

قرار رقم (2023/2)

صادر عن وحدة المتابعة المالية

بتاريخ 2023/06/25 م

### بشأن قوائم الدول مرتفعة المخاطر والدول تحت المتابعة المعززة

استناداً إلى احكام قرار بقانون رقم (39) لسنة 2022م بشأن مكافحة غسل الأموال وتمويل الإرهاب وتعديلاته، لا سيما أحكام المادة (20) والفقرات (3، 4) من المادة (30)، وبناءً على قرار اللجنة الوطنية لمكافحة غسل الأموال وتمويل الإرهاب رقم (8/4/2016) الصادر بتاريخ 2016/12/01م، بشأن تفويض وحدة المتابعة المالية بنشر قائمة الدول عالية المخاطر والتي تصدر بشكل دوري عن مجموعة العمل المالي (FATF)، ولاحقاً لما تقرر عن المجموعة منذ تاريخ 2020/02/21، وحتى تاريخ 2023/06/23م، وعطفاً على قرار اللجنة الوطنية لمكافحة غسل الأموال وتمويل الإرهاب رقم (ت/5/2020) الصادر بتاريخ 2020/02/24م بشأن الدول مرتفعة المخاطر والدول تحت المتابعة المعززة، ولاحقاً الى قرار وحدة المتابعة رقم (2020/1) بتاريخ 2020/02/25م والقرارات اللاحقة له بشأن قوائم الدول مرتفعة المخاطر والدول تحت المتابعة المعززة. وبناءً على مقتضيات المصلحة العامة، تقرر ما يلي:

#### أولاً

#### قائمة الدول مرتفعة المخاطر (القائمة السوداء)

يجب على كافة المؤسسات المالية والاعمال والمهين غير المالية المحددة في دولة فلسطين استمرار العمل بالإجراءات التالية تجاه الدول عالية المخاطر:

الدولة	الإجراءات المطلوبة تجاه الدول
- جمهورية كوريا الديمقراطية الشعبية (كوريا الشمالية).	1. تطبيق العقوبات المالية المستهدفة بما ينسجم مع احكام المرسوم التنفيذي رقم (2022/14) بشأن تنفيذ قرارات مجلس الأمن. 2. إيلاء اهتمام خاص للعلاقات التجارية والمعاملات مع تلك الدول، بما في ذلك الشركات والمؤسسات المالية، وتطبيق الإجراءات المضادة التالية:
- الجمهورية الإسلامية الإيرانية (إيران).	أ. اتخاذ اجراءات العناية الواجبة المعززة على علاقات العمل والعمليات مع تلك الدول (كجزء من التدابير المضادة)، وبما يتناسب مع المخاطر الناشئة فيها، وذلك وفق تفاصيل المواد (26، 27) من تعليمات اللجنة الوطنية رقم (4) لسنة 2022م الخاصة بالمؤسسات المالية، والمواد (24، 25) من تعليمات اللجنة الوطنية رقم (3) لسنة 2022م الخاصة بالأعمال والمهين غير المالية المحددة.



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<p>ب. تطبيق إجراءات العناية الواجبة المعززة المشار إليها في الفقرة (أ) من هذا البند عند التعامل مع أي جهة تعمل بالنيابة عن الشخص الطبيعي او الاعتباري بما فيها الشركات أو المؤسسات المالية العاملة في تلك الدول.</p> <p>ج. تعزيز آليات الإبلاغ المعتمدة لدى المؤسسة المالية أو احدى الاعمال والمهين غير المالية، بما يشمل زيادة التعاون بين الموظفين وسرعة تزويد البيانات لمسؤول مكافحة غسل الأموال وتمويل الإرهاب داخل المؤسسة المالية أو احدى الاعمال والمهين غير المالية، وذلك لضمان عدم تنفيذ أي عملية أو معاملة يشتبه بأنها تتضمن جريمة غسل الأموال أو احدى الجرائم الاصلية المرتبطة بها أو تمويل الإرهاب، وإبلاغ الوحدة بصورة فورية ودون تأخير عن هذا الاشتباه، وتزويدها بكافة البيانات المتعلقة بمحاولة ابرام تلك العمليات، مع ضمان سرية الإبلاغ وعدم اشعار العميل.</p> <p>د. عدم إنشاء فروع او مكاتب تمثيلية أو شركات تابعة في تلك الدول.</p> <p>هـ. عدم الاعتماد على أطراف ثالثة متواجدة في تلك الدول في اتخاذ أي من إجراءات العناية الواجبة تجاه العملاء.</p> <p>و. عدم إنشاء أي علاقات مراسلة مصرفية أو علاقات مراسلة مشابهة مع المؤسسات المالية في تلك الدول.</p>	
<p>1. تطبيق اجراءات العناية الواجبة المعززة على علاقات العمل والعمليات مع ماينمار ، وبما يتناسب مع المخاطر الناشئة في الدولة، وذلك وفق تفاصيل المواد (26، 27) من تعليمات اللجنة الوطنية رقم (4) لسنة 2022م الخاصة بالمؤسسات المالية، والمواد (24، 25) من تعليمات اللجنة الوطنية رقم (3) لسنة 2022م الخاصة بالأعمال والمهين غير المالية المحددة.</p> <p>2. عند تطبيق تدابير العناية الواجبة المعززة، يجب ضمان عدم تعطيل تدفقات الأموال للمساعدة الإنسانية وأنشطة المنظمات غير الربحية المشروعة والتحويلات المالية.</p>	<p>جمهورية اتحاد ماينمار (ماينمار).</p>

