

Luxembourg, 14 November 2023

Circular letter 23/12 of the Commissariat aux Assurances on the FATF declarations concerning:

- 1) High-risk jurisdictions against which enhanced due diligence measures and, where appropriate, counter-measures are required**
- 2) Jurisdictions under increased monitoring of the FATF**

Ladies and gentlemen,

At its plenary meeting in October 2023, the FATF agreed on the new lists of countries subject to enhanced monitoring.

1) High-risk jurisdictions against which enhanced due diligence measures and, where appropriate, counter-measures are required

Since February 2020, and in relation to the situation due to the COVID-19 pandemic, the FATF decided to pause the review process of high-risk jurisdictions in terms of deficiencies in the fight against money laundering, terrorist financing and the financing of proliferation ("AML/CFT/PF") against which enhanced due diligence measures and, where appropriate, counter-measures are required.

The statements concerning the Democratic People's Republic of Korea ("DPRK") and Iran therefore remain unchanged since then and we remind you of our previous communications in relation to these two countries:

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

The FATF maintains its position that the **DPRK's** AML/CFT regime continues to have substantial and strategic deficiencies and maintains its call for counter-measures against the DPRK.

Furthermore, the FATF is concerned about the threat posed by the DPRK's illegal weapons of mass destruction proliferation activities and financing.

We therefore ask you to continue to consider the risks arising from the deficiencies of the AML/CFT regime, including the DPRK's efforts to combat the financing of the proliferation of weapons of mass destruction, and to give special consideration to business relationships and transactions with that jurisdiction, including with companies and financial institutions in that jurisdiction and those acting on their behalf.

We call on you to apply enhanced due diligence and monitoring measures in these cases to prevent these business relationships from being misused to avoid the application of a strengthened regime and counter-measures.

In addition, we ask you to maintain enhanced mechanisms for reporting suspicious transactions to the Financial Intelligence Unit ("FIU").

- **Iran**

In June 2016, **Iran** made a high-level political commitment to address its strategic AML/CFT deficiencies and decided to request technical assistance to implement the FATF action plan. However, the FATF action plan expired, although the remaining deficiencies have not been fully addressed.

At its October 2019 plenary meeting, the FATF had called for (i) enhanced supervision of subsidiaries and branches of financial institutions located in Iran, (ii) enhanced control measures, including enhanced or systematic suspicious transaction reporting mechanisms for financial transactions, and (iii) enhanced external audit requirements for financial groups in respect of all their branches and subsidiaries located in Iran.

Given that Iran has not fully addressed the remaining deficiencies, the FATF demands effective counter-measures proportionate to the risks emanating from this jurisdiction. The FATF will remain concerned about the risk of terrorist financing emanating from Iran and the threat this poses to the international financial system until Iran implements the measures required to address the deficiencies identified in the action plan. Iran will remain on this list until its action plan is fully implemented.

We therefore ask you to continue to give special consideration to business relationships and transactions with this jurisdiction, including with companies and financial institutions in this jurisdiction and those acting on their behalf.

We call on you to apply in these cases enhanced diligence and monitoring of business relations in order to prevent the diversion of business relations to avoid the application of a strengthened regime and counter-measures. Thus, we ask you to increase the number and frequency of controls applied, to select the types of transactions requiring further examination, and in particular to obtain information on the reasons for the transactions under consideration.

In addition, we ask you to inform us in the event that a third party located in Iran is used to carry out due diligence measures (third party introducers and/or outsourcing).

Finally, we urge you to maintain strengthened mechanisms for reporting suspicious transactions to the FIU.

In October 2022, the FATF added the following country to its list:

- **Myanmar**

In February 2020, **Myanmar** committed to address its strategic AML/CFT deficiencies. Myanmar's action plan expired in September 2021. Given the continued lack of progress and the majority of its action items still not addressed, the FATF required at its October 2022 Plenary meeting the implementation of enhanced due diligence measures proportionate to the risk arising from Myanmar, while ensuring that these measures do not disrupt flows of funds for humanitarian assistance, legitimate activity of non-profit organisations and remittances.

We ask you to continue to take into account the risks arising from strategic deficiencies in Myanmar's AML/CFT regime and to give special consideration to business dealings and transactions with this jurisdiction.

In addition, we ask you to put in place enhanced mechanisms for reporting suspicions to the FIU.

2) Jurisdictions under increased monitoring of the FATF

The FATF has provided flexibility for jurisdictions not facing immediate deadlines to report their progress to the FATF on a voluntary basis. Accordingly, the progress of Albania, Barbados, Burkina Faso, Cayman Islands, Democratic Republic of Congo, Gibraltar, Haiti, Jamaica, Jordan, Mali, Mozambique, Nigeria, Panama, Philippines, Senegal, South Africa, South Sudan, Tanzania, Türkiye, Uganda and United Arab Emirates has been reviewed by the FATF since June 2023.

In October 2023, the FATF added **Bulgaria** to its monitoring process.

Jurisdictions that currently have strategic AML/CFT/PF deficiencies and have developed action plans with the FATF to address these deficiencies are as follows:

Barbados, Bulgaria, Burkina Faso, Cameroon, Croatia, Democratic Republic of Congo, Gibraltar, Haiti, Jamaica, Mali, Mozambique, Nigeria, Philippines, Senegal, South Africa, South Sudan, Syria, Tanzania, Türkiye, Uganda, United Arab Emirates, Vietnam and Yemen.

We therefore ask you to consider, where appropriate, the deficiencies highlighted by the FATF in its reports and the risks resulting from these deficiencies in your business relations and operations with these jurisdictions.

Please also note that following the substantial efforts demonstrated by **Albania, Cayman Islands, Jordan and Panama** these jurisdictions are no longer subject to the FATF's increased monitoring process.

We invite you to consult the FATF decisions and statements in their entirety at the following Internet addresses:

<https://www.fatf-gafi.org/en/publications/High-risk-and-other-monitored-jurisdictions/Call-for-action-october-2023.html>

<https://www.fatf-gafi.org/en/publications/High-risk-and-other-monitored-jurisdictions/Increased-monitoring-october-2023.html>

This circular is without prejudice to any other considerations to be taken into account in relation to high-risk countries, in particular those of the European authorities as applicable¹.

This Circular letter repeals and replaces Circular letter 23/11 of the Commissariat aux Assurances of 4 July 2023.

The Executive Committee

¹ [EUR-Lex - 32016R1675 - EN - EUR-Lex \(europa.eu\)](#)