



Home Office

Sector Specific Guidance on the Foreign Influence Registration Scheme (FIRS): Business and Industry

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Glossary of key terms

FIRS	Foreign Influence Registration Scheme. The Scheme introduced through Part 4 of the National Security Act 2023.
Arrangement	Any type of agreement, whether formal or informal. Could include a contract, memorandum of understanding (MOU) or quid pro-quo informal agreement or arrangement.
Foreign power	Has the meaning given by Section 32 of the National Security Act 2023. Further details can be found in section 1 .
Political influence activities	A communication, public communication or provision of money, goods or services intended to influence a political matter.
Specified foreign power	A foreign power which has been specified through regulations under the enhanced tier of FIRS.
Relevant activity	A type of activity in scope of registration under the enhanced tier of FIRS.
Exemption	A circumstance in which registration requirements do not apply. Further detail is in section 3 .
Registrant	A person required to register under FIRS.
Information notice	A notice requiring the recipient to provide further information related to arrangements or activities registerable under FIRS.

About this Guidance

This document provides additional sector specific guidance on the Foreign Influence Registration Scheme for businesses, including small and medium-sized enterprises (SMEs), the Public Relations (PR) industry, the financial services industry, the investment management industry and the pharmaceutical industry. This includes guidance on partnerships with state-owned enterprises, joint ventures with companies from countries whose government has been specified under the enhanced tier, industry bodies acting on behalf of their membership and relevant exemptions.

It is intended to enable understanding of how the scheme's requirements apply in the context of the sector. Further detail on the scheme's requirements more generally can be found in the [guidance on the political influence tier](#) and [guidance on the enhanced tier](#). Separate guidance has also been produced on the [foreign powers and foreign power-controlled entities specified under the enhanced tier](#).

This guidance explains the key requirements of the FIRS scheme, contained within Part 4 of the National Security Act 2023. However, it remains the responsibility of those in scope of the scheme to ensure that they comply with the legislation based on their own specific circumstances.

The UK remains open to transparent engagement and cooperation with foreign powers. Those who register fully and accurately are supporting the resilience of the UK and its institutions in the face of state threats. Registration of an arrangement or activity does not in itself mean that it is necessarily illegitimate or undesirable. FIRS does not prevent any activity from taking place; providing the arrangements are transparent, related activities can proceed as normal.

Section 1: Overview of requirements

1. The scheme's requirements are split into two tiers:
 - The **political influence tier**, which requires the registration of arrangements with any foreign power (except the Republic of Ireland) to carry out political influence activities in the UK;
 - The **enhanced tier**, which requires the registration of arrangements to conduct a wider set of activities but only with the foreign powers or foreign power-controlled entities which have been specified in regulations.

Political Influence Tier

2. Individuals and organisations are required to register under the political influence tier if they are directed by a foreign power to carry out, or arrange for others to carry out, political influence activities in the UK.
3. A foreign power is any of the following:
 - a) the sovereign or other head of a foreign State,
 - b) a foreign government, or part of a foreign government (for example, a ministry or department of a foreign government);
 - c) an agency or authority of a foreign government, or of part of a foreign government,
 - d) an authority responsible for administering the affairs of an area within a foreign country or territory (for example, a local government authority in a foreign country);
 - e) a political party which is a governing political party of a foreign government.
4. Entities that are owned or controlled by a foreign power are not considered foreign powers by virtue of this ownership or control. For example, state-owned enterprises or sovereign wealth funds would not be foreign powers, providing that they do not carry out public functions for the state.
5. Registration requirements only apply where there is a “direction” from a foreign power to act.
6. Political influence activities include certain communication activities, public communication activities or the provision of money, goods or services, where they are intended to influence any of the following:
 - An election or referendum in the UK;
 - A decision of a Minister or Government department (including a Minister or Government department of Wales, Scotland or Northern Ireland);
 - The proceedings of a UK registered political party (such as their manifesto commitments);
 - A Member of the House of Commons, House of Lords, Northern Ireland Assembly, Scottish Parliament or Senedd Cymru (when acting in their capacity as such).

7. Political influence activities in the context of business and industry could include:
 - A letter to the Secretary of State for Business & Trade which seeks to influence changes in trade tariffs on specific goods;
 - A meeting with an MP, which seeks to convince them to vote against tougher sanctions on the businesses of a particular country;
 - The publication of an article which outlines measures which the government could adopt to make the UK a more attractive place for investment;
 - A social media campaign which is intended to influence a UK Government decision to impose regulation on a particular industry;
 - An email to a senior civil servant which intends to influence the UK government's decision to issue an export licence.
8. Registration of arrangements under the political influence tier must be registered within 28 calendar days of the arrangement being made. Activities may take place within that 28-day window without prior registration.
9. The maximum penalty for failure to comply with the requirements of the political influence tier is 2 years imprisonment.
10. Further detail on the requirements of this tier can be found in the [guidance on the political influence tier](#).

