# FINANCIAL SERVICES COMMISSION

October 30, 2026

**Advisory Notice: FSC2026/03**

**Money Laundering and Terrorist Financing Controls in Higher Risk Jurisdictions**

**Requirement to apply Enhanced Due Diligence for higher risk jurisdictions.**

The Anti-Money Laundering and Terrorist Financing Regulations (AML/TF Regulations) require all service providers licensed and registered in Montserrat to apply enhanced customer due diligence in relation to high-risk countries.

Regulation 7(1)(b) of the AML/TF Regulations requires relevant businesses ("service providers") to apply enhanced customer due diligence measures and enhanced ongoing monitoring in any business relationship with a person "connected with a country that does not apply, or insufficiently applies (higher risk jurisdictions) the Financial Action Task Force (FATF) Recommendations.

For these purposes, *Regulation 5(1) and (5)(a)* prescribes that a service provider shall apply customer due diligence measures and conduct ongoing monitoring in the following instances:

- before the service provider establishes a business, relationship or carries out an occasional transaction;
- where the service provider—
  - suspects money laundering or terrorist financing; or
  - doubts the veracity or adequacy of documents, data or information previously obtained under its customer due diligence measures or when conducting ongoing monitoring; and
- at other appropriate times to existing customers as determined on a risk-sensitive basis.
- assess the risk that any business relationship or occasional transaction involves, or will involve, money laundering or terrorist financing, depending upon the type of customer, business relationship, product or

transaction.

*Code 12(h) to (l)* of the Anti-Money Laundering and Terrorist Financing Code 2016 (the Code) further prescribes that a service provider shall apply enhanced customer due diligence measures in the following instances:

- a country identified as not having adequate AML/CFT systems, by credible sources including mutual evaluation, detailed assessment reports or published follow-up reports;
- a country subject to a sanction, embargo or similar measure;
- a country identified by credible sources as having a significant level of corruption or other criminal activity;
- circumstances which give rise to suspicion of money laundering or terrorist financing; and
- if a high risk is identified through a national risk assessment or an adequate
- analysis of risk by the service provider, if a national risk assessment does not exist.

As the international anti-money laundering and counter-terrorist financing (AML/CTF) standard-setter, FATF regularly publishes statements; 'Jurisdictions under increased monitoring' and 'High-risk jurisdictions subject to a call for action' that identify high-risk countries based on assessments of their AML/CTF regimes. In line with AML/TF Regulation (7)(1)(b), the Financial Services Commission would like to draw service provider's attention to the latest publication by FATF on high-risk jurisdictions.

**FATF Public Statement**

On 30 October 2026, the FATF published two statements identifying jurisdictions with strategic deficiencies in their AML/CTF regimes. These statements can be found at **Annex A** and **Annex B** respectively. **Annex C** identifies jurisdictions that are no longer subject to increased monitoring by the FATF.

In response to the latest FATF statements, the Financial Services Commission advises relevant businesses to implement the following instructions:

| **Financial Services Commission Advice:** | **Consider as high risk and apply counter** | **Take appropriate actions to minimise the associated risks, which may include enhanced due** |
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| FSC No.3 | measures and enhanced due diligence measures in accordance with the risks. | diligence measures in high- risk situations. |
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| Jurisdictions: | DPRK<br>Iran<br>Myanmar | 1. Angola<br>2. Bolivia<br>3. Bosnia & Herzegovina<br>4. Cameroon<br>5. Haiti<br>6. Iraq<br>7. Kenya<br>8. Kuwait<br>9. Lao PDR<br>10. Lebanon<br>11. Nepal<br>12. Papua New Guinea<br>13. South Sudan<br>14. Syria<br>15. Venezuela<br>16. Vietnam<br>17. Virgin Islands (UK)<br>18. Yemen |

*These jurisdictions are subject to financial sanctions measures at the time of publication of this notice which require firms to take additional measures. Details can also be found here: www.fscmontserrat.org under the heading **"Notices"** for future reference.

