



سلطة النقد الفلسطينية
PALESTINE MONETARY AUTHORITY

تعميم رقم (29 / 2025)
إلى كافة الصرافين العاملين في فلسطين
التاريخ: الثلاثاء، 28 تشرين الأول، 2025

الموضوع: الدول مرتفعة المخاطر والدول تحت المتابعة المعززة

مرفق طيه نسخة عن القرار الصادر عن السادة وحدة المتابعة المالية رقم (2025/3) 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 (2025/3)

صادر عن وحدة المتابعة المالية

بتاريخ 2025/10/26م

بشأن قوائم 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) منه والفقرات (3، 4) من المادة (30)، وبناءً على قرار اللجنة الوطنية لمكافحة غسل الأموال وتمويل الإرهاب رقم (8/ج/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 2025/10/24م، وعطفاً على قرار اللجنة الوطنية لمكافحة غسل الأموال وتمويل الإرهاب رقم (ت/2020/5) الصادر بتاريخ 2020/02/24م بشأن الدول مرتفعة المخاطر والدول تحت المتابعة المعززة، ولاحقاً الى 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 والمهن 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. 2. إيلاء اهتمام خاص للعلاقات التجارية والمعاملات مع تلك الدول، بما في ذلك الشركات والمؤسسات المالية، وتطبيق الإجراءات المضادة التالية:
- الجمهورية الإسلامية الإيرانية (إيران).	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 والمهن غير المالية المحددة.



<p>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.</p> <p>ج. تعزيز آليات الإبلاغ المعتمدة لدى المؤسسة المالية أو إحدى الأعمال والمهين غير المالية، بما يشمل زيادة التعاون بين الموظفين وسرعة تزويد البيانات لمسؤول مكافحة غسل الأموال وتمويل الإرهاب داخل المؤسسة المالية أو إحدى الأعمال والمهين 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.</p> <p>د. عدم إنشاء فروع أو مكاتب تمثيلية أو شركات تابعة في تلك الدول.</p> <p>هـ. عدم الاعتماد على أطراف ثالثة متواجدة في تلك الدول في اتخاذ أي من إجراءات العناية الواجبة تجاه العملاء.</p> <p>و. عدم إنشاء أي علاقات مراسلة مصرفية أو علاقات مراسلة مشابهة مع المؤسسات المالية في تلك الدول.</p>	
<p>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 والمهين غير المالية المحددة.</p> <p>2. عند تطبيق تدابير العناية الواجبة المعززة، يجب ضمان عدم تعطيل تدفقات الأموال للمساعدة الإنسانية وأنشطة المنظمات غير الربحية المشروعة والتحويلات المالية.</p>	<p>جمهورية اتحاد ماينمار (ماينمار).</p>

ثانياً

قائمة الدول تحت المتابعة المعززة (القائمة الرمادية)

تعديل قائمة الدول تحت المتابعة المعززة (القائمة الرمادية) المنصوص عليها في قرار الوحدة رقم (2025/2) وذلك بحذف كلٍ من (جمهورية جنوب أفريقيا، جمهورية نيجيريا الاتحادية، جمهورية موزنبيق ، بوركينا فاسو) ، 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	الجزائر	11	جمهورية لبنان
2	أنغولا	12	موناكو
3	بوليفيا	13	جمهورية ناميبيا
4	بلغاريا	14	جمهورية نيبال الديمقراطية الاتحادية (نيبال)
5	الكاميرون	15	جمهورية جنوب السودان
6	ساحل العاج (كوت ديفوار)	16	الجمهورية العربية السورية (سوريا)
7	جمهورية الكونغو الديمقراطية	17	فتزويلا
8	جمهورية هايتي	18	فيتنام
9	جمهورية كينيا	19	جزر فيرجين (المملكة المتحدة)
10	جمهورية لاو الديمقراطية الشعبية (لاو)	20	الجمهورية اليمنية (اليمن)

ثالثاً

التنفيذ

يجب على كافة المؤسسات المالية والأعمال والمهين 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 أنظمة مكافحة غسل الأموال وتمويل الإرهاب.

مرفق بقرار وحدة المتابعة المالية رقم (2025/3)
بشأن قوائم الدول مرتفعة المخاطر والدول تحت المتابعة المعززة

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

3. أختار Mutual Evaluations Reports.

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).

