



អង្គការស៊ើបការណ៍ហិរញ្ញវត្ថុកម្ពុជា

លេខ...៥១២...៤៧២...១៣៦៧...ស.ហ.ក.

ថ្ងៃ អង្គារ ១កើត ខែ កត្តិក ឆ្នាំខាល ចត្វាស័ក ព.ស.២៥៦៦
រាជធានីភ្នំពេញ ថ្ងៃទី២៥ ខែ តុលា ឆ្នាំ២០២២

ជម្រាបជូន

លោក លោកស្រី អគ្គនាយក អគ្គនាយិកា នាយក នាយិកា នៃបុគ្គលរាយការណ៍ទាំងអស់

កម្មវត្ថុ : របាយការណ៍របស់ក្រុមការងារហិរញ្ញវត្ថុ (FATF) ស្តីពីប្រទេសមានហានិភ័យខ្ពស់ដែលតម្រូវឱ្យមានវិធានការប្រឆាំង និងប្រទេសដែលត្រូវបង្កើនការតាមដាន។

- យោង :**
- ព្រះរាជក្រមលេខ នស/រកម/០៦២០/០២១ ចុះថ្ងៃសៅរ៍ ៧កើត ខែ អាសាធ ឆ្នាំជូត ទោស័ក ព.ស.២៥៦៤ ត្រូវនឹងថ្ងៃទី២៧ ខែ មិថុនា ឆ្នាំ២០២០ ដែលប្រកាសឱ្យប្រើច្បាប់ស្តីពីការប្រឆាំងការសម្អាតប្រាក់និងហិរញ្ញប្បទានភេរវកម្ម
 - ប្រកាសស្តីពីការប្រឆាំងការសម្អាតប្រាក់និងហិរញ្ញប្បទានភេរវកម្ម ចុះថ្ងៃសុក្រ ១១រោច ខែ ពិសាខ ឆ្នាំជូត ស័រ្ទិស័ក ព.ស.២៥៥២ ត្រូវនឹងថ្ងៃទី៣០ ខែ ឧសភា ឆ្នាំ២០០៨
 - ប្រកាសស្តីពីការប្រឆាំងការសម្អាតប្រាក់និងហិរញ្ញប្បទានភេរវកម្ម របស់បុគ្គលរាយការណ៍ដែលមិនស្ថិតក្រោមការគ្រប់គ្រងរបស់ធនាគារជាតិនៃកម្ពុជា ចុះថ្ងៃអង្គារ ១៥កើត ខែ មិថុនា ឆ្នាំខាល ទោស័ក ព.ស.២៥៥៤ ត្រូវនឹងថ្ងៃទី២១ ខែ ធ្នូ ឆ្នាំ២០១០
 - សេចក្តីណែនាំស្តីពីវិធានការយកចិត្តទុកដាក់ស្គាល់អតិថិជន ចុះថ្ងៃសុក្រ ១រោច ខែ មាយ ឆ្នាំជូត ទោស័ក ព.ស.២៥៦៤ ត្រូវនឹងថ្ងៃទី២៩ ខែ មករា ឆ្នាំ២០២១
 - លិខិតលេខ ធ១២.០២២.៧១៥ ស.ជ.ណ របស់អង្គការស៊ើបការណ៍ហិរញ្ញវត្ថុកម្ពុជា ចុះថ្ងៃសុក្រ ៣កើត ខែ អាសាធ ឆ្នាំខាល ចត្វាស័ក ព.ស.២៥៦៦ ត្រូវនឹងថ្ងៃទី១ ខែ កក្កដា ឆ្នាំ២០២២ ។

យោងតាមលិខិតលេខ ធ១២.០២២.៧១៥ ស.ជ.ណ ចុះថ្ងៃទី១ ខែ កក្កដា ឆ្នាំ២០២២ អង្គការស៊ើបការណ៍ហិរញ្ញវត្ថុកម្ពុជា (ស.ហ.ក.) បានជូនដំណឹងអំពីការអនុវត្តវិធានការចំពោះប្រទេសដែលមានហានិភ័យខ្ពស់ និងមានចំណុចខ្វះខាតនៅក្នុងប្រព័ន្ធប្រឆាំងការសម្អាតប្រាក់និងហិរញ្ញប្បទានភេរវកម្ម (AML/CFT) ដូចមានចេញផ្សាយជាសាធារណៈដោយក្រុមការងារហិរញ្ញវត្ថុ (FATF) ។

បន្ទាប់ពីមហាសន្និបាតកាលពីថ្ងៃទី២០-២១ ខែ តុលា ឆ្នាំ២០២២ FATF បានចេញផ្សាយរបាយការណ៍ស្តីពីប្រទេសមានហានិភ័យខ្ពស់ដែលតម្រូវឱ្យមានវិធានការប្រឆាំង (Jurisdictions subject to a FATF call on its members and other jurisdictions to apply countermeasures) ចំពោះសាធារណរដ្ឋប្រជាធិបតេយ្យប្រជាមានិតកូរ៉េ (ប្រទេសកូរ៉េខាងជើង) និងប្រទេសអ៊ីរ៉ង់ និងប្រទេសដែលតម្រូវឱ្យមានការអនុវត្តវិធានការបន្តិចការយកចិត្តទុកដាក់ (Jurisdiction subject to a FATF call on its members and other jurisdictions to apply enhanced due diligence measures proportionate to the risks arising from the jurisdiction)

