



سلطة النقد الفلسطينية
PALESTINE MONETARY AUTHORITY

تعميم رقم (53 / 2023)
إلى كافة المصارف العاملة في فلسطين
التاريخ: الأربعاء، 01 آذار، 2023

الموضوع: الدول مرتفعة المخاطر والدول تحت المتابعة المعززة

مرفق طيه نسخة عن القرار الصادر عن السادة وحدة المتابعة المالية رقم (2023/01) بتاريخ 2023/02/26 بشأن الدول مرتفعة المخاطر والدول تحت المتابعة المعززة وفقاً للقائمة الصادرة عن مجموعة العمل المالي (FATF). وعليه، يطلب اتخاذ المقتضى القانوني اللازم لتنفيذ متطلبات القرار المشار إليه أعلاه، والتدابير الواجب اتخاذها بالخصوص، مع التأكيد على ضرورة الالتزام بما يلي:

1. الأخذ بعين الاعتبار المخاوف المتعلقة بأوجه القصور في أنظمة مكافحة غسل الأموال وتمويل الإرهاب في الدول المصنفة ضمن القائمة الرمادية "الدول تحت المتابعة المعززة"، وذلك عند إجراء وتحديث التقييم الذاتي لمخاطر غسل الأموال وتمويل الإرهاب.
2. تطبيق النهج القائم على المخاطر RBA، بحيث يكون تطبيق إجراءات العناية الواجبة متناسب مع (نتائج تحليل المخاطر، وطبيعة مخاطر العملية المالية، ومخاطر العملاء، وتصنيف الدول)، على أن يتم بذل إجراءات عناية واجبة معززة عند إدراك وجود مخاطر مرتفعة.

مجموعة الرقابة

سلطة النقد الفلسطينية

نسخة: السادة/ وحدة المتابعة المالية المحترمون



قرار رقم (2023/1)
صادر عن وحدة المتابعة المالية
بتاريخ 2023/02/26م

بشأن قوائم الدول مرتفعة المخاطر والدول تحت المتابعة المعززة

استناداً إلى أحكام 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 (ج/8) الصادر بتاريخ 2016/12/01م، بشأن تفويض وحدة المتابعة المالية بنشر قائمة الدول عالية المخاطر والتي تصدر بشكل دوري عن مجموعة العمل المالي (FATF)، ولاحقاً لما تقرر عن المجموعة منذ تاريخ 2020/02/21، وحتى تاريخ 2023/02/24م، وعطفاً على قرار اللجنة الوطنية لمكافحة غسل الأموال وتمويل الإرهاب رقم (ت/5) الصادر بتاريخ 2020/02/24م بشأن الدول مرتفعة المخاطر والدول تحت المتابعة المعززة، ولاحقاً إلى قرار وحدة المتابعة رقم (2020/1) بتاريخ 2020/02/25م والقرارات اللاحقة له بشأن قوائم الدول مرتفعة المخاطر والدول تحت المتابعة المعززة، وبناءً على مقتضيات المصلحة العامة، تقرر ما يلي:

أولاً

قائمة الدول مرتفعة المخاطر (القائمة السوداء)

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

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



FINANCIAL FOLLOW-UP UNIT
وحدة المتابعة المالية



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

ثانياً

قائمة الدول تحت المتابعة المعززة (القائمة الرمادية)

تعديل قائمة الدول تحت المتابعة المعززة (القائمة الرمادية) المنصوص عليها في قرار الوحدة رقم (2022/3) وذلك بحذف كل من (المملكة المغربية، مملكة كمبوديا) من القائمة، وإضافة كل من (جمهورية جنوب أفريقيا، جمهورية نيجيريا) لتصبح القائمة كما بالجدول أدناه، والأخذ بعين الاعتبار المخاوف المتعلقة بأوجه القصور في أنظمة مكافحة غسل الأموال وتمويل الإرهاب





لهذه الدول (وفقاً للملحق المرفق بهذا القرار) وذلك عند اجراء التقييم الذاتي لمخاطر غسل الأموال وتمويل الإرهاب بما يشمل تحديد وتحليل وتقييم تلك المخاطر.