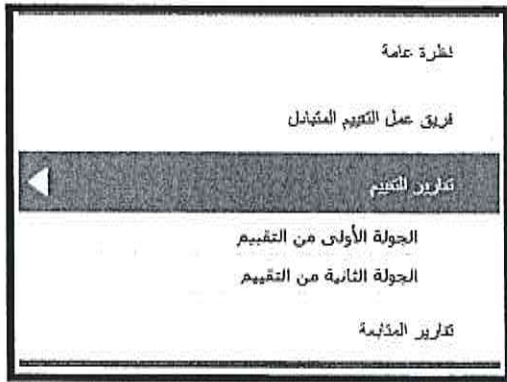
1. الدخول الى الموقع الالكتروني:

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 (2025/3)
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 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
Algeria	In October 2024, Algeria made a high-level political commitment to work with the FATF and MENAFATF to strengthen the effectiveness of its AML/CFT regime. Since then, Algeria has taken significant steps towards improving its AML/CFT regime on many of its action items with some ahead of schedule, including by improving risk-based supervision through the adoption of new procedures, risk assessments, supervision manuals and guidelines, establishing a legal framework for sanctions for breaches of basic and beneficial ownership requirements for legal persons, establishing an effective legal and institutional framework for targeted financial sanctions for terrorism financing and undertaking a terrorism financing risk assessment of the non-profit sector. Algeria will continue to work with FATF to implement its FATF action plan by: (1) improving risk-based supervision, especially for higher risk sectors, by 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; and (4) implementing a risk-based approach to oversight of non-profit organisations, without disrupting or discouraging legitimate activity, by undertaking outreach to the non-profit sector
Angola	In October 2024, Angola made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime. 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.
Bolivia	(Statement from June 2025)

مرفق بقرار وحدة المتابعة المالية رقم (2025/3)
 بشأن قوائم الدول مرتفعة المخاطر والدول تحت المتابعة المعززة

	<p>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.</p>
<p>Bulgaria</p>	<p>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 in the last reporting cycle by establishing a more proportionate and dissuasive sanctioning regime to address AML/CFT breaches by reporting entities, training law enforcement and prosecutors on ML cases, and addressing technical compliance deficiencies through the passage of legislative reforms in relation to the terrorism financing offence and the liability of legal persons, the seizure and confiscation of assets from non-bona fide third parties and proliferation financing. Bulgaria should continue to work on implementing its FATF action plan to address its strategic deficiencies, including by: (1) addressing the remaining technical compliance deficiencies in relation to confiscation; (2) improving investigations and prosecutions of different types of money laundering in line with risks, including high-scale corruption and organised crime; and (3) demonstrating initial implementation of risk-based monitoring of NPOs to prevent abuse for TF purposes.</p> <p>The FATF notes Bulgaria continued progress across its action plan, however all deadlines have now expired and work remains. The FATF encourages Bulgaria to build on its recent progress and continue to implement its action plan to address the above-mentioned strategic deficiencies as soon as possible, particularly in relation to its efforts to investigate and prosecute money laundering.</p>
<p>Cameroon</p>	<p>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 a mechanism to promote interagency AML coordination and cooperation at the operational level. 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-</p>

مرفق بقرار وحدة المتابعة المالية رقم (2025/3)
بشأن قوائم الدول مرتفعة المخاطر والدول تحت المتابعة المعززة

	<p>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.</p> <p>The FATF notes Cameroon continued progress across its action plan, however all deadlines have now expired and work remains. The FATF encourages Cameroon to continue to implement its action plan to address the above-mentioned strategic deficiencies as soon as possible.</p>
<p>côte d'ivoire</p>	<p>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 enhancing its use of international cooperation in ML/TF investigations and prosecutions, conducting outreach to improve compliance of AML/CFT obligations, improving the verification and access to beneficial ownership information of legal persons and sanctioning non-compliance, and strengthening the implementation of its targeted financial sanctions regime. Côte d'Ivoire should continue working on implementing its action plan to address its strategic deficiencies, including by: (1) improving the implementation of risk-based supervision of financial institutions and designated non-financial businesses and professions; (2) enhancing the use of financial intelligence by law enforcement authorities and improving disseminations by the FIU; and (3) demonstrating a sustained increase in the number of investigations and prosecutions of different types of ML and TF offences in line with the country's risk profile.</p>
<p>DEMOCRATIC REPUBLIC OF THE CONGO</p>	<p>Since October 2022, when the DRC made a high-level political commitment to work with the FATF and GABAC to strengthen the effectiveness of its AML/CFT regime, the DRC has taken steps towards improving its AML/CFT regime, including by providing its law enforcement agencies involved in TF investigation and prosecution with increased training and resources; and by addressing previously identified technical deficiencies in relation to FATF Recommendations 6 and 7. 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) identifying and investigating TF activities in line</p>