**Background Information**

1. This advice replaces all previous advisory notices issued by the Financial Services Commission on this subject.

2. The Financial Action Task Force is an inter-governmental body established by the G7 in 1989 and today includes as members 37 jurisdictions and two regional

organizations (the European Commission and the Gulf Co-operation Council).

3. The Commission's strategy is to use financial tools to deter crime and terrorism; detect it when it happens; and disrupt those responsible and hold them to account for their actions. The FATF is central to Montserrat's international objectives within this strategy.

4. The Anti-Money Laundering and Terrorist Financing Regulations and the Anti-Money Laundering and Terrorist Financing Code 2016, require relevant businesses to put in place policies and procedures in order to prevent activities related to money laundering and terrorist financing. Regulated persons and businesses are also required to apply enhanced customer due diligence and enhanced ongoing monitoring on a risk-sensitive basis in certain defined situations and in any other case which by its nature can present a higher risk of money laundering or terrorist financing.

5. The Financial Services Commission requires relevant businesses to take reasonable care to establish and maintain systems and controls for countering the risk that the relevant business might be used to further financial crime.

***Enquiries***

6. Enquiries about the implementation of measures with regards to public statements should be addressed to:

**The Commissioner**
**Financial Services Commission**
**Valley View Building**
**Valley View**
**Brades, MSR 1110**
**Montserrat**
**Tel. No. 1-664-491 6887/6888**
**Email: info@fsc.ms**

**Annex A: Relevant extracts from the FATF's statement on High-Risk Jurisdictions subject to a Call for Action**

**"High-Risk Jurisdictions subject to a Call for Action – 30 October 2026"**

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 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".

Since February 2020, Iran reported in January, August and December 2024, August and November 2025, and July 2026 with limited material changes in the status of its action plan.

Given heightened proliferation financing risks, the FATF reiterates its call to apply countermeasures on these high-risk jurisdictions.

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

Building upon the FATF statements over the past decade, the FATF remains concerned by the DPRK's continued failure to address the significant deficiencies in its anti-money laundering and combating the financing of terrorism (AML/CFT) regime and the serious threats posed by the DPRK's illicit activities related to the proliferation of weapons of mass destruction (WMDs) and its financing.

The FATF has continually reiterated since 2011 the need for all countries to robustly implement the targeted financial sanctions in accordance with UNSC Resolutions and apply the following countermeasures to protect their financial systems from the money laundering, terrorist financing, and proliferation financing threat emanating from DPRK:

- Terminate correspondent relationships with DPRK banks;
- Close any subsidiaries or branches of DPRK banks in their countries; and
- Limit business relationships & financial transactions with DPRK persons.
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Despite these calls, DPRK has increased connectivity with the international financial system, which raises proliferation financing (PF) risks, as the FATF noted in February 2024. This requires greater vigilance and renewed implementation and enforcement of these

countermeasures against the DPRK. As set out in UNSCR 2270, DPRK frequently uses front companies, shell companies, joint ventures and complex, opaque ownership structures for the purpose of violating sanctions. As such, FATF encourages its members and all countries to apply enhanced due diligence to the DPRK and its ability to facilitate transactions on its behalf.

The FATF also urges countries to adequately assess and account for the increased proliferation financing risk with the greater financial connectivity reported, particularly since the next round of assessments requires countries to adequately assess PF risks under Recommendation 1 and Immediate Outcome 11. The ability to obtain reliable and credible information to support the assessment of PF risks relating to the DPRK is hampered by the termination of the 1718 Committee Panel of Experts mandate. Thus, the FATF will monitor the measures to comply with DPRK targeted financial sanctions and the implementation of countermeasures against DPRK.

***Iran***

The FATF acknowledges Iran's re-engagement with the FATF as Iran aims to address deficiencies in its AML/CFT regime and calls on Iran to make more progress to address these deficiencies. In June 2016, Iran provided a high-level political commitment to address those deficiencies through an action plan that expired in January 2018. In October 2019, given Iran's lack of progress on its action plan, 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. Since February 2020, given Iran's failure to fully address its action plan, the FATF has called upon its members and required all jurisdictions to apply effective countermeasures in line with Recommendation 19.

