



GOVERNMENT OF THE REPUBLIC OF TRINIDAD AND TOBAGO

FINANCIAL INTELLIGENCE UNIT
MINISTRY OF FINANCE



FIU REFERENCE: N/001/2019

**NOTICE TO NON-PROFIT ORGANISATIONS ON ANTI-MONEY
LAUNDERING/COUNTER FINANCING OF TERRORISM OBLIGATIONS**

Notice is given pursuant to:

1. **Section 2 and the First Schedule of the Proceeds of Crime Act, Chap 11:27 as amended** (“the POCA”), Non-Profit Organisations (“NPOs”) are now classified as a Listed Business. As such, the Financial Intelligence Unit of Trinidad and Tobago (“the FIU”) brings to your attention **Section 55A of the POCA**.

Therefore, to protect your NPO from being used by criminals, the FIU advises that measures be implemented by each NPO to deter and detect transactions related to money laundering and terrorist financing and to report of suspicious activities/transactions to the FIU.

2. **Section 4 of the Non-Profit Organisations Act, No. 7 of 2019**, provides for the FIU to:
 - i. be the anti-money laundering, counter financing of terrorism and proliferation financing (“AML/CFT/PF”) Regulator of NPOs;
 - ii. be responsible for the AML/CFT/PF supervision of NPOs with a gross annual income exceeding five hundred thousand dollars (TT\$500,000); and
 - iii. use a risk based approach to determine the level of supervision required for NPOs in accordance with the **Financial Intelligence Unit Act, Chap. 72:01 as amended**

All NPOs should note that they possess a vulnerability to being abused by criminals to either launder criminal proceeds or finance terrorist activities notwithstanding the gross annual income earned by the NPO. Furthermore, NPOs referenced at (ii) above will be subject to compliance examinations on a risk based approach to test the effectiveness of their AML/CFT/PF measures implemented.

NPOs are to be guided by guidance and publications on AML/CFT/PF available on the FIU’s website (www.fiu.gov.tt) including the following:

- *Guidance to Non-Regulated Financial Institutions and Listed Businesses on how to structure an AML/CFT/PF Compliance Programme (GN/003/2019);*
- *Guidance Note on Suspicious Transaction/Activity Reporting Standards;* and
- *Guidance Note – Procedures for Reporting Terrorist Funds.*

Requests for further information, questions or queries should be directed as follows:

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Please be guided accordingly.

Dated July 18, 2019

Director (Ag)
Financial Intelligence Unit of Trinidad and Tobago

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