

قراررقم (2025/2) صادر عن وحدة المتابعة المالية بتاريخ 2025/06/19م

#### بشأن قو ائم الدول مرتفعة المخاطر والدول تحت المتابعة المعززة

استناداً إلى احكام قرار بقانون رقم (39) لسنة 2022م بشأن مكافحة غسل الأموال وتمويل الإرهاب وتعديلاته، لا سيما أحكام المادة (20) والفقرات (3، 4) من المادة (30)، وبناءً على قرار اللجنة الوطنية لمكافحة غسل الأموال وتمويل الإرهاب رقم (8/ج4/2016) الصادر بتاريخ 2016/12/01م، بشأن تفويض وحدة المتابعة المالية بنشر قائمة الدول عالية المخاطر والتي تصدر بشكل دوري عن مجموعة العمل المالي (FATF)، ولاحقاً لما تقرر عن المجموعة منذ تاريخ 2020/02/21، وحتى تاريخ 2020/5/06/13 وعطفاً على قرار اللجنة الوطنية لمكافحة غسل الأموال وتمويل الإرهاب رقم (ت/2020) الصادر بتاريخ 2020/02/24 بشأن الدول مرتفعة المخاطر والدول تحت المتابعة المعززة. ولاحقاً الى قرار وحدة المتابعة رقم (2020/1) بتاريخ 2020/02/24 والقرارات اللاحقة له بشأن قو ائم الدول مرتفعة المخاطر والدول تحت المتابعة المعززة.

أولاً قائمة الدول مرتفعة المخاطر (القائمة السوداء)

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

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



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

### <u>ثانياً</u>

بالإغاثة من الزلازل في ماينمار.

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

تعديل قائمة الدول تحت المتابعة المعززة (القائمة الرمادية) المنصوص عليها في قرار الوحدة رقم (2025/1) وذلك بإضافة كل من (يوليفيا، جزر فيرجين (المملكة المتحدة))، وحذف كلٍ من (كرو اتيا، جمهورية مالي، تنز انيا)، لتصبح القائمة كما



بالجدول أدناه، والأخذ بعين الاعتبار المخاوف المتعلقة بأوجه القصور في أنظمة مكافحة غسل الأموال وتمويل الإرهاب لهذه الدول (وفقاً للملحق المرفق بهذا القرار) وذلك عند اجراء التقييم الذاتي لمخاطر غسل الأموال وتمويل الإرهاب بما يشمل تحديد وتحليل وتقييم تلك المخاطر.

اسم الدولة	الرقم	اسم الدولة	الرقم
موناكو	13	الجزائر	1
جمهورية موزمبيق	14	أنغولا	2
جمهورية ناميبيا	15	بوليفيا	3
جمهورية نيبال الديمقراطية الاتحادية (نيبال)	16	بلغاريا	4
جمهورية نيجيريا	17	بوركينا فاسو	5
جمهورية جنوب افريقيا	18	الكاميرون	6
جمهورية جنوب السودان	19	ساحل العاج (كوت ديفوار)	7
الجمهورية العربية السورية (سوريا)	20	جمهورية الكونغو الديمقراطية	8
فنزويلا	21	جمهورية هايتي	9
فيتنام	22	جمهورية كينيا	10
جزر فيرجين (المملكة المتحدة)	23	جمهورية لاو الديمقراطية الشعبية (لاو)	11
الجمهورية اليمنية (اليمن)	24	جمهورية لبنان	12

# ثالثاً

#### التنفيذ

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

مديروحدة المتابعة المالية د. فراس مرار



المخاوف المتعلقة بأوجه القصور في أنظمة مكافحة غسل الأموال وتمويل الإرهاب



#### المخاوف المتعلقة بأوجه القصور في أنظمة مكافحة غسل الأموال وتموبل الارهاب في الدول

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

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

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

- أ. الوصول الى تقاربر التقييم المتبادل باللغة الإنجليزية (لكافة الدول).
  - 1. الدخول الى الموقع الالكتروني: www.fatf-gafi.org
  - 2. من قائمة المواضيع (Topics) نختار (Mutual Evaluations).
    - 3. أختر Mutual Evaluations Reports.
- 4. البحث عن اسم الدولة باللغة الإنجليزية على نافذة البحث الموضحة بالصورة الموضحة جانباً.
  - ب. الوصــول الى تقارير التقييم المتبادل باللغة العربية (للدول الخاضعة لتقييم مجموعة العمل المالي لمنطقة الشرق الأوسط وشمال أفريقيا).
    - 1. الدخول الى الموقع الالكتروني:
      - www.menafatf.org/ar .2
  - اختيار بند (التقييم المتبادل) ثم (تقارير التقييم الجولة الثانية من التقييم)، أو تقارير المتابعة.
    - 4. اختيار التقرير من القائمة التي تظهر حسب اسم الدولة.