Enhanced Tier

11. Individuals and organisations are required to register under the enhanced tier if they are directed by a specified foreign power or specified foreign power-controlled entity to carry out, or arrange for others to carry out, a broader range of “relevant activities” in the UK. Specified foreign power-controlled entities are also required to register any “relevant activities” that they carry out themselves in the UK.
12. Separate guidance has been produced setting out the [foreign powers and foreign power-controlled entities specified under the enhanced tier](#). This guidance also provides further details of the “relevant activities” which require registration.
13. Registration requirements only apply where there is a “direction” from a specified foreign power, or specified foreign power-controlled entity, to act.
14. “Relevant” activities in the context of business and industry could include:
 - Hosting an event in the UK at the direction of a specified foreign power or specified foreign power-controlled entity;
 - Providing goods and services in the UK to a specified foreign power or specified foreign power-controlled entity;
 - Sending information from the UK to a specified foreign power or specified foreign power-controlled entity.

15. In most cases, commercial or business activities carried out in partnership with private companies from a specified country will not require registration, because these activities are not directed by the specified foreign power.
16. Registration of arrangements under the enhanced tier is required within 10 calendar days of the arrangement being made, and before activities are carried out. It is an offence to carry out relevant activities under a registerable arrangement without the arrangement being registered first.
17. The maximum penalty for failure to comply with the requirements of the political influence tier is 5 years imprisonment.
18. Further details on the requirements of this tier can be found in the [guidance on the enhanced tier](#).

Further detail on registration requirements

19. Under both tiers, registration is required by the individual or organisation who makes the registerable arrangement with the foreign power, specified foreign power or specified foreign power-controlled entity. It is the arrangement that must be registered, not each individual activity that will be carried out. Other individuals or organisations involved in carrying out the relevant activities should check that the arrangement is registered prior to carrying out the activities. Further details can be found in [section 6](#).
20. Activity is only registerable where carried out in the UK. As such, any activities carried out overseas (as may be the case with many overseas business operations and joint ventures with overseas companies) would not require registration. However, it is possible that an overseas organisation would need to register if they carry out activities in the UK, or arrange for activities to be carried out in the UK.
21. Registration is a straightforward process and we expect that most registrants will comply with the requirements through the dedicated FIRS online registration service.

Further requirements

22. Where there is a material change to a registered arrangement, the information provided at registration must be updated within 14 calendar days, beginning with the day on which the change takes effect.
23. The scheme also enables the Secretary of State to issue information notices to those who have registered, or others who are believed to be involved in, registerable arrangements or activities. Recipients of information notices must respond with the information required by the notice by the date specified. Further details can be found in the [guidance on information notices](#).

Section 2: Examples of registerable and non-registerable arrangements

Political Influence Tier

Example 1 (registration required): The Department for Business of country A, which has a large tobacco industry, enters into a contract with a UK lobby firm. As part of the contract, the UK lobby firm agrees to encourage the UK Government to reverse a recent decision to raise the legal age for smoking. The lobby firm emails the UK Secretary of State for Health and Social Care, outlining reasons why it considers that the policy will be ineffective.

The **UK lobby firm** is required to register. They are in an arrangement with the Department for Business of country A (**a foreign power**) where they have a contract (**direction**) to make a communication to Government Minister to influence a UK Government decision (**political influence activity**).

Example 2 (registration required): The Ministry of Foreign Affairs (MFA) of country B is aware that the UK Government is considering legislation affecting country B. The MFA meets with a high-profile entrepreneur in the UK and requests that they lobby parliamentarians to seek to convince them to vote against the legislation. The MFA offers the entrepreneur significant investment opportunities in country B in return for his assistance. The entrepreneur meets with members of the House of Lords to set out the case for why the legislation would be disproportionate.

The **entrepreneur** is therefore required to register. They are in an arrangement with the Ministry of Foreign Affairs of country B (**a foreign power**) where a benefit is to be received (**direction**) if they make a communication to members of the House of Lords to influence a voting decision (**political influence activity**).

Example 3 (registration not required) (no arrangement with, or direction from, a foreign power)

The political and legal system of country C gives the Government the right to effectively control the activities of any private businesses within the country. A company headquartered in country C, which is seeking to invest in the UK, writes to the UK Home Secretary to set out the case why the visa applications of the company's employees should be expedited.

The company headquartered in country C is **not** required to register. While the foreign power has the right to control the activities of the company, the foreign power has not exercised its control and has not directed the political influence activity of writing to the Home Secretary.

Example 4 (registration not required) (no direction from a foreign power, and no political influence activities carried out)

A pharmaceutical company is in an arrangement with the Ministry of Health of country D, whereby they are obliged to inform them of any medicine shortages within the supply chain. The pharmaceutical company identifies a particular shortage and reports this both to the Ministry of Health of country D and to the UK Department of Health & Social Care, under the DHSC Reporting Requirements for Medicines Shortages and Discontinuations.

The pharmaceutical company is **not** required to register. Whilst they are in an arrangement with a foreign power, they are not being directed by that foreign power to carry out or arrange political influence activities in the UK. Furthermore, whilst the pharmaceutical company makes a communication to a UK Government department, this would not be considered a political influence activity as it is not intended to influence a political matter.

Example 5 (registration not required) (no arrangement or direction from a foreign power)

An overseas pharmaceutical company, acting independently of any foreign power, writes to the Secretary of State for Business & Trade outlining issues with UK regulations affecting the supply of medicines to Northern Ireland, and making practical suggestions for how the regulations could be amended.

The company is **not** required to register. Whilst their activities constitute political influence activities (because they are seeking to influence aspects of UK Government regulation), they are not being directed to carry out these activities by a foreign power.

