



To: All Regulated Entities

From: The Financial Services Regulatory Commission – St. Kitts Branch

Date: 11 November 2024

Re: FATF Public Statement October 2024

On 25 October 2024, the FATF issued a Public Statement reiterating its call for all jurisdictions to apply enhanced due diligence for all countries categorized as High-Risk. The FATF also instructed jurisdictions to apply countermeasures, in the most serious cases, to protect the international financial system from the money laundering, terrorist financing and proliferation financing risks emanating from the countries. Since February 2020, Iran reported in January and August 2024 with no material changes in the status of its action plan.

The FATF remains concerned by the DPRK's continued failure to address the significant deficiencies in its AML/CFT regime and the serious threats posed by the DPRK's illicit activities related to the proliferation of weapons of mass destruction (WMDs) and its financing. In February 2024, the FATF noted DPRK's increased connectivity with the international financial system and therefore urges countries to adequately assess and account for the increased proliferation financing (PF) risk.

Myanmar has made recent progress against several items in its action plan, though progress remains slow. Myanmar will remain on the list of countries subject to a call for action until its action plan is complete. If no further progress is made by the end of February 2025, the FATF will consider countermeasures.

The Public Statement also highlighted Jurisdictions under Increased Monitoring, that are actively working with the FATF to address strategic deficiencies to counter money laundering, terrorist financing and proliferation financing. The following countries had their progress reviewed by the FATF since June 2024:

- Bulgaria
- Burkina Faso
- Cameroon
- Croatia
- Democratic Republic of Congo
- Mali
- Mozambique
- Namibia
- Nigeria
- Philippines
- Senegal
- South Africa

- South Sudan
- Tanzania
- Vietnam
- Yemen

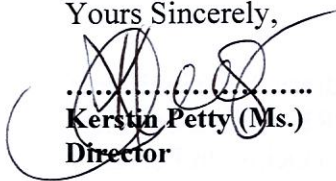
The FATF also updated its list of jurisdictions with AML/CFT deficiencies to reflect the removal of Senegal from its increased monitoring process.

The outcomes of the FATF Plenary held during the period 23-25 October 2024 were also highlighted in the Public Statement.

The FATF documents are attached in their entirety and can also be accessed via the link below. They contain relevant information that each regulated entity, as part of the implementation of its risk-based approach, should be aware of.

<https://fsrc.kn/advisories>

Yours Sincerely,



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Kerstin Petty (Ms.)
Director

High-Risk Jurisdictions subject to a Call for Action - 25 October 2024

Paris, 25 October 2024 -

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”.

Since February 2020, Iran reported in January and August 2024 with no material changes in the status of its action plan.

Given heightened proliferation financing risks, the FATF reiterates its call to apply countermeasures on these high-risk jurisdictions.

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

Democratic People's Republic of Korea (DPRK)

Building upon the FATF statements over the past decade, the FATF remains concerned by the DPRK’s continued failure to address the significant deficiencies in its anti-money laundering and combating the financing of terrorism (AML/CFT) regime and the serious threats posed by the DPRK’s illicit activities related to the proliferation of weapons of mass destruction (WMDs) and its financing.

The FATF has continually reiterated since 2011 the need for all countries to robustly implement the targeted financial sanctions in accordance with UNSC Resolutions and apply the following countermeasures to protect their financial systems from the money laundering, terrorist financing, and proliferation financing threat emanating from DPRK:

- Terminate correspondent relationships with DPRK banks;
- Close any subsidiaries or branches of DPRK banks in their countries; and
- Limit business relationships & financial transactions with DPRK persons.

Despite these calls, DPRK has increased connectivity with the international financial system, which raises proliferation financing (PF) risks, as the FATF noted in February 2024. This requires greater vigilance and renewed implementation and enforcement of these

countermeasures against the DPRK. As set out in UNSCR 2270, DPRK frequently uses front companies, shell companies, joint ventures and complex, opaque ownership structures for the purpose of violating sanctions. As such, FATF encourages its members and all countries to apply enhanced due diligence to the DPRK and its ability to facilitate transactions on its behalf.

