FINANCIAL FOLLOW-UP UNIT
وحـــدة المتابعـــة الماليـــة

**قرار رقم (2026/3)**
**صادر عن وحدة المتابعة المالية**
**بتاريخ 2026/11/01م**

## 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/ج/2016/4) 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 2026/10/30م، وعطفاً على قرار اللجنة الوطنية لمكافحة غسل الأموال وتمويل الإرهاب رقم (ت/2020/5) 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 والمهن غير المالية المحددة في دولة فلسطين استمرار العمل بالإجراءات التالية تجاه الدّول عالية المخاطر:

| الدّولة | الإجراءات المطلوبة تجاه الدّول |
|---|---|
| - جمهورية كوريا الديموقراطية الشعبية (كوريا الشمالية).<br>- الجمهورية الإسلامية الإيرانية (إيران). | 1. تطبيق العقوبات المالية المستهدفة بما ينسجم مع احكام المرسوم التنفيذي رقم (2022/14) بشأن تنفيذ قرارات مجلس الأمن.<br>2. إيلاء اهتمام خاص للعلاقات التجارية والمعاملات مع تلك الدّول، بما في ذلك الشركات والمؤسسات المالية، وتطبيق الإجراءات المضادة التالية:<br>أ. اتخاذ اجراءات العناية الواجبة المعززة على علاقات العمل والعمليات مع تلك الدّول (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 والمهن غير المالية المحددة. |

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| | ب. تطبيق إجراءات العناية الواجبة المعززة المشار اليها 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.<br>ج. تعزيز آليات الإبلاغ المعتمدة لدى المؤسسة المالية أو احدى الاعمال والمهن غير المالية، بما يشمل زيادة التعاون بين الموظفين وسرعة تزويد البيانات لمسؤول مكافحة غسل الأموال وتمويل الإرهاب داخل المؤسسة المالية أو احدى الاعمال والمهن 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.<br>د. عدم إنشاء فروع او مكاتب تمثيلية أو شركات تابعة في تلك الدول.<br>هـ. عدم الاعتماد على أطراف ثالثة متواجدة في تلك الدول في اتخاذ أي من إجراءات العناية الواجبة تجاه العملاء.<br>و. عدم إنشاء أي علاقات مراسلة مصرفية أو علاقات مراسلة مشابهة مع المؤسسات المالية في تلك الدول. |
| **جمهورية اتحاد ماينمار (ماينمار).** | 1. تطبيق اجراءات العناية الواجبة المعززة على علاقات العمل والعمليات مع ماينمار، وبما يتناسب مع المخاطر الناشئة في الدّولة، وذلك وفق تفاصيل المواد (26، 27) من تعليمات اللجنة الوطنية رقم (4) لسنة 2022م الخاصة بالمؤسسات المالية، والمواد (25، 24) من تعليمات اللجنة الوطنية رقم (3) لسنة 2022م الخاصة بالأعمال والمهن غير المالية المحددة.<br>2. عند تطبيق تدابير العناية الواجبة المعززة، يجب ضمان عدم تعطيل تدفقات الأموال للمساعدة الإنسانية وأنشطة المنظمات غير الربحية المشروعة والتحويلات المالية، خاصة فيما يتعلق بجهود الإغاثة من الزلازل في ماينمار. |

## ثانياً

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

تعديل قائمة الدول تحت المتابعة المعززة (القائمة الرمادية) المنصوص عليها في قرار الوحدة رقم (2026/2) وذلك بحذف كلٍ من **(بلغاريا، ساحل العاج (كوت ديفوار)، جمهورية كونغو الديمقراطية، وموناكو)**، 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.