الرقم	اسم الدولة	الرقم	اسم الدولة
1	جمهورية ألبانيا	13	جمهورية بنما
2	بربادوس	14	جمهورية الفلبين
3	بوركيينا فاسو	15	جمهورية السنغال
4	جزر الكايمن	16	جمهورية جنوب افريقيا
5	جمهورية كوتغو الديمقراطية	17	جمهورية جنوب السودان
6	جبل طارق	18	الجمهورية العربية السورية (سوريا)
7	جمهورية هايتي	19	جمهورية تنزانيا
8	جامايكا	20	الجمهورية التركية
9	المملكة الأردنية الهاشمية (الأردن)	21	جمهورية اوغندا
10	جمهورية مالي	22	الإمارات العربية المتحدة
11	جمهورية موزمبيق	23	الجمهورية اليمنية (اليمن)
12	جمهورية نيجيريا	-	-

ثالثاً

التنفيذ

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

مدير وحدة المتابعة المالية

د. فراس مرار

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

المخاوف المتعلقة بأوجه القصور في نظام مكافحة غسل الأموال وتمويل الإرهاب

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

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

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

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

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

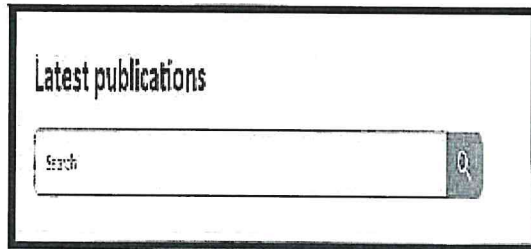
1. الدخول الى الموقع الالكتروني:

www.fatf-gafi.org

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

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

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



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

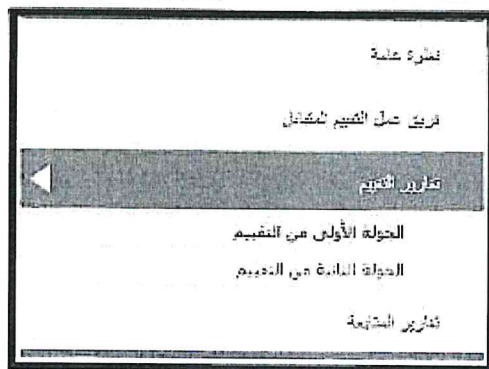
1. الدخول الى الموقع الالكتروني:

www.menafatf.org/ar

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

التقييم)، أو تقارير المتابعة.

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



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

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

الدولة	المحاور الأساسية
Albania	Since February 2020, when Albania made a high-level political commitment to work with the FATF and MONEYVAL to strengthen the effectiveness of its AML/CFT regime, Albania has taken steps towards improving its AML/CFT regime, including by demonstrating a meaningful increase in the number of money laundering cases indicted, particularly those stemming from foreign offences where the criminal proceeds were laundered in Albania. The FATF has made the initial determination that Albania has substantially completed its action plan and appreciates Albania's work to address its strategic deficiencies. However, the FATF has not yet decided to authorise an on-site visit to the country to verify the implementation of Albania's AML/CFT reforms. This is because the FATF remains concerned that Albania's apparent plans to establish a Voluntary Tax Compliance (VTC) programme do not comply with the FATF's principles for managing the AML/CFT implications of VTC programmes or FATF's best practices in this area. Albania should ensure that any amnesty provisions included in the VTC law do not present an opportunity for individuals or legal persons to legalise or repatriate assets of unlawful origin and that any criminal amnesty only relates to the previous incorrect or non-reporting of taxable income. Albania should revise its draft VTC law and work with MONEYVAL to ensure that any VTC law passed or implemented has adequate safeguards to prevent the potential for abuse of the programme for money laundering purposes. Alternatively, it could consider abandoning the planned VTC programme altogether.
Barbados	Since February 2020, when Barbados made a high-level political commitment to work with the FATF and CFATF to strengthen the effectiveness of its AML/CFT regime, Barbados has taken steps towards improving its AML/CFT regime, including by, taking appropriate measures to prevent legal persons and arrangements from being misused for criminal purposes, and by demonstrating that ML investigations and prosecutions are in line with the country's risk profile. Barbados should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) ensuring that accurate and up-to-date beneficial ownership information is available on a timely basis; (2) further pursuing repatriation or sharing of confiscated assets with other countries. The FATF expresses concern that Barbados failed to complete its action plan, which fully expired in April 2022. The FATF strongly urges Barbados to swiftly