The FATF also urges countries to adequately assess and account for the increased proliferation financing risk with the greater financial connectivity reported, particularly since the next round of assessments requires countries to adequately assess PF risks under Recommendation 1 and Immediate Outcome 11. The ability to obtain reliable and credible information to support the assessment of PF risks relating to the DPRK is hampered by the recent termination of the 1718 Committee Panel of Experts mandate. Thus, the FATF will monitor the measures to comply with DPRK targeted financial sanctions and the implementation of countermeasures against DPRK.

Iran

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.[\[1\]](#)

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 countermeasures and calls on its members and urges all jurisdictions to apply effective countermeasures, in line with Recommendation 19.[\[2\]](#)

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.

[1] In June 2016, the FATF welcomed Iran’s high-level political commitment to address its strategic AML/CFT deficiencies, and its decision to seek technical assistance in the implementation of the Action Plan. Since 2016, Iran established a cash declaration regime, enacted amendments to its Counter-Terrorist Financing Act and its Anti-Money Laundering Act, and adopted an AML by-law.

In February 2020, the FATF noted that there are still items not completed and Iran should fully address: (1) adequately criminalizing terrorist financing, including by removing the exemption for designated groups “attempting to end foreign occupation, colonialism and racism”; (2) identifying and freezing terrorist assets in line with the relevant United Nations Security Council resolutions; (3) ensuring an adequate and enforceable customer due diligence regime; (4) demonstrating how authorities are identifying and sanctioning unlicensed money/value transfer service providers; (5) ratifying and implementing the Palermo and TF Conventions and clarifying the capability to provide mutual legal assistance; and (6) ensuring that financial institutions verify that wire transfers contain complete originator and beneficiary information.

[2] Countries should be able to apply appropriate countermeasures when called upon to do so by the FATF. Countries should also be able to apply countermeasures independently of any call by the FATF to do so. Such countermeasures should be effective and proportionate to the risks.

The Interpretative Note to Recommendation 19 specifies examples of the countermeasures that could be undertaken by countries.

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 October 2022, 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. The FATF requires that as part of enhanced due diligence, financial institutions should increase the degree and nature of monitoring of the business relationship, in order to determine whether those transactions or activities appear unusual

or suspicious. If no further progress is made by February 2025, the FATF will consider countermeasures.

While overall progress continues to be slow, Myanmar has made recent progress against several items in its action plan. Myanmar should continue to work on implementing its action plan to address these deficiencies, including by: (1) demonstrating enhanced use of financial intelligence in law enforcement authorities (LEAs) investigations, and increasing operational analysis and disseminations by the financial intelligence unit (FIU); (2) ensuring that ML is investigated/prosecuted in line with risks; (3) demonstrating investigation of transnational ML cases with international cooperation; (4) demonstrating an increase in the freezing/seizing and confiscation of criminal proceeds, instrumentalities, and/or property of equivalent value; (5) managing seized assets to preserve the value of seized goods until confiscation; and (6) addressing technical compliance deficiencies related to R.7 to ensure effective implementation of targeted financial sanctions related to proliferation financing.

When applying enhanced due diligence, countries should ensure that flows of funds for humanitarian assistance, legitimate NPO activity and remittances are neither disrupted nor discouraged. The FATF will also continue to monitor whether Myanmar's AML/CFT activities apply undue scrutiny to legitimate financial flows.

Myanmar will remain on the list of countries subject to a call for action until its full action plan is completed.

Jurisdictions under Increased Monitoring - 25 October 2024

Paris, 25 October 2024 -

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. As countries consider actions based on their risk analysis taking into account the information below, they should ensure that flows of funds for humanitarian assistance, legitimate NPO activity and remittances are neither disrupted nor discouraged. Countries should also consider their international obligations under United Nations Security Council Resolution 2664 (2022) on humanitarian exemptions to asset freeze measures imposed by UN sanctions regimes.

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.