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

قدّمت الدول المدرجة على القائمة الرمادية التزاماً سياسياً عالياً لمعالجة أوجه القصور الاستراتيجية المتعلقة بأنظمة مكافحة غسل الأموال وتمويل الإرهاب، وما زالت تلك الدول تنفذ التزاماتها لمعالجة باقي أوجه القصور.

وتوضح البنود ادناه المحاور الأساسية التي تعمل تلك الدول على معالجتها أو تلك التي تم معالجتها والتي تعتمد على أوجه القصور المحددة وفقاً لتقارير التقييم المتبادل وتقارير المتابعة، حيث يجب أخذها بعين الاعتبار سواء كانت سلبية أم إيجابية:

الدولة	المحاور الأساسية
Algeria	(Statement from October 2024)
8	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
Angola	organisations, without disrupting or discouraging legitimate activity.  In October 2024, Angola made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime. Angola should 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.



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In June 2025, Bolivia made a high-level political commitment to work with the FATF and GAFILAT to strengthen the effectiveness of its AML/CFT regime. Since the adoption of its MER in December 2023, Bolivia has made significant progress on the MER's recommended actions including enhancing its ML/TF risk understanding; enhancing the production and dissemination of operational and strategic financial intelligence; strengthening the seizure and forfeiture of criminal proceeds; increasing capacity to investigate TF offences; and improving its process to implement targeted financial sanctions on TF and PF. Bolivia will continue to work with the FATF to implement its FATF action plan by: (1) ensuring relevant special investigative techniques can be used in ML investigations; (2) implementing risk-based supervision of real estate agents, lawyers, accountants and DPMS; (3) ensuring that beneficial ownership information is accurate and up-to-date and breaches to obligations are sanctioned; (4) increasing ML investigations and prosecutions.

# 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 providing guidance and training on ML/TF risk understanding and STR reporting to postal money operators, currency exchange providers and real estate agents, addressing technical compliance issues in relation to its TF offence and ensuring the ability to conduct parallel financial investigations in all terrorism investigations. 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) improving investigations and prosecutions of different types of money laundering in line with risks, including high-scale corruption and organised crime; (3) addressing gaps in the PF TFS frameworks; and (4) demonstrating initial implementation of risk-based monitoring of NPOs to prevent abuse for TF purposes.

## Burkina Faso

In February 2021, Burkina Faso made a high-level political commitment to work with the FATF and GIABA to strengthen the effectiveness of its AML/CFT regime. At its June 2025 Plenary, the FATF made the initial determination that Burkina Faso has substantially completed its action plan and warrants an on-site assessment to verify that the implementation of the AML/CFT reforms has begun and is being sustained, and that the necessary political commitment remains in place to sustain implementation in the future.

Burkina Faso has made key reforms, including by: (1) adopting follow-up mechanisms for monitoring actions in the national strategy; (2) seeking MLA and other forms of international cooperation in line with its risk profile; (3) strengthening resource capacities of all AML/CFT supervisory authorities and implementing risk based supervision of FIs and DNFBPs; (4) maintaining comprehensive and up-to-date basic and beneficial ownership information and strengthening the system of sanctions for violations of transparency obligations;



(5) increasing the diversity of suspicious transactions reporting; (6) enhancing
the FIU's human resources through additional hiring, training and budget; (7)
conduct training for LEAs, prosecutors and other relevant authorities; (8)
demonstrating that authorities are pursuing confiscation as a policy objective;
(9) enhancing capacity and support for LEAs and prosecutorial authorities
involved in combatting TF, in line with the National TF Strategy; and (10)
implementing effective targeted financial sanctions regimes related to terrorist
financing and proliferation financing as well as risk-based monitoring and
supervision of NPOs.