Enhanced Tier

Example 6 (registration required) (direction from a specified foreign power):

The Government of country E has been specified under the enhanced tier, with all activities constituting “relevant activities”. The UK-based embassy of country E signs a contract with a five-star hotel to host an event to promote country E to potential investors.

The **five-star hotel** is required to register. They are in an arrangement with the UK based embassy of country E (**a specified foreign power**) where they have signed a contract (**direction**) to host an event in the UK to promote country E to potential investors (**relevant activity**).

Example 7 (registration required) (direction from a specified foreign power):

A UK automobile brand is heavily reliant on the market of country F for both the manufacture and sale of its vehicles. The Government of country F has been specified under the enhanced tier with all activities constituting “relevant activities”. The UK automobile brand has recently published marketing materials in the UK.

The branch of the automobile brand in country F is summoned by the Ministry for Foreign Affairs of country F and urged to change the marketing materials. The automobile brand is heavily reliant on the market of country F for its business and country F has implied that it may suffer significant losses for failing to comply. It therefore amends the marketing materials for future publications in the UK.

The **automobile brand** is therefore required to register. They are in an arrangement with the Ministry of Foreign Affairs of country F (**a specified foreign power**) where they are requested - with fear of significant losses if they do not comply (**direction**) to make an amendment to marketing materials in the UK (**relevant activities**).

Example 8 (registration required) (direction from a specified foreign power):

A healthcare regulator in country G has been specified under the enhanced tier. A researcher within the UK pharmaceutical industry signs a contract with the regulator and agrees to carry out a research project into the use of a particular ingredient within medicines in the UK.

The researcher is required to register. They have signed a contract (**direction**) with a healthcare regulator in country G (**specified foreign power**) to carry out a research project in the UK (**relevant activities**).

If a public body, such as the NHS or the Medicines and Healthcare products Regulatory Authority (MHRA), were a party to the arrangement then an [exemption](#) would apply and registration would not be required.

Example 9 (registration required) (direction from a specified foreign power): The Ministry of Tourism of country H has been specified under the enhanced tier. A UK advertising and marketing agency signs a contract with the Ministry of Tourism of country H to promote the country as a tourist destination. The agency produces an advertisement and enters into separate arrangements with a number of UK broadcasting and social media companies to display the advertisement.

The UK advertising and marketing agency is required to register. They are in a contract (**direction**) with the Ministry of Tourism of country H (**specified foreign power**) to produce and disseminate an advertisement to a UK audience (**relevant activities**).

The broadcasting and social media companies should check that the agency has registered prior to showing the advertisement.

Example 10a (registration required) (direction from a specified foreign power):

The Ministry of Science and Technology of country I has been specified under the enhanced tier, with all activities constituting “relevant activities”. Employees from the Ministry wish to travel to the UK to learn more about AI technologies being developed in the UK. They request an industry body in the UK tech industry sponsor their UK visa and offer them business opportunities in country I in return. The industry body writes a sponsorship letter for them to submit as part of their UK visa application.

The industry body is required to register. They are in an arrangement with the Ministry of Science and Technology of country I (**a specified foreign power**) where they are offered business opportunities (**direction**) to write a sponsorship letter for UK visas for Ministry employees (**relevant activity**).

Example 10b (registration not required) (no direction from a specified foreign power):

A UK industry body is organising a conference in the UK on emerging AI technologies. They invite employees of the Ministry of Science and Technology from country I, which has been specified under the enhanced tier, to attend the conference and sponsor their UK visas.

The industry body is not required to register. While they are sponsoring the visas, they are not being directed to do so by a specified foreign power or entity.

Section 3: Exemptions

24. Exemptions from registration apply to:

- UK crown body arrangements (both tiers);
- Foreign powers acting overtly (both tiers);
- Diplomatic family members (both tiers);
- Legal activities carried out by a lawyer (both tiers);
- Recognised news publishers (political influence tier only);
- Sovereign wealth funds and public pension funds carrying out investment-related activities (political influence tier only);
- Activities that are reasonably necessary to support diplomatic missions (enhanced tier only);
- UK public body arrangements (enhanced tier only);
- Scholarships and education providers (enhanced tier only);
- Government administrative processes (enhanced tier only).

25. In addition to these exemptions, any public communication activities where it is reasonably clear that the activity has been made at the direction of a foreign power would not require registration under the political influence tier, because they would not meet the definition of a “political influence activity”. Therefore, any publication which intended to influence a political process would not require registration under the political influence tier, if it was clear on the publication that it was completed as part of an arrangement with a foreign power. It may still require registration under the enhanced tier, if carried out at the direction of a specified foreign power or specified foreign power-controlled entity.

26. Summaries of the exemptions most likely to be relevant to business sectors are set out below. Further detail on all of the exemptions can be found in the [guidance on the political influence tier](#) or [guidance on the enhanced tier](#).

Sovereign wealth funds and public pension funds (political influence tier)

27. Sovereign wealth funds and public pension funds do not need to register under the political influence tier, provided that **all** of the following apply:

- a) They have typical characteristics of a sovereign wealth fund or public pension fund, meaning that:
 - They are owned or controlled by a foreign power (either directly or through a trust, partnership or similar entity); and
 - Their main business is the making or managing of investments, including overseas; and
 - They receive some funding for their overseas investments from their home foreign power; and
 - The purpose of their investments is to benefit their home foreign power, or to enable pension payments;

- b) The foreign power that they are in an arrangement with is from their home country;
- c) Their political influence activities are related to their UK investments.