The FATF provides 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 2024: Bulgaria; Burkina Faso, Cameroon, Croatia, Democratic Republic of Congo, Mali, Mozambique, Namibia; Nigeria, Philippines, Senegal, South Africa, South Sudan, Tanzania, Vietnam, and Yemen. For these countries, updated statements are provided below. Haiti, Kenya, Monaco, Syria and Venezuela chose to defer reporting; thus, the statements issued previously for those jurisdictions are included below, but it may not necessarily reflect the most recent status of the jurisdictions' AML/CFT regimes. Following review, the FATF now also identifies Algeria, Angola, Côte d'Ivoire and Lebanon.

Algeria

In October 2024, Algeria 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 mutual evaluation report (MER) in May 2023, Algeria has made progress on many of the MER's recommended actions including by more effectively pursuing money laundering investigations and prosecutions. Algeria will continue to work with FATF to implement its action plan by: (1) improving risk-based supervision, especially for higher risk sectors, including through the adoption of new procedures, risk assessments, supervision manuals and guidelines, as well as undertaking inspections and applying effective, proportionate and dissuasive sanctions; (2) developing an effective framework for basic and beneficial ownership information; (3) enhancing its regime for suspicious transaction reports; (4) establishing an effective legal and institutional framework for targeted financial sanctions for terrorism financing; and (5) implementing a risk-based approach to oversight of non-profit organisations, without disrupting or discouraging legitimate activity.

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. Since the adoption of its MER in June 2023, Angola has made progress on some of the MER's recommended actions including enhancing national cooperation and coordination, international cooperation and the use of financial intelligence by competent authorities. Angola will continue to work with the FATF to implement its FATF action plan by: (1) enhancing its understanding of ML/TF risks; (2) improving risk-based supervision of non-financial banking entities and DNFBPs; (3) ensuring competent authorities have adequate, accurate and timely access to beneficial ownership information and that breaches to obligations are adequately addressed; (4) demonstrating an increase in ML investigations and prosecutions; (5) demonstrating the ability to identify, investigate and prosecute TF; and (6) demonstrating an effective process to implement targeted financial sanctions without delay.

Bulgaria

Since October 2023, when Bulgaria made a high-level political commitment to work with the FATF and MONEYVAL to strengthen the effectiveness of its AML/CFT regime, Bulgaria has taken steps towards improving its AML/CFT regime, including by demonstrating initial implementation of its national action plan for its AML/CFT Strategy; demonstrating initial implementation of risk-based supervision for postal money operators, currency exchange providers and real estate agents and ensuring that confiscation is pursued as a policy objective. Bulgaria should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) addressing the remaining technical compliance deficiencies; (2) ensuring that the beneficial ownership information held in the Register is accurate and up-to-date; (3) improving investigations and prosecutions of different types of money laundering in line with risks, including high-scale corruption and organised crime; (4) ensuring the ability to conduct parallel financial investigations in all terrorism investigations; (5) addressing gaps in the PF TFS frameworks; and (6) identifying the subset of non-profit organisations (NPOs) most vulnerable to TF abuse and demonstrating initial implementation of risk-based monitoring to prevent abuse for TF purposes.

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 supervision of financial institutions and designated non-financial businesses and professions, establishing a system to provide access to competent authorities of accurate

and up-to-date beneficial ownership information, and implementing a framework for the monitoring of the activities of NPOs at risk of TF abuse . Burkina Faso should continue to work on implementing its action plan to address its remaining strategic deficiency, by: implementing an effective targeted financial sanctions regime related to TF and PF.

The FATF notes Burkina Faso's continued progress across its action plan, however all deadlines have expired and work remains. The FATF urges Burkina Faso to swiftly implement its action plan to address the above-mentioned strategic deficiency as soon as possible as all deadlines expired in December 2022.

Cameroon

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. Cameroon should continue working on implementing its action plan to address its strategic deficiencies, including 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 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.

Côte d'Ivoire

In October 2024, Côte d'Ivoire 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 June 2023, Côte d'Ivoire has made significant progress on many of the MER's recommended actions including by strengthening its legal AML/CFT framework through several important legislative and regulatory amendments, updating ML/TF analysis by drafting typology reports on the highest risk predicate offences, strengthening the human and technical resources of the FIU and prosecutors, and operationalising the agency in charge of the management of assets seized and confiscated. Côte d'Ivoire will continue to work with the FATF to implement its FATF action plan 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.