#### Cameroon

Since June 2023, when Cameroon made a high-level political commitment to work with the FATF and GABAC to strengthen the effectiveness of its AML/CFT regime, Cameroon has taken steps to improve its AML/CFT regime by establishing and implementing an effective mechanism to maintain adequate, accurate and up-to-date beneficial information; prioritising the identification of TF activities, investigations and prosecutions in line with risk; and addressing technical deficiencies in its legal and institutional frameworks to implement targeted financial sanctions related to Recommendations 6 and 7. Cameroon should continue working on implementing its action plan to address its strategic deficiencies, including by: (1) enhancing risk-based supervision of banks and implementing effective risk-based supervision for non-bank FIs and DNFBPs, and conducting appropriate outreach to high-risk FIs and DNFBPs; (2) 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; (3) demonstrating that authorities are able to conduct a range of ML investigations, and prosecute ML in line with risks; (4) 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; (5) 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

Since October 2024, when 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, Côte d'Ivoire has taken steps to improve its AML/CFT regime by strengthening the technical compliance of its targeted financial sanctions framework with Recommendation 6. Côte d'Ivoire should continue working on implementing its action plan to address its strategic deficiencies, including 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 of BO obligations; (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 investigations and prosecutions of different types of ML and TF in line with the country's risk profile; and (6) strengthening the implementation of its targeted financial sanctions regime.

# 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 building the capacity of the FIU to conduct operational and strategic analysis. 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) strengthening the capabilities of authorities involved in the investigation and prosecution of ML and TF; and (3) demonstrating effective implementation of TF and PF-related TFS.

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

#### Haiti

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 implementing risk-based AML/CFT supervision for all financial institutions; and ensuring the FIU has adequate resources and processes to produce and disseminate operational and strategic analysis to competent authorities for combatting ML and TF. The FATF recognises the political commitment expressed at a high level and the efforts demonstrated by Haiti to advance its commitment in the midst of the challenging social, economic and security situation within the country. Haiti should continue 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 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) 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 have expired and work remains. The FATF encourages Haiti to continue to implement its action plan to address the above-mentioned strategic deficiencies.
Kenya	Since February 2024, when Kenya made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime, Kenya has taken steps towards improving its AML/CFT regime,
	including by updating its national AML/CFT strategies in line with the identified ML/TF risks. Kenya should continue to work to implement its FATF action plan to address its strategic deficiencies, including by: (1) presenting the results of the NRA and other risk assessments in a consistent manner to competent authorities and the private sector; (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 DNFBPs, 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 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.
Lao Pdr	In February 2025, Lao PDR made a high-level political commitment to work with the FATF and APG to strengthen the effectiveness of its AML/CFT regime. Since the adoption of its MER in August 2023, Lao PDR has made progress on some of the MER's recommended actions including increasing FIU resources and eliminating bearer shares. Lao PDR 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 casinos, banks and reporting entities in SEZs, including fit and proper checks; (3) enhancing the quality and quantity of financial intelligence analysis and spontaneous dissemination to law enforcement agencies; (4) ensuring law enforcement agencies receive training

and guidance on money laundering; (5) demonstrating an increase in ML



investigations and prosecutions in line with Lao PDR's risk profile, with an emphasis on crimes with a transnational element that require international cooperation; (6) developing a national confiscation policy consistent with its ML/TF risks; (7) demonstrating that relevant competent authorities are taking measures to identify, seize and, where applicable, confiscate proceeds and instrumentalities of crime in line with the risk profile; (8) monitoring FIs' and DNFBPs' compliance with TFS PF obligations; and (9) addressing technical compliance deficiencies in Recommendations 5, 6, 7 and 10.
(Statement from October 2024)
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 DNFBPs' risk understanding and applying effective, proportionate and dissuasive sanctions for breaches of AML/CFT obligations; (4) ensuring beneficial ownership information is up-to-date and that there are adequate sanctions and risk-mitigating in place for legal persons; (5) enhancing competent authorities' use of products of the FIU and financial intelligence; (6) demonstrating a sustained increase in investigations, prosecutions and court rulings for types of ML in line with the risk; (7) improving its approach to asset recovery and identifying and seizing illicit cross-border movements of currency and precious metals and stones; (8) pursuing TF investigations and sharing information with foreign partners related to investigations of TF as called for in the MER; (9) enhancing the implementation of targeted financial sanctions without delay, particularly at DNFBPs and certain non-banking financial institutions; and (10) undertaking targeted and risk-based monitoring of high-risk NPOs, without disrupting or discouraging legitimate NPO activities.
Since June 2024, when Monaco made a high-level political commitment to work with the FATF and MONEYVAL to strengthen the effectiveness of its AML/CFT regime, Monaco has taken steps towards improving its AML/CFT regime on