### ثانياً

#### قائمة الدول تحت المتابعة المعززة (القائمة الرمادية)

تعديل قائمة الدول تحت المتابعة المعززة (القائمة الرمادية) المنصوص عليها في قرار الوحدة رقم (2023/1) وذلك بإضافة كلٍ من (الكامبيرون، كرواتيا، فيتنام) لتصبح القائمة كما بالجدول أدناه، والأخذ بعين الاعتبار المخاوف المتعلقة بأوجه القصور في أنظمة مكافحة غسل الأموال وتمويل الإرهاب لهذه الدول (وفقاً للملحق المرفق بهذا القرار) وذلك عند اجراء التقييم الذاتي لمخاطر غسل الأموال وتمويل الإرهاب بما يشمل تحديد وتحليل وتقييم تلك المخاطر.



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اسم الدولة	الرقم	اسم الدولة	الرقم
جمهورية نيجيريا	14	جمهورية ألبانيا	1
جمهورية بنما	15	بربادوس	2
جمهورية الفلبين	16	بوركينافاسو	3
جمهورية السنغال	17	الكاميرون	4
جمهورية جنوب أفريقيا	18	جزر الكايمان	5
جمهورية جنوب السودان	19	كرواتيا	6
الجمهورية العربية السورية (سوريا)	20	جمهورية كونغو الديمقراطية	7
جمهورية تنزانيا	21	جبل طارق	8
الجمهورية التركية	22	جمهورية هايتي	9
جمهورية اوغندا	23	جامايكا	10
الإمارات العربية المتحدة	24	المملكة الأردنية الهاشمية (الأردن)	11
فيتنام	25	جمهورية مالي	12
الجمهورية اليمنية (اليمن)	26	جمهورية موزمبيق	13

### ثالثاً

#### التنفيذ

يجب على كافة المؤسسات المالية والأعمال والمهين غير المالية المحددة، تنفيذ أحكام هذا القرار ويعمل به من تاريخ تعميمه.

مدير وحدة المتابعة المالية

د. فراس مرار

المرفق: المخاوف المتعلقة بأوجه القصور في أنظمة مكافحة غسل الأموال وتمويل الإرهاب.



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## المخاوف المتعلقة بأوجه القصور في أنظمة مكافحة غسل الأموال وتمويل الإرهاب في الدول

### ❖ القسم الأول: أوجه القصور من خلال تقارير التقييم (لكافة الدول):

يوضح هذا القسم، كيفية الوصول الى المخاوف المتعلقة بنظام مكافحة غسل الأموال وتمويل الإرهاب وتمويل انتشار التسلح لدى الدول المدرجة في القائمة الرمادية، إضافة الى كافة الدول الأخرى التي تخضع للتقييم المتبادل من قبل مجموعة العمل المالي أو المجموعات النظرية، ويمكن الوصول الى تلك المخاوف من الاطلاع على تقارير التقييم المتبادل المتعلقة بتلك الدول، والتقارير المتابعة اللاحقة لهذا التقرير.

وتحتوي تقارير التقييم المتبادل (mutual evaluation reports) وتقارير المتابعة (follow-up reports) المنشورة على موقع مجموعة العمل المالي أو مجموعة العمل المالي لمنطقة الشرق الأوسط وشمال أفريقيا، على كافة أوجه القصور والاستنتاجات الرئيسية المتعلقة بنظام مكافحة غسل الأموال وتمويل الإرهاب في الدول المدرجة على قائمة المتابعة المعززة وكافة الدول الأخرى التي خضعت للتقييم، ويمكن الحصول على تلك وفق الآلية التالية:

### أ. الوصول الى تقارير التقييم المتبادل باللغة الإنجليزية (لكافة الدول).

1. الدخول الى الموقع الالكتروني:

[www.fatf-gafi.org](http://www.fatf-gafi.org)

2. اختيار بند (publications) ثم (publications).

3. من قائمة المواضيع (Topics) نختار (Mutual Evaluations).

4. البحث عن اسم الدولة باللغة الإنجليزية على نافذة البحث الموضحة بالصورة الموضحة جانباً.



### ب. الوصول الى تقارير التقييم المتبادل باللغة العربية (للدول الخاضعة لتقييم مجموعة العمل المالي لمنطقة الشرق الأوسط وشمال أفريقيا).

1. الدخول الى الموقع الالكتروني:

[www.menafatf.org/ar](http://www.menafatf.org/ar)

3. اختيار بند (التقييم المتبادل) ثم (تقارير التقييم- الجولة الثانية من التقييم).

التقييم)، أو تقارير المتابعة.

4. اختيار التقرير من القائمة التي تظهر حسب اسم الدولة.