Croatia

Since June 2023, when Croatia made a high-level political commitment to work with the FATF and MONEYVAL to strengthen the effectiveness of its AML/CFT regime, Croatia has taken steps towards improving its AML/CFT regime, including increasing FIU human resources and improving analytical capabilities; improving LEAs detection, investigation and prosecution of different types of ML; and increasing the application of provisional measures to secure criminal proceeds. Croatia should continue to work on implementing its action plan to address its remaining strategic deficiency: demonstrating immediate communication of changes in UN TFS regimes to reporting entities.

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 providing training to supervisory authorities and the FIU to build their technical capacity. The DRC should continue to work to implement its FATF action plan to address its strategic deficiencies, including by: (1) developing and implementing a risk-based supervision plan; (2) building the capacity of the FIU to conduct operational and strategic analysis; (3) strengthening the capabilities of authorities involved in the investigation and prosecution of ML and TF; and (4) demonstrating effective implementation of TF and PF-related TFS.

Haiti

(Statement from June 2024)

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 improving the FIU's access to and use of a wide range of information in its financial intelligence products through the adoption of a new organic law. 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) implementing risk-based AML/CFT supervision for all financial institutions and DNFBPs deemed to constitute a higher ML/TF risk; (3) ensuring basic and beneficial ownership information are maintained and accessible in a timely manner; (4) ensuring the FIU has adequate resources and processes to produce and disseminate operational and strategic analysis to competent authorities for combatting ML and TF; (4) demonstrating authorities are identifying, investigating and prosecuting ML cases in a manner consistent with Haiti's risk profile; (5) demonstrating an increase of identification, tracing and recovery of proceeds of crimes; (6) addressing the technical deficiencies in its targeted financial sanctions regime; and (7) conducting appropriate risk-based monitoring of NPOs vulnerable to TF abuse without disrupting or discouraging legitimate NPO activities.

The FATF notes Haiti's continued progress across its action plan, however all deadlines are expired and work remains. The FATF encourages Haiti to continue to implement its action plan to address the above-mentioned strategic deficiencies.

Kenya

(Statement from February 2024)

In February 2024, Kenya 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 September 2022, Kenya has made progress on some of the MER's recommended actions including by making amendments to its AML/CFT legislation to bring its framework in closer compliance with the FATF recommendations and establishing a case management system to better manage its international cooperation requests. Kenya will work to implement its FATF action plan by: (1) completing a TF risk assessment and presenting the results of the NRA and other risk assessments in a consistent manner to competent authorities and the private sector and updating the national AML/CFT strategies; (2) improving risk-based AML/CFT supervision of FIs and DNFBPs and adopting

a legal framework for the licensing and supervision of VASPs; (3) enhancing the understanding of preventive measures by FIs and DNFBSs, including to increase STR filing and implement TFS without delay; (4) designating an authority for the regulation of trusts and collection of accurate and up-to-date beneficial ownership information and implementing remedial actions for breaches of compliance with transparency requirements for legal persons and arrangements; (5) improving the use and quality of financial intelligence products; (6) increasing ML and TF investigations and prosecutions in line with risks; (7) bringing the TFS framework in compliance with R.6 and R.7 and ensure its effective implementation; and (8) revising the framework for NPO regulation and oversight to ensure that mitigating measures are risk-based and do not disrupt or discourage legitimate NPO activity.

Lebanon

In October 2024, 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. Since the adoption of its MER in May 2023, Lebanon has made progress on several of the MER's recommended actions and has applied measures to its financial sector, including through issuing a circular for banks and financial institutions to establish a department dedicated to combating bribery and corruption related crimes and guidance on politically exposed persons, while taking measures against unlicensed financial activity.

Lebanon will continue to work with the FATF to implement its FATF action plan 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 DNFBSs' 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 DNFBSs and certain non-banking financial institutions; and (10) undertaking targeted and risk-based monitoring of high-risk NPOs, without disrupting or discouraging legitimate NPO activities.

