

Turning commitments into action

Recommendations for the UK
Illicit Finance Summit



*By the Global Civil Society Coalition for the UNCAC Working Groups on
Asset Recovery, Victims of Corruption, Environmental Crime and
Corruption, Grand Corruption and State Capture, and Human Rights and
Corruption*

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INTRODUCTION

The effects of illicit finance are felt worldwide, undermining development, security, and human rights, enabling bribery and corruption, contributing to environmental harm, and adversely affecting communities. Channels such as [gold markets](#), [real estate](#), and [cryptocurrencies](#)¹ are increasingly exploited to move and conceal illicit wealth. The UK Illicit Finance Summit presents an important opportunity for participating States and other stakeholders, both individually and collectively, to reinforce existing commitments and adopt new effective measures to tackle these challenges.

In the run-up to the Summit, the [Working Groups \(WGs\) of the Global Civil Society Coalition for the UNCAC](#) identified key recommendations to address the Summit's focus areas. These include:

- 1 Strengthening asset recovery efforts**
- 2 Preventing and disrupting professional enablers,**
- 3 Improving oversight of high-risk sectors.**

Additionally, two cross-cutting issues should guide all Summit actions:

- i Prioritizing victims**
- i Protecting those who expose corruption**

¹For example, in March 2025, the UK National Wildlife Crime Unit (NWCU) published a risk assessment recognising illegal wildlife trade (IWT) as “serious financial transnational crime”, generating around £17 billion pounds per year in illicit finances. The risk assessment acknowledges the connection between IWT and illicit financial flows, money laundering and corruption, as well as its convergence with other serious organised crimes and underlines its multi-jurisdictional nature. See [The UK Illegal Wildlife Trade Project](#).

1 STRENGTHEN ASSET RECOVERY: TAKE THE PROFIT OUT OF THE CRIME

In Europe, only 2% of proceeds of crime proceeds are seized despite asset recovery efforts ranking among the highest governmental priorities by all States Parties to the UNCAC. Persistent opacity weakens both the effectiveness and legitimacy of asset recovery efforts. Analysis of the StAR Asset Recovery Watch database revealed that one fifth of G20 members had not provided information on asset recovery efforts, and reported cases from other countries are often incomplete or inconsistent.

These shortcomings point to a structural deficit in transparency, accountability, and enforcement.

National-level recommendations

● Proactive asset recovery

States should proactively identify and recover foreign stolen assets and proceeds of corruption within their jurisdictions by initiating money laundering investigations and judicial proceedings where appropriate, even without a request from the country of origin. Asset identification should be facilitated through comprehensive beneficial ownership transparency frameworks, including for the real estate sector

● Data transparency

States should ensure transparency in asset recovery by establishing robust data collection policies and systematically reporting and sharing comprehensive information on asset recovery efforts with international fora, civil society actors and the public to facilitate public scrutiny. This will strengthen accountability, enable verification, and support effective follow-up to monitor progress.

International-level recommendation

● Cross-border information sharing and acting collectively

States should enhance cross-border information-sharing to accelerate preventative and disruptive action against criminal networks and to more effectively trace, freeze, and recover illicitly obtained assets. In addition, they should establish an alliance around non-conviction based asset recovery and drive concerted and coordinated action in concrete cases.

2 PREVENT AND DISRUPT PROFESSIONAL ENABLERS: STRENGTHEN OVERSIGHT AND ACCOUNTABILITY

Intermediaries such as lawyers, accountants, real estate agents, and corporate service providers play a central role in enabling money-laundering and illicit financial flows. Financial institutions, professional service providers and other entities are subject to anti-money laundering obligations, based on internationally agreed frameworks, including the FATF Recommendations. Despite these frameworks informing anti-money laundering regimes, regulated entities often fail to comply, resulting in them owing a “duty of care” to those harmed by corruption, especially with regard to wider societal harms such as environment and climate-related impacts. Stronger oversight of these intermediaries, particularly those operating outside the law or exploiting loopholes, is critical to prevent the concealment and laundering of illicit proceeds.