| الرقم | اسم الدولة | الرقم | اسم الدولة |
|---|---|---|---|
| 1 | أنغولا | 10 | جمهورية لبنان |
| 2 | بوليفيا | 11 | جمهورية نيبال الديمقراطية الاتحادية (نيبال) |
| 3 | البوسنة والهرسك | 12 | بابوا غينيا الجديدة |
| 4 | الكاميرون | 13 | جمهورية جنوب السودان |
| 5 | جمهورية هايتي | 14 | الجمهورية العربية السورية (سوريا) |
| 6 | العراق | 15 | فنزويلا |
| 7 | جمهورية كينيا | 16 | فيتنام |
| 8 | دولة الكويت | 17 | جزر فيرجين (المملكة المتحدة) |
| 9 | جمهورية لاو الديمقراطية الشعبية (لاو) | 18 | الجمهورية اليمنية (اليمن) |

## ثالثاً

## التنفيذ

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

**مديروحدة 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

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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 الدّول الأخرى التي تخضع للتقييم المتبادل من قبل مجموعة العمل المالي أو المجموعات النظيرة، ويمكن الوصـــول الى تلك المخاوف من الاطلاع على تقارير التقييم المتبادل المتعلقة بتلك الدول، والتقارير المتابعة اللاحقة لهذا التقرير.

وتحتوي تقارير التقييم المتبادل التقييم المتبادل (mutual evaluation reports) وتقارير المتابعة (follow-up reports) المنشـورة على موقع مجموعة العمل المالي أو مجموعة العمل المالي لمنطقة الشـــرق الأوســـط وشـــمال أفريقيا، على كافة أوجه القصـــور والاستنتاجات الرئيسية المتعلقة بنظام مكافحة غسل الأموال وتمويل الإرهاب في الدول المدرجة على قائمة المتابعة المعززة وكافة الدّول 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
2. من قائمة المواضيع (Topics) نختار (Mutual Evaluations).
3. أختر Mutual Evaluations Reports.
4. البحث عن اسم الدولة باللغة الإنجليزية على نافذة البحث الموضحة بالصورة الموضحة جانباً.

ب. **الوصـــول الى تقارير التقييم المتبادل باللغة العربية (للدول الخاضـــعة لتقييم مجموعة العمل المالي لمنطقة الشـــرق الأوســـط وشمال أفريقيا).**




1. الدخول الى الموقع الالكتروني:
2. www.menafatf.org/ar
3. اختيار بند (التقييم المتبادل) ثم (تقارير التقييم- الجولة الثانية من التقييم)، أو تقارير المتابعة.
4. اختيار التقرير من القائمة التي تظهر حسب اسم الدولة.

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❖ **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 |
|---|---|
| **Angola** | In October 2024, Angola made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime, Angola has taken steps to improve its AML/CFT regime by enhancing its risk-based supervision – by developing manuals and inspection plans - and ensuring inspections are informed by the entities' ML/TF risk profiles. Angola has also ensured supervisors have sufficient resources to conduct risk-based supervision. Angola should continue to work with the FATF to implement its FATF action plan by: (1) addressing its remaining deficiencies on risk-based supervision of non-financial banking entities and DNFBPs; (2) ensuring competent authorities have adequate, accurate and timely access to beneficial ownership information and that breaches to obligations are adequately addressed; (3) demonstrating an increase in ML investigations and prosecutions; (4) demonstrating the ability to identify, investigate and prosecute TF; and (5) demonstrating an effective process to implement targeted financial sanctions without delay. |
| **Bolivia** | Since June 2025, when Bolivia made a high-level political commitment to work with the FATF and GAFILAT to strengthen the effectiveness of its AML/CFT regime, Bolivia has taken steps to improve its AML/CFT regime, including by ensuring relevant special investigative techniques can be used in ML investigations. Bolivia should continue working to implement its FATF action plan by: (1) implementing risk-based supervision of real estate agents, lawyers, accountants and DPMS; (2) ensuring that breaches to beneficial ownership obligations are sanctioned; and (3) increasing ML investigations and prosecutions in line with the country's risks (including other high-risk predicates in addition to corruption and drug trafficking). |
| **Bosnia and Herzegovina** | **Statement from June 2026**<br><br>In June 2026, Bosnia and Herzegovina 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 2024, Bosnia and Herzegovina has made progress on its MER's recommended actions, including through developing an overarching AML/CFT strategy, developing guidance for |

