Internal suspicious-activity report form and register

Marlowe & Finch Fine Art Ltd
Money Laundering Regulations 2017, regulations 19(4)(d) and 21 · art market participant
Version: 2026-11-03.1+cfa400773946

About this form

Part A is completed by the person reporting. Part B is completed by the nominated officer, Imogen Finch.

Nominated officer (MLRO)	Imogen Finch
Nominated officer: email	imogen.finch@marlowefinch.example
Nominated officer: phone	020 7946 0001

- Anyone in the business who knows or suspects, or has reasonable grounds for knowing or suspecting, money laundering or terrorist financing makes an internal report to the nominated officer (reg 19(4)(d)).
- Do not tell the customer, or anyone outside the business, that a report has been or may be made: any internal report or SAR is handled and stored securely, with regard to the tipping-off offence (HMRC AMLG11100).

Nominated officer and internal reporting: The business has a nominated officer and a written process for staff to report suspicion to them.

SAMPLE
fictitious business, for illustration

Sample pack for Marlowe & Finch Fine Art Ltd, a fictitious business. Generated 3 November 2026 from the ratified ArtGuard wording.

Part A — the report

Reported by	
Date of the report	
The customer or other person concerned, and the sale, purchase or storage involved	
What you know or suspect, and why, in plain words	
The facts: what happened, when, and the works, documents or payments involved	
Amounts involved (£), and the dates of the activity	
Where any money, work of art or other property is now, if known	
Who else is involved or associated with the matter, and how	
Whether a sale, delivery, storage or payment is waiting on this report	

SAMPLE — fictitious business, for illustration

Part B — the decision

- The nominated officer considers the report in the light of the information available to the business and decides whether it gives rise to knowledge or suspicion, or reasonable grounds for either, of money laundering or terrorist financing (reg 21(5)).
- Where a report to the NCA is needed and the business wants to go ahead with the sale or other act, the nominated officer asks for a defence (DAML) and the business does not proceed during the seven working-day notice period unless the defence is granted (HMRC AMLG11100).
- The nominated officer records the assessment and the reasons a SAR was or was not submitted, and keeps a copy of each SAR submitted (HMRC AMLG11100).

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Date received	
Decision: report to the NCA, or no report	
Reasons for the decision	
Date of the decision	
NCA reference (if reported)	
Defence (DAML) requested, and its outcome	
Date closed	

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Register of internal reports

Suspicious activity reports made to the NCA in the past two years, as recorded in the interview: 0.

Ref	Date received	Reported by	Customer or matter	Decision	Date decided	NCA reference	Defence requested (outcome)	Date closed
No internal reports recorded in ArtGuard as at 3 November 2026.								

Records of suspicious activity reports: The business keeps a copy of each SAR it submits, and a record of each potential suspicious activity, how it was assessed and why a SAR was or was not submitted.

> *"HMRC expects to see that you have recorded the potential suspicious activity, your assessment of the risk and reasons why you have or have not submitted a suspicious activity report."*
>
> — HMRC AMLG11100, 11.1

> *"Records of all internal and external reports should be retained for at least five years from the date the report was made."*
>
> — HMRC AMLG11700

SAMPLE — fictitious business, for illustration

Sources

- MLR 2017, regulation 19 (policies, controls and procedures), revised text in force 30 June 2026. Cited: reg 19(4)(d).
- HMRC, AMLG11100 (reporting suspicious activity), updated 17 July 2026. Cited: HMRC AMLG11100.
- MLR 2017, regulation 21 (internal controls), revised text in force 30 June 2026. Cited: reg 21(5).
- HMRC, AMLG11700 (record keeping), 8 July 2026. Cited: HMRC AMLG11700.

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