Mali

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 improving the robustness of the terrorist financing offence in its domestic legislation, resulting in the ability to better investigate the full scope of terrorism financing activities. Mali should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) demonstrating timely access to accurate beneficial ownership information; and (2) demonstrating the effectiveness of its targeted financial sanctions framework related to TF and PF.

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

Monaco

(Statement from June 2024)

In June 2024, Monaco 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 mutual evaluation report (MER) in December 2022, Monaco has made significant progress on several of the MER's recommended actions including by establishing a new combined financial intelligence unit (FIU) and AML/CFT supervisor, strengthening its approach to detecting and investigating terrorism financing, implementing targeted financial sanctions and risk-based supervision of non-profit organisations. Monaco will continue to work with FATF to implement its action plan 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.

Mozambique

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 improving the risk-based supervision of FIs and DNFBPs, increasing the resources available to its FIU, and providing training to the FIU on the implementation of targeted financial sanctions. Mozambique should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) implementing a risk-based supervision plan, including the implementation of remedial actions and effective and proportionate sanctions; (2) increasing financial intelligence sent to authorities; (3) demonstrating LEAs' capability to effectively investigate a range of ML offences using financial intelligence; (4) demonstrating the ability to identify TF cases; and (5) carrying out a risk assessment for NPOs in line with the FATF Standards and using it as a basis to develop an outreach plan.

Namibia

In February 2024, Namibia made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime. Namibia should continue working on implementing its FATF action plan by: (1) strengthening its AML/CFT risk based supervision through enhancing the human and resource capacities, conducting offsite and onsite inspections informed by supervisory risk assessment tools and applying effective, proportionate and dissuasive sanctions for breaches of AML/CFT obligations; (2) enhancing preventive measures through inspections and outreach to ensure that FIs and DNFBPs apply enhanced due diligence measures as well as TFS obligations related to TF and PF without delay; (3) increasing the filing of beneficial ownership information of legal persons and arrangements, and applying remedial actions and/or effective, proportionate and dissuasive sanctions against breaches of compliance with beneficial ownership obligations; (4) providing the FIU with adequate human and financial resources, as well as trainings, to improve operational and strategic analysis; (5) improving the cooperation between the FIU and LEAs to enhance the use and integration of financial intelligence in investigations; (6) enhancing the operational capabilities of authorities involved in ML and TF investigations and prosecutions by providing them with adequate resources and targeted trainings; (7) demonstrating the LEAs' capabilities to effectively investigate and prosecute ML/TF cases; and (8) approving the amended National Counter Terrorism Strategy.

Nigeria

Since February 2023, when Nigeria made a high-level political commitment to work with the FATF and GIABA to strengthen the effectiveness of its AML/CFT regime, Nigeria has taken steps towards improving its AML/CFT regime, including by enhancing international cooperation efforts, improving cooperation mechanisms amongst TF investigative bodies and implementing risk-based monitoring of NPOs at risk of TF abuse. Nigeria should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) improving AML/CFT risk-based supervision of FIs and DNFBPs and enhancing implementation of preventive measures for high-risk sectors; (2) ensuring that competent authorities have timely access to accurate and up-to-date beneficial ownership information on legal persons and applying sanctions for breaches of obligations; (3) demonstrating a sustained increase in ML investigations and prosecutions in line with ML risks; (4) proactively detecting violations of currency declaration obligations and applying appropriate sanctions; and (5) demonstrating sustained increase in investigations and prosecutions of different types of TF activities in line with the country's risk profile.

Philippines

In June 2021, the Philippines 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 2024 plenary, the FATF made the initial determination that the Philippines 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.