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| | FIs and DNFBPs on AML/CFT obligations, and improving the sharing and use of financial intelligence. Bosnia and Herzegovina will continue to work with the FATF to implement its FATF action plan by (1) further deepening its understanding of ML/TF risks, (2) adopting policies to systematically make use of international cooperation, (3) strengthening notary supervisors' understanding of ML/TF risks, ensuring consistent AML/CFT supervision of DNFBPs and imposing proportionate, dissuasive and effective sanctions on the banking sector, (4) ensuring that there is timely availability of accurate and up-to-date basic and beneficial ownership information, (5) providing targeted feedback on the quality of STRs, (6) demonstrating an increase in investigations and prosecutions of ML, (7) demonstrating that effective, proportionate and dissuasive sanctions are being applied for breaches of specific crossborder cash declaration regimes, (8) demonstrating it is proactively pursuing TF cases and clarifying the interpretation of the TF offence and (9) ensuring its supervisors can apply the full range of effective, proportionate and dissuasive sanctions for breaches of PF and TF TFS obligations. |
| **Cameroon** | Since June 2023, when Cameroon made a high-level political commitment to work with the FATF and GABAC to strengthen the effectiveness of its AML/CFT regime, Cameroon has taken steps to improve its AML/CFT regime by enhancing secure information exchange between the FIU, reporting entities, and competent authorities, and developing a risk-based the targeted outreach plan for the subset of NPOs at highest risk of TF abuse. Cameroon should continue working on implementing its FATF action plan to address its strategic deficiencies, including by: (1) 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; (2) implementing policies and procedures for seizing and confiscating proceeds and instrumentalities of crime and managing frozen, seized and confiscated property; (3) demonstrating effective implementation of TF and PF TFS regimes and implementing a risk-based approach to NPOs without disrupting legitimate NPO activities.<br><br>The FATF notes Cameroon continued progress across its action plan, however all deadlines have now expired. The FATF encourages Cameroon to continue to implement its action plan to address the above-mentioned strategic deficiencies as soon as possible. |
| **Haiti** | **Statement from June 2026**<br><br>Since June 2021, when Haiti made a high-level political commitment to work with the FATF and CFATF to strengthen the effectiveness of its AML/CFT regime, Haiti has taken steps towards improving its AML/CFT regime, including by completing its ML/TF risk assessment process and disseminating the findings. The FATF recognises the political commitment expressed at a high level and the efforts demonstrated by Haiti to advance its commitment in the midst of the challenging social, economic and security situation within the country. Haiti should continue |

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| | to work on implementing its action plan to address its strategic deficiencies, including by: (1) implementing risk-based AML/CFT supervision for DNFBPs deemed to constitute a higher ML/TF risk; (2) ensuring basic and beneficial ownership information are maintained and accessible in a timely manner; (3) demonstrating authorities are identifying, investigating and prosecuting ML cases in a manner consistent with Haiti's risk profile; (4) demonstrating an increase of identification, tracing and recovery of proceeds of crimes; (5) addressing the technical deficiencies in its targeted financial sanctions regime; and (6) conducting appropriate risk-based monitoring of NPOs vulnerable to TF abuse without disrupting or discouraging legitimate NPO activities.<br><br>The FATF notes Haiti's continued progress across its action plan, however all deadlines have expired and work remains. The FATF encourages Haiti to continue to implement its action plan to address the above-mentioned strategic deficiencies. |
| **Iraq** | **Statement from June 2026**<br><br>In June 2026, Iraq made a high-level political commitment to work with the FATF and MENAFATF to strengthen the effectiveness of its AML/CFT regime. Since the adoption of its MER in November 2024, Iraq has made progress on its MER's recommended actions, including through applying market entry controls to prevent criminals and terrorists from accessing important sectors, providing guidance and outreach to non-banking financial institutions and DNFBPs and introducing measures to mitigate the risks in the real estate sector, and enhancing authorities' understanding on how legal persons are misused for ML/TF. Iraq will continue to work with the FATF to implement its FATF action plan by (1) enhancing its understanding of specific ML/TF risks and adopting appropriate riskbased preventive measures, (2) enhancing the detection of informal money or value transfer services, establishing a legislative framework for VSAPs and applying effective, proportionate and dissuasive sanctions for breaches of AML/CFT requirements, (3) ensuring FIs and DFNBPs apply TFS and PEP measures (4) increasing the quantity and quality of STRs with a focus on high-risk sectors and demonstrating an increase use of financial information particularly related to DNFPBs, (5) enhancing risk-based implementation of beneficial ownership measures, (6) pursuing more ML investigations and prosecutions of ML and reviewing sentencing in ML cases, (7) pursuing more TF investigations and prosecutions in relation to specific TF risks and addressing the technical compliance issues in relation to its TF offence, (8) developing a robust understanding of the NPO sector and the TF risks affecting NPOs and |