many of its action items, including those expiring this cycle by strengthening the understanding of risk in relation to ML and income tax fraud committed abroad, enhancing the application of sanctions for breaches of basic and beneficial ownership requirements and reviewing sentencing in ML cases and taking actions as appropriate to reinforce the need for effective, dissuasive and proportionate sanctions for ML. Monaco should continue to work with FATF to implement its action plan by: (1) demonstrating a sustained increase in outbound requests to identify and seek the seizure of criminal assets abroad (2) enhancing the application of sanctions for AML/CFT breaches; (3) completing its resourcing program for its FIU and strengthen the quality and timeliness of STR reporting; (4) enhancing judicial efficiency, including through increasing resources of prosecutors and the application of effective, dissuasive and proportionate sanctions for ML; and (5) increasing the seizure of property suspected to derive from criminal activities.

# 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. At its June 2025 Plenary the FATF made the initial determination that Mozambique 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.

Mozambique has made the following reforms including: (1) ensuring cooperation and coordination amongst relevant authorities to implement riskbased 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.



#### Namibia

Since February 2024, when Namibia made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime, Namibia has taken steps towards improving its AML/CFT regime, including by strengthening its AML/CFT risk based supervision through conducting offsite and onsite inspections informed by supervisory risk assessment tools; 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; 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; and approving the amended National Counter Terrorism Strategy. Namibia should continue working on implementing its FATF action plan to address strategic deficiencies, including by: (1) applying effective, proportionate and dissuasive sanctions for breaches of AML/CFT obligations; (2) improving the cooperation between the FIU and LEAs to enhance the use and integration of financial intelligence in investigations; (3) enhancing the operational capabilities of authorities involved in ML investigations and prosecutions by providing them with adequate resources and targeted trainings; (4) demonstrating the LEAs' capabilities to effectively investigate and prosecute ML/TF cases.

# Nepal

#### (Statement from February 2025)

In February 2025, Nepal made a high-level political commitment to work with the FATF and APG to strengthen the effectiveness of its AML/CFT regime. Since the adoption of its MER in August 2023, Nepal has made progress on some of the MER's recommended actions including streamlining MLA requests and increasing the capabilities of the FIU. Nepal will continue to work with the FATF to implement its FATF action plan by: (1) improving its understanding of key ML/TF risks; (2) improving risk-based supervision of commercial banks, higher risk cooperatives, casinos, DPMS and real estate sector; (3) demonstrating identification and sanctioning of materially significant illegal MVTS/hundi providers, without hindering financial inclusion; (4) increasing capacity and coordination of competent authorities to conduct ML investigations; (5) demonstrating an increase in ML investigations and prosecutions; (6) demonstrating measures to identify, trace, restrain, seize and, where applicable, confiscate proceeds and instrumentalities of crime in line with the risk profile; (7) addressing technical compliance deficiencies in its targeted financial sanctions regime for TF and PF.

# Nigeria

In February 2023, Nigeria made a high-level political commitment to work with the FATF and GIABA to strengthen the effectiveness of its AML/CFT regime. At



its June 2025 Plenary the FATF made the initial determination that Nigeria 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.

