Organizations for Terrorist Financing June 2011

<sup>3</sup> FATF BPP-combating-abuse-non-profit-organisations.pdf

## OBJECTIVES

- (i) To provide guidance on preventative measures and best practices to assist NPOs from misuse for ML or TF purposes.
- (ii) To develop and promote the application of a 'risk-based approach', rather than a 'one size fit all approach' to regulating, supervising, and monitoring the NPO sector.
- (iii) To emphasize the importance of transparency, accountability, and to promote the use of the regulated financial system in the operations of NPOs.
- (iv) To provide information and raise awareness to the general public and competent authorities of the potential for misuse of the NPO sector for ML and TF purposes and provide solutions on how to avoid these eventualities.

## PREVENTATIVE MEASURES / BEST PRACTICES

NPOs should develop and document policies and procedures to ensure they have appropriate systems in place relating to the following core governing principles:

### 1) **Know Your Key Donors, Partners, and Beneficiaries**

NPOs should carry out proper due diligence procedures to ensure they know who are their donors, Partners, or beneficiaries. NPOs should also confirm the identity, credentials, and legitimacy of the beneficiaries, and the identity and good standing of partners and donors, giving due regard to their confidentiality.

### 2) **Transactions Conducted Via Regulated Financial Channels**

NPOs should ensure that transactions are conducted via regulated financial channels to minimize the potential for abuse of the entity for the purpose of TF or ML. This would allow for transparency, accountability, and the availability of a paper trail to support a Money Laundering or Terrorist Financing investigation by law enforcement or any other competent authorities.

### 3) **Funds applied in a manner consistent with the Mission and Objectives**

NPOs should conduct regular and routine reviews of its expenditure to ensure that funds are channeled towards causes which are congruent with their missions and objectives. The organization should not accept donations which are proposed to be directed towards purposes that are not consistent with the charities' established and documented missions and objectives.

## 4) Report Suspicious Transactions to FIU

NPOs should closely and continuously monitor all transactions and activities conducted by the entity. The entity is obliged to submit suspicious transaction reports (STRs) to the Financial Intelligence Unit (FIU), if they determine or have reasonable grounds to suspect that Money Laundering, Terrorist Financing or proceedings of crime have been facilitated or channeled through their charitable activities.

## 5) Report Terrorist Reports to FIU

NPOs should review and submit Terrorist Property Reports (TPRs) without delay, if there are reasonable grounds for suspicion of TF activity while the NPO conducts its charitable activities.

## **PREVENTIVE MEASURES APPLICABLE TO TARGETED NPOs<sup>4</sup>**

NPOs that are considered most at risk for Terrorist Financing abuse are required to:

- a) Register with the Financial Intelligence Unit (FIU).
- b) Implement policies and procedures for ascertaining information on Beneficiaries/ Partners and Donors (Know Your Beneficiaries/ Partners and Donors).
- c) Keep and maintain accurate and up to date records
- d) Report STRs and TPRs in a timely manner
- e) Cooperate with Regulators / Supervisors.

## **REGISTRATION PROCEDURE<sup>5</sup>**

Targeted NPOs (following a classification as such based on a TF risk assessment and a referral from a relevant competent authority) must register with the FIU. The Registration Form and details on the Registration Process are available on the FIU's website at: [fiu.gov.gy](http://fiu.gov.gy)<sup>6</sup>.

## **KNOW YOUR BENEFICIARY, PARTNERS, AND DONORS**

### **Natural Person**

To identify and verify the identity of a beneficiary, partner or donor that is a natural person, the NPO should obtain the following information:

- (a) Beneficiary, Partner, or Donor full name (including maiden name -where applicable)
- (b) Identification document - National Identification or Passport
- (c) Permanent and mailing address (including PO Box numbers-if necessary)

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<sup>4</sup> See definition of key terms on page 13 for the meaning of 'targeted NPO'.

<sup>5</sup> Refer FIU – Reporting Entity Registration Policy. <http://fiu.gov.gy>

<sup>6</sup> <https://fiu.gov.gy/registration-guidelines/>

- (d) Telephone Numbers, E-mail, etc.
- (e) Date and place of birth
- (f) Nationality
- (g) Occupation/or nature of business (where self-employed)
- (h) Name and address of employer (if applicable)
- (i) Signature.

Where the beneficiary is a ‘group or class of persons’ or the activity is carried out for the benefit of the public, identifying each person/ beneficiary may be impracticable or even impossible. The organization in such a case may seek to identify and verify the identity of the person or legal entity that arranges or organizes the transaction on behalf of the class or group of people. The Organisation’s Governing Body or trustees should seek to ensure that funds and/or activities are indeed for the benefit of the intended class of persons. This may be done through its partners or community representatives.