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| | implementing risk-based measures while avoiding undue disruption or other unintended consequences for legitimate NPO activities and (9) enhancing its ability to identify and combat PF TFS evasion. |
| Kenya | Since February 2024, when Kenya made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime. Kenya has taken steps towards improving its AML/CFT regime, including by improving riskbased AML/CFT supervision of FIs and DNFBPs; enhancing the understanding of preventive measures by FIs and DNFBPs, including to increase STR filing; designating an authority for the regulation of trusts and collection of accurate and up-to-date beneficial ownership information and improving the use and quality of financial intelligence products. Kenya has also brought its TFS framework into compliance with R.6 and is ensuring its effective implementation and has revised its framework for NPO regulation and oversight to ensure that mitigating measures are risk-based and do not disrupt or discourage legitimate NPO activity. Kenya should continue to work to implement its FATF action plan to address its strategic deficiencies, including by: (1) implementing remedial actions for breaches of compliance with transparency requirements for legal persons and arrangements and (2) increasing ML investigations and prosecutions in line with risks. |
| Kuwait | Since February 2026, when Kuwait made a high-level political commitment to work with the FATF and MENAFATF to strengthen the effectiveness of its AML/CFT regime, Kuwait has taken steps to improve its AML/CFT regime ahead of schedule by enhancing outreach to real estate agents and DPMSs on STR reporting, including through distribution of sector-based indicators of ML/TF. Kuwait should continue to work on implementing its FATF action plan to address its strategic deficiencies, including by (1) ensuring that beneficial ownership information in the registry is accurate, and applying effective, proportionate and dissuasive sanctions in cases of inaccurate information where appropriate and (2) increasing ML investigations and prosecutions in relation to crossborder movements of currency and BNIs. |
| LAO PDR | Since February 2025, when Lao PDR made a high-level political commitment to work with the FATF and APG to strengthen the effectiveness of its AML/CFT regime, Lao PDR has taken steps to improve its AML/CFT regime by addressing the remaining technical compliance deficiencies in its targeted financial sanctions regime for TF. Lao PDR should continue to work on implementing its FATF action plan to address its strategic deficiencies, including: (1) enhancing its understanding of ML/TF risks; (2) improving risk-based supervision of casinos, |