ចំពោះប្រទេសមីយ៉ាន់ម៉ា។ ប្រទេសទាំងបីនេះត្រូវបាន FATF ចាត់ទុកជាប្រទេសដែលមានហានិភ័យខ្ពស់ (បញ្ជីខ្មៅ) ដោយសារ៖

១/- សាធារណរដ្ឋប្រជាធិបតេយ្យប្រជាមានិតកូរ៉េ (ប្រទេសកូរ៉េខាងជើង)

ប្រទេសនេះបានខកខានក្នុងការបំពេញចំណុចខ្លះខាតនៅក្នុងរបបប្រឆាំងការសម្អាតប្រាក់ និងហិរញ្ញប្បទានភេរវកម្មរបស់ខ្លួន ដែលមានការគំរាមកំហែងដល់សុច្ឆរិតភាពនៃប្រព័ន្ធហិរញ្ញវត្ថុអន្តរជាតិ។ លើសពីនេះ FATF ក៏មានការព្រួយបារម្ភយ៉ាងខ្លាំងលើសកម្មភាពខុសច្បាប់របស់ប្រទេសនេះពាក់ព័ន្ធនឹងការរើកសាមភាយអាវុធមហាប្រល័យនិងការផ្តល់ហិរញ្ញប្បទានដល់សកម្មភាពនេះ។

២/- ប្រទេសអ៊ីរ៉ង់

ប្រទេសនេះបន្តខកខានក្នុងការអនុវត្តសន្ធិសញ្ញាប្រឆាំងហិរញ្ញប្បទានភេរវកម្ម និងប៉ាឡឺម៉ូ (Palermo and Terrorist Financing Convention) ស្របតាមស្តង់ដាររបស់ FATF។ ដូច្នេះ FATF បានស្នើឱ្យប្រទេសជាសមាជិកទាំងអស់ បន្តអនុវត្តវិធានការប្រឆាំងចំពោះប្រទេសទាំងពីរនេះ ស្របតាមអនុសាសន៍ទី១៩ (Recommendation 19) របស់ FATF។

៣/- ប្រទេសមីយ៉ាន់ម៉ា

ប្រទេសនេះនៅតែបន្តខកខានពុំបានបញ្ចប់ផែនការសកម្មភាពតាមការកំណត់របស់ FATF ទោះបីជាផែនការសកម្មភាពនេះត្រូវបានពន្យារពេលអនុវត្ត ១ឆ្នាំថែមទៀតក៏ដោយ។ ជាលទ្ធផល FATF បានសម្រេចបន្ថែមវិធានការលើប្រទេសនេះ ដោយស្នើឱ្យប្រទេសជាសមាជិកទាំងអស់អនុវត្តវិធានការបន្តិកការយកចិត្តទុកដាក់ស្គាល់អតិថិជនចំពោះរាល់ទំនាក់ទំនងអាជីវកម្មទាំងអស់ជាមួយប្រទេសនេះ លើកលែងតែលំហូរមូលនិធិពាក់ព័ន្ធនឹងជំនួយមនុស្សធម៌ សកម្មភាពអង្គការមិនស្វែងរកប្រាក់ចំណេញ និងការផ្ទេរប្រាក់ដែលស្របច្បាប់។ (ដូចមានក្នុងឧបសម្ព័ន្ធ ១ ឬគេហទំព័ររបស់ FATF: <https://tinyurl.com/5n7amsxx>)។