### ❖ القسم الثاني: تنفيذ خطط العمل لمعالجة أوجه القصور

قدّمت الدول المدرجة على القائمة الرمادية التزاماً سياسياً عالياً لمعالجة أوجه القصور الاستراتيجية المتعلقة بأنظمة مكافحة غسل الأموال وتمويل الإرهاب، وما زالت تلك الدول تنفذ التزاماتها لمعالجة باقي أوجه القصور. وتوضح البنود ادناه المحاور الأساسية التي تعمل تلك الدول على معالجتها أو تلك التي تم معالجتها والتي تعتمد على أوجه القصور المحددة وفقاً لتقارير التقييم المتبادل وتقارير المتابعة، حيث يجب أخذها بعين الاعتبار سواء كانت سلبية أم إيجابية:

الدولة	المحاور الأساسية
Albania	<p>In February 2020, Albania made a high-level political commitment to work with the FATF and MONEYVAL to strengthen the effectiveness of its AML/CFT regime. At its February 2023 plenary, the FATF made the initial determination that Albania substantially completed its action plan. However, at that time, the FATF decided not to authorise an on-site visit to the country because it was concerned that Albania's apparent plans to establish a Voluntary Tax Compliance (VTC) programme did not comply with the FATF's principles for managing the AML/CFT implications of VTC programmes or FATF's best practices in this area.</p> <p>At its June 2023 plenary, Albania confirmed its abandonment of the planned VTC programme and committed to respect the FATF principles and best practices on VTC programmes if it considers adopting a VTC programme in the future. As a result, the FATF made the determination to conduct an on-site assessment to verify that the implementation of Albania's AML/CFT reforms has begun and is being sustained, and that the necessary political commitment remains in place to sustain implementation in the future. The FATF notes that the introduction of a VTC programme disregarding the FATF principles and best practices would impact the FATF's consideration of a country's progress towards addressing its AML/CFT deficiencies and its commitment to improve its AML/CFT regime. The FATF will continue monitoring Albania and any VTC programme developments.</p>
Barbados	<p>Since February 2020, when Barbados made a high-level political commitment to work with the FATF and CFATF to strengthen the effectiveness of its AML/CFT regime, Barbados has taken steps towards improving its AML/CFT regime, including by, demonstrating that accurate and up-to-date beneficial ownership information is available on a timely basis, and by pursuing repatriation and sharing of confiscated assets with other countries. Barbados should continue to work on implementing its action plan to address its strategic deficiencies by demonstrating that the levels of suspicious activity reporting by certain reporting entities are in line with risks.</p> <p>The FATF expresses concern that Barbados failed to complete its action plan, which fully expired in April 2022. The FATF strongly urges Barbados to swiftly demonstrate significant progress in completing its action plan by October 2023 or the FATF will consider next steps if there is insufficient progress.</p>



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<p><b>Burkina Faso</b></p>	<p>In February 2021, Burkina Faso made a high-level political commitment to work with the FATF and GIABA to strengthen the effectiveness of its AML/CFT regime. Burkina Faso should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) updating its understanding of ML/TF risks, including through the revision of the national risk assessment in line with the sectoral priorities identified in its national strategy; (2) strengthening of resource capacities of all AML/CFT supervisory authorities and implementing risk based supervision of FIs and DNFBPs; (3) maintaining comprehensive and updated basic and beneficial ownership information of legal persons and strengthening the system of sanctions for violations of transparency obligations; (4) increasing the diversity of suspicious transactions reporting; (5) establishing procedures for effective implementation of declaration of cross-border declaration of currencies and bearer negotiable instruments; (6) enhancing cooperation between LEAs and prosecutorial authorities combatting TF and conducting TF investigations and prosecutions in line with its risk profile; and (7) implementing an effective targeted financial sanctions regime related to TF and PF as well as risk-based monitoring and supervision of NPOs.</p> <p>The FATF notes Burkina Faso’s continued progress across its action plan, however all deadlines have now expired and work remains. The FATF urges Burkina Faso to swiftly implement its action plan to address the above-mentioned strategic deficiencies as soon as possible as all deadlines expired in December 2022.</p>
<p><b>Cameroon</b></p>	<p>In June 2023, Cameroon made a high-level political commitment to work with the FATF and GABAC to strengthen the effectiveness of its AML/CFT regime. Since the adoption of its MER in October 2021, Cameroon has made progress on some of the MER’s recommended actions by increasing the resources of the FIU and building the capacity of investigation authorities and judicial bodies to effectively conduct ML/TF cases. Cameroon will work to implement its FATF action plan by: (1) Aligning AML/CFT national strategies and policies with the findings of the NRA and monitoring their implementation, and demonstrating AML/CFT cooperation and coordination between competent authorities; (2) Ensuring risk-based prioritisation of incoming international cooperation requests in line with risks and responding in an effective manner; (3) Enhancing risk-based supervision of banks and implementing effective risk-based supervision for non-bank FIs and DNFBPs, and conducting appropriate outreach to high-risk FIs and DNFBPs; (4) Maintaining and ensuring timely access by competent authorities to adequate and up to date beneficial ownership information on legal persons, and establishing a sanctions regime for violations of transparency obligations applicable to legal persons; (5) Enhancing secure information exchange between the FIU, reporting entities and competent authorities and demonstrating an increase in dissemination of intelligence reports to support operational needs of competent authorities; (6) Demonstrating that authorities are able to conduct a range of ML investigations, and prosecute ML in line with risks; (7) Implementing policies and procedures for seizing and confiscating proceeds and instrumentalities of crime and managing frozen, seized and confiscated property, and prioritising seizure and confiscation of assets at the border; (8) Demonstrating that TF investigations and prosecutions</p>