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	demonstrate significant progress in completing its action plan by June 2023 or the FATF will consider next steps if there is insufficient progress
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 increasing ML investigations and the use of international cooperation in line with its risk profile. Burkina Faso should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) updating its understanding of ML/TF risks, including through the revision of the national risk assessment in line with the sectoral priorities identified in its national strategy; (2) strengthening of resource capacities of all AML/CFT supervisory authorities and implementing risk based supervision of FIs and DNFBPs; (3) maintaining comprehensive and updated basic and beneficial ownership information of legal persons and strengthening the system of sanctions for violations of transparency obligations; (4) increasing the diversity of suspicious transactions reporting; (5) establishing procedures for effective implementation of declaration of cross-border declaration of currencies and bearer negotiable instruments; (6) enhancing cooperation between LEAs and prosecutorial authorities combatting TF and conducting TF investigations and prosecutions in line with its risk profile; and (7) implementing an effective targeted financial sanctions regime related to TF and PF as well as risk-based monitoring and supervision of NPOs. The FATF notes Burkina Faso's continued progress across its action plan, however all deadlines have now expired and work remains. The FATF encourages Burkina Faso to continue to implement its action plan to address the above-mentioned strategic deficiencies as soon as possible.
The Cayman Islands	Since February 2021, when the Cayman Islands made a high-level political commitment to work with the FATF and CFATF to strengthen the effectiveness of its AML/CFT regime, the Cayman Islands has taken steps towards improving its AML/CFT regime, including by advancing ML prosecutions into convictions and demonstrating progress on complex ML cases with a foreign predicate. However, the Cayman Islands should continue to work on implementing its action plan to address its remaining strategic deficiencies, by demonstrating that they are prosecuting all types of money laundering cases in line with the jurisdiction's risk profile and that such prosecutions are resulting in the application of dissuasive, effective, and proportionate sanctions. The FATF expresses concern that the Cayman Islands failed to complete its action plan, which fully expired in May 2022. The FATF strongly urges the Cayman Islands to swiftly demonstrate significant progress in completing its action plan by June 2023 or the FATF will consider next steps if there is insufficient progress.