In September 2026, Iran provided an update to the FATF on its efforts to address various items of its FATF action plan. Iran has made limited progress on technical compliance by developing a framework to receive international asset freezing requests. However, Iran's AML/CFT regime continues to have fundamental deficiencies. In particular, Iran's legal framework does not adequately criminalise terrorist financing and fails to establish a targeted financial sanctions regime in line with the FATF Standards. As a result, the FATF calls on Iran to modify its overarching legal framework, including its primary legislation, to remove any possibility of exceptions, or other limitations, to its terrorist financing offence and targeted financial sanctions regime that are not in line with the FATF Standards and international obligations.

The FATF reiterates its previous assessment and calls on Iran to address its deficiencies regarding Iran's ratification and domestic implementation of the United Nations Convention against Transnational Organized Crime (Palermo Convention) and United Nations Convention for the Suppression of the Financing of Terrorism (TF Convention). As the FATF noted in June 2026, several of Iran's reservations to the Palermo and TF Conventions are overly broad and Iran's domestic compliance with these Conventions is not in line with the FATF Standards. Lastly, the FATF also notes Iran has failed to address the majority of its action plan since 2016. Considering the United Nations Security Council Resolutions related to Iran's lack of compliance with its nuclear non-proliferation obligations, the FATF reminds all jurisdictions of their obligations under the FATF standards to address proliferation financing risks emanating from Iran. Additionally, given the ongoing terrorist financing and proliferation financing threats emanating from Iran and as Iran's action plan remains incomplete, the FATF reiterates its call on its members and urges all jurisdictions to apply effective countermeasures on Iran, including the following:

- Refusing the establishment of subsidiaries or branches or representative offices of financial institutions and virtual asset service providers from the country concerned or otherwise taking into account the fact that the relevant financial institution or virtual asset service provider is from a country that does not have adequate AML/CFT systems; and

- Prohibiting financial institutions and virtual asset service providers from establishing branches or representative offices in the country concerned or otherwise taking into account the fact that the relevant branch or representative office would be in a country that does not have adequate AML/CFT systems.
- On a risk basis, limiting business relationships or financial transactions, including virtual asset transactions, with the identified country or persons in the country concerned.

- Prohibiting financial institutions and virtual asset service providers from establishing new correspondent relationships and requiring them to undertake a risk-based review of existing correspondent relationships with financial institutions and virtual asset service providers in the country concerned.

When applying countermeasures, countries should ensure that flows of funds involving humanitarian assistance, food and health supplies, diplomatic operating costs, and personal remittances are appropriately handled on a risk basis considering the terrorist financing or proliferation financing risks emanating from Iran, in line with international obligations. Iran

will remain on the list of FATF High Risk Jurisdictions Subject to a Call for Action until the full Action Plan has been completed. As the FATF previously stated, should Iran ratify and implement the Palermo and Terrorist Financing Conventions, in line with the FATF standards, the FATF will decide on next steps, including whether to suspend countermeasures. The FATF may consider additional next steps if Iran fails to demonstrate additional progress on its action plan.

The FATF strongly encourages Iran to work with the FATF to urgently make further progress on its action plan to fully address: (1) adequately criminalizing terrorist financing in line with the FATF Standards; (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) ensure that the ratification and implementation of the Palermo and TF Conventions are in line with the FATF Standards and clarify the capability to provide mutual legal assistance; and (6) ensuring that financial institutions verify that wire transfers contain complete originator and beneficiary information.

***Myanmar***

In February 2020, Myanmar committed to address its strategic deficiencies. Myanmar's action plan expired in September 2021.

In October 2022, given the continued lack of progress and the majority of its action items still not addressed after a year beyond the action plan deadline, the FATF decided that further action was necessary in line with its procedures and FATF calls on its members and other jurisdictions to apply enhanced due diligence measures proportionate to the risk arising from Myanmar. The FATF requires that as part of enhanced due diligence, financial institutions should increase the degree and nature of monitoring of the business relationship, in order to determine whether those transactions or activities appear unusual or suspicious. If no further progress is made by February 2027, the FATF will consider countermeasures.