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	are pursued in line with risk; and (9) Demonstrating effective implementation of TF and PF TFS regimes and implementing a risk-based approach to NPOs without disrupting legitimate NPO activities.
The Cayman Islands	In February 2021, the Cayman Islands made a high-level political commitment to work with the FATF and CFATF to strengthen the effectiveness of its AML/CFT regime. At its June 2023 plenary, the FATF made the initial determination that the Cayman Islands have substantially completed its action plan and warrants an on-site assessment to verify that the implementation of the AML/CFT reforms has begun and is being sustained, and that the necessary political commitment remains in place to sustain implementation in the future. The Cayman Islands has made the following key reforms, including: (1) applying sanctions that are effective, proportionate and dissuasive, and taking administrative penalties and enforcement actions against obliged entities to ensure that breaches are remediated effectively and in a timely manner; (2) imposing adequate and effective sanctions in cases where relevant parties (including legal persons) do not file accurate, adequate and up to date beneficial ownership information; and (3) demonstrating that they are prosecuting all types of money laundering in line with the jurisdiction's risk profile and that such prosecutions are resulting in the application of dissuasive, effective, and proportionate sanctions.
The Democratic Republic of the Congo	Since October 2022, when the DRC made a high-level political commitment to work with the FATF and GABAC to strengthen the effectiveness of its AML/CFT regime, the DRC has taken steps towards improving its AML/CFT regime, including by strengthening its legal framework on the criminalisation of money laundering. The DRC should continue to work to implement its FATF action plan to address its strategic deficiencies, including by: (1) finalising the NRA on ML and TF and adopting an AML/CFT national strategy; (2) designating supervisory authorities for all DNFBP sectors, and developing and implementing a risk-based supervision plan; (3) adequately resourcing the FIU, and build its capacity to conduct operational and strategic analysis; (4) strengthening the capabilities of authorities involved in the investigation and prosecution of ML and TF; and (5) demonstrating effective implementation of TF and PF-related TFS.
Croatia	In June 2023, Croatia made a high-level political commitment to work with the FATF and MONEYVAL to strengthen the effectiveness of its AML/CFT regime. Since the adoption of its MER in December 2021, Croatia has made progress on its MER's recommended actions to improve its system by licensing and monitoring the registration of VASPs, enhancing and implementing more effective sanctions in supervisory activities and enhancing implementation of preventive measures for high-risk sectors. Croatia will work to implement its FATF action plan by: (1) Completing the national risk assessment, including assessing the ML/TF risk associated with the misuse of legal persons and legal arrangements and the use of cash in the real estate sector; (2) Increasing FIU human resources and improving analytical capabilities; (3) Continuing to improve LEAs detection, investigation and prosecution of different types of ML, including ML involving a foreign predicate offences and the misuse of legal persons; (4) Demonstrating a sustained increase in the application of provisional measures in securing



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	<p>direct/indirect proceeds, as well as foreign proceeds subject to confiscation; (5) Demonstrating the ability to systematically detect and where relevant investigate TF in line with its risk profile; (6) Establishing a national framework for the implementation of UN TFS measures and providing guidance and conducting outreach and training to the reporting entities; and (7) Identifying the subset of NPOs most vulnerable to TF abuse and providing targeted outreach to NPOs and to the donor community on potential vulnerabilities of NPOs to TF abuse.</p>
<p><b>Gibraltar</b></p>	<p>Since June 2022, when Gibraltar made a high-level political commitment to work with the FATF and MONEYVAL to strengthen the effectiveness of its AML/CFT regime, Gibraltar has taken steps to do so, including by demonstrating that the supervisors for trust and company service providers, lawyers, gaming businesses, real estate agents, and other non-bank entities are now using a range of effective, proportionate, and dissuasive sanctions for AML/CFT breaches, specifically by taking more enforcement actions, imposing financial penalties, and publishing the results of cases, where appropriate. Gibraltar should continue to work on implementing its action plan to address its strategic deficiencies, including by showing that it is able to pursue more final confiscation judgments commensurate with the risk and context of Gibraltar.</p> <p>The FATF notes Gibraltar continued progress across its action plan; however, all deadlines have now expired. The FATF encourages Gibraltar to continue to implement its action plan to address the above-mentioned strategic deficiencies as soon as possible.</p>
<p><b>Haiti</b></p>	<p>(Statement from February 2023)</p> <p>In June 2021, Haiti made a high-level political commitment to work with the FATF and CFATF to strengthen the effectiveness of its AML/CFT regime. The FATF recognises the political commitment expressed at a high level and the efforts demonstrated by Haiti to advance its commitments in the midst of the challenging social, economic and security situation within the country. Haiti should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) completing its ML/TF risk assessment process and disseminating the findings; (2) facilitating information sharing with relevant foreign counterparts; (3) addressing the technical deficiencies in its legal and regulatory framework that impede the implementation of AML/CFT preventive measures and implementing risk-based AML/CFT supervision for all financial institutions and DNFBPs deemed to constitute a higher ML/TF risk; (4) ensuring basic and beneficial ownership information are maintained and accessible in a timely manner; (5) ensuring a better use of financial intelligence and other relevant information by competent authorities for combatting ML and TF; (6) addressing the technical deficiencies in its ML offence and demonstrating authorities are</p>