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The Democratic Republic of the Congo	(Statement from October 2022) In October 2022, the DRC made a high-level political commitment to work with the FATF and GABAC to strengthen the effectiveness of its AML/CFT regime. Since the adoption of its MER in October 2020, the DRC has made progress on some of the MER's recommended actions including making confiscation of proceeds of crime a policy priority. The DRC will work to implement its FATF action plan by: (1) finalising the NRA on ML and TF and adopting an AML/CFT national strategy; (2) designating supervisory authorities for all DNFBP sectors, and developing and implementing a risk-based supervision plan; (3) adequately resourcing the FIU, and build its capacity to conduct operational and strategic analysis; (4) strengthening the capabilities of authorities involved in the investigation and prosecution of ML and TF; and (5) demonstrating effective implementation of TF and PF-related TFS.
Gibraltar	Since June 2022, when Gibraltar made a high-level political commitment to work with the FATF and MONEYVAL to strengthen the effectiveness of its AML/CFT regime, Gibraltar has taken steps to do so, including by demonstrating that the supervisors for trust and company service providers, lawyers, gaming businesses, real estate agents, and other non-bank entities are now using a range of effective, proportionate, and dissuasive sanctions for AML/CFT breaches, specifically by taking more enforcement actions, imposing financial penalties, and publishing the results of cases, where appropriate. Gibraltar should continue to work on implementing its action plan to address its strategic deficiencies, including by showing that it is able to pursue more final confiscation judgments commensurate with the risk and context of Gibraltar.
Haiti	In June 2021, Haiti made a high-level political commitment to work with the FATF and CFATF to strengthen the effectiveness of its AML/CFT regime. The FATF recognises the political commitment expressed at a high level and the efforts demonstrated by Haiti to advance its commitments in the midst of the challenging social, economic and security situation within the country. Haiti should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) completing its ML/TF risk assessment process and disseminating the findings; (2) facilitating information sharing with relevant foreign counterparts; (3) addressing the technical deficiencies in its legal and regulatory framework that impede the implementation of AML/CFT preventive measures and implementing risk-based AML/CFT supervision for all financial institutions and DNFBPs deemed to constitute a higher ML/TF risk; (4) ensuring basic and beneficial ownership information are maintained and accessible in a timely manner; (5) ensuring a better use of financial intelligence and other relevant information by competent authorities for combatting ML and TF; (6) addressing the technical deficiencies in its ML offence and demonstrating authorities are

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	Identifying, investigating and prosecuting ML cases in a manner consistent with Haiti's risk profile; (7) demonstrating an increase of identification, tracing and recovery of proceeds of crimes; (8) addressing the technical deficiencies in its TF offence and targeted financial sanctions regime; and (9) conducting appropriate risk-based monitoring of NPOs vulnerable to TF abuse without disrupting or discouraging legitimate NPO activities.
Jamaica	Since February 2020, when Jamaica made a high-level political commitment to work with the FATF and CFATF to strengthen the effectiveness of its AML/CFT regime, Jamaica has taken steps towards improving its AML/CFT regime, including by introducing its Charities regulations and bringing the microcredit sector under AML/CFT supervision. Jamaica should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) including all DNFBPs in the AML/CFT regime and ensuring adequate, risk-based supervision in all sectors; and (2) ensuring that BO definition is in line with the FATF Standards, taking appropriate measures to prevent legal persons and arrangements from being misused for criminal purposes, and ensuring that accurate and up-to-date basic and beneficial ownership information is available on a timely basis to competent authorities. The FATF again expresses concern that Jamaica failed to complete its action plan, which fully expired in January 2022. The FATF strongly urges Jamaica to swiftly demonstrate significant progress in completing its action plan by June 2023 or the FATF will consider next steps, which could include calling on its members and urging all jurisdictions to apply enhanced due diligence to business relations and transactions with Jamaica.
Jordan	Since October 2021, when Jordan made a high-level political commitment to work with the FATF and MENAFATF to strengthen the effectiveness of its AML/CFT regime, Jordan has taken positive steps towards improving its AML/CFT regime, including by conducting inspections of reporting entities including FIs and DNFBPs, pursuing money laundering investigations and prosecutions for predicate offences in line with its risk profile, and conducting outreach on TFS obligations. Jordan should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) completing and disseminating the ML/TF risk assessments of legal persons and virtual assets; (2) applying effective, proportionate, and dissuasive sanctions for noncompliance; (3) implementing a sanctions mechanism for violations of the transparency obligations related to legal persons and arrangements; (4) applying effective, proportionate, and dissuasive sanctions in ML cases; and (5) demonstrating that TFS deficiencies are rectified.