### **Legal Entity - Companies or Business**

To identify and verify the identity of a beneficiary, partner or donor that is a legal person, the NPO should obtain the following information:

- a) The Name of the organization/legal entity/business.
- b) The Registered Address of the entity.
- c) Country of Incorporation/Registration.
- d) Identify and verify the identity of the beneficial owners.
- e) Identity of Directors, Secretary or Partners or senior executives
- f) Business Registration or operation licenses (if applicable)
- g) Nature of business.

### **Legal Arrangement**

Where the transaction involves a legal arrangement (e.g., an express trust or similar arrangement), to identify and verify the identity of the beneficiary, partner or donor the following procedures may apply:

- (a) Identification of person acting on behalf of and the principal/ settlor/ Donor
- (b) Obtain copies of Power of Attorneys if applicable
- (c) Letter of Authorization
- (d) Trust Instruments e.g., Trust Deeds
- (e) Identify beneficial owner - natural person that owns and controls the legal arrangement

Where it appears that the person on whose behalf the person or representative acts is located in another country, the NPO should seek to establish ‘whether the country is a ML/TF high risk jurisdiction’, and if it is subject to adequate TF oversight or regulation and the level of AMLCFT compliance.

### **Political Exposed Person<sup>7</sup> (PEP)**

A 'Politically Exposed Person' (PEP) is any individual entrusted with prominent public functions on behalf of a State: for examples:

- A Head of State or of government
- Senior politicians
- Senior government, judicial or military Officials
- Senior executives of state-owned corporations
- Important political party officials Family members or close associates of a PEP whether the PEP is resident in Guyana or not.

NPOs, using a 'Risk-Based Approach', may apply the following measures to enable it to -

- (a) identify PEPs and assess the risk associated with the PEPs.
- (b) determine if a PEP is from an international organization or foreign country.
- (c) obtain adequate identification information of PEPs.
- (d) gather information on the source of wealth or funds (if necessary)
- (e) continuously monitor the relationship with the PEP and
- (f) where applicable, ensure the approval of senior management is granted before establishing or continuing a business relationship with a PEP.

### **TRANSACTIONS VIA REGULATED FINANCIAL CHANNELS**

NPOs are encouraged to conduct transactions through regulated financial channels. The overriding responsibility for the NPOs is to have in place strong internal governance policies, including the requirement for the NPO to utilize regulated services, such as licensed commercial banks or money transfer agencies to send or receive funds. The use of unregulated financial services can allow for anonymity of transactions, thereby making it difficult to identify criminal beneficial, aid in the concealment of proceeds of crime being channeled through the entity, or allowing the entity to be used to facilitate terrorist financing or money laundering.

NPOs are also encouraged to establish customer relationships with licensed financial institutions. This will allow financial transactions conducted by NPOs to be subject to ML/TF scrutiny by the financial institutions due diligence procedures and can be easily used to facilitate investigation by law enforcement if necessary.

Strong internal controls and policies would also allow for transparency and accountability. This may include the preparation and maintenance of accurate and up to date records of financial activities and audited financial statements and/or annual returns are submitted to the relevant regulatory bodies as required by the laws regulation the NPO sector, such as the Friendly Societies Act or the Companies Act.

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<sup>7</sup>Refer to FIU PEP Guideline No 3 of 2017



## RECORD KEEPING

NPOs should ensure there are effective systems in place for keeping accurate and up-to date financial records, information obtained from its due diligence procedures, unusual, large cash or complex transactions or established business relationships with its beneficiaries. This is to ensure it can submit accurate ‘Suspicious Transaction Reports’, Terrorist Property Reports or other relevant information, as may be requested by the FIU.

Record keeping also facilitates the availability of a paper trail to support any investigation to be conducted by law enforcement. Where the nature of the NPO’s activities makes it impracticable to identify each beneficiary, for example, the distribution of clothing, food to street children, destitute or similar situations, the NPO may identify the leader or person in the community who would have organized or recommended such activity.

The type of financial and other records that should be kept and maintained may include the following:

- a) Cash received and expended, including receipts and invoices;
- b) Gifts (including real estate and personal property);
- c) Sales and purchases of property or other assets;
- d) Cash raised through fundraising.
- e) Statements of assets and liabilities and gross annual income;
- f) Copies of identification information obtained on beneficiaries / donors / partners.
- g) The nature, purpose and date of the transactions or activities.
- h) Any information related to suspicion of ML or TF and STRs sent to the FIU.

