

Rosie Naylor

Senior Associate

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OVERVIEW

Rosie Naylor is a senior associate in the White Collar Defence and Investigations group of the firm's London office.

Rosie's areas of focus include:

- Internal and law enforcement investigations
- Anti-bribery and anti-money laundering
- Corporate due diligence
- Compliance advice, including advice relating to health & safety law, whistleblowing, sanctions and anti-corruption procedures
- Large scale health and safety investigations, often involving construction sites

Rosie also has experience advising political parties, individual candidates, and third party campaigners on their conduct both inside and outside election periods.

Rosie is currently on secondment part-time at a multinational technology company.

PROFESSIONAL BACKGROUND

Prior to joining the firm, Rosie interned at K&L Gates in 2013. In addition, she worked at a UK law firm in 2014, and a London law firm in 2010 and 2012.

ACHIEVEMENTS

- Recognised by *The Legal 500 United Kingdom* as a Recommended Lawyer in London
  - Electoral, 2024-2027
  - Fraud: White-Collar Crime (Advice to Individuals), 2024-2027

- Regulatory Investigations and Corporate Crime (Advice to Corporates), 2024-2027

EDUCATION

- Legal Practice Course, BPP Law School, 2016
- Graduate Diploma in Law, BPP Law School, Waterloo, 2015 *(distinction)*
- B.A., Newcastle University, Newcastle upon Tyne, 2014 *(First Class Honours)*

ADMISSIONS

- Solicitor of the Senior Courts of England and Wales

THOUGHT LEADERSHIP *POWERED BY HUB*

- 6 July 2026, FCA Identifies Key Compliance Issues in Its Sanctions Systems and Controls Report (May 2026)
- 6 May 2026, UK Government's Fraud Strategy Framework: 2026 to 2029
- 28 April 2026, UK Government's Strategic Approach to Sanctions Enforcement
- 24 February 2026, Misconduct in Public Office: In the Spotlight
- 13 February 2026, OFSI Announces Major Reforms to Enforcement Process Following Consultation
- 11 February 2026, OFSI Fines the Bank of Scotland for Sanctions Breach: Key Compliance Lessons
- 16 December 2025 , SFO Publishes New Guidance on Evaluating Corporate Compliance Programmes
- 16 December 2025, FCA Publishes Findings on Firms' Risk Assessments and Criticises Poor Practice
- 11 November 2025, European Union Adopts 19th Package of Sanctions Against Russia
- 20 October 2025, Increased Risk of UK Sanctions Enforcement–An Analysis of Recent Sanctions Enforcement Action in the United Kingdom
- 28 August 2025, UK CPS and SFO Issue Updated Corporate Prosecution Guidance: What Corporates Need to Know
- 1 August 2025, Europe: UK FCA Confirms the Circumstances in Which it May Make Public Announcements About Live Investigations
- 28 July 2025, European Union Adopts 18th Sanctions Package Against Russia
- 28 July 2025, UK Office for Financial Sanctions Implementation Crypto-Assets Threat Assessment (July 2025): Key Lessons for Sanctions Compliance
- 28 July 2025, OFSI's Enforcement Playbook Is Being Redrafted: What This Potential Reform Means for You

- 21 July 2025, Key Takeaways: Secondary Sanctions—United Kingdom Issues Sanctions Guidance for Non-UK Businesses
- 18 July 2025, Key Lessons: The Latest UK Office for Financial Sanctions Implementation Art Market Participants and High Value Dealers Threat Assessment
- 15 July 2025, The FCA's Developing Approach to Nonfinancial Misconduct by Individuals in the Financial Services Sector
- 14 July 2025, What You Need to Know About the United Kingdom Issuing Sanctions Guidance for Non-UK Businesses
- 8 July 2025, Key Lessons From the Latest UK Office for Financial Sanctions Implementation Art Market Participants and High Value Dealers Threat Assessment (June 2025)
- 20 June 2025, Key Takeaways From the UK Financial Conduct Authority's Revised Enforcement Guide
- 29 May 2025, UK Cross-Government Review of Sanctions Implementation and Enforcement
- 28 May 2025, Key Compliance Tips on How to Respond to Information Requests From Ofsi
- 7 May 2025, European Union Adopts 16th Package of Sanctions Against Russia
- 5 May 2025, The Serious Fraud Office's Guidance on How to Best Avoid Prosecution
- 23 April 2025, The Latest OFSI Property and Related Services Threat Assessment
- 15 April 2025, What Legal Services Providers Need to Learn From OFSI's Legal Services Threat Assessment
- 8 April 2025, FCA Backpedals: "Name and Shame" and Diversity and Inclusion Requirements Axed, and Non-financial Misconduct Rules Delayed
- 31 March 2025, Europe: UK Sanctions Regulator Highlights Compliance Failures
- 26 March 2025, New Office of Financial Sanctions Implementation Financial Services Threat Assessment
- 21 January 2025, Europe: Are the UK FCA's Revised "Name and Shame" Proposals an Improvement?
- 8 January 2025, The FCA's Part 2 of Its "Name and Shame" Proposals: What You Need to Know
- 18 November 2024, UK Office of Trade Sanctions Implementation New Enforcement Powers and Increased Reporting Obligations
- 4 November 2024, Lessons on Effective Financial Crime Controls: The Starling Bank Example
- 23 October 2024, Top Tips for Sanctions Compliance and Preventing Sanctions Evasion
- 11 October 2024, UK Office of Trade Sanctions Implementation New Enforcement Powers and Increased Reporting Obligations
- 8 August 2024, EU and UK Sanctions Briefing: The Luxury Goods Sector

