

## 中華民國證券投資信託暨顧問商業同業公會 函

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受文者：

發文日期：中華民國109年11月5日  
發文字號：中信顧字第1090052637號  
速別：普通件  
密等及解密條件或保密期限：  
附件：如文

主旨：函轉金融監督管理委員會檢送有關法務部調查局函知  
「防制洗錢金融工作組織」(FATF)公布高風險及加強  
監督國家或地區名單相關訊息一案，請查照。

說明：依據金融監督管理委員會109年11月3日金管證券字第  
1090365244號函辦理。

正本：本公會各投信會員公司、本公會各投顧會員公司  
副本：

理事長 張 錫

裝

訂

線

檔 號：

保存年限：

# 金融監督管理委員會 函

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受文者：中華民國證券投資信託暨顧問商業同業公會（代表人  
張錫先生）

發文日期：中華民國109年11月3日

發文字號：金管證券字第1090365244號

速別：普通件

密等及解密條件或保密期限：

附件：如文(附件1 109UJ07231\_1\_03133941667.pdf)

主旨：有關法務部調查局函知「防制洗錢金融工作組織」  
(FATF) 公布高風險及加強監督國家或地區名單相關訊  
息一案，請轉知所屬會員，請查照。

說明：

- 一、依據法務部調查局109年10月26日調錢貳字第  
10935561620號函辦理。
- 二、檢附上函暨附件影本一份。

正本：中華民國證券商業同業公會（代表人賀鳴珩先生）、中華民國期貨業商業同業  
公會（代表人糜以雍先生）、中華民國證券投資信託暨顧問商業同業公會（代  
表人張錫先生）、中華民國會計師公會全國聯合會（代表人黃奕睿先生）

副本：臺灣證券交易所股份有限公司（代表人許璋瑤先生）、財團法人中華民國證券  
櫃檯買賣中心（代表人陳永誠先生）、臺灣期貨交易所股份有限公司（代表人  
吳自心先生）、臺灣集中保管結算所股份有限公司（代表人林修銘先生）、元  
大證券金融股份有限公司（代表人黃廷賢先生）(均含附件)

109/11/03  
14:11:55

中華民國證券投資信託暨顧問商業同業公會（代表



裝  
訂  
線



檔 號：  
保存年限：

### 法務部調查局 函

地址：23149新北市新店區中華路74號  
承辦人：高調查官  
電話：02-29112241-6224  
傳真：02-29131280

受文者：金融監督管理委員會

發文日期：中華民國109年10月26日  
發文字號：調錢貳字第10935561620號

1090147357

速別：普通件

密等及解密條件或保密期限：

附件：如說明四(A11010000F\_10935561620A0C\_ATTCH8.pdf、A11010000F\_10935561620A0C\_ATTCH9.pdf、A11010000F\_10935561620A0C\_ATTCH10.pdf)

主旨：檢送「防制洗錢金融行動工作組織」(Financial Action Task Force, 下稱「FATF」)公布高風險及加強監督國家或地區名單相關訊息，請察照。

說明：

- 一、相關文號：本局109年2月24日調錢貳字第10935509060號及109年7月8日調錢貳字第10935537410號函。
- 二、查FATF自第31屆第2次大會(109年2月)起，以「高風險國家或地區(High-Risk Jurisdictions subject to a Call for Action)」取代原稱「公開聲明(Public Statement)」文件，我國昔以「防制洗錢及打擊資恐有嚴重缺失之國家或地區」稱之；FATF現另以「加強監督國家或地區(Jurisdictions under Increased Monitoring)」取代原稱「加強全球遵循進展文件(Improving Global AML/CFT Compliance: On-going Process)」，我國昔以「未遵循或未充分遵循國際防制洗錢組織建議之國家或地區」稱之，合先敘明。
- 三、FATF第32屆第1次大會業於本(109)年10月23日辦理完竣

銀行局  
證期局  
保險局  
檢查局



，本次會議提列高風險及加強監督國家或地區名單如次：

- (一)高風險國家或地區名單：北韓、伊朗 (High-Risk Jurisdictions subject to a Call for Action-23 October 2020，如附件1)。FATF表示因暫停高風險國家或地區審核程序，相關建議仍適用FATF109年2月發布之聲明(詳如附件2)。
- (二)加強監督國家或地區名單：阿爾巴尼亞、巴哈馬、巴貝多、波札那、柬埔寨、迦納、牙買加、模里西斯、緬甸、尼加拉瓜、巴基斯坦、巴拿馬、敘利亞、烏干達、葉門、辛巴威 (Jurisdictions under Increased Monitoring-23 October 2020，如附件3)。