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Mali	In October 2021, Mali made a high-level political commitment to work with the FATF and GIABA to strengthen the effectiveness of its AML/CFT regime. Mali has taken steps towards improving its AML/CFT regime, including by conducting AML/CFT trainings for FIs and DNFBPs and enhancing the FIU and LEAs cooperation mechanisms on the use of financial intelligence. Mali should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) implementing the national strategic AML/CFT action plan in line with the NRA; (2) developing and starting to implement a risk based approach for the AML/CFT supervision of all FIs and higher risk DNFBPs and demonstrating effective, proportionate and dissuasive sanctions for non-compliance; (3) conducting a comprehensive assessment of ML/TF risks associated with all types of legal persons; (4) increasing the capacity of the FIU and the LEAs and enhancing their cooperation on the use of financial intelligence; (5) conducting parallel financial investigation; (6) strengthening the capacities of relevant authorities responsible for investigation and prosecution of TF cases; (7) strengthening the legal framework and procedures to implement TFS related to TF and PF; and (8) implementing a risk-based approach for supervision of the NPO sector to prevent abuse for TF purposes.
Mozambique	(Statement from October 2022) In October 2022, Mozambique made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime. Since the adoption of its MER in April 2021, Mozambique has made progress on some of the MER's recommended actions to improve its system including by finalising its NRA and strengthening its asset confiscation efforts. Mozambique will work to implement its FATF action plan by: (1) ensuring cooperation and coordination amongst relevant authorities to implement risk-based AML/CFT strategies and policies; (2) conducting training for all LEAs on mutual legal assistance to enhance the gathering of evidence or seizure/confiscation of proceeds of crime; (3) providing adequate financial and human resources to supervisors, developing and implementing a risk-based supervision plan; (4) providing adequate resources to the authorities to commence the collection of adequate, accurate and up-to-date beneficial ownership information of legal persons; (5) increasing the human resources of the FIU as well as increasing financial intelligence sent to authorities; (6) demonstrating LEAs capability to effectively investigate ML/TF cases using financial intelligence; (7) conducting a comprehensive TF Risk Assessment and begin implementing a comprehensive national CFT strategy; (8) increasing awareness on TF and PF-related TFS; and (9) carrying out the TF risk assessment

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	for NPOs in line with the FATF Standards and using it as a basis to develop an outreach plan.
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. Since the adoption of its MER in August 2021, Nigeria has made progress on some of the MER's recommended actions to improve its system including by improving its AML/CFT legislative framework, updating its assessment of inherent ML/TF/PF risks and strengthened its implementation of targeted financial sanctions. Nigeria will work to implement its FATF action plan by: (1) completing its residual ML/TF risk assessment and updating its national AML/CFT strategy to ensure alignment with other national strategies relevant to high-risk predicate offences; (2) enhancing formal and informal international cooperation in line with ML/TF risks; (3) improving AML/CFT risk-based supervision of FIs and DNFBPs and enhancing implementation of preventive measures for high-risk sectors; (4) ensuring that competent authorities have timely access to accurate and up-to-date BO information on legal persons and applying sanctions for breaches of BO obligations; (5) demonstrating an increase in the dissemination of financial intelligence by the FIU and its use by LEAs; (6) demonstrating a sustained increase in ML investigations and prosecutions in line with ML risks; (7) proactively detecting violations of currency declaration obligations and apply appropriate sanctions and maintaining comprehensive data on frozen, seized, confiscated, and disposed assets; (8) demonstrating sustained increase in investigations and prosecutions of different types of TF activities in line with risk and enhancing interagency cooperation on TF investigations; and (9) conducting risk-based and targeted outreach to NPOs at risk of TF abuse and implementing risk-based monitoring for the subset of NPOs at risk of TF abuse without disrupting or discouraging legitimate NPO activities.
Panama	Since June 2019, when Panama made a high-level political commitment to work with the FATF and GAFILAT to strengthen the effectiveness of its AML/CFT regime, Panama has taken important steps towards improving its AML/CFT regime, including by demonstrating its ability to investigate and prosecute ML involving foreign tax crimes. However, Panama should continue to take action to fully address remaining measures in its action plan as all timelines have already expired in January 2021. Panama should therefore continue to work on implementing its action plan to address its strategic deficiencies, by ensuring adequate verification, of up-to-date beneficial ownership information by obliged entities and timely access by competent authorities.

