



Home Office

Sector Specific Guidance on the Foreign Influence Registration Scheme (FIRS): Defence and Security

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Contents

Glossary of key terms	2
About this Guidance	3
Section 1: Overview of requirements	4
Political Influence Tier	4
Enhanced Tier	5
Further detail on registration requirements	6
Further requirements	6
Section 2: Examples of registerable and non-registerable arrangements	7
Political Tier	7
Enhanced Tier	8
Section 3: Common scenarios affecting the defence and security sector	9
State-owned enterprises	9
Partnerships with state-owned enterprises (both tiers)	10
Section 4: Exemptions from registration	11
Foreign Powers	11
UK Crown Body Arrangements (both tiers)	12
Section 5: Exceptions to publication	14
Safety or interests of the UK exception	14
Commercially sensitive information	15
Section 6: Who the registration requirements fall upon and responsibilities of employees and subcontractors carrying out activities	17

Glossary of key terms

FIRS	Foreign Activities & 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 from registration	A circumstance in which registration requirements do not apply. Further detail is in section 4 .
Exception to publication	A circumstance in which information registered under FIRS will not be published. Further information is in section 5 .
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 the defence and security sector. This includes guidance on defence companies that have close links to foreign power, the “UK Crown Bodies Arrangement” exemption in the context of defence and the circumstances in which exceptions to publication may apply for national security reasons.

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 is intended to explain 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 co-operation 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. Registration requirements only apply where there is a “direction” from a foreign power to act. Support from a foreign power which enables activities to take place (for example, through the provision of facilities for political influence activities to take place) does not in itself trigger a registration requirement.
5. 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).

6. Political influence activities in a defence context could include:
 - A meeting with a senior civil servant to influence cyber-security related Government policy;
 - A letter to a member of parliament which seeks to encourage them to vote against amendments proposed to defence and security-related legislation;
 - An article published to a UK audience proposing policy changes to improve UK defence or security (where it is not made clear that this article is published at the direction of the relevant foreign power).
7. 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.
8. The maximum penalty for failure to comply with the requirements of the political influence tier is 2 years imprisonment.
9. Further detail on the requirements of this tier can be found in the [guidance on the political influence tier](#).

Enhanced Tier

10. Individuals and organisations are required to register under the enhanced tier if they are directed by a specified foreign power or 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.
11. 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.
12. Registration requirements only apply where there is a “direction” from a specified foreign power, or specified foreign power-controlled entity, to act. Support from a foreign power for activities (for example, through the provision of facilities or equipment) does not in itself trigger a registration requirement.
13. “Relevant” activities in the context of the defence and security sector could include:
 - The manufacture or sale of weapons at the direction of a specified foreign power or specified foreign power-controlled entity;
 - Research on sensor capabilities at the direction of a specified foreign power or specified foreign power-controlled entity;
 - Engagement with the UK armed forces at the direction of a specified foreign power or specified foreign power-controlled entity.

14. 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.
15. The maximum penalty for failure to comply with the requirements of the enhanced tier is 5 years imprisonment.
16. Further details on the requirements of this tier can be found in the [guidance on the enhanced tier](#).

Further detail on registration requirements

17. Under both tiers, registration is required by the individual or organisation who makes the registerable arrangement with the foreign power, specified foreign power or foreign power-controlled entity. Further details can be found in [section 6](#).
18. Activity is only registerable where carried out in the UK. As such, any activities carried out abroad would not require registration. However, it is possible that an overseas individual or organisation would need to register if they carry out activities in the UK, or arrange for activities to be carried out in the UK.
19. 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

20. 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.
21. 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 Tier

Example 1 (registration required): A security and aerospace company enters into a contract with the Government of Country A. As part of the contract, the company agrees to lobby senior civil servants in the Ministry of Defence to promote the use of a new technology to improve precision in UK fighter jets. The company attends an international air show in the UK and, in the margins of the event, approaches a senior civil servant in the UK Ministry of Defence to and highlight the benefits of the new technology.