The Philippines has made the following key reforms including: (1) demonstrating that risk-based supervision of DNFBPs is occurring; (2) demonstrating that supervisors are using AML/CFT controls to mitigate risks associated with casino junkets; (3) implementing the new registration requirements for MVTS and applying sanctions to unregistered and illegal remittance operators; (4) enhancing and streamlining LEA access to BO information and taking steps to ensure that BO information is accurate and up-to-date; (5) demonstrating an increase in the use of financial intelligence and an increase in ML investigations and prosecutions in line with risk; (6) demonstrating an increase in the identification, investigation and prosecution of TF cases; (7) demonstrating that appropriate measures are taken with respect to the NPO sector (including unregistered NPOs) without disrupting legitimate NPO activity; and (8) enhancing the effectiveness of the targeted financial sanctions framework for both TF and PF.

South Africa

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 including by demonstrating a sustained increase in outbound MLA requests, strengthening its AML/CFT supervisory capacity by improving the risk-based supervision of DNFBPs, enhancing its identification, seizure and confiscation of proceeds and instrumentalities of a wider range of predicate crimes, in line with its risk profile, updating and implementing its TF strategy and increasing relevant authorities' TF capabilities on the basis of an understanding of its TF risks, as well as ensuring the effective implementation of targeted financial sanctions. South Africa should continue to work on implementing its action plan to address its remaining strategic deficiencies, including by: (1) demonstrating that all AML/CFT supervisors apply effective, proportionate, and effective sanctions for non-compliance; (2) 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 beneficial ownership obligations; (3) 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.

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, including by disseminating the results of their recently completed NRA to all stakeholders. South Sudan should continue to work to implement its action plan, including by: (1) finalising its comprehensive review of the AML/CFT Act (2012) to comply with the FATF Standards; (2) 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) finalising the operationalisation of 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 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)

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

Since October 2022, when Tanzania made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime, Tanzania has taken steps towards improving its AML/CFT regime, including by improving the 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; demonstrating authorities' capability (including through improving the use of financial intelligence and availability of statistics) to effectively conduct a range of investigations and prosecutions of ML in line with the country's risk profile; developing and beginning to implement a comprehensive national CFT strategy; and, using the recently completed TF risk assessment for NPOs as a basis to develop an outreach and training plan. Tanzania should continue to work on implementing its action plan to address its remaining strategic deficiency by demonstrating a capability to conduct TF investigations and pursue prosecutions in line with the country's risk profile.

Venezuela

(Statement from June 2024)

In June 2024, Venezuela made a high-level political commitment to work with the FATF and CFATF to strengthen the effectiveness of its AML/CFT regime. Since the adoption of its MER in November 2022, Venezuela has made progress on some of the MER's recommended actions including by updating its national risk assessment. Venezuela will work 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 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.

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 made limited progress. The FATF strongly encourages Vietnam to coordinate internally to demonstrate progress on its action plan to address its strategic deficiencies, including by: (1) increasing risk understanding, domestic co-ordination and co-operation to 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; and (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.

Yemen

(Statement from February 2023)

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

Senegal

The FATF welcomes Senegal's significant progress in improving its AML/CFT regime. Senegal 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 February 2021 by: (1) demonstrating consistent understanding of ML/TF risks across relevant authorities; (2) seeking international cooperation to facilitate ML/TF investigations and tracing of proceeds of crime located abroad; (3) demonstrating that FIs and DNFBPs are subject to adequate and effective risk-based supervision and sanction measures and that they improve compliance with AML/CFT obligations including by increasing STR reporting and establishing effective internal control mechanisms; (4) maintaining adequate, accurate and up-to-date basic and beneficial ownership information and ensuring its timely access by competent authorities; (5) increasing the capacity of the FIU staff to conduct analysis and increasing the dissemination of financial intelligence; (6) increasing the capacity of law enforcement authorities in the detection and investigation of ML and predicate offences in line with risk and maintaining statistics on cases investigated and prosecuted; (7) establishing policies and procedures for the identification and seizure of proceeds of crime and demonstrating the effective application of seizing and freezing powers of relevant competent authorities; (8) strengthening the law enforcement and prosecutorial authorities' understanding of TF risks and CFT capacity and demonstrating that TF

investigations are in line with Senegal's risk profile; (9) implementing targeted financial sanction regime; and (10) implementing a risk-based monitoring regime for NPOs at risk of abuse for TF purposes.