四、檢附FATF前揭公告資料：

- (一)附件1：High-Risk Jurisdictions subject to a Call for Action-23 October 2020。
- (二)附件2：High-Risk Jurisdictions subject to a Call for Action-21 February 2020。
- (三)附件3：Jurisdictions under Increased Monitoring-23 October 2020。

正本：司法院民事廳、法務部、金融監督管理委員會、中央銀行、內政部地政司、經濟部商業司、財政部賦稅署、行政院農業委員會農業金融局、中華郵政股份有限公司

副本：電2020/10/22交  
10:05章

局長 呂文忠

## Jurisdictions under Increased Monitoring – 23 October 2020

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Jurisdictions under increased monitoring are actively working with the FATF to address strategic deficiencies in their regimes to counter money laundering, terrorist financing, and proliferation financing. When the FATF places a jurisdiction under increased monitoring, it means the country has committed to resolve swiftly the identified strategic deficiencies within agreed timeframes and is subject to increased monitoring. This list is often externally referred to as the 'grey list'.\*

The FATF and FATF-style regional bodies (FSRBs) continue to work with the jurisdictions noted below and report on the progress made in addressing the identified strategic deficiencies. The FATF calls on these jurisdictions to complete their agreed action plans expeditiously and within the proposed timeframes. The FATF welcomes their commitment and will closely monitor their progress. The FATF does not call for the application of enhanced due diligence measures to be applied to these jurisdictions, but encourages its members to take into account the information presented below in their risk analysis.

The FATF continues to identify additional jurisdictions, on an on-going basis, that have strategic deficiencies in their regimes to counter money laundering, terrorist financing, and proliferation financing. A number of jurisdictions have not yet been reviewed by the FATF and FSRBs.

The FATF gave the option for jurisdictions publicly identified to not report at this meeting given their focus on addressing the impact of the COVID-19 pandemic. The following countries chose to report: Albania, Botswana, Cambodia, Ghana, Mauritius, Pakistan, and Zimbabwe. For these countries, updated statements are provided below. The following countries deferred their reporting: Barbados, Jamaica, Myanmar, Nicaragua, Panama and Uganda. The statements issued in February 2020 for these jurisdictions are included below, but they may not necessarily reflect the most recent status of the jurisdiction's AML/CFT regime.

### Jurisdictions with strategic deficiencies

Albania  
The Bahamas  
Barbados  
Botswana  
Cambodia  
Ghana  
Jamaica  
Mauritius  
Myanmar  
Nicaragua  
Pakistan  
Panama  
Syria  
Uganda  
Yemen  
Zimbabwe

### Jurisdictions no longer subject to monitoring

Iceland  
Mongolia

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 bringing into effect legislation to implement a register of beneficial owners, taking measures to reduce the informal economy and use of cash, and establishing specialised teams and officials in each district to investigate and prosecute ML. Albania should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) conducting additional in-depth analysis to understand its ML risks, and enhancing institutional coordination and cooperation; (2) improving the timely handling of mutual legal assistance requests; (3) establishing more effective mechanisms to detect and prevent criminals from owning or controlling DNFBPs, including by strengthening competent authorities' powers to take necessary actions; (4) ensuring that accurate and up-to-date legal and beneficial ownership information is available on a timely basis; (5) increasing the number and improving the sophistication of prosecutions and confiscations for ML, especially in cases involving foreign predicate offenses or third-party ML; (6) improving the implementation of targeted financial sanctions, in particular through enhanced supervisory action and targeted, proactive outreach.

## The Bahamas

In October 2018, The Bahamas made a high-level political commitment to work with the FATF and CFATF to strengthen the effectiveness of its AML/CFT regime and address any related technical deficiencies. In February 2020, the FATF made the initial determination that The Bahamas has substantially completed its action plan and warrants an on-site assessment to verify that the implementation of The Bahamas' AML/CFT reforms has begun and is being sustained, and that the necessary political commitment remains in place to sustain implementation in the future. Due to the impact of the COVID-19 crisis, the FATF was unable to conduct an on-site visit to confirm whether the process of implementing the required reforms and actions have begun and are being sustained in The Bahamas. The FATF will conduct an on-site visit at the earliest possible date.