អនុវត្តតាមខ្លឹមសារនៃកថាខណ្ឌ១៤ មាត្រា៨ និងកថាខណ្ឌ (គ) មាត្រា ១០ នៃច្បាប់ស្តីពីការប្រឆាំងការសម្អាតប្រាក់និងហិរញ្ញប្បទានភេរវកម្ម និងប្រការ២៧ នៃប្រកាសស្តីពីការប្រឆាំងការសម្អាតប្រាក់និងហិរញ្ញប្បទានភេរវកម្ម ប្រការ២៤ នៃប្រកាសស្តីពីការប្រឆាំងការសម្អាតប្រាក់និងហិរញ្ញប្បទានភេរវកម្ម របស់បុគ្គលរាយការណ៍ដែលមិនស្ថិតក្រោមការគ្រប់គ្រងរបស់ធនាគារជាតិនៃកម្ពុជា ចំណុចទី៤.៧ និងចំណុចទី៤.៨ នៃសេចក្តីណែនាំស្តីពីវិធានការយកចិត្តទុកដាក់ស្គាល់អតិថិជន ស.ហ.ក. ស្នើ លោក លោកស្រី ជំរុញការអនុវត្តវិធានការបន្តិកការយកចិត្តទុកដាក់ស្គាល់អតិថិជន និងការយកចិត្តទុកដាក់ស្គាល់អតិថិជន ជាប្រចាំចំពោះទំនាក់ទំនងអាជីវកម្ម និងប្រតិបត្តិការជាមួយ ឯកត្តបុគ្គល អាជីវកម្ម ក្រុមហ៊ុន និងគ្រឹះស្ថាន ហិរញ្ញវត្ថុមកពីប្រទេសកូរ៉េខាងជើង អ៊ីរ៉ង់ និងមីយ៉ាន់ម៉ា ព្រមទាំងស្វែងរកព័ត៌មានពីគោលបំណង ប្រវត្តិប្រតិបត្តិការ និងទំនាក់ទំនងអាជីវកម្មជាដើម ឱ្យបានលម្អិតជាលាយលក្ខណ៍អក្សរ និងបញ្ជូនមកអាជ្ញាធរមានសមត្ថកិច្ច។ លើសពីនេះ លោក លោកស្រី ត្រូវអនុវត្តវិធានការដាក់ទណ្ឌកម្មហិរញ្ញវត្ថុចំពោះប្រទេសកូរ៉េខាងជើង ស្របតាមសេចក្តីសម្រេចចិត្តរបស់ក្រុមប្រឹក្សាសន្តិសុខអង្គការសហប្រជាជាតិ។ លោក លោកស្រី ត្រូវបញ្ឈប់ទំនាក់ទំនងធនាគារឆ្លើយឆ្លងជាមួយធនាគារមកពីប្រទេសកូរ៉េខាងជើង។

ទន្ទឹមនេះ FATF ក៏បានចេញផ្សាយរបាយការណ៍ស្តីពីប្រទេសដែលត្រូវបង្កើនការតាមដាន (Jurisdictions Under Increased Monitoring) ផងដែរ។ នៅក្នុងរបាយការណ៍នោះ FATF បានដកប្រទេស នីកាវ៉ាហ្គា (Nicaragua) និងប្រទេសប៉ាគីស្ថាន (Pakistan) ចេញពីដំណើរការត្រួតពិនិត្យរបស់ខ្លួន ប៉ុន្តែបាន បញ្ចូលប្រទេសមួយចំនួនវិញ រួមមាន៖ ១/. សាធារណរដ្ឋប្រជាធិបតេយ្យកុងហ្គោ (Democratic Republic of the Congo) ២/. ម៉ូសំប៊ីក (Mozambique) និង ៣/. តង់សានី (Tanzania)។ (ដូចមានក្នុងឧបសម្ព័ន្ធ ២ ឬ គេហទំព័ររបស់ FATF: <https://tinyurl.com/bdextrzfb>)។ ដូច្នេះ សូម លោក លោកស្រី បញ្ចូលប្រទេសដែល មានដូចក្នុងឧបសម្ព័ន្ធ ២ នេះ ទៅក្នុងដំណើរការវាយតម្លៃហានិភ័យរបស់គ្រឹះស្ថាន លោក លោកស្រី ស្របតាមចំណុចទី៣ នៃការវាយតម្លៃហានិភ័យនៃសេចក្តីណែនាំស្តីពីវិធានការយកចិត្តទុកដាក់ស្គាល់ អតិថិជន។

ដោយឡែក សម្រាប់ប្រទេសកម្ពុជាត្រូវបាន FATF ទទួលស្គាល់ថាបានអនុវត្តពេញលេញ ស្របតាមផែនការសកម្មភាព។ FATF នឹងចុះត្រួតពិនិត្យដល់ទឹកនៃខ្លួន ដែលជានីតិវិធីបន្ត ដើម្បីធ្វៀងផ្ទាត់ អំពីនិរន្តរភាពនិងការបន្តការប្តេជ្ញាចិត្តថ្នាក់នយោបាយ ក្នុងការអនុវត្តការកែទម្រង់ការប្រឆាំងការសម្អាតប្រាក់ និងហិរញ្ញប្បទានភេរវកម្មនាពេលអនាគត មុននឹងសម្រេចដកប្រទេសកម្ពុជាចេញពីរបាយការណ៍ស្តីពីប្រទេស ដែលត្រូវបង្កើនការតាមដាននេះ។

អាស្រ័យដូចបានជម្រាបជូនខាងលើ សូម លោក លោកស្រី អគ្គនាយក អគ្គនាយិកា នាយក នាយិកា នៃបុគ្គលរាយការណ៍ទាំងអស់អនុវត្តឱ្យមានប្រសិទ្ធភាពខ្ពស់ ចាប់ពីថ្ងៃជូនដំណឹងនេះតទៅ។