The **security and aerospace company** is required to register. It is in an arrangement with the Government of Country A (**a foreign power**) where they have a contract (**direction**) to lobby senior civil servants to promote the use of a new technology in UK fighter jets (**political influence activity**). No exemptions apply.

Example 2 (registration required): The Government of Country B approaches the CEO of an aviation and defence company based in Country B. The Government of Country B requests that they use contacts in the UK Government to increase cybersecurity cooperation between the two countries, offering additional funding for the company if they successfully achieve buy-in from the UK Government. The CEO subsequently meets with UK special advisors and senior civil servants outlining the capabilities that the company can offer and outlining a proposal for increased cooperation and possible ways in which the UK Government could target its funding in cybersecurity. A series of emails and meetings follow.

The **aviation and defence company** is required to register. It is in an arrangement with the Government of Country B (**a foreign power**) where they are requested, with offer of additional funding upon compliance (**direction**), to communicate with senior UK Government contacts to influence Government decisions related to cybersecurity cooperation (**political influence activities**). No exemptions apply.

Example 3 (registration not required): A defence company from Country C is a supplier of equipment for the UK armed forces. In order to sell its goods to the UK, it applies for an export licence from the Government of Country C. The export licence is approved with conditions about the terms of the export. The defence company then engages with a senior civil servant in the Ministry of Defence to explain how the company could support training of the armed forces in the equipment (and seeking to influence a potential decision by the Ministry related to military training programmes).

The defence company is **not** required to register. Whilst they are carrying out political influence activities, they are not being directed to do so by a foreign power. The approval of an export licence by a foreign power does not constitute a direction to carry out political influence activities.

Enhanced Tier

Example 4 (registration required) (direction from a specified foreign power):

The Government of Country D has been specified under the enhanced tier, with all activities constituting “relevant activities”. The UK-based embassy of Country D enters into a contract with a UK defence company to carry out research into how tanks can be modified to better operate in difficult terrain.

The **defence company** is required to register. They are in an arrangement with the UK-based embassy of Country D (**a specified foreign power**) where they have signed a contract (**direction**) to carry out a research project in the UK (**relevant activity**). No exemptions apply.

Example 5 (registration not required) (no direction from a specified foreign power):

A UK aerospace company is organising a conference in the UK on emerging AI technologies and their use in aerospace. They invite employees of the Ministry of Science and Technology from Country F, which has been specified under the enhanced tier, to attend the conference and sponsor their UK visas.

The aerospace company 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: Common scenarios affecting the defence and security sector

State-owned enterprises

22. 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 operation of military sites), but not functions that are predominantly commercial (for example, the manufacture or sale of weapons).
23. 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.
24. 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.
25. Where a state-owned enterprise carries out activities which it determines itself, with no direction from a foreign power, registration is not required.

Example 6 (political influence tier) (registration not required): The UK Ministry of Defence launches an invitation for defence companies to bid for a contract to renew a fleet of Royal Air Force aircraft. A company that is partially owned by the Government of Country D, but its day-to-day operation is independent of the government, submits a bid for the contract. The CEO of the company also invites the UK Secretary of State to dinner and present the case for why the tender should be awarded to their company.

The company is **not** required to register. Whilst the company is owned by a foreign power and is carrying out political influence activities, its day-to-day operation is independent of the foreign power and the foreign power has not directed it to bid for the contract, or communicate with the UK Secretary of State.

Partnerships with state-owned enterprises (both tiers)

26. Those being directed by state-owned enterprises to carry out political influence activities in the UK do not have to register. They would only have to register under the political influence tier if they were being directed to do so by a **foreign power**.
27. Where a foreign power is specified under the enhanced tier, that does not mean that all entities which are owned by that foreign power are also specified. These entities would only be considered specified if they are named as a specified foreign power-controlled entity. Therefore, those carrying out relevant activities in the UK at the direction of state owned enterprise would only have to register if the entities were themselves specified.
28. However, where someone knows or reasonably ought to know that they are acting pursuant to a registerable arrangement (for example, an arrangement between a foreign power and a state-owned company), then they should check that the arrangement is registered. This could be the case if, for example, someone was directed by a state-owned company to carry out activities which are predominantly in the interest of a foreign power.

