## **Proliferation Financing**

Proliferation financing is defined as the act of providing funds or financial services that are used, in whole or in part, for the manufacture, acquisition, possession, development, export, trans-shipment, brokering, transport, transfer, stockpiling, or use of nuclear, chemical, or biological weapons (weapons of mass destruction) and their means of delivery and related materials—including technologies and dual-use goods used for non-legitimate purposes—in violation of national laws or international obligations

## What are the common tactics used to evade proliferation financing sanctions?

Common tactics used to evade proliferation financing sanctions include:

- Using intermediaries and front companies: Illicit actors often set up shell or front companies, or use third-party suppliers and intermediaries, to hide the true beneficiary and origin of goods or funds.
- **Obscuring beneficial ownership:** Complex ownership structures are used to conceal the identities of those ultimately controlling or benefiting from transactions.
- **Utilising third-party bank accounts:** Transactions may be routed through accounts in third countries or via third-party payments to avoid detection.
- Exploiting virtual assets and new technologies: Digital currencies and other financial technologies are leveraged to move funds covertly.
- **Co-mingling funds:** Illicit transactions are mixed with legitimate business operations to disguise their true purpose.
- **Exploiting trade and shipping networks:** Use of transhipment hubs, vessels, or ports with weak controls to move goods or funds undetected.
- Changing company directors or ownership: Frequently altering the management or ownership of companies to avoid links to sanctioned parties.
- Withdrawing bulk cash or gold: Moving physical assets across borders to bypass formal financial systems.

These tactics are designed to obscure the origin, destination, and beneficiaries of funds or goods, making detection and enforcement challenging.