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	<p>identifying, investigating and prosecuting ML cases in a manner consistent with Haiti's risk profile; (7) demonstrating an increase of identification, tracing and recovery of proceeds of crimes; (8) addressing the technical deficiencies in its TF offence and targeted financial sanctions regime; and (9) conducting appropriate risk-based monitoring of NPOs vulnerable to TF abuse without disrupting or discouraging legitimate NPO activities.</p>
<b>Jamaica</b>	<p>Since February 2020, when Jamaica made a high-level political commitment to work with the FATF and CFATF to strengthen the effectiveness of its AML/CFT regime, Jamaica has taken steps towards improving its AML/CFT regime, including by ensuring that its definition of beneficial ownership is in line with the FATF Standards. Jamaica should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) ensuring adequate, risk-based supervision in all DNFBP sectors; and (2) demonstrating that accurate and up-to-date basic and beneficial ownership information is available on a timely basis to competent authorities, and effective, proportionate and dissuasive sanctions are applied.</p> <p>The FATF again expresses concern that Jamaica failed to complete its action plan, which fully expired in January 2022. The FATF strongly urges Jamaica to swiftly demonstrate significant progress in completing its action plan by October 2023 or the FATF will consider next steps, which could include calling on its members and urging all jurisdictions to apply enhanced due diligence to business relations and transactions with Jamaica.</p>
<b>Jordan</b>	<p>In October 2021, Jordan made a high-level political commitment to work with the FATF and MENAFATF to strengthen the effectiveness of its AML/CFT regime. At its June 2023 plenary, the FATF made the initial determination that Jordan has substantially completed its action plan ahead of the agreed timeline and warrants an on-site assessment to verify that the implementation of AML/CFT reforms has begun and is being sustained, and that the necessary political commitment remains in place to sustain implementation in the future. Jordan has made the following key reforms, including: (1) completing and disseminating the ML/TF risk assessments of legal persons and virtual assets; (2) conducting inspections of reporting entities including FIs and DNFBPs; (3) implementing a sanctions mechanism for violations of the transparency obligations related to legal persons and arrangements; (4) applying effective, proportionate, and dissuasive sanctions for noncompliance; (5) pursuing money laundering investigations and prosecutions for predicate offences in line with its risk profile; (6) applying effective, proportionate, and dissuasive sanctions in ML cases; (7) implementing</p>



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	<p>a legal and institutional framework for TFS; and (8) demonstrating that TFS compliance is assessed and TFS deficiencies are rectified.</p>
<p>Mali</p>	<p>Since October 2021, when Mali made a high-level political commitment to work with the FATF and GIABA to strengthen the effectiveness of its AML/CFT regime, Mali has taken steps towards improving its AML/CFT regime, including by providing resources to financial supervisors and competent authorities involved in the investigation and prosecution of TF and conducting outreach to NPOs at risk of TF abuse. Mali should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) implementing the national strategic AML/CFT action plan in line with the NRA; (2) developing and starting to implement a risk based approach for the AML/CFT supervision of all FIs and higher risk DNFBPs and demonstrating effective, proportionate and dissuasive sanctions for non-compliance; (3) conducting a comprehensive assessment of ML/TF risks associated with all types of legal persons; (4) increasing the capacity of the FIU and the LEAs and enhancing their cooperation on the use of financial intelligence; (5) conducting parallel financial investigation; (6) strengthening the capacities of relevant authorities responsible for investigation and prosecution of TF cases; (7) strengthening the legal framework and procedures to implement TFS related to TF and PF; and (8) implementing a risk-based approach for supervision of the NPO sector to prevent abuse for TF purposes.</p>
<p>Mozambique</p>	<p>Since October 2022, when Mozambique made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime, Mozambique has taken steps towards improving its AML/CFT regime, including by addressing the deficiencies identified in Recommendation 10. Mozambique should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) ensuring cooperation and coordination amongst relevant authorities to implement risk-based AML/CFT strategies and policies; (2) conducting training for all LEAs on mutual legal assistance to enhance the gathering of evidence or seizure/confiscation of proceeds of crime; (3) providing adequate financial and human resources to supervisors, developing and implementing a risk-based supervision plan; (4) providing adequate resources to the authorities to commence the collection of adequate, accurate and up-to-date beneficial ownership information of legal persons; (5) increasing the human resources of the FIU as well as increasing financial intelligence sent to authorities; (6) demonstrating LEAs capability to effectively investigate ML/TF cases using financial intelligence; (7) conducting a comprehensive TF Risk Assessment and begin implementing a comprehensive national CFT strategy; (8) increasing awareness on TF and PF-related TFS; and (9)</p>