សូម លោក លោកស្រី អគ្គនាយក អគ្គនាយិកា នាយក នាយិកា ទទួលនូវការរាប់អានអំពីខ្ញុំ។ *skk*

អង្គការស៊ើបអារណ៍ហិរញ្ញវត្ថុកម្ពុជា
ប្រធាន

សាយ សំអាត

Appendix I

High-Risk Jurisdictions subject to a Call for Action – 21 October 2022



High-risk jurisdictions have significant strategic deficiencies in their regimes to counter money laundering, terrorist financing, and financing of proliferation. For all countries identified as high-risk, the FATF calls on all members and urges all jurisdictions to apply enhanced due diligence, and, in the most serious cases, countries are called upon to apply counter-measures to protect the international financial system from the money laundering, terrorist financing, and proliferation financing (ML/TF/PF) risks emanating from the country. This list is often externally referred to as the “black list”.

1. Jurisdictions subject to a FATF call on its members and other jurisdictions to apply countermeasures

Since February 2020, in light of the COVID-19 pandemic, the FATF has paused the review process for Iran and DPRK, given that they are already subject to the FATF’s call for countermeasures. Therefore, please refer to the statement on these jurisdictions adopted in 21 February 2020. While the statement may not necessarily reflect the most recent status of Iran and the Democratic People’s Republic of Korea’s AML/CFT regimes, the FATF’s call to apply countermeasures on these high-risk jurisdictions remains in effect.

Democratic People's Republic of Korea (DPRK)

[unchanged since February 2020]

The FATF remains concerned by the DPRK’s failure to address the significant deficiencies in its anti-money laundering and combating the financing of terrorism (AML/CFT) regime and the serious threats they pose to the integrity of the international financial system. The FATF urges the DPRK to immediately and meaningfully address its AML/CFT deficiencies. Further, the FATF has serious concerns with the threat posed by the DPRK’s illicit activities related to the proliferation of weapons of mass destruction (WMDs) and its financing.

The FATF reaffirms its 25 February 2011 call on its members and urges all jurisdictions to advise their financial institutions to give special attention to business relationships and transactions with the DPRK, including DPRK companies, financial institutions, and those acting on their behalf. In addition to enhanced scrutiny, the FATF further calls on its members and urges all jurisdictions to apply effective counter-measures, and targeted financial sanctions in accordance with applicable United Nations Security Council Resolutions, to protect their financial sectors from money laundering, financing of terrorism and WMD proliferation financing (ML/TF/PF) risks emanating from the DPRK. Jurisdictions should take necessary measures to close existing branches, subsidiaries and representative offices of DPRK banks within their territories and terminate correspondent relationships with DPRK banks, where required by relevant UNSC resolutions.

Iran

[unchanged since February 2020]

In June 2016, Iran committed to address its strategic deficiencies. Iran's action plan expired in January 2018. In February 2020, the FATF noted Iran has not completed the action plan.

In October 2019, the FATF called upon its members and urged all jurisdictions to: require increased supervisory examination for branches and subsidiaries of financial institutions based in Iran; introduce enhanced relevant reporting mechanisms or systematic reporting of financial transactions; and require increased external audit requirements for financial groups with respect to any of their branches and subsidiaries located in Iran.

Now, given Iran's failure to enact the Palermo and Terrorist Financing Conventions in line with the FATF Standards, the FATF fully lifts the suspension of counter-measures and calls on its members and urges all jurisdictions to apply effective counter-measures, in line with Recommendation 19.

Iran will remain on the FATF statement on [High Risk Jurisdictions Subject to a Call for Action] until the full Action Plan has been completed. If Iran ratifies the Palermo and Terrorist Financing Conventions, in line with the FATF standards, the FATF will decide on next steps, including whether to suspend countermeasures. Until Iran implements the measures required to address the deficiencies identified with respect to countering terrorism-financing in the Action Plan, the FATF will remain concerned with the terrorist financing risk emanating from Iran and the threat this poses to the international financial system.

2. Jurisdiction subject to a FATF call on its members and other jurisdictions to apply enhanced due diligence measures proportionate to the risks arising from the jurisdiction

Myanmar

In February 2020, Myanmar committed to address its strategic deficiencies. Myanmar's action plan expired in September 2021.

In June 2022, the FATF strongly urged Myanmar to swiftly complete its action plan by October 2022 or the FATF would call on its members and urge all jurisdictions to apply enhanced due diligence to business relations and transactions with Myanmar. Given the continued lack of progress and the majority of its action items still not addressed after a year beyond the action plan deadline, the FATF decided that further action was necessary in line with its procedures and FATF calls on its members and other jurisdictions to apply enhanced due diligence measures proportionate to the risk arising from Myanmar. When applying enhanced due diligence measures, countries should ensure that flows of funds for humanitarian assistance, legitimate NPO activity and remittances are not disrupted.

