



سلطة النقد الفلسطينية
PALESTINE MONETARY AUTHORITY

تعميم رقم (18 / 2024)
إلى كافة الصرافين العاملين في فلسطين
التاريخ: الأربعاء، 03 تموز، 2024

الموضوع: الدول مرتفعة المخاطر والدول تحت المتابعة المعززة

مرفق طيه نسخة عن القرار الصادر عن السادة وحدة المتابعة المالية رقم (2024/2) بتاريخ 2024/06/30 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 (2024/2)

صادر عن وحدة المتابعة المالية

بتاريخ 2024/06/30 م

بشأن قوائم الدول مرتفعة المخاطر والدول تحت المتابعة المعززة

استناداً إلى أحكام قرار بقانون رقم (39) لسنة 2022 م 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/4/2016) الصادر بتاريخ 2016/12/01 م، 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 2024/06/28 م، وعطفاً على قرار اللجنة الوطنية لمكافحة غسل الأموال وتمويل الإرهاب رقم (ت/5/2020) الصادر بتاريخ 2020/02/24 م بشأن الدول مرتفعة المخاطر والدول تحت المتابعة المعززة، ولاحقاً إلى قرار وحدة المتابعة رقم (2020/1) بتاريخ 2020/02/25 م 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 2022 م الخاصة بالمؤسسات المالية، والمواد (24، 25) من تعليمات اللجنة الوطنية رقم (3) لسنة 2022 م 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 والمهنيين غير المالية، بما يشمل زيادة التعاون بين الموظفين وسرعة تزويد البيانات لمسؤول مكافحة غسل الأموال وتمويل الإرهاب داخل المؤسسة المالية أو إحدى الأعمال والمهنيين 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 والمهنيين 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 (2024/1) وذلك بإضافة كل من (موناكو، فنزويلا)، وحذف كل من (الجمهورية التركية، جمايكا)، 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	بلغاريا	12	جمهورية نيجيريا
2	بوركينافاسو	13	جمهورية الفلبين
3	الكاميرون	14	جمهورية السنغال
4	كرواتيا	15	جمهورية جنوب افريقيا
5	جمهورية كونغو الديمقراطية	16	جمهورية جنوب السودان
6	جمهورية هايتي	17	الجمهورية العربية السورية (سوريا)
7	جمهورية كينيا	18	جمهورية تنزانيا
8	جمهورية مالي	19	فنزويلا
9	موناكو	20	فيتنام
10	جمهورية موزمبيق	21	الجمهورية اليمنية (اليمن)
11	جمهورية ناميبيا	-	-

ثالثاً

التنفيذ

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

مدير وحدة المتابعة المالية

د. فراس مزار

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

المخاوف المتعلقة بأوجه القصور في أنظمة
مكافحة غسل الأموال وتمويل الإرهاب

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 التسليح 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).

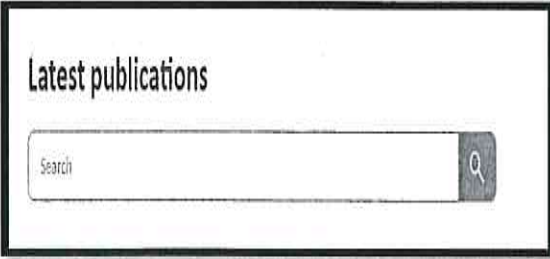
1. الدخول الى الموقع الالكتروني:

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.



مرفق بقرار وحدة المتابعة المالية رقم (2024/2)
بشأن قوائم الدول مرتفعة المخاطر والدول تحت المتابعة المعززة