## Barbados

(Statement from February 2020)

In February 2020, Barbados made a high-level political commitment to work with the FATF and CFATF to strengthen the effectiveness of its AML/CFT regime. Since the completion of its MER in November 2017, Barbados has made progress on a number of its MER recommended actions to improve technical compliance and effectiveness, including by updating the National Risk Assessment and developing mitigating measures. Barbados will work to implement its action plan, including by: (1) demonstrating it effectively applies risk-based supervision for FIs and DNFBPs; (2) 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; (3) increasing the capacity of the FIU to improve the quality of its financial information to further assist law enforcement authorities in investigating ML or TF; (4) demonstrating that money laundering investigations and prosecutions are in line with the country's risk profile and reducing the backlog to complete prosecutions that result in sanctions when appropriate; (5) further pursuing confiscation in ML cases, including by seeking assistance from foreign counterparts.

## Botswana

Since October 2018, when Botswana made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime and address any related technical deficiencies, Botswana has taken steps towards improving its AML/CFT regime, including by assessing the risks associated with legal persons, legal arrangements and NPOs, and make operational the Online Business Registration System. Botswana should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) increasing risk-based supervision and take legislative steps to ensure that FIs and DNFBPs are required to apply customer due diligence measures; (2) improving the analysis and dissemination and the use of financial intelligence by the FIU; (3) implementing a CFT strategy, and improving the TF investigation capacity of the law enforcement agencies; (4) ensuring the implementation without delay of targeted financial sanctions measures related to proliferation financing; and (5) applying a risk-based approach to monitoring NPOs.

## Cambodia

Since February 2019, when Cambodia made a high-level political commitment to work with the FATF and APG to strengthen the effectiveness of its AML/CFT regime and address any related technical deficiencies, Cambodia has taken steps towards improving its AML/CFT regime, including by promulgating a law that provides broad legal basis for mutual legal assistance (MLA), implementing risk-based supervision for real estate and casinos, promulgating a new AML/CFT Law to address most of the relevant technical compliance deficiencies related to CDD and PEPs and a law that establishes the legal framework for targeted financial sanctions related to proliferation financing. Cambodia should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) increasing law enforcement authorities' use of mutual legal assistance through training; (2) implementing the risk-based supervision to banks, including through prompt, proportionate and dissuasive enforcement actions, as appropriate; (3) enhancing analysis of suspicious transaction reports and increasing disseminations to law enforcement authorities; (4) demonstrating an increase in ML investigations and prosecutions in line with risk; (5) demonstrating an increase in the freezing and confiscation of criminal proceeds, instrumentalities, and property of equivalent value; (6) finalising and implementing a legal framework for UN targeted financial sanctions related to proliferation financing and enhancing the understanding of sanctions evasion.

## Ghana

Since October 2018, when Ghana made a high-level political commitment to work with the FATF and GIABA to strengthen the effectiveness of its AML/CFT regime, Ghana has taken steps towards improving its AML/CFT regime, including by developing a comprehensive national AML/CFT policy based on risk identified in the national risk assessment, implementing measures to mitigate ML/TF risks associated with legal persons and improving risk based supervision. Ghana should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) ensuring the timely access to adequate, accurate and current basic and beneficial ownership information; (2) ensuring that the FIU is focusing its activities on the risks identified in the national risk assessment; and (3) applying a risk-based approach for monitoring non-profit organisations.

## Jamaica

(Statement from February 2020)

In February 2020, Jamaica made a high-level political commitment to work with the FATF and CFATF to strengthen the effectiveness of its AML/CFT regime. Since the completion of its MER in November 2016, Jamaica has made progress on a number of its MER recommended actions to improve technical compliance and effectiveness, including by amending its customer due diligence obligations. Jamaica will work to implement its action plan, including by: (1) developing a more comprehensive understanding of its ML/TF risk; (2) including all FIs and DNFBPs in the AML/CFT regime and ensuring adequate risk based supervision in all sectors; (3) taking appropriate measures to prevent legal persons and arrangements from being misused for criminal purposes, and ensure that accurate and up to date basic and beneficial ownership information is available on a timely basis; (4) taking proper measures to increase the use of financial information and to increase ML investigations and prosecutions, in line with the country's risk profile; (5) ensuring the implementation of targeted financial sanctions for TF without delay; and (6) implementing a risk based approach for supervision of its NPO sector to prevent abuse for TF purposes.