Example 7 (political influence tier): A defence company from Country A is in a long-standing agreement with the Ministry of National Security of Country A to negotiate in the defence interests of Country A, with the bonuses of company employees being agreed and paid by the Ministry of National Security. The close links between the company and the Ministry of National Security is widely publicised and acknowledged on the company's own website. The company enters into a contract with a UK lobbying firm, who agrees to communicate with UK senior civil servants in the Ministry of Defence to put forward the case for the UK military to provide training to the armed forces of Country B, a close ally of Country A.

The **defence company** is required to register. They are in an arrangement with the Ministry of National Security of Country A (**a foreign power**), with the bonuses of company employees paid by the Ministry (**direction**), to communicate with senior civil servants to influence a government decision (**political influence activities**). No exemptions apply.

The lobbying firm is **not** required to register, as they are not directly in an arrangement with a foreign power. However, given they are acting in the foreign power's interests and would be expected to know about the link between the company and the Ministry of National Security, they should check that the defence company has registered prior to carrying out the political influence activities otherwise they may be committing a criminal offence.

Section 4: Exemptions from registration

29. 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 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).

30. 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 published research which intended to influence a political process would not require registration under the political influence tier, if it was clear on the research report 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.

31. Further detail on all of the exemptions can be found in the [guidance on the political influence tier](#) or [guidance on the enhanced tier](#).

Foreign Powers

32. Defence and security organisations which meet the definition of a “foreign power” benefit from the exemption for foreign powers (see paragraph 2 of Schedule 15 to the National Security Act 2023). This may be the case if the organisation is a part of a foreign government, or an agency or authority of a foreign government. An entity may be considered an “agency or authority of a foreign government” if the entity carries out public functions on behalf of the government (for example, the operation of military sites within the country).

33. However, this exemption does not apply where an organisation that meets the definition of a foreign power makes a misrepresentation about their activities or the capacity in which they act.
34. An organisation may meet this definition of a foreign power in relation to all or only some of its activities. For example, if a military firm which provides services on behalf of a government as one of a number of areas of activity. The organisation may need to register if acting at the direction of a foreign power outside of its own role as a foreign power.

Example 8 (exemption applies):

An official of the Cyber Network and Defence Agency (CNDA) from Country G, who is responsible for creating and providing cybersecurity solutions for state infrastructure, communicates with UK senior officials, seeking to influence a UK Government decision on sharing data on cybersecurity issues with Country G.

The Cyber Network and Defence Agency does **not** need to register. Whilst this constitutes political influence activity, it is an agency of a foreign government and is carrying out the activity themselves, therefore benefiting from the exemption.

UK Crown Body Arrangements (both tiers)

35. Arrangements do not need to be registered when the United Kingdom is a party to that arrangement. This includes arrangements where any individual acting on behalf of the Crown (for example, a civil servant), or any entity which holds crown status, is a party.
36. The exemption applies to both formal arrangements, such as International Armaments Cooperation programmes and also to informal arrangements. For example, an informal arrangement with the UK Government to discuss and negotiate terms of a formalised partnership would also constitute a UK arrangement as defined in Schedule 15 to the National Security Act 2023, referred to here as a “UK crown body arrangement”.
37. Defence companies can benefit from the exemption if they act pursuant to a UK crown body arrangement, even if they were not involved in the arrangement from the start. For example, a defence company who acts pursuant to a bilateral defence partnership between the UK and another country would benefit from the exemption.

Example 9 (exemption applies):

The UK Government signs an agreement with two other countries, X and Y, to jointly build and operate submarines. Country X directs a defence company to attend a meeting with UK ministers to discuss specifics of the building process.

The defence company does **not** need to register, as the UK Government is party to this arrangement. However, other activities which do not relate to this arrangement that the UK Government are party to may still require registration.