Nigeria has made the following reforms including: (1) completing its residual ML/TF risk assessment and updating its national AML/CFT strategy to ensure alignment with other national strategies relevant to high-risk predicate offences; (2) enhancing formal and informal international cooperation in line with its ML/TF risks; (3) improving AML/CFT risk-based supervision of FIs and DNFBPs and enhancing implementation of preventive measures for high-risk sectors; (4) ensuring that competent authorities have timely access to accurate and up-todate BO information on legal persons and applying sanctions for breaches of BO obligations; (5) demonstrating an increase in the dissemination of financial intelligence by the FIU and its use by LEAs; (6) demonstrating a sustained increase in ML investigations and prosecutions in line with ML risks; (7) proactively detecting violations of currency declaration obligations and apply appropriate sanctions and maintaining comprehensive data on frozen, seized, confiscated, and disposed assets; (8) demonstrating sustained increase in investigations and prosecutions of different types of TF activities in line with risk and enhancing interagency cooperation on TF investigations; and (9) conducting risk-based and targeted outreach to NPOs at risk of TF abuse and implementing risk-based monitoring for the subset of NPOs at risk of TF abuse without disrupting or discouraging legitimate NPO activities.

#### South Africa

In February 2023, South Africa made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime. At its June 2025 Plenary the FATF made the initial determination that South Africa 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.

South Africa has made the following reforms including: (1) demonstrating a sustained increase in outbound MLA requests that help facilitate ML/TF investigations and confiscations of different types of assets in line with its risk profile; (2) improving risk-based supervision of DNFBPs and demonstrating that all AML/CFT supervisors apply effective, proportionate, and effective sanctions for noncompliance; (3) ensuring that competent authorities have timely access to accurate and up-to-date BO information on legal persons and arrangements and applying sanctions for breaches of violation by legal persons to BO obligations; (4) demonstrating a sustained increase in law enforcement agencies' requests for financial intelligence from the FIC for its ML/TF investigations; (5) demonstrating a sustained increase in investigations and



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	prosecutions of serious and complex money laundering and the full range of TF activities in line with its risk profile; (6) enhancing its identification, seizure and confiscation of proceeds and instrumentalities of a wider range of predicate crimes, in line with its risk profile; (7) updating its TF Risk Assessment to inform the implementation of a comprehensive national counter financing of terrorism strategy; and (8) ensuring the effective implementation of targeted financial sanctions and demonstrating an effective mechanism to identify individuals and entities that meet the criteria for domestic designation.
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 implementing all the relevant provisions of the Vienna Convention, and Terrorist Financing Conventions into its domestic law in compliance with international standards and developing AML/CFT guidance for FIs, which includes requirements for preventive measures. South Sudan should continue to work to implement its action plan, including by: (1) ensuring that competent authorities are suitably structured and capacitated to implement a risk-based approach to AML/CFT supervision for financial institutions; (2) developing a comprehensive legal framework to collect and verify the accuracy of beneficial ownership information for legal persons; (3) finalising the operationalisation of a fully functioning and independent FIU; (4) establishing and implementing the legal and institutional framework to implement targeted financial sanctions in compliance with United Nations Security Council Resolutions on terrorism and WMD proliferation financing; and (5) commencing implementation of targeted risk-based supervision/monitoring of NPOs at risk of TF abuse.
	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.
Sauri e	(Statement from February 2023)
Syria	Since Enhruany 2010, when Syria made a high level political commitment to
	Since February 2010, when Syria made a high-level political commitment to work with the FATF and MENAFATF to address its strategic AML/CFT deficiencies, Syria has made progress to improve its AML/CFT regime. In June 2014, the FATF determined that Syria had substantially addressed its action plan at a technical level, including by criminalising terrorist financing and establishing procedures for freezing terrorist assets. While the FATF determined that Syria has completed its agreed action plan, due to the security situation, the FATF has

been unable to conduct an on-site visit to confirm whether the process of



	implementing the required reforms and actions has begun and is being sustained. The FATF will continue to monitor the situation, and will conduct an
	on-site visit at the earliest possible date.
Venezuela	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. Venezuela should continue working on implementing its FATF action plan to address its strategic deficiencies 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.  In particular, the FATF is especially concerned about Venezuela's approach to conducting oversight of the NPO sector; the FATF calls on Venezuela to urgently consider whether certain sections of the November 2024 NPO law should be reexamined and potentially altered so that it is in line with the FATF's risk-based approach for supervision of the NPO sector and the FATF's best practices on Recommendation 8.
Vietnam	Since June 2023, when Vietnam made a high-level political commitment to work with the FATF and APG to strengthen the effectiveness of its AML/CFT regime, Vietnam has taken steps towards improving its AML/CFT regime, including by ensuring the independence of the FIU. Vietnam should continue working on implementing its FATF 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) conducing outreach activities with the private sector; (7) establishing a regime that provides competent authorities with adequate, accurate and up-to-date information on beneficial ownership; (8) enhancing the quality and quantity of financial intelligence analysis and 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.