Myanmar should continue to work on implementing its action plan to address these deficiencies, including by: (1) demonstrating an improved understanding of ML risks in key areas; (2) demonstrating that on-site/offsite inspections are risk-based, and hundi operators are registered and supervised; (3) demonstrating enhanced use of financial intelligence in LEA investigations, and increasing operational analysis and disseminations by the FIU;



(4) ensuring that ML is investigated/prosecuted in line with risks; (5) demonstrating investigation of transnational ML cases with international cooperation; (6) demonstrating an increase in the freezing/seizing and confiscation of criminal proceeds, instrumentalities, and/or property of equivalent value; (7) managing seized assets to preserve the value of seized goods until confiscation; and (8) demonstrating implementation of targeted financial sanctions related to PF.

The FATF urges Myanmar to work to fully address its AML/CFT deficiencies and Myanmar will remain on the list of countries subject to a call for action until its full action plan is completed.



Appendix II

Jurisdictions under Increased Monitoring - 21 October 2022



Paris, 21 October 2022 - Jurisdictions under increased monitoring are actively working with the FATF to address strategic deficiencies in their regimes to counter money laundering, terrorist financing, and proliferation financing. When the FATF places a jurisdiction under increased monitoring, it means the country has committed to resolve swiftly the identified strategic deficiencies within agreed timeframes and is subject to increased monitoring. This list is often externally referred to as the “grey list”.

The FATF and FATF-style regional bodies (FSRBs) continue to work with the jurisdictions below as they report on the progress achieved in addressing their strategic deficiencies. The FATF calls on these jurisdictions to complete their action plans expeditiously and within the agreed timeframes. The FATF welcomes their commitment and will closely monitor their progress. The FATF does not call for the application of enhanced due diligence measures to be applied to these jurisdictions. The FATF Standards do not envisage de-risking, or cutting-off entire classes of customers, but call for the application of a risk-based approach. Therefore, the FATF encourages its members and all jurisdictions to take into account the information presented below in their risk analysis.

The FATF identifies additional jurisdictions, on an on-going basis, that have strategic deficiencies in their regimes to counter money laundering, terrorist financing, and proliferation financing. A number of jurisdictions have not yet been reviewed by the FATF or their FSRBs, but will be in due course.

Since the start of the COVID-19 pandemic, the FATF has provided some flexibility to jurisdictions not facing immediate deadlines to report progress on a voluntary basis. The following countries had their progress reviewed by the FATF since June 2022: Albania, Barbados, Burkina Faso, Cambodia, Cayman Islands, Haiti, Jamaica, Jordan, Mali, Morocco, Myanmar, Nicaragua, Pakistan, Panama, Philippines, Senegal, South Sudan, Türkiye, UAE, and Uganda. For these countries, updated statements are provided below. Gibraltar chose to defer reporting; thus, the statement issued in June 2022 for that jurisdiction is included below, but it may not necessarily reflect the most recent status of the jurisdiction’s AML/CFT regime. Following review, the FATF now also identifies the Democratic Republic of the Congo, Mozambique, and Tanzania.

The FATF welcomes the progress made by these countries in combating money laundering and terrorist financing, despite the challenges posed by COVID-19.

Jurisdictions with strategic deficiencies

Albania
Barbados
Burkina Faso
Cambodia
Cayman Islands
Democratic Republic of the Congo

Jurisdiction no longer subject to increased monitoring

Nicaragua
Pakistan

Gibraltar
Haiti
Jamaica
Jordan
Mali
Morocco
Mozambique
Panama
Philippines
Senegal
South Sudan
Syria
Tanzania
Türkiye
Uganda
United Arab Emirates
Yemen

Albania

Since February 2020, when Albania made a high-level political commitment to work with the FATF and MONEYVAL to strengthen the effectiveness of its AML/CFT regime, Albania has taken steps towards improving its AML/CFT regime, including by enacting an adequate legal framework for violations of company and NPO registration obligations and implementing proportionate and dissuasive sanctions against entities that failed to declare their beneficial owners in the registry by the deadline. Albania should continue to work on implementing its action plan to address its strategic deficiencies, including by increasing the number of money laundering indictments that it brings to court for prosecution.

The FATF expresses concern that Albania failed to complete its action plan, which fully expired in February 2022. The FATF strongly urges Albania to swiftly demonstrate significant progress in completing its action plan by February 2023 or the FATF will consider next steps if there is insufficient progress.

Additionally, the FATF expresses concern that Albania's plans for a possible Voluntary Tax Compliance (VTC) programme do not comply with the FATF's principles for managing the AML/CFT implications of VTCs or FATF's best practices for such programmes. Albania should revise its draft VTC law and work with MONEYVAL to ensure that any VTC law passed or implemented has adequate safeguards to prevent the potential for abuse of the programme for money laundering or terrorist financing purposes.