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	carrying out the TF risk assessment for NPOs in line with the FATF Standards and using it as a basis to develop an outreach plan.
Nigeria	<p>(Statement from February 2023)</p> <p>In February 2023, Nigeria made a high-level political commitment to work with the FATF and GIABA to strengthen the effectiveness of its AML/CFT regime. Since the adoption of its MER in August 2021, Nigeria has made progress on some of the MER's recommended actions to improve its system including by improving its AML/CFT legislative framework, updating its assessment of inherent ML/TF/PF risks and strengthened its implementation of targeted financial sanctions. Nigeria will work to implement its FATF action plan by: (1) completing its residual ML/TF risk assessment and updating its national AML/CFT strategy to ensure alignment with other national strategies relevant to high-risk predicate offences; (2) enhancing formal and informal international cooperation in line with ML/TF risks; (3) improving AML/CFT risk-based supervision of FIs and DNFBPs and enhancing implementation of preventive measures for high-risk sectors; (4) ensuring that competent authorities have timely access to accurate and up-to-date BO information on legal persons and applying sanctions for breaches of BO obligations; (5) demonstrating an increase in the dissemination of financial intelligence by the FIU and its use by LEAs; (6) demonstrating a sustained increase in ML investigations and prosecutions in line with ML risks; (7) proactively detecting violations of currency declaration obligations and apply appropriate sanctions and maintaining comprehensive data on frozen, seized, confiscated, and disposed assets; (8) demonstrating sustained increase in investigations and prosecutions of different types of TF activities in line with risk and enhancing interagency cooperation on TF investigations; and (9) conducting risk-based and targeted outreach to NPOs at risk of TF abuse and implementing risk-based monitoring for the subset of NPOs at risk of TF abuse without disrupting or discouraging legitimate NPO activities.</p>
Panama	<p>In June 2019, Panama made a high-level political commitment to work with the FATF and GAFILAT to strengthen the effectiveness of its AML/CFT regime. At its June 2023 plenary, the FATF made the initial determination that Panama has substantially completed its action plan and warrants an on-site assessment to verify that the implementation of AML/CFT reforms has begun and is being sustained, and that the necessary political commitment remains in place to sustain implementation in the future. Panama has made the following key reforms, including: (1) strengthening its understanding of the national and sectoral ML/TF risk and informing findings to its national policies to mitigated the identified risks; (2) taking action to identify unlicensed money remitters, applying</p>



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	<p>a risk-based approach to supervision of the DNFBP sector and applying effective, proportionate, and dissuasive sanctions against AML/CFT violations; (3); verifying updated beneficial ownership information by obliged entities, establishing mechanisms to monitor the activities of offshore entities, assessing the existing risks of misuse of legal persons and arrangements to define and implement specific measures to prevent the misuse of nominee shareholders and directors, and allowing timely access to adequate and accurate beneficial ownership information; and (4) using FIU products for ML investigations, demonstrating its ability to investigate and prosecute ML involving foreign tax crimes and providing constructive and timely international cooperation with such offence, and continuing to focus on ML investigations in relation to high-risk areas identified in the NRA and MER.</p>
<b>Philippines</b>	<p>Since June 2021, when the Philippines made a high-level political commitment to work with the FATF and APG to strengthen the effectiveness of its AML/CFT regime, the Philippines has taken steps to promote understanding of TFS obligations amongst FIs and DNFBPs, to increase the use of financial intelligence and investigative skills of LEAs tasked with ML investigations and to prioritise asset tracing and confiscation at the point of conviction in criminal cases. The Philippines should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) demonstrating that effective risk-based supervision of DNFBPs is occurring; (2) demonstrating that supervisors are using AML/CFT controls to mitigate risks associated with casino junkets; (3) enhancing and streamlining LEA access to BO information and taking steps to ensure that BO information is accurate and up-to-date; (4) demonstrating an increase in ML investigations and prosecutions in line with risk; and (5) demonstrating an increase in the identification, investigation and prosecution of TF cases.</p> <p>The FATF urges the Philippines to swiftly implement its action plan to address the above-mentioned strategic deficiencies as soon as possible as all deadlines expired in January 2023.</p>
<b>Senegal</b>	<p>Since February 2021, when Senegal made a high-level political commitment to work with the FATF and GIABA to strengthen the effectiveness of its AML/CFT regime, Senegal has strengthened risk-based supervision of DNFBPs, increased disseminations from the FIU to law enforcement authorities and increased resources dedicated to TF investigation and prosecution. Senegal should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) improving compliance by detecting AML/CFT violations and imposing effective, proportionate and dissuasive sanctions</p>