## Record Maintenance

- a) The records/documents obtained for all transactions should be safely stored to facilitate their protection. That is to prevent records from becoming blurred, defaced, illegible, mutilated or in any other way deteriorated.
- b) Ensure that records are stored digitally or electronically so it’s easily retrievable or capable of reproduction in a printable and legible (readable) form.
- c) Records kept and maintained should be for a period of seven years; or such longer period as may be determined by the competent authorities for the purpose of an ongoing investigation.

## REPORTING OBLIGATION<sup>8</sup>

The NPO should ensure it has a system in place to facilitate reporting of suspicious transactions and terrorist property reports to the FIU.

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<sup>8</sup> Section 18 AMLCFT Act, Regulation No 4 of 2010; Guidelines No 1, 2013; No 2 of 2015; No 3 of 2015; No 2 of 2016; & No 1 of 2018

## Suspicious Transaction Report

A Suspicious Transaction Report (STR) is required to be submitted to the FIU, whenever the NPO, suspects or has reasonable grounds to suspect that funds, a transaction, or attempted transaction are connected to the proceeds of a criminal activity, money laundering or terrorist financing or linked to a terrorist organization or proliferation financing offences. The STR must consider the following:

- a) Be submitted as soon as possible but not later than three (3) days after forming the suspicion.
- b) In assessing whether or not a transaction is suspicious, include, complex, unusual large business transactions, and unusual patterns of transactions, whether completed or not, that have no apparent economic or lawful purpose and are inconsistent with the profiles of the persons carrying out such transactions.
- c) Be delivered to the Director Financial Intelligence Unit (FIU) Ministry of Finance Compound, 49 Main & Urquhart Streets, Georgetown, Guyana or via the FIU's secure online portal (caseKonnnect).
- d) Be kept confidential, as it is an offence for a person who knows or suspects that a report is being prepared or has been sent to the FIU, to disclose that information to another person, other than a court, or another person authorized by law.

*Please refer to STR Guidelines on the FIU's website ([fiu.gov.gy](http://fiu.gov.gy)).*

## Terrorist Property Report<sup>9</sup>

A 'Terrorist Property Report' (TPR) is a report required to be submitted to the FIU pursuant to the AMLCFT Act & Regulations made thereunder, where the organization discovers it is holding assets or funds or dealing with a person or entity listed on the United Nations Security Council Resolutions list of Terrorist or Terrorist Organisation and include persons or entities listed on United Nations Security Council Resolution (UNSCR) 1267(1999) or as may be specified by the Minister responsible for Finance under section 2(2) of the AMLCFT Act 2009 pursuant to UNSCR 1373(2001) or UNSCR 1718 (2006) or 2231(2015).

A TPR must be made to the FIU without delay, when a Reporting Entity knows or believes that it has in its possession, funds, or other assets (property) of a person or entity designated pursuant to the above UNSCR resolution. If a Reporting Entity is not sure that it is dealing with funds or other assets of a designated or specified person or entity, but suspect that it might be, then a Suspicious Transaction Report is required to be submitted to the FIU.

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<sup>9</sup> Section 68 AMLCFT Act 2009 (as amended); Regulation No 4 of 2015 (as amended by Regulation No 7 of 2015)

A TPR may be sent to the Director, hand delivered and may include the use of flash drive to submit reports. There is also a secure online portal (caseKonnnect) for submission of reports to the FIU.

The TPR must contain information that describes the funds or other assets (property).

The report must also provide information about the designated or specified person or entity and anyone who owns or controls the property on their behalf. In addition, if there were any transactions or proposed transactions related to the funds or other assets (property) the report must provide information about such transactions.

***Please refer to the Guidelines on Terrorism, terrorism financing and proliferation financing, etc. on the FIU website at: [fiu.gov.gy](http://fiu.gov.gy).***

### **MEMBERSHIP AND EMPLOYEE SCREENING**

NPOs should ensure they have policies and procedures in place to screen members, employees and volunteers prior to their employment or engagement. Screening measures are essential to safeguard against criminal associates being beneficial owners or persons with controlling interest in its activities. This is to ensure that the organization is not being used to conceal or disguise illegally obtained funds, assets, or criminal property.