	The FATF again expresses concern that Panama failed to complete its action plan, which fully expired in January 2021. The FATF strongly urges Panama to swiftly complete its action plan by June 2023 or the FATF will consider calling on its members and urging all jurisdictions to apply enhanced due diligence to business relations and transactions with Panama.
Philippines	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. The Philippines should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) demonstrating that effective risk-based supervision of DNFBPs is occurring; (2) demonstrating that supervisors are using AML/CFT controls to mitigate risks associated with casino junkets; (3) enhancing and streamlining LEA access to BO information and taking steps to ensure that BO information is accurate and up-to-date; (4) demonstrating an increase in the use of financial intelligence and an increase in ML investigations and prosecutions in line with risk; (5) demonstrating an increase in the identification, investigation and prosecution of TF cases; and (6) enhancing the effectiveness of the targeted financial sanctions framework for both TF and PF by demonstrating that DNFBPs understand their obligations. The FATF notes the Philippines' continued progress across its action plan, however all deadlines have now expired and work remains. The FATF encourages the Philippines to continue to implement its action plan to address the above-mentioned strategic deficiencies as soon as possible.
Senegal	Since February 2021, when Senegal made a high-level political commitment to work with the FATF and GIABA to strengthen the effectiveness of its AML/CFT regime, Senegal has established a database to collect statistics and data on ML/TF investigations and prosecutions and enhanced the framework for coordination and conduct of TF investigations. Senegal should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) improving compliance by detecting AML/CFT violations and imposing effective, proportionate and dissuasive sanctions against non-compliant DNFBPs; (2) updating and maintaining comprehensive beneficial ownership information on legal persons and arrangements and strengthening the system of sanctions for violations of transparency obligations; (3) enhancing capacity and support for LEAs and prosecutorial authorities involved in combatting TF in line with the 2019 TF National Strategy; and (4) implementing an effective TFS regime related to TF and PF as well as risk-based monitoring and supervision of NPOs. The FATF notes Senegal's continued progress across its action plan, however all deadlines have now expired and work remains. The FATF urges Senegal to swiftly

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	implement its action plan to address the above-mentioned strategic deficiencies as soon as possible.
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. Since the adoption of its MER in June 2021, South Africa has made significant progress on many of the MER's recommended actions to improve its system including by developing national AML/CFT policies to address higher risks and newly amending the legal framework for TF and TFS, among others. South Africa will work to implement its FATF action plan by: (1) demonstrating a sustained increase in outbound MLA requests that help facilitate ML/TF investigations and confiscations of different types of assets in line with its risk profile; (2) improving risk-based supervision of DNFBPs and demonstrating that all AML/CFT supervisors apply effective, proportionate, and effective sanctions for noncompliance; (3) ensuring that competent authorities have timely access to accurate and up-to-date BO information on legal persons and arrangements and applying sanctions for breaches of violation by legal persons to BO obligations; (4) demonstrating a sustained increase in law enforcement agencies' requests for financial intelligence from the FIC for its ML/TF investigations; (5) demonstrate a sustained increase in investigations and prosecutions of serious and complex money laundering and the full range of TF activities in line with its risk profile; (6) enhancing its identification, seizure and confiscation of proceeds and instrumentalities of a wider range of predicate crimes, in line with its risk profile; (7) updating its TF Risk Assessment to inform the implementation of a comprehensive national counter financing of terrorism strategy; and (8) ensuring the effective implementation of targeted financial sanctions and demonstrating an effective mechanism to identify individuals and entities that meet the criteria for domestic designation.
South Sudan	In June 2021, South Sudan made a high-level political commitment to work with the FATF to strengthen the effectiveness of its AML/CFT regime. South Sudan should continue to work to implement its action plan, including by: (1) conducting a comprehensive review of the AML/CFT Act (2012), with the support of international partners, including technical assistance, to comply with the FATF Standards; (2) becoming a party to and fully implementing the 1988 Vienna Convention, the 2000 Palermo Convention, and the 1999 Terrorist Financing Convention; (3) ensuring that competent authorities are suitably structured and capacitated to implement a risk-based approach to AML/CFT supervision for financial institutions; (4) developing a comprehensive legal framework to collect and verify the accuracy of beneficial ownership information for legal persons; (5) operationalising a fully functioning and independent FIU; (6) establishing and