28. Investment holding or advisory entities carrying out political influence activities related to investments for an exempt sovereign wealth fund or public pension fund will not be required to register, and they will be able to continue with their activities without restriction.

29. This exemption does not apply to the enhanced tier. As such, a sovereign wealth fund or public pension fund would still need to register if they are directed by a specified foreign power, or specified foreign power-controlled entity, to carry out relevant activities in the UK.

Example 11 (exemption applies): A public pension fund is owned by the Government of country J, who directs it to invest in a new rail line in the UK and to lobby the UK Government to provide additional funding to support its investments. The public pension fund writes to the Chancellor setting out how its investments would support UK Growth and why the UK Government should support them.

The public pension fund is not required to register as they benefit from an exemption.

Example 12 (exemption applies): A sovereign wealth fund is owned by the Government of country K, who directs it to invest in a new rail line in the UK and to lobby the UK Government to provide additional funding to support its investments. An advisory entity owned by the sovereign wealth fund then writes to the Chancellor setting out how its investments would support UK Growth and why the UK Government should support them.

Registration is not required as the sovereign wealth fund's arrangement with the Government of country J is exempt, and the advisory entity is acting pursuant to an exempt arrangement.

Example 13 (exemption does not apply): A sovereign wealth fund is directed by the Government of country L to lobby UK Parliamentarians to vote against proposed legislation to strengthen UK export controls.

The exemption does not apply as the political influence activities being carried out are unrelated to the sovereign wealth fund's UK investments.

Activities that are reasonably necessary for the functioning of a diplomatic mission, consular post or permanent mission to a UK-based international organisation (enhanced tier)

30. Arrangements do not need to be registered if the activities being carried out are reasonably necessary to support the functioning of a diplomatic mission, consular post or permanent missions of UK-based international organisations.
31. Contractors of the embassies, consulates and other diplomatic residences of specified foreign powers may benefit from this exemption if they provide goods or services such as:
- Accommodation services (for example, serviced apartments for diplomats);
 - Cleaning services;
 - Catering services;
 - Construction and maintenance services;
 - Banking services;
 - Insurance services;
 - Sale of office equipment;
 - Supply of utilities (for example, water, gas, electricity, telephone and internet);
 - Transport services (for example, taxi services);
 - Postal, delivery and shipping services.
32. Those providing the above services will only benefit from the exemption if they are providing the services that are reasonably needed to support a diplomatic mission, consular posts or permanent mission of UK-based international organisations. The same services provided to other individuals which form part of the specified foreign power (for example, civil servants based in the specified country) do not benefit from the exemption.
33. Contractors and suppliers of diplomatic missions who provide other goods or services (such as hosting events and providing marketing services) do not benefit from the exemption.

Example 14 (exemption applies): The Foreign Ministry of country M has been specified under the enhanced tier. A UK-based embassy, which forms part of the Foreign Ministry of country M, signs a contract with a UK construction firm for building work to the embassy. The construction firm is not required to register, as the arrangement relates to the provision of services which are reasonably necessary for the functioning of a diplomatic mission.

Example 15 (exemption does not apply): The Foreign Ministry of country N has been specified under the enhanced tier. A UK-based embassy, which forms part of the Foreign Ministry of country N, signs a contract with a public relations (PR) firm. As part of the contract, the PR firm agrees to host an event at which speakers would seek to address recent criticism of repression of the people of country N by the Government, with a view to changing the narrative about the issue. Whilst the PR firm is in an arrangement with a diplomatic mission, the services that it is providing are not reasonably necessary for the function of the mission, so registration is required.

UK Public bodies arrangements (Enhanced tier only)

34. Arrangements do not need to be registered when a UK public body is a party to that arrangement. This includes arrangements where any individual acting on behalf of the UK public body (for example, an employee), is a party. For more detail on public authorities please see the enhanced tier guidance.
35. For example, where an arrangement exists between a foreign power and a UK business, and a UK public body is also a party to that same arrangement, this exemption will apply. The exemption will **not** apply if the UK business is in two separate arrangements – one with a specified foreign power and one with the UK public body. The involvement of a UK public body in the activities alone does not mean that the exemption applies.
36. This exemption **does not** apply to arrangements to which local government public bodies and maintained schools, academy schools and further and higher education institutions are party.
37. The exemption only applies when the UK public body is an actual party to the **arrangement** with the specified foreign power (for example, if it were a multilateral agreement involving both the UK public body and the specified foreign power). The involvement of a UK public body in the activities alone does not mean that the exemption applies.
38. Similarly, where a UK public body is only a party to part of an arrangement, the other part of the arrangement would still need registration. For example, where an arrangement with a foreign power has both formalised and informal elements, and the UK public body is only party to the formalised element, the informal elements of the arrangement may still require registration if all conditions are met.
39. Even if a UK public body is party to the arrangement, it will be necessary for a person in an arrangement with a foreign power (including a specified foreign power) to register with FIRS where this arrangement involves them being directed to carry out political influence activity in the UK.

Example 16 (exemption applies): A UK public body and a specified agency of a foreign power fund a joint business venture between a UK business and a foreign business and an MOU exists between these four parties. Much of the activity involves business activity in the UK, as well as meetings held in the UK between the UK and foreign businesses. As the UK public body is party to the arrangement (as they are jointly funding the venture with the specified agency of the foreign power), the UK business and the foreign business do not need to register this arrangement with FIRS.