## Mauritius

Since February 2020, when Mauritius made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime, Mauritius has taken steps towards improving its AML/CFT regime, including by developing a risk-based supervision plan for the global business and management companies. Mauritius should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) implementing the risk-based supervision plan effectively for The Financial Services Commission and focusing on different stages of outreach across DNFBP supervisors; (2) ensuring the access to accurate basic and beneficial ownership information by competent authorities in a timely manner; (3) demonstrating that law enforcement have capacity to conduct money laundering investigations, including parallel financial investigations and complex cases; (4) implementing a risk-based approach for supervision of its NPO sector to prevent abuse for TF purposes, and (5) demonstrating the adequate implementation of targeted financial sanctions through outreach and supervision.

## Myanmar

(Statement from February 2020)

In February 2020, Myanmar made a high-level political commitment to work with the FATF and APG to strengthen the effectiveness of its AML/CFT regime. Since the completion of its MER in September 2018, Myanmar has proactively made progress on a number of its MER recommended actions to improve technical compliance and effectiveness, including by introducing various legislative measures and establishing a regulatory framework for the registration of hundi operators. Myanmar will work to implement its action plan, including by: (1) demonstrating an improved understanding of ML risks in key areas; (2) ensuring the supervisory body for DNFbps is sufficiently resourced, onsite/offsite inspections are risk-based, and hundi operators are registered and supervised; (3) demonstrating enhances in the use of financial intelligence in LEA investigations, and increasing operational analysis and disseminations by the FIU; (4) ensuring that ML is investigated/prosecuted in line with risks; (5) demonstrating investigation of transnational ML cases with international cooperation; (6) demonstrating an increase in the freezing/seizing and confiscation of criminal proceeds, instrumentalities, and/or property of equivalent value; (7) managing seized assets to preserve the value of seized goods until confiscation; and (8) demonstrating implementation of targeted financial sanctions related to PF, including training on sanctions evasion.

## Nicaragua

(Statement from February 2020)

In February 2020, Nicaragua made a high-level political commitment to work with the FATF and GAFILAT to strengthen the effectiveness of its AML/CFT regime. Since the completion of its MER in July 2017, Nicaragua has made progress on a number of its MER recommended actions to improve technical compliance and effectiveness, including by increasing the use of financial information in the investigation and prosecution of ML offenses and fixing its legal framework for criminalizing TF. Nicaragua will work to implement its action plan, including by: (1) developing a more comprehensive understanding of its ML/TF risk; (2) more proactively seeking international cooperation to support ML investigations, especially with the aim of identifying and tracing assets with confiscation and repatriation purposes; (3) conducting effective risk-based supervision; (4) taking appropriate measures to prevent legal persons and arrangements from being misused for criminal purposes, and ensure that accurate and up-to-date basic and beneficial ownership information is available on a timely basis.

## Pakistan

Since June 2018, when Pakistan made a high-level political commitment to work with the FATF and APG to strengthen its AML/CFT regime and to address its strategic counter-terrorist financing-related deficiencies, Pakistan's continued political commitment has led to progress in a number of areas in its action plan, including: taking action to identify and sanction illegal MVTS, implementing cross-border currency and bearer negotiable instruments controls, improving international cooperation in terrorist financing cases, passing amendments to the Anti-Terrorism Act to increase the sanctioning authority, financial institutions implementing targeted financial sanctions and applying sanctions for AML/CFT violations, and controlling facilities and services owned or controlled by designated persons and entities.

Pakistan should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) demonstrating that law enforcement agencies are identifying and investigating the widest range of TF activity and that TF investigations and prosecutions target designated persons and entities, and those acting on behalf or at the direction of the designated persons or entities; (2) demonstrating that TF prosecutions result in effective, proportionate and dissuasive sanctions; (3) demonstrating effective implementation of targeted financial sanctions against all 1267 and 1373 designated terrorists and those acting for or on their behalf, preventing the raising and moving of funds including in relation to NPOs, identifying and freezing assets (movable and immovable), and prohibiting access to funds and financial services; and (4) demonstrating enforcement against TFS violations, including in relation to NPOs, of administrative and criminal penalties and provincial and federal authorities cooperating on enforcement cases.

The FATF takes note of the significant progress made on a number of action plan items. To date, Pakistan has made progress across all action plan items and has now largely addressed 21 of the 27 action items. As all action plan deadlines have expired, the FATF strongly urges Pakistan to swiftly complete its full action plan by February 2021.