Senegal should continue to work with GIABA to sustain its improvements in its AML/CFT system.

Outcomes FATF Plenary, 23-25 October 2024

Paris, 25 October 2024 -

The first FATF Plenary under the Presidency of Elisa de Anda Madrazo of Mexico concluded today.

Delegates from the FATF's Global Network of over 200 jurisdictions and observers from international organisations participated in three days of discussions on key money laundering, terrorism financing and proliferation financing issues.

The FATF achieved a significant milestone in approving the last two assessment reports in the FATF's fourth cycle of assessments, the joint FATF-GAFILAT assessment of the Argentine Republic (Argentina) and the joint FATF/MENAFATF assessment of the Sultanate of Oman (Oman). FATF will now focus on its new round which will deliver more focused, risk-based mutual evaluations.

The FATF removed Senegal from its increased monitoring following a successful on-site visit and updated its statements on 'high-risk and other monitored jurisdictions'.

Members agreed to release for public consultation proposed revisions to the standards related to FATF's ongoing focus on financial inclusion. FATF also approved new guidance on national risk assessments to support countries to understand the illicit finance risks they face.

For the first time, two jurisdictions – Cayman Islands and Senegal – were invited to participate in the FATF Plenary and Working Groups as guests. This represents significant progress on FATF's priority to increase its inclusivity and broaden the diversity of perspectives at the FATF.

The FATF also discussed standards changes related to cross-border payment systems and progressed work to identify the latest terrorist financing and proliferation financing risks. FATF also commenced a project to review its processes to ensure that countries do not misuse the FATF requirements to restrict the activities of NPOs.

Members reported on the value of the horizontal review of DNFBPs technical compliance related to corruption to support necessary reforms. FATF decided to continue discussing follow-up on this issue at its next meeting.

The suspension of the Russian Federation continues to stand ([see February 2024 statement](#))

Building on the Women in FATF and the Global Network (WFGN) initiative that was launched during the Singapore Presidency, the Plenary discussed proposals to strengthen diversity and inclusiveness throughout the Global Network.

Compliance with the FATF Standards

High-risk and other Monitored Jurisdictions

Jurisdictions under increased monitoring

[Jurisdictions under increased monitoring](#) are actively working with the FATF to address the 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 implement an Action Plan to resolve swiftly the identified strategic deficiencies within agreed timeframes.

At this Plenary, the FATF added Algeria, Angola, Côte d'Ivoire and Lebanon to the list of jurisdictions subject to increased monitoring.

Jurisdictions no longer under Increased Monitoring

The FATF Plenary congratulated Senegal for its significant progress in addressing the strategic anti-money laundering, countering financing of terrorism and countering financing of proliferation (AML/CFT/CPF) deficiencies previously identified during its mutual evaluation. Senegal has completed its Action Plans to resolve the identified strategic deficiencies within agreed timeframes and will no longer be subject to the FATF's increased monitoring process.

Senegal will continue to work with the FATF and the Inter Governmental Action Group against Money Laundering in West Africa (GIABA) of which it is a member to continue strengthening its AML/CFT/CPF regimes.

Jurisdictions subject to a Call for Action

The FATF identifies countries or jurisdictions with serious strategic deficiencies to counter money laundering, terrorist financing, and proliferation financing. These [jurisdictions are subject to a call for action](#) to protect the international financial system.

Mutual Evaluation Reports of Argentina and Oman

The FATF discussed and approved the joint FATF-GAFILAT mutual evaluation report of Argentina which assessed the effectiveness of the country's measures to combat money laundering, terrorist financing and proliferation financing, and their compliance with the FATF Recommendations. The Plenary concluded that Argentina has improved its AML/CFT/CPF framework since its last mutual evaluation in 2010 and demonstrates strengths in domestic cooperation and coordination between agencies. However, Argentina needs to improve effectiveness across its AML/CFT/CPF system, particularly on targeted financial sanctions related to proliferation financing. Argentina also needs to better understand the money laundering and terrorist financing risks it faces, in particular laundering from corruption and through informal financial services, and to increase the prosecutions of these crimes in line with its risk profile. Argentina should also strengthen the supervision and regulation for some sectors.