❖ 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
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 adopting an action plan to implement its national AML/CFT Strategy, establishing market entry controls for VASPs and postal money operators, communicating UN changes to targeted financial sanctions (TFS) and completing the implementation of a system to ensure prioritisation of STRs. Bulgaria should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) demonstrating initial implementation of its national action plan for its AML/CFT Strategy; (2) addressing the remaining technical compliance deficiencies; (3) demonstrating initial implementation of risk-based supervision for postal money operators, currency exchange providers and real estate agents; (4) ensuring that the beneficial ownership information held in the Register is accurate and up-to-date; (5) improving investigations and prosecutions of different types of money laundering in line with risks, including high-scale corruption and organised crime; (6) ensuring that confiscation is pursued as a policy objective; (7) ensuring the ability to conduct parallel financial investigations in all terrorism investigations; (8) addressing gaps in the PF TFS frameworks; and (9) 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 implementing a case management system for mutual legal assistance requests, developing a software for the management of STRs and establishing procedures for the implementation of the cross-border declaration system. Burkina Faso should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) strengthening resource capacities of all AML/CFT supervisory authorities and implementing risk-based supervision; (2) maintaining comprehensive and updated basic and beneficial ownership information of legal persons and strengthening the system of sanctions for violations of transparency obligations; and (3) implementing an effective TFS 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 expired and work remains. The FATF urges Burkina Faso to swiftly implement its action plan to address the above-mentioned strategic deficiencies 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 work to implement its FATF action plan 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.
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 demonstrating the ability to systematically detect and where relevant investigate TF in line with its risk profile, addressing technical compliances deficiencies in relation to Recommendations 6 and 7, providing guidance to reporting entities on TFS, and identifying the subset of NPOs most vulnerable to TF abuse. Croatia should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) increasing FIU human resources and improving analytical capabilities; (2) continuing to improve law enforcement authorities' (LEAs') detection, investigation and prosecution of different types of ML, including ML involving a foreign predicate offences and the misuse of legal persons; (3) demonstrating a sustained increase in the application of provisional measures in securing direct/indirect proceeds, as well as foreign proceeds subject to confiscation; (4) demonstrating immediate communication of changes in UN TFS regimes to reporting entities and (5) providing targeted outreach to NPOs and to the donor community on potential vulnerabilities of NPOs to TF abuse.

The 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 disseminating the results of their NRA and providing financial and human resources to FI and DNFBP supervisors. 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	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 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 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.
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 establishing a framework for the monitoring of NPOs at risk of abuse for TF purposes and implementing measures commensurate with the risk. 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; (2) addressing pending technical compliance deficiencies with R.5 and 20, and identifying and investigating TF activities in line with the country's risk profile; and (3) implementing TFS 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	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 commencing the collection of beneficial ownership information, developing a CFT strategy and enhancing the capacity of CFT investigative and prosecutorial authorities, and addressing deficiencies in the TFS framework. Mozambique should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) providing adequate financial and human resources to supervisors, developing and implementing a risk-based supervision plan; (2) increasing the human resources of the FIU as well as increasing financial intelligence sent to authorities; (3) demonstrating LEAs' capability to effectively investigate a range of ML offences using financial intelligence; (4) conducting training for FIU, supervisors, and LEAs on the new legal and institutional framework for implementing 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.
Namibia	(Statement from February 2024) 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.

	Since the adoption of its MER in September 2022, Namibia has made progress on its MER's recommended actions to ensure a common understanding of ML/TF/PF risk across key stakeholders as well as improve international cooperation. Namibia will work to implement 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 completing its residual ML/TF risk assessments and disseminating the results, and increasing the dissemination of financial intelligence by the FIU and its use by LEA in line with the country's risk profile. Nigeria should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) enhancing formal and informal international cooperation in line with ML/TF risks; (2) improving AML/CFT risk-based supervision of FIs and DNFBPs and enhancing implementation of preventive measures for high-risk sectors; (3) 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; (5) demonstrating a sustained increase in ML investigations and prosecutions in line with ML risks; (6) proactively detecting violations of currency declaration obligations and apply appropriate sanctions; (7) 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 (8) implementing risk-based monitoring for the subset of NPOs at risk of TF abuse without disrupting or discouraging legitimate NPO activities.
Philippines	Since June 2021, when the Philippines made a high-level political commitment to work with the FATF and APG to strengthen the effectiveness of its AML/CFT regime, the Philippines has taken significant steps towards improving its AML/CFT regime, including by demonstrating an increase in ML investigations and prosecutions in line with risk; enforcement of beneficial ownership transparency obligations and law enforcement access to those beneficial ownership data records; and that risk-based supervision of DNFBPs is occurring. The Philippines should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) demonstrating that supervisors are using AML/CFT controls to mitigate risks associated with casino junkets; (2) applying cross-border measures to all main sea/airports including detection of false declarations of currency and confiscation action in line with risk; and (3) demonstrating an increase in the prosecution of TF cases in line with risk. The FATF urges the Philippines to swiftly implement its action plan to address the above-mentioned strategic deficiencies as soon as possible as all deadlines expired in January 2023.
Senegal	In February 2021, Senegal 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 2024 plenary, the FATF made the initial determination that Senegal has substantially completed its action plan and warrant 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. Senegal has made the following key reforms including: (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.
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 implementing and updating its supervisory risk assessment tools for DNFBPs, updating its TF risk assessment, and enhancing the capacity of relevant CFT authorities. South Africa should continue to work on implementing its action plan to address its remaining strategic deficiencies, including by: (1) demonstrating a sustained increase in outbound mutual legal assistance (MLA) requests that help facilitate ML/TF investigations and confiscations of different types of assets in line with its risk profile; (2) demonstrating that all AML/CFT supervisors apply effective, proportionate, and effective sanctions for non-compliance; (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 beneficial ownership obligations; (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) 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 becoming a party to the relevant UN Conventions. South Sudan should continue to work to implement its action plan, including by: (1) completing its comprehensive review of the AML/CFT Act (2012), with the support of international partners, including technical assistance, 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) operationalising a fully functioning and independent FIU; (6) establishing and implementing the legal and institutional framework to implement targeted financial sanctions in compliance with United Nations Security Council Resolutions on terrorism and WMD proliferation financing; and (7) commencing implementation of targeted risk-based supervision/monitoring of NPOs at risk of TF abuse. The FATF notes South Sudan's limited progress across its action plan 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	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 finalising the risk-based supervision manuals for the real estate and DPMS sectors, demonstrating progress in the LEAs' capacity to identify, trace, seize and, where feasible, confiscate proceeds and instrumentalities of crime, producing written guidance and trainings to enhance the private sector's understanding of TF and PF TFS obligations, completing the revision of the national TF risk assessment and categorising the NPOs considered at high risk of TF abuse. Tanzania should continue to work on implementing its action plan to