Barbados

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 the ability to enforce breaches of BO requirements, strengthening the relationship between the FIU and LEAs, improving the ML database, and demonstrating progress in the investigation, seizure and forfeiture of cash and assets. Barbados should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) taking appropriate measures to prevent legal persons and arrangements from being misused for criminal purposes, and ensuring that accurate and up-to-date basic and beneficial ownership information is available on a timely basis; (2) demonstrating that ML investigations and prosecutions are in line with the country's risk profile; (3) further pursuing confiscation in ML cases, including by repatriating or sharing confiscated assets with other countries.

The FATF urges Barbados to swiftly complete its action plan as all deadlines have now expired and to address the above-mentioned strategic deficiencies by February 2023.

Burkina Faso

Since February 2021, when 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 has taken steps towards improving its AML/CFT regime, including by strengthening its efforts to pursue confiscation as a policy objective. 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) seeking mutual legal assistance (MLA) and other forms of international cooperation in line with its risk profile; (3) strengthening of resource capacities of all AML/CFT supervisory authorities and implementing risk based supervision of FIs and DNFBPs; (4) maintaining comprehensive and updated basic and beneficial ownership information and strengthening the system of sanctions for violations of transparency obligations; (5) increasing the diversity of STR reporting; (6) enhancing the resources of the FIU to provide additional capacity building and training to FIs, DNFBPs and the investigative and judicial authorities; (7) conduct training for LEAs, prosecutors and other relevant authorities; (8) enhancing capacity and support for LEAs and prosecutorial authorities involved in combatting TF, in line with the TF National Strategy; and (9) implementing an effective targeted financial sanctions regime related to TF and PF as well as risk-based monitoring and supervision of NPOs.

Cambodia

In February 2019, Cambodia made a high-level political commitment to work with the FATF and APG to strengthen the effectiveness of its AML/CFT regime. At its October 2022 Plenary, the FATF made the initial determination that



Cambodia has substantially completed its action plan and warrants an on-site visit to verify that the implementation of Cambodia's AML/CFT reforms has begun and is being sustained, and that the necessary political commitment remains in place to sustain implementation and improvement in the future. Cambodia has made a number of key reforms, including to improve: (1) MLA law and providing training on MLA to prosecutors and judges; (2) risk-based supervision for FIs and DNFBPs; (3) the legal framework on preventive measures and conducting outreach to the casino, real-estate and MVTs sectors; (4) the quality and quantity of FIU disseminations, demonstrating an increase in ML investigations in line with risk; (5) its effectiveness in asset confiscation; and (6) establishing a legal framework for implementing UN sanctions related to targeted financial sanctions for PF and providing training to strengthen the skills of competent authorities to implement TFS for PF. The FATF will continue to monitor the COVID-19 situation and conduct an on-site visit at the earliest possible date.

The Cayman Islands

Since February 2021, when 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, the Cayman Islands has taken steps towards improving its AML/CFT regime, including by 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 in line with those requirements. The Cayman Islands should continue to work on implementing its action plan to address its strategic deficiencies, including by demonstrating that they are prosecuting all types of money laundering cases in line with the jurisdiction's risk profile and that such prosecutions are resulting in the application of dissuasive, effective, and proportionate sanctions.

The FATF urges the Cayman Islands to swiftly complete its action plan as all deadlines have now expired and to address the above-mentioned strategic deficiency by February 2023.

The Democratic Republic of the Congo

In October 2022, the DRC 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 2020, the DRC has made progress on some of the MER's recommended actions including making confiscation of proceeds of crime a policy priority. The DRC will work to implement its FATF action plan 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.

Gibraltar

(Statement from June 2022)

In June 2022, Gibraltar 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 2019, Gibraltar has made progress on a significant number of its MER's recommended actions, such as completing a new national risk assessment, addressing the technical deficiencies in relation to BO-related record keeping, introducing transparency requirements for nominee shareholders and directors, strengthening the financial intelligence unit, and refining its ML investigation policy in line with risks. Gibraltar should work on implementing its action plan, including by: (1) ensuring that supervisory authorities for non-bank financial institutions and DNFBPs use a range of effective, proportionate, and dissuasive sanctions for AML/CFT breaches; and (2) demonstrating that it is more actively and successfully pursuing final confiscation judgements, through criminal or civil proceedings based on financial investigations.

Haiti

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. 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 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.

Jamaica

In February 2020, Jamaica made a high-level political commitment to work with the FATF and CFATF to strengthen the effectiveness of its AML/CFT regime. Jamaica should continue to work on implementing its action plan to address its



strategic deficiencies, including by: (1) including all FIs and DNFBPs in the AML/CFT regime and ensuring adequate, risk-based supervision in all sectors; (2) taking appropriate measures to prevent legal persons and arrangements from being misused for criminal purposes, and ensuring that accurate and up-to-date basic and beneficial ownership information is available on a timely basis to competent authorities; and (3) implementing a risk-based approach for supervision of the NPO sector to prevent abuse for TF purposes.

The FATF 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 February 2023 or the FATF will consider next steps if there is insufficient progress.