- 11 April 2024, UK and EU Sanctions Update–April 2024
- 28 November 2023, New Government Guidance and UK High Court Seeks to Settle Disarray in UK Sanctions Law
- 21 November 2023, Europe: Significant Expansion to Corporate Criminal Liability in the United Kingdom
- 20 November 2023, Why Corporates Are Now More Likely to Face Criminal Prosecution for the Actions of Their Employees
- 2 November 2023, UK Sanctions Law in Disarray? What You Need to Know
- 27 September 2023, FCA Publishes Outcome of Its Review of Firms' Compliance With Sanction Controls
- 25 September 2023, Europe: UK's FCA Challenges Firms to Improve Sanction Screening Processes
- 31 July 2023, UK Sanctions Update–July 2023
- 3 July 2023, UK Sanctions Update–June 2023
- 6 June 2023, Russia-Related Export Controls Continue to Escalate
- 21 March 2023, PSJC v Mint – A Road Map for Litigation Involving Sanctioned Individuals or Entities?
- 6 February 2023, Sanctions Update—January 2023
- 6 February 2023, OFSI Annual Review: April 2021 to August 2022
- 14 November 2022, Where the United States Goes, the FCA Will Inevitably Follow: Regulatory Action Against the Use of Personal Mobile Devices
- 10 June 2022, FCA Calls for Sanctions Evasion Reporting
- 25 May 2022, UK Sanctions Update - Ban on Services and Prevention of Disinformation
- 19 April 2022, Between a Rock and a Hard Place: The Sanctions Climate for Foreign Investment in Russia - Part I of II
- 8 April 2022, The Economic Crime (Transparency and Enforcement) Act 2022 – Impact on UK Sanctions Regime
- 25 February 2022, Sanctions Update: Monetary Penalty Imposed by OFSI
- 25 February 2022, UK Imposes Further Sanctions in Response to Russia's Invasion of Ukraine
- 2 November 2021, Lessons Learned from the OFSI Annual Review: 2020 - 2021
- 5 July 2021, Planet Plumbing Trade Marks Head Down the Drain
- 21 May 2021, UK Government Anti-Corruption Plan – It's Global
- 20 April 2020, The Labour Party Leaks: Data Protection Risks for Political Parties and Campaigners

- 13 May 2019, Can you Keep a Secret? Publishing the Identity of Ultimate Beneficial Owners
- 30 April 2019, Digital Crisis PR: London Calling: Digital Crises in the UK
- 24 January 2017, Article 50 - Government Loses Supreme Court Case

OTHER PUBLICATIONS

- "Cos. Must Monitor Sanctions Regime As Law Remains Unclear," *Law360,* 15 December 2023

NEWS & EVENTS

- 19 November 2024, EU Sanctions and Enforcement Masterclass, Hosted by Lexology
- 25 January 2022, K&L Gates Advises Soho Square Capital LLP on Investment and Partnership With Oliver James

OTHER MEDIA MENTIONS

- Quoted, "Questions Surround EU's New Russia-Related Due Diligence Rules, Lawyers Say," *Export Compliance Daily*, 22 November 2024

AREAS OF FOCUS

- White Collar Defense and Investigations
- Public Policy and Law

REPRESENTATIVE EXPERIENCE

GOVERNMENT ENFORCEMENT

- Advising clients on section 2 interviews and witness evidence in relation to SFO investigations into multinational corporations.
- Advising a multinational technology company in relation to the SFO probe into Unaoil.
- Advising large multinational providing services to the government in relation to alleged improper distribution of profits, advising on SFO and City of London Police investigation into the company and advising its subsidiary on the UK Bribery Act in relation to a contract for the construction of military training facilities.
- Acting for a multinational law firm in respect of an SFO investigation into a mining conglomerate.
- Advising on and drafting regulations for Media City relating to health & safety, anti-bribery & corruption, media content & ethics.

- Advising former Chairman of UK company in relation to threatened civil and criminal action from shareholders.
- Advising clients on section 2 interviews and witness evidence in relation to SFO investigations into multinational corporations.
- Advising a senior accountant at one of the 'Big 4' accountancy firms in relation to a high profile Financial Reporting Council (FRC) investigation into allegedly providing false and misleading documentation during an audit quality review.
- Acting for FTSE directors in respect of an FCA investigation into market abuse.
- Advising a German aviation company on possible money laundering offences under the Proceeds of Crime Act 2002, related disclosures and an investigation by the police.
- Advising brokers on responding to cross-border CFTC subpoenas in connection with alleged market manipulation.

HEALTH & SAFETY REPRESENTATIVE WORK

- Advising global construction company in relation to health and safety investigations; including investigations by the HSE into fatalities and other serious accidents in the workplace.
- Providing COVID-19 health & safety advice
- Conducting health & safety training for a global construction company.
- Drafting health & safety policies for a Qatari corporation
- Representing clients in relation to responding to the Grenfell Tower Inquiry

ELECTORAL LAW

- Advising political party on spending, donations, and change of name applications to Electoral Commission.
- Advising on the legal implications of a request to return high-profile cultural artefact to place of origin.
- Advising on anti-money laundering, anti-bribery and corruption, and sanctions drafting in a Master Investment Agreement involving Qatari entities.