Example 10 (exemption applies): A state-owned enterprise of Country C is a manufacturer of anti-submarine weapons and works very closely with the Ministry of National Security of Country C. The state-owned enterprise and the Ministry of National Security of Country C jointly meet with a senior civil servant in the UK Ministry of Defence to set out the benefits that joint training between the UK navy and the navy of Country C could bring, and they present a proposal for how it could be delivered. The UK Government is aware of the relationship between the enterprise and the Ministry of National Security, having signed a non-disclosure agreement involving both parties previously.

The state-owned enterprise is **not** required to register. Whilst it is carrying out political influence activities together with a foreign power, the fact that the UK Government is clearly aware of the arrangement between the enterprise and the foreign power means that they are acting as part of a UK crown body arrangement.

Example 11 (exemption applies): A defence company from Country D operates under a military assistance programme provided by the Government of Country D to allied nations, including the UK. The UK Government and Government of Country D sign an agreement related to this programme, and the defence company then is involved in providing the military assistance, which involves some communication to senior members of the armed forces to influence how military training is carried out.

The defence company is **not** required to register. Whilst their communications to senior members of the armed forces could constitute political influence activities, they are acting pursuant to a UK crown body arrangement, so they benefit from an exemption.

Section 5: Exceptions to publication

38. 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 (for example, those which relate solely to research activities) will not be published.
39. 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.
40. 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; or
 - Where publication would involve the disclosure of commercially sensitive information.
41. 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).
42. Registrants who believe that an exception to publication applies will be given the opportunity to provide evidence to demonstrate that the exception applies at the end of the registration process.
43. The exceptions which are most likely to be relevant to the defence and security sectors are the exceptions for where publication would be prejudicial to the safety or interests of the UK, or where it 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](#).

Safety or interests of the UK exception

44. This exception applies where publication would be prejudicial to the safety or interests of the UK. This includes, but is not limited to, the following scenarios:
- Where publication would be harmful to UK national security (for example, if it would reveal details of planned national security policies);

- Where publication would be harmful to defence interests (for example, if it would reveal details of planned Ministry of Defence weapon contracts);
- Where publication would reveal any UK Government information protectively marked.

Commercially sensitive information

45. Defence and security bodies 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.

46. 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).

47. 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.

48. 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 (such as in the chemical industries);
- Plans for the development of future products.

49. Certain types of costs information may meet the threshold for this exception 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.

50. 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.
51. 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.
52. 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

53. 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).
54. Therefore, where an organisation forms a registerable arrangement with a foreign power, it is the organisation that has the legal responsibility to register.
55. 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 the case management team or registration portal.
56. 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.
57. There are safeguards in the legislation to protect individuals who have no way of knowing that they are acting pursuant to a registerable arrangement. For example, employees or subcontractors undertaking work, without knowledge that a foreign power or specified foreign power or entity has directed the activities, would have no reason to know that they are acting pursuant to a registerable arrangement. 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). The information required at registration (as provided for in regulations) is set out on the [guidance on the information required at registration and the public register](#).

Case study 1 (political influence tier):

The Government of Country F approaches a UK based cybersecurity company. The Government of Country F requests that the company use contacts in the UK Government to increase cybersecurity cooperation between the two countries, offering additional funding for the company if they successfully achieve buy-in from the UK Government. The company hires freelance consultants to present to the UK Government on what cybersecurity cooperation would offer. The company holds a briefing meeting with the consultants, and invites the Government of Country F to this meeting. The company also provides the consultants with promotional material featuring Country F, to use in their presentations to the UK Government.

The **cybersecurity company** is required to register as they are in a registerable arrangement with the foreign power.

The **freelance consultant** is not required to register as they are not directly a party to the registerable arrangement. However, given that they are aware of the context of the campaign, and were invited to a meeting with the foreign power, they ought reasonably to know that they are acting pursuant to a registerable arrangement. The freelance consultants should therefore check that the cybersecurity company has registered the arrangement.

Case study 2 (enhanced tier): A UK aviation and defence company signs a contract with a specified foreign power and agrees to host a conference in the UK.

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

The **aviation and defence company** is required to register as they are in a 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.