As the FATF noted in June 2026, fraud and cyber scam activities in Myanmar remain extensive and present significant illicit finance risks. While Myanmar has taken some steps to tackle fraud and cyber scam operations, including planning the establishment of a national anti-online scams centre and strengthening regional and international cooperation, the FATF reiterates its call on Myanmar to take appropriate action to address the illicit finance risks associated with fraud and cyber scam threats and will continue to work with Myanmar in this regard. In tackling these illicit finance threats, Myanmar should have due regard for the victims of trafficking by criminal groups.

Lastly, when applying enhanced due diligence, countries should ensure that flows of funds for humanitarian assistance, legitimate NPO activity and remittances are neither disrupted nor discouraged. Especially in relation to earthquake relief efforts in Myanmar, the FATF recognises the importance of ensuring that implementation of its Recommendations does not adversely and disproportionately affect NPOs and further, does not unduly hinder civil society and the delivery of humanitarian assistance. The FATF will also continue to monitor whether Myanmar's AML/CFT activities apply undue scrutiny to legitimate financial flows.

Myanmar will remain on the list of countries subject to a call for action until its full action plan is completed. Myanmar should urgently work to further implement its FATF action plan to address its strategic deficiencies, including: (1) increasing operational analysis and disseminations by the financial intelligence unit (FIU); and (2) ensuring that ML is investigated/prosecuted in line with risks.

**Annex B: Relevant extracts from the FATF's Statement on Jurisdictions under Increased Monitoring – October 2026**

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 below as they report on the progress achieved in addressing their strategic deficiencies. The FATF calls on these jurisdictions to complete their action plans expeditiously and within the agreed 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. The FATF Standards do not envisage derisking, or cutting-off entire classes of customers, but call for the application of a risk-based approach. Therefore, the FATF encourages its members and all jurisdictions to take into account the information presented below in their risk analysis. As countries consider actions based on their risk analysis taking into account the information below, they should ensure that flows of funds for humanitarian assistance, legitimate NPO activity and remittances are neither disrupted nor discouraged. Countries should also consider their international obligations under United Nations Security Council Resolution 2761 (2024) on humanitarian exemptions to asset freeze measures imposed by UN sanctions regimes.

The FATF identifies 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 or their FSRBs, but will be in due course.

The FATF provides some flexibility to jurisdictions not facing immediate deadlines to report progress on a voluntary basis. The following countries had their progress reviewed by the FATF since June 2026: Angola, Bolivia, Bulgaria, Cameroon, Côte d'Ivoire, Democratic Republic of the Congo, Kenya, Lao PDR, Lebanon, Monaco, Nepal, Papua New Guinea, South Sudan, Syria, Venezuela, Vietnam and the Virgin Islands (UK). For these countries, updated statements are provided below. Bosnia and Herzegovina, Haiti, Iraq and Yemen chose not to report this cycle; thus, the statement issued previously for that jurisdiction is included below, but it may not necessarily reflect the most recent status of the jurisdictions' AML/CFT regimes.

**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 has taken steps to improve its AML/CFT regime by enhancing its risk-based supervision – by developing manuals and inspection plans - and ensuring inspections are informed by the entities' ML/TF risk profiles. Angola has also ensured supervisors have sufficient resources to conduct risk-based supervision. Angola should continue to work with the FATF to implement its FATF action plan by: (1) addressing its remaining deficiencies on risk-based supervision of non-financial banking entities and DNFBPs; (2) ensuring competent authorities have adequate, accurate and timely access to beneficial ownership information and that breaches to obligations are adequately addressed; (3) demonstrating an increase in ML investigations and prosecutions; (4) demonstrating the ability to identify, investigate and prosecute TF; and (5) demonstrating an effective process to implement targeted financial sanctions without delay.

**Bolivia**

Since June 2025, when Bolivia made a high-level political commitment to work with the FATF and GAFILAT to strengthen the effectiveness of its AML/CFT regime, Bolivia has taken steps to improve its AML/CFT regime, including by ensuring relevant special investigative techniques can be used in ML investigations. Bolivia should continue working to implement its FATF action plan by: (1) implementing risk-based supervision of real estate agents, lawyers, accountants and DPMS; (2) ensuring that breaches to beneficial ownership obligations are sanctioned; and (3) increasing ML investigations and prosecutions in line with the country's risks (including other high-risk predicates in addition to corruption and drug trafficking).