مرفق بقرار وحدة المتابعة المالية رقم (2025/3)
 بشأن قوائم الدول مرتفعة المخاطر والدول تحت المتابعة المعززة

	<p>with its risks; and (3) demonstrating effective implementation of TF and PF-related TFS.</p> <p>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.</p>
Haiti	<p>(Statement from June 2025)</p> <p>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.</p>
Kenya	<p>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 conducting sensitization activities and producing guidance on the results of its national risk assessment, increasing the number of disseminations by the FIU, and enhancing interagency cooperation on TF investigations at the border. Kenya should continue to work to implement its FATF action plan to address its strategic deficiencies, including by: (1) improving risk-based AML/CFT supervision of FIs and DNFBPs and adopting a legal framework for the licensing and supervision of VASPs; (2) enhancing the understanding of preventive measures by FIs and</p>

مرفق بقرار وحدة المتابعة المالية رقم (2025/3)
 بشأن قوائم الدول مرتفعة المخاطر والدول تحت المتابعة المعززة

	<p>DNFBPs, including to increase STR filing and implement TFS without delay; (3) 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; (4) improving the use and quality of financial intelligence products; (5) increasing ML and TF investigations and prosecutions in line with risks; (6) bringing the TFS framework in compliance with R.6 and ensure its effective implementation; and (7) 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.</p>
Lao PDR	<p>Since February 2025, when Lao PDR made a high-level political commitment to work with the FATF and APG to strengthen the effectiveness of its AML/CFT regime, Lao PDR has taken some steps towards improving its AML/CFT regime, including addressing technical compliance deficiencies in relation to the TF offence (Recommendation 5). Lao PDR should continue to work on implementing its FATF action plan to address its strategic deficiencies, including : (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 that 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 co-operation; (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 PF TFS obligations; and (9) addressing technical compliance deficiencies in Recommendations 6, 7, and 10.</p>
Lebanon	<p>(Statement from October 2024)</p> <p>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.</p>

مرفق بقرار وحدة المتابعة المالية رقم (2025/3)
بشأن قوائم الدول مرتفعة المخاطر والدول تحت المتابعة المعززة

	<p>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.</p>
<p>Monaco</p>	<p>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 by demonstrating a sustained increase in outbound requests to identify and seek the seizure of criminal assets abroad, completing its resourcing program for its FIU, enhancing judicial efficiency by increasing resources for prosecutors and increasing the seizure of property suspected to derive from criminal activities. Monaco should continue to work on implementing its FATF action plan by: (1) enhancing the application of sanctions for AML/CFT breaches; (2) strengthening the timeliness of STR reporting and (3) applying effective, dissuasive and proportionate sanctions for ML.</p>
<p>Namibia</p>	<p>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 applying effective, proportionate and dissuasive sanctions for breaches of AML/CFT obligations; improving the cooperation between the FIU and LEAs to enhance the use and integration of financial intelligence in investigations; and enhancing the operational capabilities of authorities involved in ML investigations and prosecutions by providing them with adequate resources and targeted trainings. Namibia should continue working on implementing its FATF action plan to address strategic deficiencies, including by demonstrating its</p>

مرفق بقرار وحدة المتابعة المالية رقم (2025/3)
 بشأن قوائم الدول مرتفعة المخاطر والدول تحت المتابعة المعززة

	capabilities to effectively investigate and prosecute ML and TF cases, consistent with its risk profile.
Nepal	<p>Since February 2025, when Nepal made a high-level political commitment to work with the FATF and APG to strengthen the effectiveness of its AML/CFT regime, Nepal has taken some steps towards improving its AML/CFT regime. Nepal should continue to work on implementing its FATF action plan to address the strategic deficiencies, including : (1) improving its understanding of key ML/TF risks; (2) improving risk-based supervision of commercial banks, higher-risk cooperatives, casinos, DPMS, and the real estate sector; (3) demonstrating the identification and sanctioning of materially significant illegal MVTS/hundi providers, without hindering financial inclusion; (4) increasing capacity and co-ordination 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.</p>
South Sudan	<p>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 a framework to conduct risk-based AML/CFT supervision by creating a dedicated manual to train supervisory staff. 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.</p> <p>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.</p>