Jordan

Since October 2021, when Jordan made a high-level political commitment to work with the FATF and MENAFATF to strengthen the effectiveness of its AML/CFT regime. Jordan has taken steps towards improving its AML/CFT regime, including by strengthening its legal and operational TF-related TFS framework, increasing capacity for risk-based DNFBP supervision, making basic and beneficial ownership information accessible by competent authorities, maintaining statistics on ML investigations and prosecution and strengthening its legal framework with respect to confiscation. Jordan should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) completing and disseminating the ML/TF risk assessments of legal persons and virtual assets; (2) Improving risk based supervision and applying effective, proportionate, and dissuasive sanctions for noncompliance; (3) Conducting training and awareness raising programs for DNFBPS on their AML/CFT obligations, particularly with regard to filing and submitting STRS; (4) Maintaining comprehensive and updated basic and beneficial ownership information on legal persons and legal arrangements; (5) Pursuing money laundering investigations and prosecutions, including through parallel financial investigations, for predicate offences in line with the risk identified in the NRA; (6) Monitoring and effectively supervising the compliance of FIs and DNFBPS with TFS obligations; and (7) Developing and implementing a risk-based approach for supervision of the NPO sector to prevent abuse for TF purposes.

Mali

In October 2021, Mali made a high-level political commitment to work with the FATF and GIABA to strengthen the effectiveness of its AML/CFT regime. 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



noncompliance; (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) ensuring relevant competent authorities are involved in investigation and prosecution of ML; (6) strengthening the capacities of relevant authorities responsible for investigation and prosecution of TF cases; (7) establishing a 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.

Morocco

In February 2021, Morocco made a high-level political commitment to work with the FATF and MENAFATF to strengthen the effectiveness of its AML/CFT regime. At its October 2022 plenary, the FATF has made the initial determination that Morocco has substantially completed its action plan and warrants an on-site assessment to verify that the implementation of Morocco'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. Morocco has made the following key reforms, including: (1) improving risk-based supervision and taking remedial actions and applying effective, proportionate and dissuasive sanctions for non-compliance; (2) strengthening its TFS framework and monitoring FIs and DNFBP's compliance with TFS obligations; (3) undertaking and sharing the results of the risk assessment on the misuse of all types of legal persons with the private sector and the competent authorities; (4) increasing the diversity of suspicious transactions reporting; and (5) establishing asset seizing and confiscation procedures.

The FATF will continue to monitor the COVID-19 situation and conduct an on-site visit at the earliest possible date.

Mozambique

In October 2022, Mozambique made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime. Since the adoption of its MER in April 2021, Mozambique has made progress on some of the MER's recommended actions to improve its system including by finalising its NRA and strengthening its asset confiscation efforts. Mozambique will work to implement its FATF action plan 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) 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.

Panama

Since June 2019, when Panama made a high-level political commitment to work with the FATF and GAFILAT to strengthen the effectiveness of its AML/CFT regime, Panama has taken important steps towards improving its AML/CFT regime, including by ensuring effective, proportionate, and dissuasive sanctions in response to AML/CFT violations. However, Panama should continue to take urgent action to fully address remaining measures in its action plan as all timelines have already expired in January 2021. Panama should therefore continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) ensuring adequate verification, of up-to-date beneficial ownership information by obliged entities and timely access by competent authorities, establishing effective mechanisms to monitor the activities of offshore entities, and further implementing the specific measures to prevent the misuse of nominee shareholders and directors; and (2) demonstrating its ability to investigate and prosecute ML involving foreign tax crimes.

The FATF again expresses significant concern that Panama failed to complete its action plan, which fully expired in January 2021. The FATF strongly urges Panama to swiftly complete its action plan by February 2023 or the FATF will consider calling on its members and urging all jurisdictions to apply enhanced due diligence to business relations and transactions with Panama.

Philippines

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 towards improving its AML/CFT regime, including by demonstrating that appropriate measures are being taken with respect to the NPO sector and implementing supervision for targeted financial sanctions. 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 the use of financial intelligence and an increase in ML investigations and prosecutions in line with risk; (5) demonstrating an increase in the identification, investigation and prosecution of TF cases; and (6) enhancing the effectiveness of the targeted financial sanctions framework for both TF and PF by demonstrating that DNFBPs understand their obligations.



Senegal

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 taken steps towards improving its AML/CFT regime, including by ensuring consistent understanding of ML/TF risks across relevant authorities through training and outreach, and seeking MLA and other forms of international cooperation. 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 against non-compliant entities; (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) strengthening the authorities understanding of TF risks and enhancing capacity and support for LEAs and prosecutorial authorities involved in combatting TF in line with the 2019 TF National Strategy; and (4) implementing an effective TFS regime related to TF and PF as well as risk-based monitoring and supervision of NPOs.

The FATF notes Senegal's continued progress across its action plan, however all deadlines have now expired and work remains. The FATF encourages Senegal to continue to implement its action plan to address the above-mentioned strategic deficiencies as soon as possible.