National-level recommendations

● Oversight of professional service providers

States should [establish and strengthen comprehensive domestic regulatory and supervisory regimes for professional service providers](#) and designate a national authority to perform an independent supervisory role, monitor professional service providers’ conduct and adherence to regulatory requirements and standards.

● Public-interest and collective claims

States should establish legal frameworks for public-interest and group claims for compensation against financial institutions and professional service providers that launder the proceeds of corruption. There are examples of courts recognising that banks may owe a special duty of care to third parties in relation to money laundering, grounded in anti-money laundering statutes as well as banks’ broader social responsibilities².

²As one example: Dutch courts have found a duty of care by banks towards reasonable interests of third parties (who have no contractual relationship with the bank), breach of which is a wrongful act requiring compensation of damage. In 2015, the Dutch Supreme Court found that a bank could be liable if its handling of suspicious payment transactions was too lax and the internal alarm systems failed, on the grounds that it must use its actual or potential knowledge (about diversion, money laundering and suspicious transactions) to prevent damage, see: [Does a bank have a duty of care towards third parties? \(Hupkes Advoten\)](#), (NJ 2016/245 and ABN AMRO Dutch court decision [ECLI:NL:HR:2015:3399](#)).

International-level recommendation

● Standards on financial secrecy and enablers

The Summit should catalyse a joint initiative for States to adopt stronger standards for tackling professional enablers and financial secrecy risks in sectors such as gold markets, real estate, and corporate services, building upon existing international standards and commitments under the Financial Action Task Force (FATF), the UNCAC, the Sevilla Commitment and initiatives under the 4th International Conference on Financing for Development.

1 STRENGTHEN REGULATION OF HIGH-RISK SECTORS: GOLD, REAL ESTATE, AND CRYPTOCURRENCY

Transnational organised criminal networks increasingly rely on environmental crimes, including illegal mining and logging, timber, fisheries, wildlife and waste trafficking to generate, conceal, and transfer profits. Environmental crime generates around [USD 110 to 281 billion](#) in criminal gains each year, with the illicit gold trade alone estimated at around [USD 80 billion annually](#). [Yet preventative and enforcement responses often remain fragmented](#). Appropriate action should build on commitments already agreed by States under the UNCAC, including the recently adopted [Resolution 11/9 on preventing and combating corruption as it relates to crimes that affect the environment](#), and relevant international standards such as those developed by the FATF.

National-level recommendations

● Regulation of high-risk sectors

States should strengthen regulation and oversight of high-risk sectors, including finance, transport, real estate, legal, accounting, and corporate services, by ensuring access to accurate beneficial ownership information and requiring robust reporting systems to detect suspicious financial transactions. They should also improve transparency and oversight of cryptocurrency transactions to prevent misuse for illicit finance.

● Environmental crimes as predicate offences to enable effective asset recovery

Strengthen asset recovery frameworks for illicit gold trafficking and other environmental crimes, and ensure recovered assets support environmental restoration and affected communities. States should designate these crimes as predicate offences for money laundering and strengthen financial investigations in practice, mutual legal assistance, and asset tracing and confiscation in cases involving environmental crime and related corruption³.

³Please see the Green Manifesto for commitments that the UK and other governments participating in the Summit should commit to in order to combat illicit finance and other forms of corruption that cause environmental harms: <https://www.spotlightcorruption.org/report/clean-and-green-a-manifesto-on-how-the-uks-anti-corruption-efforts-can-help-tackle-environmental-harm/>.

International-level recommendation

● Cross-border cooperation

Establish or join cross-border public-private partnerships to detect and disrupt illicit financial flows from environmental crimes. Strengthening cooperation can help dismantle criminal networks operating across jurisdictions and [enhance early detection of illicit financial flows](#). States should strengthen international, inter-agency, and multi-stakeholder cooperation through information sharing, joint investigations, and financial investigations. These partnerships should take a holistic approach to dismantling these transnational organised crime networks while addressing their links to corruption, money laundering, and other serious crimes⁴.