Example 17 (exemption applies in part): A UK public health body is part of a global partnership working on a clinical trial of a new vaccination. This global partnership is partially funded by a specified foreign power and involves clinical research, testing and reporting being carried out by the UK public health body and other members of the global partnership in the UK. The UK public health body does not need to register this arrangement with FIRS and neither do any of the other members of the global health partnership. If, separate to this arrangement, a medical research company who is part of the global partnership was directed by the specified foreign power to attend and report back on the findings of a UK medical conference that is unrelated to the global partnership, the medical research company would have to register this (as the UK public body is not party to that arrangement).

Government administrative and technical services (Enhanced tier)

40. A person does not need to register an arrangement where they are directed by a specified foreign power to carry out activity in the UK that is reasonably necessary to facilitate the provision of the following services by or on behalf of the specified foreign power. These services are:
- a. a number of technical or administrative services related to consular functions including but not limited to issuing passports or travel documents to the nationals of a specified foreign power, notarisaton and registration services (including registration of births, deaths and marriages and providing or arranging for assistance to be provided in emergency circumstances, such as serious injury or illness;
 - b. immigration and citizenship services; and
 - c. tax administrative services such as advice or assistance on paying tax owed to the specified foreign power or complying with any other legal requirements relating to tax.
41. A person is only exempt from registering with the scheme where they are directed to carry out activity that is reasonably necessary to enable the provision of a service covered by the exemption. For example, if an individual is directed to fill in a passport application form by the specified foreign power as part of the process of applying for or renewing a passport, this does not to be registered with FIRS.

However, if while applying for a passport, they were directed by the specified foreign power to provide the names and addresses of the employees of the individual's company, this would not be exempt and should be registered with FIRS.

Example 18 (exemption applies): A UK health business has regular commercial activity and engagement with a business (business X) which is headquartered in country A. Business X is not specified FIRS, but country A's Ministry of Finance is specified on the enhanced tier.

As part of ongoing commercial engagements, the UK business is legally obliged to pay tax to country A's Ministry of Finance. The UK business gets in contact with country A's Ministry of Finance. The Ministry of Finance directs the UK business to complete and submit a tax assessment form. The application form asks for information that is considered reasonable and within scope of the administrative process. The UK business does not need to register this arrangement with FIRS.

Exemption 19 (exemption does not apply): A UK health business has regular commercial activity and engagement with a business (business X) which is headquartered in country B. Business X is not specified on FIRS, but country B's Ministry of Finance is specified under the enhanced tier of FIRS.

As part of ongoing commercial engagements, the UK business is legally obliged to pay tax to country B's Ministry of Finance. The UK business gets in contact with country B's Ministry of Finance. The Ministry of Finance directs the UK business to complete and submit a tax assessment form. The application form asks for detailed information about the UK business's research and development department. The Ministry of Finance also asks the UK business for information regarding ongoing medical research, that will not form part of the tax assessment.

Since the tax assessment form has asked for information that is outside the scope of tax assessment, by asking for medical research data, this activity should be registered with FIRS.

Section 4: Common scenarios affecting business and industry

Joint ventures (both tiers)

42. Joint ventures do not require registration if they relate entirely to activities which are carried out outside of the UK, even if one of the parties is a UK company.
43. Joint ventures which relate to activities carried out in, or with effect in, the UK may require registration under the enhanced tier if:
- One of the parties is a specified foreign power-controlled entity.
 - The joint venture is directed by a specified foreign power to carry out activities in the UK.
44. A joint venture may also be required to register under the political influence tier if it is directed by a foreign power to carry out, or arrange, political influence activities in the UK.

Example 20 (registration required) (enhanced tier)

The Ministry of Trade of country G has been specified under the enhanced tier, with all activities constituting “relevant activities”. A joint venture has been set up between a UK company and a company in country G. The joint venture then signs a contract with the Ministry of Trade of country G and agrees to carry out a survey involving respondents in the UK.

The joint venture is required to register. They are in an arrangement with the Ministry of Trade of country G (**a specified foreign power**) made up of a contract (**direction**) to carry out a survey in the UK (**relevant activities**). No exemptions apply.

Example 21 (registration not required) (enhanced tier)

The Government of country H has been specified under the enhanced tier. A UK company forms a joint venture with a company from country H, whose main activities are the sale of alcohol. As part of the joint venture, the UK company sells the alcohol to UK consumers.

Whilst the Government of country H has been specified under the enhanced tier, neither party of the joint venture are being directed by that government to carry out activities in the UK. Registration is therefore not required.

State-owned enterprises (both tiers)

45. Ownership, funding or another means of control by a foreign power does not in itself trigger a registration requirement for a state-owned enterprise, nor does it make a state-owned enterprise a foreign power. An entity would only be considered a foreign power if it carries out functions of a public nature (for example, the issue of passports or operation of prisons), but not functions that are predominantly commercial (for example, the sale of goods or services).
46. A state-owned enterprise would only be required to register under the political influence tier if it is directed by a foreign power to carry out, or arrange, political influence activities in the UK.
47. A state-owned enterprise would only be required to register under the enhanced tier if either:
- It is itself a specified foreign power-controlled entity and is carrying out relevant activities in the UK; or
 - It is directed by a specified foreign power or specified foreign power-controlled entity to carry out relevant activities in the UK.
48. Where a state-owned enterprise carries out activities which it determines itself, with no direction from a foreign power, registration is not required.