**Bosnia & Herzegovina** *(Statement from June 2026)*

In June 2026, Bosnia and Herzegovina 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 MER in December 2024, Bosnia and Herzegovina has made progress on its MER's recommended actions, including through developing an overarching AML/CFT strategy, developing guidance for FIs and DNFBPs on AML/CFT obligations, and improving the sharing and use of financial intelligence. Bosnia and Herzegovina will continue to work with the FATF to implement its FATF action plan by (1) further deepening its understanding of ML/TF risks, (2) adopting policies to systematically make use of international cooperation, (3) strengthening notary supervisors' understanding of ML/TF risks, ensuring consistent AML/CFT supervision of DNFBPs and imposing proportionate, dissuasive and effective sanctions on the banking sector, (4) ensuring that there is timely availability of accurate and

up-to-date basic and beneficial ownership information, (5) providing targeted feedback on the quality of STRs, (6) demonstrating an increase in investigations and prosecutions of ML, (7) demonstrating that effective, proportionate and dissuasive sanctions are being applied for breaches of specific crossborder cash declaration regimes, (8) demonstrating it is proactively pursuing TF cases and clarifying the interpretation of the TF offence and (9) ensuring its supervisors can apply the full range of effective, proportionate and dissuasive sanctions for breaches of PF and TF TFS obligations.

**Cameroon**

Since June 2023, when Cameroon made a high-level political commitment to work with the FATF and GABAC to strengthen the effectiveness of its AML/CFT regime, Cameroon has taken steps to improve its AML/CFT regime by enhancing secure information exchange between the FIU, reporting entities, and competent authorities, and developing a risk-based the targeted outreach plan for the subset of NPOs at highest risk of TF abuse. Cameroon should continue working on implementing its FATF action plan to address its strategic deficiencies, including by: (1) enhancing risk-based supervision of banks and implementing effective risk-based supervision for non-bank FIs and DNFBPs, and conducting appropriate outreach to high-risk FIs and DNFBPs; (2) implementing policies and procedures for seizing and confiscating proceeds and instrumentalities of crime and managing frozen, seized and confiscated property; (3) demonstrating effective implementation of TF and PF TFS regimes and implementing a risk-based approach to NPOs without disrupting legitimate NPO activities.

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

**Haiti** *(Statement from June 2026)*

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 by completing its ML/TF risk assessment process and disseminating the findings. 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) implementing risk-based AML/CFT supervision for DNFBPs deemed to constitute a higher ML/TF risk; (2) ensuring basic and beneficial ownership information are maintained and accessible in a timely manner; (3) demonstrating

authorities are identifying, investigating and prosecuting ML cases in a manner consistent with Haiti's risk profile; (4) demonstrating an increase of identification, tracing and recovery of proceeds of crimes; (5) addressing the technical deficiencies in its targeted financial sanctions regime; and (6) 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.

**Iraq** *(Statement from June 2026)*

In June 2026, Iraq made a high-level political commitment to work with the FATF and MENAFATF to strengthen the effectiveness of its AML/CFT regime. Since the adoption of its MER in November 2024, Iraq has made progress on its MER's recommended actions, including through applying market entry controls to prevent criminals and terrorists from accessing important sectors, providing guidance and outreach to non-banking financial institutions and DNFBPs and introducing measures to mitigate the risks in the real estate sector, and enhancing authorities' understanding on how legal persons are misused for ML/TF. Iraq will continue to work with the FATF to implement its FATF action plan by (1) enhancing its understanding of specific ML/TF risks and adopting appropriate riskbased preventive measures, (2) enhancing the detection of informal money or value transfer services, establishing a legislative framework for VSAPs and applying effective, proportionate and dissuasive sanctions for breaches of AML/CFT requirements, (3) ensuring FIs and DFNBPs apply TFS and PEP measures (4) increasing the quantity and quality of STRs with a focus on high-risk sectors and demonstrating an increase use of financial information particularly related to DNFPBs, (5) enhancing risk-based implementation of beneficial ownership measures, (6) pursuing more ML investigations and prosecutions of ML and reviewing sentencing in ML cases, (7) pursuing more TF investigations and prosecutions in relation to specific TF risks and addressing the technical compliance issues in relation to its TF offence, (8) developing a robust understanding of the NPO sector and the TF risks affecting NPOs and implementing risk-based measures while avoiding undue disruption or other unintended consequences for legitimate NPO activities and (9) enhancing its ability to identify and combat PF TFS evasion.