## Panama

(Statement from February 2020)

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 some steps towards improving its AML/CFT regime, including by drafting sectoral risk assessments for the corporate and DNFBP sectors and free trade zones. Panama should continue to work on implementing its action plan to address its strategic deficiencies, including by: (1) strengthening its understanding of the national and sectoral ML/TF risk and informing findings to its national policies to mitigate the identified risks; (2) proactively taking action to identify unlicensed money remitters, applying a risk-based approach to supervision of the DNFBP sector and ensuring effective, proportionate, and dissuasive sanctions against AML/CFT violations; (3) ensuring adequate verification and update of beneficial ownership information by obliged entities, establishing an effective mechanisms to monitor the activities of offshore entities, assessing the existing risks of misuse of legal persons and arrangements to define and implement specific measures to prevent the misuse of nominee shareholders and directors, and ensuring timely access to adequate and accurate beneficial ownership information; and (4) ensuring effective use of FIU products for ML investigations, demonstrating its ability to investigate and prosecute ML involving foreign tax crimes and to provide constructive and timely international cooperation with such offence, and continuing to focus on ML investigations in relation to high-risk areas identified in the national risk assessment and MER.

## Syria

(Statement from February 2020)

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.

## Uganda

(Statement from February 2020)

In February 2020, Uganda made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime. Since the completion of its MER in 2016, Uganda has made progress on a number of its MER recommended actions to improve technical compliance and effectiveness, including conducting its first national ML/TF risk assessment and amending the relevant legal frameworks to address the technical deficiencies in its ML and TF offences. Uganda will work to implement its action plan, including by: (1) adopting a national AML/CFT strategy; (2) seeking international cooperation in line with the country's risk profile; (3) developing and implementing risk-based supervision to FIs and DNFBPs; (4) ensuring that competent authorities have timely access to accurate basic and beneficial ownership information for legal entities; (5) demonstrating LEAs and judicial authorities apply the ML offence consistent with the identified risks; (6) establishing and implementing policies and procedures for identifying, tracing, seizing and confiscating proceeds and instrumentalities of crime; (7) demonstrating that LEAs conduct TF investigations and pursue prosecutions commensurate with Uganda's TF risk profile; (8) addressing the technical deficiencies in the legal framework to implement PF-related TFS and implementing a risk based approach for supervision of its NPO sector to prevent abuse for TF purposes.

## Yemen

(Statement from February 2020)

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.

## Zimbabwe

Since October 2019, when Zimbabwe made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime and address any related technical deficiencies, Zimbabwe has taken initial steps towards improving its AML/CFT regime, including by establishing a legal framework to collect beneficial ownership information of legal person and arrangements, as well as completing a comprehensive assessment of its ML/TF risks. Zimbabwe should continue to work on implementing its action plan, including by: (1) implementing the national AML/CFT policy base on key ML/TF risks; (2) implementing risk-based supervision for FIs and DNFBPs including through capacity building among the supervisory authority; (3) ensuring development of adequate risk mitigation measures among FIs and DNFBPs, including by applying proportionate and dissuasive sanctions to breaches; (4) developing a comprehensive legal framework and mechanism to collect and maintain accurate and updated beneficial ownership information for legal persons and arrangements, and ensure timely access by the competent authorities; and (5) addressing remaining gaps in PF-related targeted financial sanction framework and demonstrating implementation.

### **Jurisdictions No Longer Subject to Increased Monitoring by the FATF**

## Iceland

The FATF welcomes Iceland's significant progress in improving its AML/CFT regime. Iceland has strengthened the effectiveness of its AML/CFT regime and addressed related technical deficiencies to meet the commitments in its action plan regarding the strategic deficiencies that the FATF identified in October 2019. Iceland is therefore no longer subject to the FATF's increased monitoring process. Iceland will continue to work with the FATF to improve further its AML/CFT regime.

## Mongolia

The FATF welcomes Mongolia's significant progress in improving its AML/CFT regime. Mongolia has strengthened the effectiveness of its AML/CFT regime and addressed related technical deficiencies to meet the commitments in its action plan regarding the strategic deficiencies that the FATF identified in October 2019. Mongolia is therefore no longer subject to the FATF's increased monitoring process. Mongolia will continue to work with the APG to improve further its AML/CFT regime.

\* This statement was previously called "Improving Global AML/CFT Compliance: On-going Process".