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	<p>against non-compliant DNFBPs; (2) updating and maintaining comprehensive beneficial ownership information on legal persons and arrangements and strengthening the system of sanctions for violations of transparency obligations; (3) identifying and investigating TF activities in line with the country's risk profile; and (4) implementing an effective TFS regime related to TF and PF as well as risk-based monitoring and supervision of NPOs.</p> <p>The FATF notes Senegal's continued progress across its action plan, however all deadlines have now expired and work remains. The FATF urges Senegal to swiftly implement its action plan to address the above-mentioned strategic deficiencies as soon as possible.</p>
<b>South Africa</b>	<p>Since February 2023, when South Africa made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime, South Africa has taken steps towards improving its AML/CFT regime during its first cycle of reporting, including by improving its criminalisation of terrorist financing. South Africa should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) demonstrating a sustained increase in outbound MLA requests that help facilitate ML/TF investigations and confiscations of different types of assets in line with its risk profile; (2) improving risk-based supervision of DNFBPs and demonstrating that all AML/CFT supervisors apply effective, proportionate, and effective sanctions for noncompliance; (3) ensuring that competent authorities have timely access to accurate and up-to-date BO information on legal persons and arrangements and applying sanctions for breaches of violation by legal persons to BO obligations; (4) demonstrating a sustained increase in law enforcement agencies' requests for financial intelligence from the FIC for its ML/TF investigations; (5) demonstrate a sustained increase in investigations and prosecutions of serious and complex money laundering and the full range of TF activities in line with its risk profile; (6) enhancing its identification, seizure and confiscation of proceeds and instrumentalities of a wider range of predicate crimes, in line with its risk profile; (7) updating its TF Risk Assessment to inform the implementation of a comprehensive national counter financing of terrorism strategy; and (8) ensuring the effective implementation of targeted financial sanctions and demonstrating an effective mechanism to identify individuals and entities that meet the criteria for domestic designation.</p>
<b>South Sudan</b>	<p>Since June 2021, when South Sudan made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime, South Sudan has taken steps towards improving its AML/CFT regime, including by preventing criminals from controlling or owning financial</p>



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	<p>institutions. South Sudan should continue to work to implement its action plan, including by: (1) conducting a comprehensive review of the AML/CFT Act (2012), with the support of international partners, including technical assistance, to comply with the FATF Standards; (2) becoming a party to and fully implementing the 1988 Vienna Convention, the 2000 Palermo Convention, and the 1999 Terrorist Financing Convention; (3) ensuring that competent authorities are suitably structured and capacitated to implement a risk-based approach to AML/CFT supervision for financial institutions; (4) developing a comprehensive legal framework to collect and verify the accuracy of beneficial ownership information for legal persons; (5) operationalising a fully functioning and independent FIU; (6) establishing and implementing the legal and institutional framework to implement targeted financial sanctions in compliance with United Nations Security Council Resolutions on terrorism and WMD proliferation financing; and (7) commencing implementation of targeted risk-based supervision/monitoring of NPOs at risk of TF abuse.</p> <p>The FATF notes South Sudan's limited progress across its action plan with all deadlines now expired and work remains. The FATF again encourages South Sudan to continue to implement its action plan to address the above-mentioned strategic deficiencies as soon as possible and demonstrate strong political and institutional commitment to strengthen the effectiveness of its AML/CFT regime, particularly in supporting the lead AML/CFT agency in coordinating national AML/CFT efforts.</p>
Syria	<p>(Statement from February 2023)</p> <p>Since February 2010, when Syria made a high-level political commitment to work with the FATF and MENAFATF to address its strategic AML/CFT deficiencies, Syria has made progress to improve its AML/CFT regime. In June 2014, the FATF determined that Syria had substantially addressed its action plan at a technical level, including by criminalising terrorist financing and establishing procedures for freezing terrorist assets. While the FATF determined that Syria has completed its agreed action plan, due to the security situation, the FATF has been unable to conduct an on-site visit to confirm whether the process of implementing the required reforms and actions has begun and is being sustained. The FATF will continue to monitor the situation and will conduct an on-site visit at the earliest possible date.</p>
Tanzania	<p>(Statement from October 2022)</p> <p>In October 2022, Tanzania made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime.</p>



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	<p>Since the adoption of its MER in April 2021, Tanzania has made progress on some of the MER's recommended actions to improve its system including by developing legal framework for TF and TFS as well as disseminating FIU strategic analysis. Tanzania will work to implement its FATF action plan by: (1) improving risk-based supervision of FIs and DNFBPs, including by conducting inspections on a risk-sensitive basis and applying effective, proportionate, and dissuasive sanctions for non-compliance; (2) demonstrating authorities' capability to effectively conduct a range of investigations and prosecutions of ML in line with the country's risk profile; (3) demonstrating that LEAs are taking measures to identify, trace, seize, and confiscate proceeds and instrumentalities of crime; (4) conducting a comprehensive TF Risk Assessment and begin implementing a comprehensive national CFT strategy as well as demonstrating capability to conduct TF investigations and pursue prosecutions in line with the country's risk profile; (5) increasing awareness of the private sector and competent authorities on TF and PF-related TFS; and (6) carrying out the TF risk assessment for NPOs in line with the FATF Standards and using it as a basis to develop an outreach plan.</p>
Turkey	<p>Since October 2021, when Türkiye made a high-level political commitment to work with the FATF to strengthen the effectiveness of its AML/CFT regime, Türkiye has taken positive steps towards improving its AML/CFT regime, including by (1) increasing on-site inspections of reporting entities by supervisors; (2) enhancing the use of financial intelligence to support ML investigations; (3) taking steps to improve a risk-based approach for the supervision of non-profit organisations to prevent their abuse for terrorist financing. Türkiye should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) undertaking more complex ML investigations and prosecutions; and (2) conducting more financial investigations in terrorism cases, prioritising TF investigations and prosecutions related to UN-designated groups.</p> <p>The FATF notes Türkiye continued progress across its action plan; however, all deadlines have now expired. The FATF encourages Türkiye to continue to implement its action plan to address the above-mentioned strategic deficiencies as soon as possible.</p>