Example 22 (registration required) (political influence tier)

A state-owned enterprise from country I meets with the Minister of Trade from country I, who directs the enterprise to leverage contacts within the UK Government to make the case for a state visit to the UK for the President of country I. The Minister of Trade offers substantial amounts of funding to the enterprise if they successfully convince the UK Government to agree to the state visit. The CEO of the state-owned enterprise then sends a letter to the Cabinet Secretary outlining the benefits that a state visit would bring.

The state-owned enterprise is required to register. They are in an arrangement with the Minister of Trade of country I (**a foreign power**) where they are directed – with the offer of significant funding upon compliance (**direction**) – to make a communication to the UK Government to influence a decision to enable a state visit for the President of country I to the UK (**political influence activities**).

Example 23 (registration requirement) (enhanced tier)

The Government of country J has been specified under the enhanced tier, with all activities constituting “relevant activities”. The laws of country J require all state-owned enterprises in the country to comply with requests made by the Government and several senior managers of state-owned enterprises have been sanctioned after having spoken out against the country’s government. A civil servant sits on the board of a state-owned enterprise and directs the enterprise’s communication unit to share the government’s social media posts which rebut claims that the government is seeking to interfere in an upcoming election in the UK. The communication unit complies with the direction of the civil servant and the messages are shared on social media intended at a UK audience.

The state-owned enterprise is required to register. They are in an arrangement with a civil servant of country J (**a foreign power**) where they are directed – with potential consequences for the company’s managers if they fail to comply (**direction**) – to share messages on social media for the government of country J (**relevant activities**).

Example 24 (registration not required under either tier)

A state-owned enterprise is 100% owned by, and receives funding for investments from, the government of country K. A senior manager from the enterprise, acting without direction from the state, attends a conference in the UK and speaks to the UK Minister for Energy Security & Net Zero with the aim of attracting funding from the UK Government to support its investment into a nuclear power plant.

Whilst the enterprise is owned by and receives funding from the government of country K, the manager of the enterprise is acting without direction from the government. Registration is therefore not required, even if the government of country K were specified under the enhanced tier.

Partnerships with state-owned enterprises (both tiers)

49. Those being directed by state-owned enterprises to carry out political influence activities in the UK do not have to register. Under the political influence tier, they would only have to register if they were being directed to do so by a **foreign power**.
50. Where a foreign power is specified under the enhanced tier, that does not mean that all entities which are controlled by that foreign power are also specified. These entities would only be considered specified if they are named in regulations as a specified foreign power-controlled entity. Therefore, those carrying out relevant activities in the UK at the direction of foreign-power controlled entities would only have to register if the entities were themselves specified.
51. Where someone has reason to believe that they are acting pursuant to a registerable arrangement (for example, an arrangement between a foreign power

and a state-owned enterprise), then they should check that the arrangement is registered. However, in the majority of cases, those carrying out activities which are solely commercial in nature would have no reason to know that they were acting pursuant to a registerable arrangement. See the political influence tier for further details.

Example 25 (registration not required under either tier)

The government of country L owns a proportion of the shares and has voting rights within a state-owned enterprise in the country, however the day-to-day activities of the enterprise are self-directed. The state-owned enterprise enters into a contract with a public relations firm, who agrees to lobby government ministers on behalf of the enterprise to seek more open investment opportunities in the UK. The public relations firm writes to the Minister for Business and Trade outlining the benefits that the state-owned enterprise could bring to UK infrastructure.

Neither the PR firm nor the state-owned enterprise are required to register. This applies even if the government of country L has been specified under the enhanced tier. This is because:

- The state-owned enterprise is not being directed by a foreign power as their day-to-day activities are self-directed.
- The state-owned enterprise is not a foreign power so the PR firm is not in an arrangement with a foreign power.
- The state-owned enterprise is not specified under the enhanced tier.

Private equity and venture capital arrangements (enhanced tier)

52. UK private equity and venture capital firms would only be required to register under the enhanced tier when they are in an arrangement with a specified foreign power, or specified foreign power-controlled entity, and are directed by them to carry out or arrange “relevant activities” in the UK.

53. Sovereign wealth funds, sovereign investors and public pension funds which are owned or controlled by a specified foreign power are not automatically considered specified because of this ownership or control. Therefore, a UK private equity firm would only be required to register where they are in a relevant arrangement with a foreign power or entity which has been specified themselves under the enhanced tier.

54. Where a UK private equity or venture capital firm has reason to believe that they are acting pursuant to a registerable arrangement between a foreign power and an investment body, they should check that the arrangement is registered prior to

carrying out any activities. However, in the majority of cases, if the activities are solely investment-related, they would have no reason to know that they were acting pursuant to a registerable arrangement. See the political influence tier for further details.

Example 26 (registration not required)

The Ministry of Commerce of country M has been specified on the enhanced tier. A sovereign wealth fund is owned by the Ministry, although its day-to-day operations are independent and its operations solely relate to making and managing investments of Government funds overseas. The sovereign wealth fund forms an arrangement with a UK private equity firm, invests money into its private fund programs, which the private equity firm then invests into a number of other companies in accordance with the investment strategy of the program. A side-letter agreement is in place between the private equity firm and the sovereign wealth fund, stating that the private equity firm should prioritise investments expected to provide the greatest return within the next 5 years (as opposed to a longer or shorter period).