More on:




- High-Risk Jurisdictions subject to a Call for Action
- Outcomes FATF Plenary, 23 October 2020

< High-risk and other monitored jurisdictions





## High-Risk Jurisdictions subject to a Call for Action – 23 October 2020

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High-risk jurisdictions have significant strategic deficiencies in their regimes to counter money laundering, terrorist financing, and financing of proliferation. For all countries identified as high-risk, the FATF calls on all members and urges all jurisdictions to apply enhanced due diligence, and in the most serious cases, countries are called upon to apply counter-measures to protect the international financial system from the ongoing money laundering, terrorist financing, and proliferation financing (ML/TF/PF) risks emanating from the country. This list is often externally referred to as the “black list”.

On 2 August 2020, FATF decided to pause the review process for the list of High-Risk Jurisdictions subject to a Call for Action. Therefore, please refer to the statement on these jurisdictions adopted in February 2020. While the statement may not necessarily reflect the most recent status in Iran and the Democratic People's Republic of Korea's AML/CFT regime, the FATF's call for action on these high-risk jurisdictions remains in effect.

- [High-Risk Jurisdictions subject to a Call for Action – 21 February 2020](#)

More on:

- [Jurisdictions under Increased Monitoring](#)
- [Outcomes FATF Plenary 23 October 2020](#)

[← High-risk and other monitored jurisdictions](#)



## High-Risk Jurisdictions subject to a Call for Action – 21 February 2020

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High-risk jurisdictions have significant strategic deficiencies in their regimes to counter money laundering, terrorist financing, and financing of proliferation. For all countries identified as high-risk, the FATF calls on all members and urges all jurisdictions to apply enhanced due diligence, and in the most serious cases, countries are called upon to apply counter-measures to protect the international financial system from the ongoing money laundering, terrorist financing, and proliferation financing (ML/TF/PF) risks emanating from the country. This list is often externally referred to as the "black list". \*

### Democratic People's Republic of Korea (DPRK)

The FATF remains concerned by the DPRK's failure to address the significant deficiencies in its anti-money laundering and combating the financing of terrorism (AML/CFT) regime and the serious threats they pose to the integrity of the international financial system. The FATF urges the DPRK to immediately and meaningfully address its AML/CFT deficiencies. Further, the FATF has serious concerns with the threat posed by the DPRK's illicit activities related to the proliferation of weapons of mass destruction (WMDs) and its financing.

The FATF reaffirms its 25 February 2011 call on its members and urges all jurisdictions to advise their financial institutions to give special attention to business relationships and transactions with the DPRK, including DPRK companies, financial institutions, and those acting on their behalf. In addition to enhanced scrutiny, the FATF further calls on its members and urges all jurisdictions to apply effective counter-measures, and targeted financial sanctions in accordance with applicable United Nations Security Council Resolutions, to protect their financial sectors from money laundering, financing of terrorism and WMD proliferation financing (ML/TF/PF) risks emanating from the DPRK. Jurisdictions should take necessary measures to close existing branches, subsidiaries and representative offices of DPRK banks within their territories and terminate correspondent relationships with DPRK banks, where required by relevant UNSC resolutions.

### Iran

In June 2016, Iran committed to address its strategic deficiencies. Iran's action plan expired in January 2018. In February 2020, the FATF noted Iran has not completed the action plan.[1]

In October 2019, the FATF called upon its members and urged all jurisdictions to: require increased supervisory examination for branches and subsidiaries of financial institutions based in Iran; introduce enhanced relevant reporting mechanisms or systematic reporting of financial transactions; and require increased external audit requirements for financial groups with respect to any of their branches and subsidiaries located in Iran.

Now, given Iran's failure to enact the Palermo and Terrorist Financing Conventions in line with the FATF Standards, the FATF fully lifts the suspension of counter-measures and calls on its members and urges all jurisdictions to apply effective counter-measures, in line with Recommendation 19.[2]

Iran will remain on the FATF statement on [High Risk Jurisdictions Subject to a Call for Action] until the full Action Plan has been completed. If Iran ratifies the Palermo and Terrorist Financing Conventions, in line with the FATF standards, the FATF will decide on next steps, including whether to suspend countermeasures. Until Iran implements the measures required to address the deficiencies identified with respect to countering terrorism-financing in the Action Plan, the FATF will remain concerned with the terrorist financing risk emanating from Iran and the threat this poses to the International financial system.

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

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

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

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

\* This statement was previously called "Public Statement"

More on:

2020/2/24

Documents - Financial Action Task Force (FATF)

- Jurisdictions under Increased Monitoring - February 2020
- Outcomes FATF Plenary Paris, 19-21 February 2020

◀ High-risk and other monitored jurisdictions