⁴For example, this recommendation aligns with NWCU's [Illegal Wildlife Trade Project](#) recommendations that each investigation into the illegal wildlife trade includes a financial investigation strategy, and for NWCU to continue to strengthening relationships and multi-agency working with other countries, to ensure that a two-way intelligence stream is opened, once international links are identified. In addition to information sharing, the report underlines the importance of public-private partnerships to detect and address illicit money flows that have a detrimental effect on economies and the environment.

TWO CROSS-CUTTING ISSUES

In addition, the Working Groups have identified **two cross-cutting issues that should be taken into consideration across all Summit actions:**



Victim-centered approach: ensuring social justice in illicit finance

Victims often face loss of livelihoods, displacement, environmental degradation, and denial of access to basic services, while public and private resources are diverted for illicit gain. Victim reparation should be integrated throughout the criminal and asset recovery process, not treated as an afterthought. Restoring trust in institutions and democracy requires States to ensure that victims are recognised and meaningfully reflected within legal and institutional processes.

National-level recommendations

● Early victim identification and participation

States should [identify victims at the outset of criminal investigations or asset recovery proceedings](#), including in foreign bribery, domestic corruption, and natural resource-related cases. They should be invited to provide evidence, participate in trials, and specify the consequences of illicit acts, ensuring their perspective informs judicial decisions. Court documents should explicitly reference compensation claims to enable courts to consider restitution or reparation in the interest of justice.

● Transparent and participatory asset allocation

Where returning confiscated assets directly to victims is not immediately feasible, States should establish a third-party implementation framework within a short time frame of a confiscation order, in consultation with victims, affected communities, and civil society. Harm should be assessed and allocation agreed by victims and prosecutors before filing, ensuring courts act on complete information. The mechanism should prevent ongoing harm, avoid long-term retention, and allocate funds transparently for agreed development goals, using a published process aligned with UNCAC standards.



Protect those who expose corruption: enabling civil society and whistleblowers

No effective fight against illicit finance is possible without a safe and enabling environment for civil society actors, journalists, and whistleblowers. Individuals exposing corruption, illicit financial flows, and environmental crimes face significant risks, including threats, harassment, and legal retaliation.

National-level recommendations

● Legal protection and prevention of reprisals

States should adopt and implement robust legal frameworks that protect whistleblowers, journalists, and anti-corruption defenders. This includes ensuring protection against retaliation, enabling secure reporting channels, and guaranteeing that these actors can safely participate in national and international anti-corruption processes. To address persistent challenges, States should take concrete steps to counter restrictive funding environments and foreign agent laws affecting civil society actors, and to strengthen early-warning and protection mechanisms. In line with Human Rights Council [Resolution 59/10](#) States should track attacks on civil society, support protection mechanisms and review and update frameworks for engagement with civil society and tackle barriers to participation.

● Civic space and access to information

States should ensure access to information and a safe civic environment in line with UNCAC Article 13 and human rights obligations. Civil society actors must be recognised as partners in monitoring and implementing anti-corruption measures, and be provided resources, training, and meaningful participation channels in oversight and enforcement processes.

Ensure commitments are effectively implemented: follow-up to the Summit

To translate commitments into action, the Summit should establish a clear follow-up and accountability mechanism:

● Multi-stakeholder monitoring

Joint initiatives should adopt multi-stakeholder approaches that meaningfully involve non-state actors from across regions with relevant expertise.

● Alignment with international frameworks

Governments should align national-level commitments with existing international frameworks, such as the UNCAC and UNTOC and their review mechanisms, as well as other relevant fora. They should engage civil society actors in monitoring progress and provide adequate resources, including training for public institutions.

● Funding for civil society engagement

Governments, donors, and the philanthropic community should provide funding to enable civil society actors across the globe to actively engage in follow-up processes, joint initiatives, and efforts to advance implementation of commitments at the national level.

Civil society asks and recommendations will continue to evolve in the run-up to the Summit.