The UK private equity firm is **not** required to register, as they are not in an arrangement with a specified foreign power or specified foreign power-controlled entity. Whilst the sovereign wealth fund is owned by a specified foreign power, they are not themselves listed as a specified foreign power-controlled entity. There is also no reason for the private equity firm to know that they are acting pursuant to a registerable arrangement between the Ministry of Commerce and the sovereign wealth fund, as the activities are solely related to investments, rather than other strategic aims of the foreign power.

Lobbying activities carried out through trade associations (political influence tier)

55. Where an organisation is in an arrangement with a foreign power and is directed to carry out political influence activities, that organisation is required to register, regardless as to whether they carry out the activities alone, or through trade associations.
56. Trade associations that are acting pursuant to a registerable arrangement between an organisation and a foreign power should check that the organisation has registered the arrangement prior to carrying out the activities. However, in circumstances where they have no means of knowing that a registerable arrangement is in place, no offence would be committed.
57. Trade associations would only be required to register themselves if they were directed by a foreign power to carry out or arrange political influence activities in the UK. They would not be required to register where, for example, they carried out political influence activities at the general direction of their membership, or where

they facilitate knowledge sharing between their members and the UK Government (or governments of other countries).

Example 27 (registration required): A state-owned bank from country M is in an arrangement with the Ministry of Trade & Investment of country M. Under this arrangement, the Ministry of Financial Security directs the bank to lobby the UK Government to relax regulation on inward investment to the UK. The bank joins an event organised by a trade association and, together with employees and other members of the trade association, speaks to UK senior civil servants outlining why the regulation is outdated and needs a review.

The state-owned bank is required to register, as they are in an arrangement with the Ministry of Trade & Investment of country M (**a foreign power**) through which they are directed to lobby the UK Government to relax regulation on inward investment (**political influence activities**).

The other employees and members of the trade association are not affected by any requirements under FIRS, providing they are not aware that a foreign power has directed the lobbying activities. If they had knowledge that the bank was acting at the direction of a foreign power, then they would be required to check that the bank has registered the arrangement.

Trade associations and industry bodies with companies from enhanced tier countries in their membership (enhanced tier)

58. Trade associations and industry bodies which act at the general direction of their membership will not be required to register. Under the enhanced tier, they would only be required to register if they acted at the specific direction of a specified foreign power or specified foreign power-controlled entity.
59. Registration would be required if they had a foreign power-controlled entity which had been specified under the enhanced tier as part of their membership, and they acted at the specific direction of this member.
60. Registration would not be required if they acted at the direction of a private or state-owned company from a country whose government had been specified, providing that company had not been themselves specified under the enhanced tier.

Example 28a (registration required) (direction from a specified foreign power-controlled entity): A trade body has a state-owned enterprise from country M that has been specified under the enhanced tier as part of its membership. The enterprise requests specific assistance from the trade body to attract talent from across the industry to support the enterprise in a business venture, and pays the trade body for its assistance. The trade body approaches a number of industry experts who may be interested in the opportunity.

The **trade body** is required to register. They are in an arrangement with a specified state-owned enterprise (**specified foreign power-controlled entity**) who pays them (direction) to promote an opportunity to support the enterprise in a business venture (relevant activities).

Example 28b (registration not required) (no arrangement with a specified foreign power or entity):

A trade body has a company from country M as part of its membership. The government of country M has been specified under the enhanced tier, however the company is an independent commercial entity. The company requests specific assistance from the trade body to market its services to a UK audience and pays the trade body for its assistance. The trade body approaches a number of companies who would benefit from the company's services.

The trade body is **not** required to register, as they are not in an arrangement with a specified foreign power or specified foreign power-controlled entity. Whilst the government of country M has been specified, the company is not part of the government.

Section 5: The public register and exceptions to publication

61. Certain information registered which relates to arrangements to carry out political influence activities will be included on a public register. This includes arrangements registered under the political influence tier, as well as any arrangements registered under the enhanced tier which relate to the carrying out of political influence activities. Other registrations under the enhanced tier will not be published.

62. Not all information provided at registration is published. Please see the [guidance on the information required at registration and the public register](#) for further details.

63. Exceptions to publication apply in the following scenarios:

- Where there is a risk that publication would prejudice the safety or interests of the UK.
- Where there is a risk that publication would prejudice the prevention or detection of crime, a criminal investigation or criminal proceedings;
- Where there is a significant risk that publication would put any individual's safety seriously at risk.
- Where publication would involve the disclosure of commercially sensitive information.

64. Exceptions to publication may apply to a registration as a whole (meaning that no details are published) or to only certain information within a registration (meaning that the registration is published but with that information redacted).

65. Registrants who believe that an exception to publication applies will be given the opportunity to provide evidence to demonstrate that the exception applies as part of the registration process.

66. The exception which is most likely to be relevant to the business sectors is the exception for where publication would involve the disclosure of commercially sensitive information. Further details about the other exceptions to publication can be found in the [guidance on the information required at registration and the public register](#).

Commercially sensitive information

67. Businesses who believe that the exception for commercially sensitive information applies should provide evidence when submitting their registration to demonstrate that:

- Information that would be published is confidential; and

- Its publication is highly likely to seriously prejudice the commercial interests of any individual or entity.