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| | banks, and reporting entities in SEZs, including fit and proper checks; (3) enhancing the quality and quantity of financial intelligence analysis and spontaneous dissemination to law enforcement agencies; (4) ensuring that law enforcement agencies receive training and guidance on money laundering; (5) demonstrating an increase in ML investigations and prosecutions in line with Lao PDR's risk profile, with an emphasis on crimes with a transnational element that require international co-operation; (6) developing a national confiscation policy consistent with its ML/TF risks; (7) demonstrating that relevant competent authorities are taking measures to identify, seize, and, where applicable, confiscate proceeds and instrumentalities of crime in line with the risk profile; (8) monitoring FIs' and DNFBPs' compliance with PF TFS obligations; and (9) addressing technical compliance deficiencies in Recommendations 7 and 10. |
| **Lebanon** | Since October 2024, when Lebanon made a high-level political commitment to work with the FATF and MENAFATF to strengthen the effectiveness of its AML/CFT regime in spite of the challenging social, economic and security situation within the country, Lebanon has taken steps to improve its AML/CFT regime by issuing instructions regarding how to apply TFS without delay and providing targeted outreach and training to FIs and DFNBPs with lower levels of understanding of their TFS obligations. Lebanon should continue working on implementing its FATF action plan to address its strategic deficiencies by: (1) conducting assessments of specific terrorist financing and money laundering risks identified in the MER and ensuring that policies and measures are in place to mitigate these risks; (2) enhancing mechanisms to ensure the timely and effective execution of requests for mutual legal assistance, extradition and asset recovery; (3) enhancing DNFBPs' risk understanding and applying effective, proportionate and dissuasive sanctions for breaches of AML/CFT obligations; (4) ensuring beneficial ownership information is up-to-date and that there are adequate sanctions and risk-mitigating in place for legal persons; (5) enhancing competent authorities' use of products of the FIU and financial intelligence; (6) demonstrating a sustained increase in investigations, prosecutions and court rulings for types of ML in line with the risk; (7) improving its approach to asset recovery and identifying and seizing illicit cross-border movements of currency and precious metals and stones; (8) pursuing TF investigations and sharing information with foreign partners related to investigations of TF as called for in the MER; (9) enhancing the implementation of targeted financial sanctions without delay, particularly at DNFBPs and certain non-banking financial institutions; institutions; and (10) |

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| | undertaking targeted and risk-based monitoring of high-risk NPOs, without disrupting or discouraging legitimate NPO activities. |
| **Nepal** | Since February 2025, when Nepal made a high-level political commitment to work with the FATF and APG to strengthen the effectiveness of its AML/CFT regime, Nepal has taken steps to improve its AML/CFT regime by improving its understanding of key ML/TF risks and increasing supervisory resources. Nepal should continue to work on implementing its FATF action plan to address its strategic deficiencies, including: (1) improving risk-based supervision of commercial banks, higher-risk cooperatives, casinos, DPMS, and the real estate sector; (2) demonstrating the identification and sanctioning of materially significant illegal MVTS/hundi providers, without hindering financial inclusion; (3) increasing capacity and co-ordination of competent authorities to conduct ML investigations; (4) demonstrating an increase in ML investigations and prosecutions; and (5) demonstrating measures to identify, trace, restrain, seize, and, where applicable, confiscate proceeds and instrumentalities of crime in line with the risk profile. |
| **Papua New Guinea** | Since February 2026, when Papua New Guinea made a high-level political commitment to work with the FATF and APG to strengthen the effectiveness of its AML/CFT regime, Papua New Guinea has taken steps to improve its AML/CFT regime and understanding of ML/TF risks following completion of its National Risk Assessment and Legal Persons Risk Assessment. Papua New Guinea should continue to work on implementing its FATF action plan to address its strategic deficiencies, including: (1) endorsing the National AML/CFT/CPF Strategic Plan; (2) proactively seeking outbound international cooperation to identify and trace criminal property abroad; (3) improving risk-based supervision of banks, MVTS/FX dealers and higher risk DNFBPs; (4) demonstrating an increase in ML investigations and prosecutions; (5) demonstrating an increase in freezing/seizing and confiscation of criminal proceeds, instrumentalities and property of equivalent value; (6) conducting training for competent authorities to enhance their understanding of TFS-PF implementation; (7) addressing technical compliance deficiencies, including with respect to the ML offence, TF offence, TFS-PF, politically exposed persons and suspicious transaction reporting. |
| **South Sudan** | 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. South Sudan should continue to work to implement its action plan, including by: (1) ensuring that competent authorities are suitably structured and capacitated |