**Kenya**

Since February 2024, when Kenya made a high-level political commitment to work with the FATF and ESAAMLG to strengthen the effectiveness of its AML/CFT regime. Kenya has taken steps towards improving its AML/CFT regime, including by improving riskbased

AML/CFT supervision of FIs and DNFBPs; enhancing the understanding of preventive measures by FIs and DNFBPs, including to increase STR filing; designating an authority for the regulation of trusts and collection of accurate and up-to-date beneficial ownership information and improving the use and quality of financial intelligence products. Kenya has also brought its TFS framework into compliance with R.6 and is ensuring its effective implementation and has revised its framework for NPO regulation and oversight to ensure that mitigating measures are risk-based and do not disrupt or discourage legitimate NPO activity. Kenya should continue to work to implement its FATF action plan to address its strategic deficiencies, including by: (1) implementing remedial actions for breaches of compliance with transparency requirements for legal persons and arrangements and (2) increasing ML investigations and prosecutions in line with risks.

**Kuwait**

Since February 2026, when Kuwait made a high-level political commitment to work with the FATF and MENAFATF to strengthen the effectiveness of its AML/CFT regime, Kuwait has taken steps to improve its AML/CFT regime ahead of schedule by enhancing outreach to real estate agents and DPMSs on STR reporting, including through distribution of sector-based indicators of ML/TF. Kuwait should continue to work on implementing its FATF action plan to address its strategic deficiencies, including by (1) ensuring that beneficial ownership information in the registry is accurate, and applying effective, proportionate and dissuasive sanctions in cases of inaccurate information where appropriate and (2) increasing ML investigations and prosecutions in relation to crossborder movements of currency and BNIs.

**Lao PDR**

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 steps to improve its AML/CFT regime by addressing the remaining technical compliance deficiencies in its targeted financial sanctions regime for TF. 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 7 and 10.

**Lebanon**

Since October 2024, when 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, Lebanon has taken steps to improve its AML/CFT regime by issuing instructions regarding how to apply TFS without delay and providing targeted outreach and training to FIs and DFNBPs with lower levels of understanding of their TFS obligations. Lebanon should continue working on implementing its FATF action plan to address its strategic deficiencies 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; institutions; and (10) undertaking targeted and risk-based monitoring of high-risk NPOs, without disrupting or discouraging legitimate NPO activities.

**Nepal**

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 steps to improve its AML/CFT regime by improving its understanding of key ML/TF risks and increasing supervisory resources. Nepal should continue to work on implementing its FATF action plan to address its strategic deficiencies, including: (1) improving risk-based supervision of commercial banks, higher-risk cooperatives, casinos, DPMS, and the real estate sector; (2) demonstrating the identification and sanctioning of materially significant illegal MVTS/hundi providers, without hindering financial inclusion; (3) increasing capacity and co-ordination of competent authorities to conduct ML investigations; (4) demonstrating

an increase in ML investigations and prosecutions; and (5) demonstrating measures to identify, trace, restrain, seize, and, where applicable, confiscate proceeds and instrumentalities of crime in line with the risk profile.