مرفق بقرار وحدة المتابعة المالية رقم (2025/3)
 بشأن قوائم الدول مرتفعة المخاطر والدول تحت المتابعة المعززة

<p>Syria</p>	<p>(Statement from February 2023)</p> <p>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.</p>
<p>Venezuela</p>	<p>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.</p> <p>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 re-examined 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.</p>
<p>Vietnam</p>	<p>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 some steps towards improving its AML/CFT regime. Vietnam should continue to work on implementing its FATF action plan to address its strategic deficiencies, including: (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;</p>

مرفق بقرار وحدة المتابعة المالية رقم (2025/3)
 بشأن قوائم الدول مرتفعة المخاطر والدول تحت المتابعة المعززة

	<p>(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) enhancing the quality and quantity of financial intelligence analysis and dissemination; (9) prioritising 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 DNFBNs for compliance with PF TFS obligations and that there is co-operation and co-ordination between authorities to prevent PF TFS from being evaded.</p> <p>The FATF notes Vietnam’s continued progress across its action plan; however, all deadlines have expired in May 2025, 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</p>
<p>Virgin Islands (UK)</p>	<p>(Statement from June 2025)</p> <p>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 PF-related targeted financial sanctions; and enhancing supervision and monitoring of FI and DNFBN’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.</p>
<p>Yemen</p>	<p>(Statement from February 2023)</p> <p>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</p>

مرفق بقرار وحدة المتابعة المالية رقم (2025/3)
بشأن قوائم الدول مرتفعة المخاطر والدول تحت المتابعة المعززة

	<p>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.</p>
--	---

Jurisdiction No Longer Subject to Increased Monitoring by the FATF	
Burkina Faso	<p>The FATF welcomes Burkina Faso's significant progress in improving its AML/CFT regime. Burkina Faso strengthened the effectiveness of its AML/CFT regime to meet the commitments in its action plan regarding the strategic deficiencies that the FATF identified in February 2021, by: (1) 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.</p> <p>Burkina Faso should continue to work with GIABA to sustain its improvements in its AML/CFT system.</p>

<p>Mozambique</p>	<p>The FATF welcomes Mozambique’s significant progress in improving its AML/CFT regime. Mozambique 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) ensuring cooperation and coordination amongst relevant authorities to implement risk-based AML/CFT strategies and policies; (2) conducting training for all LEAs on mutual legal assistance to enhance the gathering of evidence or seizure/confiscation of proceeds of crime; (3) providing adequate financial and human resources to supervisors, developing and implementing a risk-based supervision plan; (4) providing adequate resources to the authorities to commence the collection of adequate, accurate and up-to-date beneficial ownership information of legal persons; (5) increasing the human resources of the FIU as well as increasing financial intelligence sent to authorities; (6) demonstrating LEAs capability to effectively investigate ML/TF cases using financial intelligence; (7) conducting a comprehensive TF Risk Assessment and begin implementing a comprehensive national CFT strategy; (8) increasing awareness on TF and PF-related TFS; and (9) carrying out the TF risk assessment for NPOs in line with the FATF Standards and using it as a basis to develop an outreach plan.</p> <p>Mozambique should continue to work with ESAAMLG to sustain its improvements in its AML/CFT system.</p>
<p>Nigeria</p>	<p>The FATF welcomes Nigeria’s significant progress in improving its AML/CFT regime. Nigeria 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 2023, 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 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-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</p>

مرفق بقرار وحدة المتابعة المالية رقم (2025/3)
 بشأن قوائم الدول مرتفعة المخاطر والدول تحت المتابعة المعززة

	<p>implementing risk-based monitoring for the subset of NPOs at risk of TF abuse without disrupting or discouraging legitimate NPO activities.</p> <p>Nigeria should continue to work with GIABA to sustain its improvements in its AML/CFT system.</p>
<p>South Africa</p>	<p>The FATF welcomes South Africa’s significant progress in improving its AML/CFT regime. South Africa 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 2023, 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) demonstrating 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.</p> <p>South Africa should continue to work with the FATF and ESAAMLG to sustain its improvements in its AML/CFT system.</p>