

Reference: 2025-062

Thank you for your email in which you requested the following information under the Freedom of Information Act 2000 (FOIA):

- 1. Of the bribery investigations undertaken by the SFO into individuals since the Bribery Act was enacted, have any such investigations included a principal money laundering offence under sections 327-329 of the Proceeds of Crime Act (POCA) 2002? If so, how many?**
- 2. For any/each individual bribery investigation commenced involving bribery AND a principal money laundering offence please provide the following details:**
 - a) The POCA section(s) under investigation (327, 328 or 329)?**
 - b) Whether the investigation resulted in any charges being laid? If so, please confirm which charges were laid?**
 - c) The period over which the investigation was conducted (e.g. 2014-2018)**
- 3. Of the bribery prosecutions brought against individuals since the Bribery Act was enacted, have any included a principal money laundering offence under sections 327-329 of the Proceeds of Crime Act (POCA) 2002? If so, how many?**
- 4. For any/each individual bribery prosecution commenced involving bribery AND a principal money laundering offence please provide the following details:**
 - a) Whether the prosecution resulted in a conviction or an acquittal, for which offences**
 - b) In the case of a conviction, the sentence imposed**
 - c) The year the prosecution was brought**
 - d) The section indicted (327, 328 or 329)?**
- 5. Has the SFO ever brought a prosecution under section 330 or 331 POCA? If so under which section(s), how many, and in what years?**
- 6. For any/each individual prosecution commenced involving an offence under section 330 or 331, please provide the following details:**
 - a) Whether the prosecution resulted in a conviction or an acquittal**
 - b) In the case of a conviction, the sentence imposed**
 - c) The year the prosecution was brought**
 - d) The section indicted (327, 328 or 329)**

Response

Please see below our response to your questions in the order asked.

Question 1

In most cases, the principal offence of a bribery investigation are bribery offences. We have therefore considered the question to incorporate any bribery investigation where money laundering offences were prosecuted.

Accordingly, of the bribery investigations that have taken place and charged since the enactment of the Bribery Act, there has been one investigation with additional charges of money laundering offences under sections 327-329 of the Proceeds of Crime Act (POCA) 2002.

Question 2

In this one bribery investigation stated above:

- a. Section 328 was under investigation.
- b. Three defendants were charged with two counts of money laundering, contrary to s.328 (1) of the Proceeds of Crime Act 2002.
- c. This investigation took place from 2016 to 2021.

Question 3

There have been two bribery prosecutions which included money laundering offences and one money laundering only prosecution arising from a bribery investigation.

Question 4

Two bribery prosecutions which included money laundering offences contrary to s. 328(1) of the POCA 2002 act were brought in 2021. Both defendants were acquitted of the bribery charges. The SFO discontinued the prosecutions of the money laundering offences.

Question 5

There have been no recordings of prosecutions under section 330 or 331 POCA.

Question 6

There have been no recordings of prosecutions under section 330 or 331 POCA.