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	implementing the legal and institutional framework to implement targeted financial sanctions in compliance with United Nations Security Council Resolutions on terrorism and WMD proliferation financing; and (7) commencing implementation of targeted risk-based supervision/monitoring of NPOs at risk of TF abuse. The FATF notes South Sudan's limited progress across its action plan. The FATF again encourages South Sudan to continue to demonstrate its strong political and institutional commitment to strengthen the effectiveness of its AML/CFT regime, particularly in supporting the lead AML/CFT agency in coordinating national AML/CFT efforts.
Syria	Since February 2010, when Syria made a high-level political commitment to work with the FATF and MENAFATF to address its strategic AML/CFT deficiencies, Syria has made progress to improve its AML/CFT regime. In June 2014, the FATF determined that Syria had substantially addressed its action plan at a technical level, including by criminalising terrorist financing and establishing procedures for freezing terrorist assets. While the FATF determined that Syria has completed its agreed action plan, due to the security situation, the FATF has been unable to conduct an on-site visit to confirm whether the process of implementing the required reforms and actions has begun and is being sustained. The FATF will continue to monitor the situation, and will conduct an on-site visit at the earliest possible date.
Tanzania	(Statement from October 2022) In October 2022, Tanzania made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime. Since the adoption of its MER in April 2021, Tanzania has made progress on some of the MER's recommended actions to improve its system including by developing legal framework for TF and TFS and disseminating FIU strategic analysis. Tanzania will work to implement its FATF action plan by: (1) improving risk-based supervision of FIs and DNFBPs, including by conducting inspections on a risk-sensitive basis and applying effective, proportionate, and dissuasive sanctions for non-compliance; (2) demonstrating authorities' capability to effectively conduct a range of investigations and prosecutions of ML in line with the country's risk profile; (3) demonstrating that LEAs are taking measures to identify, trace, seize, and confiscate proceeds and instrumentalities of crime; (4) conducting a comprehensive TF Risk Assessment and begin implementing a comprehensive national CFT strategy as well as demonstrating capability to conduct TF investigations and pursue prosecutions in line with the country's risk profile; (5) increasing awareness of the private sector and competent authorities on TF and

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	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.
Turkey	Since October 2021, when Türkiye made a high-level political commitment to work with the FATF to strengthen the effectiveness of its AML/CFT regime, Türkiye has taken further steps towards improving its AML/CFT regime, including by issuing regulations regarding politically exposed persons and guidance to the private sector on detecting terrorist financing, as well as increasing the FIU's proactive dissemination of financial intelligence. Türkiye should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) increasing on-site inspections by supervisors across all sectors, commensurate with risk; (2) enhancing the use of financial intelligence to support ML investigations; (3) undertaking more complex ML investigations and prosecutions; (4) using statistics on confiscation and terrorist financing to update risk assessments and inform policy; (5) conducting more financial investigations in terrorism cases, prioritising TF investigations and prosecutions related to UN-designated groups, and ensuring TF investigations are extended to identify financing and support networks; (6) concerning targeted financial sanctions, pursuing outgoing requests to third-countries related to UN-designated groups, in line with Türkiye's risk profile; and (7) fully implementing a risk-based approach for the supervision of non-profit organisations to prevent their abuse for terrorist financing, including by taking steps to ensure that audits conducted are risk-based, that supervision does not disrupt or discourage legitimate NPO activity such as fundraising, and that sanctions applied are proportionate to any violations. The FATF continues to monitor that Türkiye's oversight of the NPO sector is in line with the risk-based approach as set out in the FATF Standards.