**Papua New Guinea**

Since February 2026, when Papua New Guinea made a high-level political commitment to work with the FATF and APG to strengthen the effectiveness of its AML/CFT regime, Papua New Guinea has taken steps to improve its AML/CFT regime and understanding of ML/TF risks following completion of its National Risk Assessment and Legal Persons Risk Assessment. Papua New Guinea should continue to work on implementing its FATF action plan to address its strategic deficiencies, including: (1) endorsing the National AML/CFT/CPF Strategic Plan; (2) proactively seeking outbound international cooperation to identify and trace criminal property abroad; (3) improving risk-based supervision of banks, MVTS/FX dealers and higher risk DNFBPs; (4) demonstrating an increase in ML investigations and prosecutions; (5) demonstrating an increase in freezing/seizing and confiscation of criminal proceeds, instrumentalities and property of equivalent value; (6) conducting training for competent authorities to enhance their understanding of TFS-PF implementation; (7) addressing technical compliance deficiencies, including with respect to the ML offence, TF offence, TFS-PF, politically exposed persons and suspicious transaction reporting.

**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. South Sudan should continue to work to implement its action plan, including by: (1) ensuring that competent authorities are suitably structured and capacitated to implement a risk-based approach to AML/CFT supervision for financial institutions; (2) developing a comprehensive legal framework to collect and verify the accuracy of beneficial ownership information for legal persons; (3) finalising the operationalisation of a fully functioning and independent FIU; (4) establishing and implementing the legal and institutional framework to implement targeted financial sanctions in compliance with United Nations Security Council Resolutions on terrorism and WMD proliferation financing; and (5) commencing implementation of targeted risk-based supervision/monitoring of NPOs at risk of TF abuse.

The FATF notes South Sudan's limited progress across its action plan with all deadlines now expired and work remaining. The FATF again encourages South Sudan to continue to

implement its action plan to address the above-mentioned strategic deficiencies as soon as possible and demonstrate strong political and institutional commitment to strengthen the effectiveness of its AML/CFT regime, particularly in supporting the lead AML/CFT agency in coordinating national AML/CFT efforts.

**Syria** *(Statement from February 2023)*
Since February 2010, when Syria made a high-level political commitment to work with the FATF and MENAFATF to address its strategic AML/CFT deficiencies, Syria has made progress to improve its AML/CFT regime. In June 2014, the FATF determined that Syria had substantially addressed its action plan at a technical level, including by criminalising terrorist financing and establishing procedures for freezing terrorist assets. While the FATF determined that Syria has completed its agreed action plan, due to the security situation, the FATF has been unable to conduct an on-site visit to confirm whether the process of implementing the required reforms and actions has begun and is being sustained. The FATF will continue to monitor the situation, and will conduct an on-site visit at the earliest possible date.

**Venezuela**
Since June 2024, when Venezuela made a high-level political commitment to work with the FATF and CFATF to strengthen the effectiveness of its AML/CFT regime, Venezuela has taken steps to improve its AML/CFT regime. Venezuela should continue working 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.

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.

**Vietnam**

Since June 2023, when Vietnam made a high-level political commitment to work with the FATF and APG to strengthen the effectiveness of its AML/CFT regime, Vietnam has taken 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; (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) 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 DNFBPs for compliance with PF TFS obligations and that there is co-operation and coordination between authorities to prevent PF TFS from being evaded.

The FATF expresses significant concern with the pace of progress and Vietnam's failure to complete its action plan. The FATF again strongly urges Vietnam to swiftly implement its action plan to address the above-mentioned strategic deficiencies as soon as possible as all deadlines expired in May 2025. The FATF will expect to see tangible improvements in February 2027 or the FATF will consider next steps.

**Virgin Islands (UK)**

Since June 2025, when 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, the Virgin Islands (UK) has taken steps to improve its AML/CFT regime, including by ensuring that accurate and up-to-date beneficial ownership information is available to competent authorities, improving the quality of SARs and ensuring that reporting is in line with risk, and increasing human resources within law enforcement authorities. The Virgin Islands (UK) should continue working to implement its FATF action plan by: (1) enhancing risk-based supervision of TCSPs, Investment Businesses and VASPs; (2) ensuring that breaches of beneficial ownership obligations are sanctioned; (3) improving the dissemination of financial intelligence in international cases; (4) systematically pursuing ML investigations and prosecutions in line with risk; and (5) increasing the seizure and confiscation of criminal proceeds.