### **ROLE OF SUPERVISORY AUTHORITY<sup>10</sup>**

#### **RISK-BASED SUPERVISION**

NPOs may be subjected to ongoing Terrorist Financing (TF) or Proliferation Financing (PF) risk assessment which shall be done at the national or sectoral level. NPO may also be subjected to a risk profiling process by the prudential regulator or competent authority during or after their establishment as a NPO. The risk profiling method to be applied may require the NPO to complete a TF Questionnaire aimed to identify, among other things, whether or not the NPO falls within the subset of FATF defined NPOs; and to understanding the level of TF risk associated with the NPO. Other methods may be used by the relevant competent authority to determine the risk profile of the NPO.

The role of the Supervisory Authority (SA) is provided for in the AML/CFT Act (Sections 22 and 23). Pursuant to Section 22. The functions of the SA include, among others, the following:

- (a) Assess the ML/TF/PF risks associated with the NPO Sector.
- (b) Examine, regulate, supervise, and train registered NPOs.
- (c) Issue instructions, guidelines, or recommendations to the NPO.
- (d) Cooperate and share information with competent authorities.
- (e) Submit STRs to FIU if upon examination there is reasonable grounds for suspicion of ML/TF/PF or other crimes.

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<sup>10</sup> Sections 22 & 23 AMLCFT Act 2009 (as amended)

- (f) Submit information on sanctions imposed on the NPO to the FIU.
- (g) Maintain statistics of onsite/ offsite examinations completed on the NPO.

### **EXPECTATIONS OF NPO - EXAMINATION**

NPOs are expected to be aware of AMLCFT Examinations that will be conducted by the SA. Therefore, it is important that the NPO be prepared for such examinations. Records of those examinations, findings, recommendations, and follow-up actions taken or to be undertaken by the NPO following the SA's examination should also be maintained by the entity.

### **RED FLAGS /INDICATORS**

A Compliance Officer attached to an NPO may consider submitting an STR based on observation of the following Red Flags:

- 1) Donations are from unidentified sources or a series of unexplained small donations.
- 2) A favorable treatment is being offered to a donor.
- 3) Many small beneficiaries with suspicious identity documents; or beneficiaries giving kickbacks to the NPO; or intermediaries demanding payment for recommending beneficiaries.
- 4) Vague project proposal made by partners or an unusual level of privacy required and project delivery not demonstratable.
- 5) Partner Reports indicates 100% met target with little details or inconsistent financial and narrative reporting.
- 6) NPO Employees appear to be living beyond means, or appearing at unusual times, or carrying out unassigned tasks.
- 7) Lack of monitoring of projects where procurement irregularities exist, such as tampered invoices or excuses of systems crashes.
- 8) NPO treasurer withdraws cash from the NPO account and then deposits it into a personal account, before diverting the funds to a suspected terrorist's account.
- 9) Adverse media reports linking the NPO to known or suspected terrorist organisations.
- 10) Parties to the transaction (for example: account owner, sender, beneficiary or recipient) are from countries known to support terrorist activities and organisations.
- 11) Funds sent from large international NPOs based in high-risk countries, to their branches in regional countries, are channeled to local NPOs based or operating in domestic conflict areas.

**CONCLUSION**

It is hoped that this guideline provides all NPOs with preventative measures that can be incorporated into the organization’s AMLCFT regime.

This guideline is not intended to be implemented as a replacement for the prudential laws and regulations governing the operations of the NPOs. It should be used in conjunction with relevant laws to guide measures to be implemented using a ‘risk-based approach’ to guard against the potential abuse of the NPO sector for TF or ML purposes.

**DEFINITION OF KEY TERMS**

Beneficial Ownership	“Beneficial ownership” means ownership by a natural person or persons who ultimately exercise individually or jointly voting rights representing at least twenty-five per cent of the total shares, or otherwise have ownership rights of a legal entity; or ownership by a natural person or persons who ultimately owns or controls a customer or the person on whose behalf a transaction is being conducted and includes those persons who exercise ultimate effective control over a legal person or arrangement; (AMLCFT (Amendment) No. 2 Act No. 10 of 2015).
Beneficiaries	The term ‘beneficiaries’ refers to those natural persons, or groups of natural persons who receive charitable, humanitarian, or other types of assistance through the services of the NPO.
Donor	A ‘Donor’ refers to a person or entity that provides a gift to the organization and includes, cash, assets, funds, or any form of property as defined in the AMLCFT Act 2009 (as amended).
Member	A ‘member’ refers to persons who are admitted to membership in accordance with the rules of the NPO.