	address its strategic deficiencies, including by: (1) 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; (2) 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; (3) developing and beginning to implement a comprehensive national CFT strategy as well as demonstrating a capability to conduct TF investigations and pursue prosecutions in line with the country's risk profile; and (4) using the recently completed TF risk assessment for NPOs as a basis to develop an outreach and training plan.
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. 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 further progress on its action plan and share relevant information with the FATF. Vietnam should continue to work on implementing 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	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	
Jamaica	The FATF welcomes Jamaica's significant progress in improving its AML/CFT regime. Jamaica 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 2020 by, (1) developing a more comprehensive understanding of its ML/TF risk; (2) including all FIs and DNFBPs in the AML/CFT regime and implementing adequate risk based supervision in all sectors; (3) 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; (4) taking proper measures to increase ML investigations and prosecutions, in line with the country's risk profile, and increasing the use of financial intelligence in ML investigations; (5) implementing targeted financial sanctions for terrorist financing without delay; and (6) implementing a risk based approach for supervision of its NPO sector to prevent abuse for TF purposes. Jamaica is therefore no longer subject to the FATF's increased monitoring process. Jamaica should continue to work with CFATF to sustain its improvements in its AML/CFT system.
Türkiye	The FATF welcomes Türkiye's significant progress in improving its AML/CFT regime. Türkiye 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 including by (1) dedicating more resources at the FIU to supervision of AML/CFT compliance by high-risk sectors and increasing on-site inspections overall; (2) applying dissuasive sanctions for AML/CFT breaches, in particular for unregistered money transfer services and exchange offices and in relation to the requirements of adequate, accurate, and up-to-date beneficial ownership information; (3) enhancing the use of financial intelligence to support ML investigations and increasing proactive disseminations by the FIU; (4) undertaking more complex money laundering investigations and prosecutions; (5) setting out clear responsibilities and measurable performance objectives and metrics for the authorities responsible for recovering criminal assets and pursuing terrorism financing cases and using statistics to update risk assessments and inform policy; (6) 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; (7) concerning targeted financial sanctions under UNSCRs 1373 and 1267, pursuing outgoing requests and domestic designations related to UN-designated groups, in line with Turkey's risk profile; (8) implementing a risk-based approach to oversight of non-profit organisations to prevent their abuse for terrorist financing, conducting outreach to a broad range of NPOs in the sector and engaging with their feedback, ensuring that sanctions applied are proportionate to any violations, and taking steps to ensure that supervision does not disrupt or discourage legitimate NPO activity, such as fundraising. Türkiye is therefore no longer subject to the FATF's increased monitoring process. Türkiye should continue to work with the FATF to sustain its improvements in its AML/CFT system, including by continuing to ensure its oversight of the NPO sector is risk-based and in line with the FATF standards.
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