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<p>Uganda</p>	<p>Since February 2020, when Uganda made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime, Uganda demonstrated progress, including by developing and implementing risk-based supervision of FIs and DNFBPs. Uganda should continue to work to implement its action plan to address its strategic deficiencies, including by: (1) ensuring that competent authorities have timely access to accurate basic and beneficial ownership information for legal entities; and (2) increasing awareness on PF-related TFS by conducting training for FIs and DNFBPs on TFS. The FATF continues to monitor Uganda’s oversight of the NPO sector to encourage the application of the risk-based approach to supervision of NPOs in line with the FATF Standards and mitigate unintended consequences.</p> <p>The FATF expresses concern that Uganda failed to complete its action plan, which fully expired in May 2022. The FATF strongly urges Uganda to swiftly demonstrate significant progress in completing its action plan by October 2023 or the FATF will consider next steps if there is insufficient progress.</p>
<p>The United Arab Emirates</p>	<p>Since February 2022, when the United Arab Emirates (UAE) made a high-level political commitment to work with the FATF and MENAFATF to strengthen the effectiveness of its AML/CFT regime, the UAE demonstrated significant progress, including by enhancing and maintaining a shared understanding of the ML/TF risks between the different DNFBP sectors and institutions, and ensuring a more granular understanding of the risk of abuse of legal persons and legal arrangements for ML/TF.</p> <p>The UAE should continue to work to implement its FATF action plan by: (1) demonstrating a sustained increase in the application of effective, proportionate and dissuasive sanctions for FI and DNFBP noncompliance with AML/CFT requirements; showing that DNFBP sectors are implementing risk-based CDD; and showing an increase in the number and quality of STRs filed by FIs and DNFBPs; (2) demonstrating a sustained increase in the issuance of dissuasive, effective and proportionate sanctions where necessary for breaches of beneficial ownership obligations and (3) demonstrating a sustained increase in effective investigations and prosecutions of different types of ML cases consistent with UAE’s risk profile.</p>
<p>Vietnam</p>	<p>In June 2023, Vietnam made a high-level political commitment to work with the FATF and APG to strengthen the effectiveness of its AML/CFT regime. Since the adoption of its MER in November 2021, Vietnam has made progress on some of the MER’s recommended actions by joining the Asset Recovery Interagency Network Asia Pacific (ARIN-AP) and adopting a national action plan on AML/CFT/CPF. Vietnam will work to implement its FATF action plan by: (1) Increasing risk understanding, domestic co-ordination and co-operation to</p>





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	<p>combat ML/TF; (2) Enhancing international co-operation; (3) Implementing effective risk-based supervision for FIs and DNFBPs; (4) Taking action to regulate virtual assets and virtual asset service providers; (5) Addressing technical compliance deficiencies, including with respect to the ML offence, targeted financial sanctions, customer due diligence and suspicious transaction reporting; (6) Conducting outreach activities with the private sector; (7) Establishing a regime that provides competent authorities with adequate, accurate and up-to-date information on beneficial ownership; (8) Ensuring the independence of the FIU and enhancing the quality and quantity of financial intelligence analysis and disseminations; (9) Prioritizing parallel financial investigations and demonstrating an increase in the number of ML investigations and prosecutions undertaken; (10) demonstrating that there is monitoring of FIs and DNFBPs for compliance with PF TFS obligations and that there is co-operation and co-ordination between authorities to prevent PF TFS from being evaded.</p>
Yemen	<p>(Statement from February 2023)</p> <p>Since February 2010, when Yemen made a high-level political commitment to work with the FATF and MENAFATF to address its strategic AML/CFT deficiencies, Yemen has made progress to improve its AML/CFT regime. In June 2014, the FATF determined that Yemen had substantially addressed its action plan at a technical level, including by: (1) adequately criminalising money laundering and terrorist financing; (2) establishing procedures to identify and freeze terrorist assets; (3) improving its customer due diligence and suspicious transaction reporting requirements; (4) issuing guidance; (5) developing the monitoring and supervisory capacity of the financial sector supervisory authorities and the financial intelligence unit; and (6) establishing a fully operational and effectively functioning financial intelligence unit. While the FATF determined that Yemen has completed its agreed action plan, due to the security situation, the FATF has been unable to conduct an on-site visit to confirm whether the process of implementing the required reforms and actions has begun and is being sustained. The FATF will continue to monitor the situation, and conduct an on-site visit at the earliest possible date.</p>