The Plenary also discussed and approved the FATF-MENAFATF assessment of Oman and concluded that Oman has significantly improved its AML/CFT/CPF framework in recent years with robust technical compliance. Oman has taken positive steps regarding the use of financial intelligence, international cooperation combating terrorist financing and implementing targeted financial sanctions for proliferation financing. However, Oman should increase its efforts to achieve greater effectiveness over time, including deepening the understanding of its ML risks, enhancing ML investigations and prosecutions in line with risks and improving confiscation of proceeds of crime. It should also take measures to prevent legal persons from being used for criminal purposes and strengthen risk-based supervision.

The FATF will publish both reports after the FATF's quality and consistency review is completed.

Membership Issues

The suspension of the membership of the [Russian Federation](#) continues to stand. Following [the statements](#) issued since March 2022, the FATF reiterates that all jurisdictions should be vigilant to current and emerging risks from the circumvention of measures taken against the Russian Federation in order to protect the international financial system.

Strategic Initiatives

National Risk Assessment

The risk-based approach is at the core of the FATF Recommendations and effective measures to tackle the trillions of dollars of financial flows that fuel crime and terror. A risk assessment is key to a country being able to identify, assess, and understand the risks it faces so that it can direct its resources where it makes the greatest impact.

The FATF has revised its guidance for a national money laundering risk assessment to reflect experiences and lessons it has learnt since 2013, when the guidance was first issued. The guidance will help countries, and in particular low-capacity countries, understand and mitigate their illicit finance risks. The guidance benefits from the experience of over 90 countries across the FATF Global Network facing different risks, challenges and at various levels of capacity.

Financial Inclusion and the Risk-based Approach

At this Plenary, members agreed to release for public consultation proposed revisions to the FATF Standards (mainly Recommendation 1 on assessing risk and applying a risk-based approach) to support financial inclusion.

This work was carried out as a result of the FATF Stocktake report on mitigating the Unintended Consequences of the FATF Standards, which concluded that the flexibility envisaged under the FATF's risk-based approach is not being fully used. The revisions aim to encourage countries to allow simplified measures as appropriate where countries assess risks to be lower.

The FATF aims to finalise these revisions and guidance to support this work in 2025.

Global Network Cooperation

Under its Mexican Presidency, the FATF aims to increase FSRBs' voices and participation in FATF work and to strengthen cohesion in the Global Network. This week, FATF made significant progress on this priority.

First, members agreed to strengthen their support to regional bodies to support high-quality, consistent evaluations across the Global Network.

Secondly, the FATF President launched a new initiative by inviting two guest jurisdictions, Senegal and Cayman Islands, to input more actively in the FATF and promote further engagement within the region. This initiative aims to broaden the diversity of perspectives and backgrounds at the FATF from regions of the globe that currently do not have many FATF members involved in their regional bodies as joint members. Invitations to guest jurisdictions are for one year, on a rotational basis.

Ongoing Work and New Projects

Delegates heard updates on ongoing work, including on revisions to the FATF Standards to reflect the evolution of cross-border payment systems and changes to industry standards, and work on a comprehensive update on terrorist financing risks. The FATF is also working on a project that will help detect and prevent online child sexual exploitation, a crime that has seen a significant increase and targets the most vulnerable members of our society. The FATF's project will focus on the financial transactions and indicators that can identify suspicious behaviour and help protect children all over the world.

FATF Members officially commenced new work including a project working together with data protection and privacy (DPP) experts, the private sector and other international partners on information sharing consistent with different national rules for AML/CFT/CPF and DPP. FATF also commenced a project to review its processes to ensure that countries do not misuse the FATF requirements to restrict the activities of NPOs.

Women in FATF and the Global Network (WFGN) Initiative

The Plenary took stock of actions taken to improve gender diversity in the FATF and discussed further proposals to strengthen this work. The FATF will launch a second mentoring programme to strengthen inclusivity and diversity within the FATF and Global Network, building on the WFGN initiative under the Singapore Presidency.