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

# Virgin Islands (UK)

In June 2025, the Virgin Islands (UK) made a high-level political commitment to work with the FATF and CFATF to strengthen the effectiveness of its AML/CFT regime. Since the adoption of its MER in November 2023, the Virgin Islands (UK) has made significant progress on its MER's recommended actions including increasing requests for international cooperation; establishing a CFT strategy and enhancing the analytical processes to identify TF cases; conducting a risk assessment of the NPO sector and identifying the specific NPOs at risk of TF abuse; improving coordination, outreach and training to implement TF and PFrelated targeted financial sanctions; and enhancing supervision and monitoring of FI and DNFBP's implementation of targeted financial sanctions. The Virgin Islands (UK) will continue to work with the FATF to implement its FATF action plan by: (1) enhancing risk-based supervision of TCSPs, Investment Businesses and VASPs; (2) ensuring that accurate and up-to-date beneficial ownership information is available to competent authorities and breaches to obligations are sanctioned; (3) improving the quality of SARs and ensuring that reporting is in line with risk; (4) systematically pursuing ML investigations and prosecutions in line with risk; (5) increasing the seizure and confiscation of criminal proceeds; and (6) operationalising the new asset management framework.

#### 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.

#### القسم الثالث: الدول التي تم حذفها من القائمة الرمادية

#### Jurisdiction No Longer Subject to Increased Monitoring by the FATF

#### Croatia

The FATF welcomes Croatia's significant progress in improving its AML/CFT regime. Croatia strengthened the effectiveness of its AML/CFT regime to meet the commitments in its action plan regarding the strategic deficiencies that the FATF identified in June 2023 by: (1) completing the national risk assessment, including assessing the ML/TF risk associated with the misuse of legal persons and legal arrangements and the use of cash in the real estate sector; (2) increasing FIU human resources and improving analytical capabilities; (3) continuing to improve LEA detection, investigation and prosecution of different types of ML, including ML involving foreign predicate offences and the misuse of legal persons; (4) demonstrating a sustained increase in the application of provisional measures in securing direct/indirect proceeds, as well as foreign proceeds subject to confiscation; (5) demonstrating the ability to systematically detect and where relevant investigate TF in line with its risk profile; (6) establishing a national framework for the implementation of UN TFS measures and providing guidance and conducting outreach and training to reporting entities; and (7) identifying the subset of NPOs most vulnerable to TF abuse and providing targeted outreach to NPOs and to the donor community on potential vulnerabilities of NPOs to TF abuse. Croatia is therefore no longer subject to the FATF's increased monitoring process.

Croatia should continue to work with MONEYVAL to sustain its improvements in its AML/CFT system. The FATF encourages Croatia to continue its outreach on TF risks to the NPO sector and the donor community.



#### Mali

The FATF welcomes Mali's significant progress in improving its AML/CFT regime. Mali strengthened the effectiveness of its AML/CFT regime to meet the commitments in its action plan regarding the strategic deficiencies that the FATF identified in October 2021 by: (1) disseminating the results of the NRA to all relevant stakeholders including by conducting awareness raising activities with the highest risk sectors; (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 targeted financial sanctions; and (8) implementing a risk-based approach for supervision of the NPO sector to prevent abuse for TF purposes. Mali is therefore no longer subject to the FATF's increased monitoring process.

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

# United Republic Of Tanzania

The FATF welcomes the United Republic of Tanzania's significant progress in improving its AML/CFT regime. The United Republic of Tanzania strengthened the effectiveness of its AML/CFT regime to meet the commitments in its action plan regarding the strategic deficiencies that the FATF identified in October 2022 by: (1) 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. The United Republic of Tanzania is therefore no longer subject to the FATF's increased monitoring process.

The United Republic of Tanzania should continue to work with ESAAMLG to sustain its improvements in its AML/CFT system.