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| | to implement a risk-based approach to AML/CFT supervision for financial institutions; (2) developing a comprehensive legal framework to collect and verify the accuracy of beneficial ownership information for legal persons; (3) finalising the operationalisation of a fully functioning and independent FIU; (4) 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 (5) commencing implementation of targeted risk-based supervision/monitoring of NPOs at risk of TF abuse.<br><br>The FATF notes South Sudan's limited progress across its action plan with all deadlines now expired and work remaining. 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. |
| **Syria** | ***(Statement from February 2023)***<br><br>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. |
| **Venezuela** | Since June 2024, when Venezuela made a high-level political commitment to work with the FATF and CFATF to strengthen the effectiveness of its AML/CFT regime, Venezuela has taken steps to improve its AML/CFT regime. Venezuela should continue working to implement its FATF action plan by: (1) strengthening its understanding of ML/TF risks, including in relation to TF and legal persons and arrangements; (2) ensuring the full range of financial institutions and DNFBPs are subject to AML/CFT measures and risk-based supervision; (3) ensuring adequate, accurate and up-to-date beneficial ownership information is accessible in a timely |

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| | manner; (4) enhancing the resources of the FIU and improving competent authorities' use of financial intelligence; (5) enhancing the investigation and prosecution of ML and TF; (6) ensuring measures to prevent the abuse of NPOs for TF are targeted, proportionate, and risk-based and do not disrupt or discourage legitimate activities within the NPO sector; and (7) implementing TF- and PF-related targeted financial sanctions without delay.<br><br>In particular, the FATF is especially concerned about Venezuela's approach to conducting oversight of the NPO sector; the FATF calls on Venezuela to urgently consider whether certain sections of the November 2024 NPO law should be re-examined and potentially altered so that it is in line with the FATF's risk-based approach for supervision of the NPO sector and the FATF's best practices on Recommendation 8. |
| **Vietnam** | Since June 2023, when Vietnam made a high-level political commitment to work with the FATF and APG to strengthen the effectiveness of its AML/CFT regime, Vietnam has taken some steps towards improving its AML/CFT regime. Vietnam should continue to work on implementing its FATF action plan to address its strategic deficiencies, including: (1) increasing risk understanding; (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) enhancing the quality and quantity of financial intelligence analysis and dissemination; (9) prioritising parallel financial investigations and demonstrating an increase in the number of ML investigations and prosecutions undertaken; and (10) demonstrating that there is monitoring of FIs and DNFBPs for compliance with PF TFS obligations and that there is co-operation and coordination between authorities to prevent PF TFS from being evaded.<br><br>The FATF expresses significant concern with the pace of progress and Vietnam's failure to complete its action plan. The FATF again strongly urges Vietnam to swiftly implement its action plan to address the above-mentioned strategic deficiencies as soon as possible as all deadlines expired in May 2025. The FATF will expect to see tangible improvements in February 2027 or the FATF will consider next steps. |

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| **Virgin Islands (UK)** | Since June 2025, when the Virgin Islands (UK) made a high-level political commitment to work with the FATF and CFATF to strengthen the effectiveness of its AML/CFT regime, the Virgin Islands (UK) has taken steps to improve its AML/CFT regime, including by ensuring that accurate and up-to-date beneficial ownership information is available to competent authorities, improving the quality of SARs and ensuring that reporting is in line with risk, and increasing human resources within law enforcement authorities. The Virgin Islands (UK) should continue working to implement its FATF action plan by: (1) enhancing risk-based supervision of TCSPs, Investment Businesses and VASPs; (2) ensuring that breaches of beneficial ownership obligations are sanctioned; (3) improving the dissemination of financial intelligence in international cases; (4) systematically pursuing ML investigations and prosecutions in line with risk; and (5) increasing the seizure and confiscation of criminal proceeds. |
| **Yemen** | ***(Statement from February 2023)***<br><br>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. |