**Yemen** *(Statement from February 2023)*

Since February 2010, when Yemen made a high-level political commitment to work with the FATF and MENAFATF to address its strategic AML/CFT deficiencies, Yemen has made progress to improve its AML/CFT regime. In June 2014, the FATF determined that Yemen had substantially addressed its action plan at a technical level, including by: (1) adequately criminalising money laundering and terrorist financing; (2) establishing procedures to identify and freeze terrorist assets; (3) improving its customer due diligence and suspicious transaction reporting requirements; (4) issuing guidance; (5) developing the monitoring and supervisory capacity of the financial sector supervisory authorities and the financial intelligence unit; and (6) establishing a fully operational and effectively functioning financial intelligence unit. While the FATF determined that Yemen has completed its agreed action plan, due to the security situation, the FATF has been unable to conduct an on-site visit to confirm whether the process of implementing the required reforms and actions has begun and is being sustained. The FATF will continue to monitor the situation, and conduct an on-site visit at the earliest possible date.

**Annex C: Relevant extracts from the FATF's statement on Jurisdictions No Longer Subject to Increased Monitoring – October 2026**

## Bulgaria

The FATF welcomes Bulgaria's significant progress in improving its AML/CFT regime. Bulgaria 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 2023 by: (1) implementing its national AML/CFT Strategy through adopting a comprehensive action plan; (2) addressing remaining technical compliance deficiencies; (3) demonstrating initial implementation of risk-based supervision for postal money operators, currency exchange providers and real estate agents and establishing market entry controls for VASPs and postal money operators; (4) ensuring that the beneficial ownership information held in the Register is accurate and up-to-date; (5) completing the implementation of the automated system to ensure more automated prioritisation of STRs; (6) improving investigations and prosecutions of different types of money laundering in line with risks, including high-scale corruption and organised crime; (7) ensuring that confiscation is pursued as a policy objective; (8) ensuring the ability to conduct parallel financial investigations in all terrorism investigations; (9) addressing gaps in the TF and PF targeted financial sanctions frameworks; and (10) identifying the subset of NPOs most vulnerable to TF abuse and demonstrating initial implementation of risk-based monitoring to prevent abuse for TF purposes.

Bulgaria should continue to work with MONEYVAL to sustain its improvements in its AML/CFT system.

## Côte d'Ivoire (Ivory Coast)

The FATF welcomes Côte d'Ivoire's significant progress in improving its AML/CFT regime. Côte d'Ivoire 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 2024 by: (1) enhancing its use of international cooperation in ML/TF investigations and prosecutions; (2) improving the implementation of risk-based supervision of financial institutions and designated non-financial businesses and professions and conducting outreach campaigns to improve compliance; (3) improving the verification and access of basic and beneficial ownership information of legal persons and applying sanctions in case of violation; (4) enhancing the use of financial intelligence by law enforcement authorities and improving disseminations by the FIU; (5) demonstrating a sustained increase in the number of ML and TF investigations and prosecutions of different types in line with the country's risk profile; and (6) strengthening the targeted financial sanctions framework.

Côte d'Ivoire should continue to work with GIABA to sustain its improvements in its AML/CFT system.

**Democratic Republic of Congo**

The FATF welcomes the Democratic Republic of Congo's significant progress in improving its AML/CFT regime. The Democratic Republic of Congo 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) finalising the NRA on ML and TF and adopting an AML/CFT national strategy; (2) designating supervisory authorities for all DNFBP sectors, and developing and implementing a riskbased supervision plan; (3) adequately resourcing the FIU, and build its capacity to conduct operational and strategic analysis; (4) strengthening the capabilities of authorities involved in the investigation and prosecution of ML and TF; and (5) demonstrating effective implementation of TF and PF-related TFS.

The Democratic Republic of Congo should continue to work with GABAC and ESAAMLG to sustain its improvements in its AML/CFT system.

**Monaco**

The FATF welcomes Monaco's significant progress in improving its AML/CFT regime. Monaco strengthened the effectiveness of its AML/CFT regime to meet the commitments in its action plan regarding the strategic deficiencies that the FATF identified in June 2024 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.

Monaco should continue to work with MONEYVAL to sustain its improvements in its AML/CFT system.