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Uganda	Since February 2020, when Uganda made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime, Uganda demonstrated progress, including demonstrating LEAs and judicial authorities apply the ML offence consistent with the identified risks, and establishing and implementing policies and procedures for identifying, tracing, seizing and confiscating proceeds and instrumentalities of crime. Uganda should continue to work to implement its action plan to address its strategic deficiencies, including by: (1) developing and implementing risk-based supervision of FIs and DNFBPs; (2) ensuring that competent authorities have timely access to accurate basic and beneficial ownership information for legal entities; and (3) addressing the technical deficiencies in the legal framework to implement PF-related targeted financial sanctions. The FATF continues to monitor Uganda's oversight of the NPO sector to encourage the application of the risk-based approach to supervision of NPOs in line with the FATF Standards and mitigate unintended consequences. The FATF expresses concern that Uganda failed to complete its action plan, which fully expired in May 2022. The FATF strongly urges Uganda to swiftly demonstrate significant progress in completing its action plan by June 2023 or the FATF will consider next steps if there is insufficient progress.
The United Arab Emirates	Since February 2022, when the United Arab Emirates (UAE) made a high-level political commitment to work with the FATF and MENAFATF to strengthen the effectiveness of its AML/CFT regime, the UAE demonstrated significant progress, including by demonstrating a sustained increase in outbound MLA requests to help facilitate the investigation of TF, ML, and high-risk predicates, showing greater use of financial intelligence to pursue high-risk ML threats, and combating UN sanctions evasion, including by demonstrating a better understanding among the private sector. The UAE should continue to work to implement its FATF action plan by: (1) enhancing and maintaining a shared understanding of the ML/TF risks between the different DNFBP sectors and institutions; (2) showing an increase in the number and quality of STRs filed by FIs and DNFBPs; (3) ensuring a more granular understanding of the risk of abuse of legal persons and, where applicable, legal arrangements, for ML/TF; and (4) demonstrating a sustained increase in effective investigations and prosecutions of different types of ML cases consistent with UAE's risk profile.
Yemen	Since February 2010, when Yemen made a high-level political commitment to work with the FATF and MENAFATF to address its strategic AML/CFT deficiencies, Yemen has made progress to improve its AML/CFT regime. In June 2014, the FATF

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

Jurisdiction No Longer Subject to Increased Monitoring by the FATF	
Morocco	The FATF welcomes Morocco's significant progress in improving its AML/CFT regime. Morocco 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 related to improving its international cooperation mechanisms, strengthening AML/CFT supervision, strengthening transparency of legal persons by ensuring timely access to accurate beneficial ownership information, strengthening the capacities of the FIU, enhancing capacities to conduct ML investigation and confiscate the proceeds of crime and improving effectiveness of the targeted financial sanctions regime. Morocco is therefore no longer subject to the FATF's increased monitoring process. Morocco should continue to work with MENAFATF to sustain its improvements in its AML/CFT system.
Cambodia	The FATF welcomes Cambodia's significant progress in improving its AML/CFT regime. Cambodia has 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 2019 related to improvements in the legal framework for international cooperation and preventive measures, risk-based supervision of FIs and DNFBPs, improving the quality and quantity of FIU disseminations, increasing and improving investigation and prosecution of ML and asset confiscation and establishing and implementing a legal framework for PF TFS. Cambodia is therefore no longer subject to the FATF's increased monitoring process. Cambodia should continue to work with APG to sustain its improvements in its AML/CFT system.