South Sudan

In June 2021, South Sudan made a high-level political commitment to work with the FATF to strengthen the effectiveness of its AML/CFT regime. South Sudan became a member of ESAAMLG in September 2022 and committed to undergo a mutual evaluation. 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.

The FATF notes South Sudan's limited progress across its action plan. The FATF again encourages South Sudan to continue to demonstrate its 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

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.

Tanzania

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. 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 and 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.

Türkiye

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 further steps towards improving its AML/CFT regime, including by increasing the human resources at the FIU to conduct analysis and pursuing a number of domestic designations under UNSCR 1373 to target terrorist financing in line with Türkiye's risk profile. Türkiye should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) increasing on-site inspections by supervisors across all sectors, commensurate with risk; (2) enhancing the use of financial intelligence to support ML investigations and increasing proactive disseminations by the FIU; (3) undertaking more complex money laundering investigations and prosecutions; (4) setting out clear responsibilities and measurable performance objectives and metrics for the authorities responsible for recovering criminal assets and pursuing terrorism financing cases and using statistics to update risk assessments and inform policy; (5) conducting more financial investigations in terrorism cases, prioritising TF investigations and prosecutions related to UN-designated groups, and ensuring TF investigations are extended to identify financing and support networks; (6) concerning targeted financial sanctions, pursuing outgoing requests to third-countries related to UN-designated groups, in line with Türkiye's risk profile; and (7) to fully implement a risk-based approach to supervision of non-profit organisations to prevent their abuse for terrorist financing, taking steps to ensure that audits conducted are risk-based, that supervision does not disrupt or discourage legitimate NPO activity such as fundraising, and that sanctions applied are proportionate to any violations.

The FATF continues to monitor Türkiye's oversight of the NPO sector. Türkiye is urged to demonstrate the implementation of the risk-based approach to supervision of NPOs in line with the FATF Standards.

Uganda

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 completing the ML/TF risk assessment of legal persons and arrangements. Uganda should continue to work to implement its action plan to address its strategic deficiencies, including by: (1) developing and implementing risk-based supervision of FIs and DNFBPs; (2) ensuring that competent authorities have timely access to accurate basic and beneficial ownership information for legal entities; (3) demonstrating LEAs and judicial authorities apply the ML offence consistent with the identified risks; (4) establishing and implementing policies and procedures for identifying, tracing, seizing and confiscating proceeds and instrumentalities of crime; and (5) addressing the technical deficiencies in the



legal framework to implement PF-related targeted financial sanctions. 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.

The FATF strongly urges Uganda to swiftly implement its action plan to address the above-mentioned strategic deficiencies as soon as possible as all deadlines expired in May 2022.

The United Arab Emirates

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 positive progress, including by providing additional resources to the FIU to strengthen the FIU analysis and provide financial intelligence to LEAs and the Public Prosecutors for combating of high-risk ML threats.

The UAE should continue to work to implement its FATF action plan by: (1) demonstrating through case studies and statistics a sustained increase in outbound MLA requests to help facilitate investigation of TF, ML, and high-risk predicates; (2) enhancing and maintaining a shared understanding of the ML/TF risks between the different DNFBP sectors and institutions; (3) showing an increase in the number and quality of STRs filed by FIs and DNFBPs; (4) ensuring a more granular understanding of the risk of abuse of legal persons and, where applicable, legal arrangements, for ML/TF; (5) demonstrate greater use of financial intelligence to pursue high-risk ML threats; and demonstrating a sustained increase in effective investigations and prosecutions of different types of ML cases consistent with UAE's risk profile; and (6) proactively identifying and combating sanctions evasion, including by demonstrating a better understanding of sanctions evasion among the private sector.

Yemen

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.

Jurisdictions No Longer Subject to Increased Monitoring by the FATF

Nicaragua

The FATF notes Nicaragua’s progress in improving the elements of its AML/CFT regime covered by its action plan. Nicaragua has addressed technical deficiencies to meet the commitments of its action plan regarding strategic deficiencies in the areas that the FATF identified in February 2020. Nicaragua is therefore no longer subject to the FATF’s increased monitoring process.

However, the FATF is strongly concerned by the potential misapplication of the FATF Standards resulting in the suppression of Nicaragua’s non-profit sector. Nicaragua should continue to work with GAFILAT to improve further its AML/CFT regime, including by ensuring its oversight of NPOs is risk-based and in line with the FATF Standards. Nicaragua is strongly encouraged to continue cooperating with GAFILAT on this issue.

Pakistan

The FATF welcomes Pakistan’s significant progress in improving its AML/CFT regime. Pakistan has strengthened the effectiveness of its AML/CFT regime and addressed technical deficiencies to meet the commitments of its action plans regarding strategic deficiencies that the FATF identified in June 2018 and June 2021, the latter of which was completed in advance of the deadlines, encompassing 34 action items in total. Pakistan is therefore no longer subject to the FATF’s increased monitoring process.

Pakistan will continue to work with APG to further improve its AML/CFT system.