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Money Laundering	<p>'Money laundering' means conduct which constitutes an offence as described under section 3 of the AML/CFT Act 2009 -</p> <p>“A person commits the offence of money laundering if he knowingly or having reasonable grounds to believe that any property in whole or in part directly or indirectly represents any person’s proceeds of crime -</p> <p>(a) converts or transfers property knowing or having reason to believe that property is the proceeds of crime, with the aim of concealing or disguising the illicit origin of that property; (b) conceals or disguises the true nature, origin, location, disposition, movement or ownership of that property knowing or having reason to believe that the property is the proceeds of crime; (c) acquires, possesses or uses that property, knowing or having reasonable grounds to believe that it is derived directly or indirectly from proceeds of crime; or (d) participates in, associates with or conspires to commit, attempts to commit or aids and abets, counsels or procures or facilitates the commission of any of the above acts.”</p>
Non-Profit Organisation	<p>NPO refers to a legal person or arrangement or Organisation that primarily engages in raising or disbursing funds for purposes such as charitable, religious, cultural, educational, social, or fraternal purposes, or for the carrying out of other types of “good works.</p>
Partner	<p>A ‘<b>partner</b>’ refers to a person or entity who enters into an arrangement or agreement or partnership to cooperate or collaborate to advance their mutual interests of a charitable activity/activities.</p>
Politically Exposed Person	<p>A 'politically exposed person' takes the meaning as set out in the AML/CFT 2009, which states:- ‘any individual who is or has been entrusted with prominent public functions on behalf of a state, including a Head of State or of government, Senior politicians, senior government, judicial or military officials, senior executives of state owned corporations, important political party officials, including family members or close associates of the politically exposed person whether that person is resident in Guyana or not.</p>
Proliferation Financing	<p>‘Proliferation Financing’ includes the act of providing funds or financial services which are used, in whole or in part, for the manufacture, acquisition, possession, development, export, trans-shipment, brokering, transport, transfer, stockpiling or use of nuclear, chemical or biological weapons and their means of delivery and related materials (including both technologies and dual use goods used for non-legitimate purposes), in contravention of the provisions of any or, where applicable, international obligations.</p>
Risk-Based Approach	<p>A 'Risk Based Approach' means identifying, assessing, and understanding the ML/TF risks to which a NPO (or the NPO sector as a whole) is exposed and applying effective proportionate mitigating measures commensurate to those risks identified.</p>
Supervisory Authority	<p>'Supervisory Authority' means the authority set out in column 2 of the Fourth Schedule of the AMLCFT Act 2009 who has compliance oversight over the reporting entity set out in column 1 of the Schedule or as may be appointment by the Minister of Finance.</p>

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Suspicious Transaction Report	A 'suspicious transaction report' is a report required to be submitted to the FIU as a consequence to observation/recognition of a suspicion that funds a transaction or attempted transaction or activity is connected to ML/TF or other criminal activity.
Targeted Non-Profit Organisation	A 'Targeted Non-Profit Organisation (NPO) refers to an organisation or arrangement which has been assessed by a relevant competent authority follow a risk profiling process or other risk assessment mechanism and that process or mechanism has determined that the NPO falls within the subset of FATF defined NPOs and is most at risk for abuse for money laundering or terrorist financing purposes.
Terrorist Financing	'Terrorist financing' means willfully providing or collecting funds, by any means, directly or indirectly, with the unlawful intention that they should be used or in the knowledge that they are to be used in full or in part- (a) to carry out terrorist acts; (b) by a Terrorist Organisation; or (c) by an individual terrorist. (See AMLCFT Act for further details).
Terrorist Property Report	A 'Terrorist Property Report' is a report required to be submitted to the FIU pursuant to AMLCFT Act & Regulations made thereunder, relating to persons or entities listed on the United Nations Security Council Resolutions list of Terrorist or terrorist Organisation.
Trustees	A 'trustees' refer to persons appointed by an express trust (e.g. trust deed or similar document) and include persons who hold and administer property or assets for the benefit of a NPO.

**REFERENCES:**

1. Anti-money Laundering & Countering the Financing of Terrorism Act No 13 of 2009 (as amended); <http://fiu.gov.gy>
2. Anti-money Laundering & Countering the Financing of Terrorism Regulations No 4 of 2010; <http://fiu.gov>
3. Anti-money Laundering & Countering the Financing of Terrorism Regulations Regulation 4 of 2015 (AMLCFT Regulation No 7 of 2015); <http://fiu.gov>
4. International Standards for Combating Money Laundering & the Financing of Terrorism & Proliferation (FATF Recommendations, Adopted by the FATF Plenary February 2012, updated February 2018; [www://fatf-gafi.org](http://www.fatf-gafi.org)
5. Combating the Abuse of NPO (Recommendation 8) FATF Best Practice Paper June 2015, [www://fatf-gafi.org](http://www.fatf-gafi.org).