FINANCIAL FOLLOW-UP UNIT
وحـــدة المتابعـــة الماليـــة

❖ **القسم الثالث: الدول التي تم حذفها من القائمة الرمادية.**

| الدولة | المحاور الأساسية |
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| **Bulgaria** | The FATF welcomes Bulgaria's significant progress in improving its AML/CFT regime. Bulgaria strengthened the effectiveness of its AML/CFT regime to meet the commitments in its action plan regarding the strategic deficiencies that the FATF identified in October 2023 by: (1) implementing its national AML/CFT Strategy through adopting a comprehensive action plan; (2) addressing remaining technical compliance deficiencies; (3) demonstrating initial implementation of risk-based supervision for postal money operators, currency exchange providers and real estate agents and establishing market entry controls for VASPs and postal money operators; (4) ensuring that the beneficial ownership information held in the Register is accurate and up-to-date; (5) completing the implementation of the automated system to ensure more automated prioritisation of STRs; (6) improving investigations and prosecutions of different types of money laundering in line with risks, including high-scale corruption and organised crime; (7) ensuring that confiscation is pursued as a policy objective; (8) ensuring the ability to conduct parallel financial investigations in all terrorism investigations; (9) addressing gaps in the TF and PF targeted financial sanctions frameworks; and (10) identifying the subset of NPOs most vulnerable to TF abuse and demonstrating initial implementation of risk-based monitoring to prevent abuse for TF purposes.<br><br>Bulgaria should continue to work with MONEYVAL to sustain its improvements in its AML/CFT system. |
| **Côte d'Ivoire** | The FATF welcomes Côte d'Ivoire's significant progress in improving its AML/CFT regime. Côte d'Ivoire strengthened the effectiveness of its AML/CFT regime to meet the commitments in its action plan regarding the strategic deficiencies that the FATF identified in October 2024 by: (1) enhancing its use of international cooperation in ML/TF investigations and prosecutions; (2) improving the implementation of risk-based supervision of financial institutions and designated non-financial businesses and professions and conducting outreach campaigns to improve compliance; (3) improving the verification and access of basic and beneficial ownership information of legal persons and applying sanctions in case of violation; (4) enhancing the use of financial intelligence by law enforcement authorities and improving disseminations by the FIU; (5) demonstrating a sustained increase in the number of ML and TF investigations and prosecutions of different types in line with the country's risk profile; and (6) strengthening the targeted financial sanctions framework.<br><br>Côte d'Ivoire should continue to work with GIABA to sustain its improvements in its AML/CFT system. |

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| **Democratic Republic of the Congo** | The FATF welcomes the Democratic Republic of Congo's significant progress in improving its AML/CFT regime. The Democratic Republic of Congo strengthened the effectiveness of its AML/CFT regime to meet the commitments in its action plan regarding the strategic deficiencies that the FATF identified in October 2022 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 riskbased 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.<br><br>The Democratic Republic of Congo should continue to work with GABAC and ESAAMLG to sustain its improvements in its AML/CFT system. |
| **Monaco** | The FATF welcomes Monaco's significant progress in improving its AML/CFT regime. Monaco strengthened the effectiveness of its AML/CFT regime to meet the commitments in its action plan regarding the strategic deficiencies that the FATF identified in June 2024 by: (1) strengthening the understanding of risk in relation to money laundering and income tax fraud committed abroad; (2) demonstrating a sustained increase in outbound requests to identify and seek the seizure of criminal assets abroad (3) enhancing the application of sanctions for AML/CFT breaches and breaches of basic and beneficial ownership requirements; (4) completing its resourcing program for its FIU and strengthen the quality and timeliness of STR reporting; (5) enhancing judicial efficiency, including through increasing resources of investigative judges and prosecutors and the application of effective, dissuasive and proportionate sanctions for money laundering; and (6) increasing the seizure of property suspected to derive from criminal activities.<br><br>Monaco should continue to work with MONEYVAL to sustain its improvements in its AML/CFT system. |