68. Information is considered confidential if:

- It is not generally known by, or available to, individuals external to your organisation, unless they need access to the information to fulfil their roles (as may be the case with certain contractors, suppliers or business partners); and
- It is subject to measures to prevent it from being disclosed outside of these closed circles (for example, access restrictions in the area where the information is stored; or contractual agreements which prohibit the disclosure of the information).

69. For this exception to apply, there must be a clear link between publication and damage to commercial interests. This could include, for example, where there are particular details which would be published which would be highly advantageous to a competitor.

70. Whilst the evidence acceptable to demonstrate an exception will vary in each case, the following types of evidence could be provided (if appropriate and relevant):

- Copies of Non-Disclosure Agreements or details of contractual obligations,
- Patent applications or other intellectual property protection documents,
- Expert assessments of the commercial value of the information.

71. Examples of types of information that could be considered commercially sensitive include, but are not limited to:

- Pending mergers and acquisitions;
- Trade secrets, patents and other intellectual property;
- New inventions, technologies or new research findings;
- Detailed processes, procedures or techniques used by a company (for example, detailed manufacturing processes);
- Recipes or formulas (common in the food, pharmaceutical and cosmetic industries);
- Plans for the development of future products.

72. Certain types of costs information may meet the threshold for this criterion to be met, for example capital expenditure and operating expenses, but only where a clear explanation can be provided as to how it would seriously prejudice commercial interests. The same applies for other types of data held by a company, such as price information, supplier lists and client information.

73. Information related to procurement exercises (for example, tender bids) could in some circumstances meet the criteria for the exception to apply. For example, information provided confidentially by a company as part of a tender bid could prejudice their commercial interests if published because it could give competitors an advantage in making a similar bid.

74. Similarly, information could, in particular, be considered commercially sensitive in the period prior to signing a formal contract. However, evidence is still required to demonstrate the potential consequences from the publication; for example, the potential for competitors to take advantage of the fact that they knew that a contract was being signed.

75. A risk of reputational damage occurring as a result of publication does not, in itself, mean that the exception to publication applies. Evidence would need to be provided as to how that reputational damage would be caused by publication and how it would seriously prejudice the commercial interests of the company.

Section 6: Who the registration requirements fall upon and responsibilities of employees and subcontractors carrying out activities

76. Where the conditions for registration under either tier of FIRS are met, it is the individual or organisation which is in the arrangement with the foreign power (political influence tier) or specified foreign power or entity (enhanced tier) that is required to register (referred to as “P” in the legislation).

77. Therefore, where an organisation forms a registerable arrangement with a foreign power, it is the organisation that has the legal responsibility to register.

78. Employees and subcontractors of the organisation or others carrying out activities pursuant to the registerable arrangement do not have to register, but they should check that the arrangement is registered before carrying out their activities. This can be done by requesting a confirmation of the registration from the registrant which can then be verified via with the case management team.

79. There are safeguards in the legislation to protect employees or subcontractors, where they have no way of knowing that they are acting pursuant to a registerable arrangement, for example:

- Their activities are solely commercial in nature, with no information to suggest that they have been directed by a specified foreign power or entity;
- They know that the entity with whom they are working is state-owned, state-controlled or otherwise closely linked to the state, but have no reason to know that the state has actually directed the activities that they are carrying out;
- The objectives that they are seeking to achieve through their activities are not strategic or political objectives of the state, but rather the commercial objectives of the entity that they are working with, and they have no information to suggest that the state has directed these activities.

80. There are also similar safeguards where the person has taken all reasonable steps open to them to check whether or not the arrangement is registered and believed that it was (see section 67 of the National Security Act 2023).

81. There is no specific duty on any employees, subcontractors or other persons carrying out activities to proactively carry out due diligence into who is directing the activity. The key is whether they have knowledge or information available to them which suggests that they may be acting pursuant to a registerable arrangement –

and if they have such knowledge or information, then they should check that it is registered.

Case study 1 (political influence tier): A PR agency forms an arrangement with the Government of country X and agrees to launch a campaign to seek to persuade the UK Government to provide visa-free travel to the UK for nationals of country X.

The PR agency identifies a number of freelance lobbyists with appropriate contacts in the UK senior civil service and signs an agreement with all of them, which sets out the context and objectives of the campaign. These lobbyists then each communicate with senior civil servants to set out the case for current visa requirements to be relaxed.

The **PR agency** is required to register as they are in the registerable arrangement with the foreign power.

The **freelance lobbyists** are not required to register as they are not directly a party to the registerable arrangement. However, given they are aware of the context of the campaign and the objectives are clearly to further strategic aims of a foreign power, they ought reasonably to know that they are acting pursuant to a registerable arrangement. The freelance lobbyists should therefore check that the PR agency has registered the arrangement.

Case study 2 (enhanced tier): A UK conference facilitator signs a contract with a specified foreign power and agrees to organise an event in the UK.

The conference facilitator arranges for a catering company to provide refreshments at the event. The conference facilitator provides the catering company with the title, timings and attendee numbers at the event, but there is no indication that the event has been directed by a specified foreign power.

The **conference facilitator** is required to register as they are in the registerable arrangement with the specified foreign power.

The **catering company** is not required to register as they are not directly a party to the registerable arrangement. They also have no reason to know that the event has been directed by a specified foreign power, so are not required to take any action to comply with FIRS.